

# Issues and Options Consultation Comments Summary

Question	Name	Organisation	Comment Summary
2.01	David Coleman		<ol style="list-style-type: none"> <li>1. traffic volume and speed. This bears on a wide range of issues: air quality, safety, noise and wellbeing.</li> <li>2. air quality</li> <li>3. noise, both daytime and night time</li> <li>4. tall buildings</li> </ol>
2.01	Oliver Caroe	Chapter of the Cathedral Church of St Paul	Chapter agrees that the key challenges facing the Corporation include meeting the many competing needs for business space and related infrastructure whilst protecting the internationally significant (and lesser) heritage assets, and making the City an attractive and joined up place for visitors and workers.
2.01	Fred Rogers		The key challenges are 1. realising that Brexit will have a serious and long-term negative impact on the UK and its economy; 2. understanding the shift to working from home, which will accelerate as technology advances, commuting costs increase and housing in the City becomes more unaffordable; 3. meeting existing pollution legislation and being in advance of future changes.
2.01	John Lett	GLA	The key challenge for the City will be how to maintain a flexible approach to the range of future commercial office demands over the Plan period, in the face of Brexit. The Mayor would welcome the Corporation's views on potential changes to the Central Activity Zone (CAZ) boundary through the London Plan review.
2.01	Fiona Meyringer		The key challenges to be addressed in the Local Plan review are environment & pollution.

Question	Name		Organisation	Comment Summary
2.01	Helen	Kay	Barbican Association	Protect residential amenity by explicitly recognising as residential areas the 4 residential wards in the City, and offering them specific protections against the extended activities that go on elsewhere in the City.
2.01	Elaine	Elstone	Tetlow King for Rentplus	One of the key challenges for the review is meeting local affordable housing need.
2.01	Keira	Murphy	Environment Agency	<p>Key environmental challenges to be addressed in the Local Plan review:</p> <ul style="list-style-type: none"> <li>- Surface water and Thames flooding, enabling improvement of flood defences and designing for future climate change.</li> <li>- Improve water quality and champion SuDS.</li> <li>- Water resources</li> <li>- Protection and enhancement of the Thames foreshore and urban greening.</li> <li>- Waste reduction through re-use, recycling and good practice.</li> </ul> <p>Evidence required:</p> <ul style="list-style-type: none"> <li>- Review of Strategic Flood Risk Assessment</li> <li>- TE 2100 briefing for City of London</li> <li>- Thames River Basin Management Plan</li> </ul>
2.01	Patrick	Streeter	City of London Corporation	There are serious dangers in continuing to expand the City at the present rate. The air is bad; there are serious transport pinch-points and general overcrowding. Crossrail will make matters worse.
2.01	Ivo	de Wit		Overall, the “Live. Work. Play.” environment becomes more important.

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2.01	Jeremy	Gray	City Property Association	<p>The following should be considered as part of the Local Plan review:</p> <ul style="list-style-type: none"> <li>- Providing sufficient flexibility and support for development, to enable the City to grow particularly with regard to the likely economic and social challenges the City will face as a result of the UK leaving the EU;</li> <li>- Creating a policy framework to ensure that all development opportunities presented by the opening of Crossrail are supported;</li> <li>- Continued expansion, development and densification of the Eastern Cluster;</li> <li>- Pedestrian capacity and street level movement;</li> <li>- Continued delivery of high quality public realm;</li> <li>- Addressing traffic congestion and related impacts;</li> <li>- Establishing better linkages with the surrounding areas including, Aldgate, Shoreditch and Old Street and the associated Technology Sectors and other emerging Markets operating in the Fringe;</li> <li>- The need to diversify the nature of the businesses operating in the City and to support all markets not just the financial market; and</li> <li>- Provision of complementary business uses and activities for occupiers, workers and visitors.</li> </ul>

Question	Name	Organisation	Comment Summary
2.01	John Whitehead		<p>The available office space in the City seems certain to continue to grow, which leaves me concerned about the ability of the City's infrastructure to support the larger numbers of workers and support services trying to enter the square mile and the risk that this will create an unpleasant environment, and I believe that addressing these concerns should be the key priority.</p> <ul style="list-style-type: none"> <li>• The City must make a priority of addressing the levels of air pollution.</li> <li>• The City must move faster to limit polluting vehicles from entering the City. The need to await the results of the experiment with the LEN is going to hinder more urgent action.</li> <li>• The streets around the main congregation of very large office blocks are increasingly congested. Through traffic should be channelled away from the heart of the City.</li> <li>• Pavements should be widened in streets like Bishopsgate, Leadenhall Street, Fenchurch Street and East Cheap.</li> </ul> <p>The second priority concerns housing for the City workforce – and this does not just concern lower paid ancillary catering and retail staff, but even younger executives for whom a salary of even £40,000 a year is insufficient to make working in London an attractive prospect. There is limited scope within the City, but the City should show the way by, for instance, pioneering new forms of communal urban living for young, single urban professionals.</p> <p>Finally, and given these primary priorities the City needs to seriously reconsider its commitment to also finding space within the square mile for its much vaunted cultural hub. I fear that this is an ill-conceived vanity project from which the City will find it hard to resile if</p>
2.01	Tom Noble	City Public Realm, CoL	<p>At a strategic level, the advancement of the 'Future City' agenda and ensuring that the City keeps pace with rapid changes relating to 'smart cities' are key priorities. Making the City's limited public space work harder to accommodate growing and more varied activities, whilst retaining the unique character of the Square Mile, will be paramount.</p>
2.01	Daniel Palman	Berkeley Homes	<p>There will be competing land pressures faced within the City in the future and whilst it is clear that the importance and function of commercial floorspace within the City is the priority the need to tackle London's housing supply issue should also be addressed.</p>

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2.01	Charlotte Fletcher		road safety and reduction of vehicles wayfinding and signage promoting the city better to tourists and Londoners
2.01	Leonard Goodrich	Chancery Lane Association	The key challenges are - - Utility infrastructure - The City's transport, information technology, water, waste and green infrastructure needs to be world class. - Boosting vitality and economic growth - encouraging greater diversity of land use in some parts of the City could support economic growth and contribute to creation of an attractive place for businesses and workers.
2.01	Rita Cadavez		Mobility and routes around the Barbican area could be improved for pedestrians and bicycles.
2.01	Natasha Downie	Historic Royal Palaces	The proximity of the Square Mile to the Tower of London World Heritage Site (WHS), and the potential for an increasing number of tall buildings to appear within the setting of the WHS to the north-west of the Tower (in the eastern side of the Eastern Cluster policy area) and elsewhere, is a matter of concern to Historic Royal Palaces – particularly in relations to draft Strategic Objective 1.  If development pressure and developers' preference for tall buildings continues at the present level, very careful balancing by the City between encouraging growth and limiting possibly damaging effects on the setting of the WHS will be required. Historic Royal Palaces would ask that awareness of this potential tension is clearly reflected in the new Plan, perhaps in a specific policy for the WHS.
2.01	Paul Martinelli		Continuing to differentiate the City from the London Boroughs

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2.01	Peter Bennett		The City needs to be able to adapt quickly to meet changing economic circumstances in order to retain its world status as a business centre. It needs to remain competitive in terms of cost and quality with other European and world centres. Any Plan has to be flexible to ensure it remains relevant to these underlying principles.
2.01		Anonymous 1	Office supply and residential development
2.02	Leonard Goodrich	Chancery Lane Association	The Local Plan needs to encourage infrastructure improvements that would support the Strategic Objectives of the Plan. For example, growth in cycling necessitates intelligently designed cycle routes and infrastructure throughout the City. There is a need for more residential space on the fringes of the City, including in Chancery Lane, for those who work in and around the City. This would boost vitality, reduce pressure on transport infrastructure and generally represent intelligent placemaking of a sort that would assist in achieving the strategic objectives of the Plan.
2.02	Tom Noble	City Public Realm, CoL	The quality of the City's built environment (townscape and public realm) is critical to ensuring its future competitiveness. More use of area strategies and Key City Place guidelines will be helpful for developers and occupiers and this will enable policies to remain flexible enough to adapt to changing
2.02	Rita Cadavez		Much of the City's programme is based on Mo-Fri office spaces which leave this part of the city deserted over the weekend. Developing a framework that allows for flexible use of street level spaces (other than the main retail areas) could become an interesting challenge.

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2.02	Fred Rogers		Suggesting that the City will be the leading future world-class City indicates a complete refusal to address how and why any international pre-eminence the City enjoys has arisen and is maintained. Simply, there can be no long-term future for what the City represents. Certainly the constant round of demolish, rebuild, demolish, rebuild, might be good for the GDP but its
2.02	Charlotte Fletcher		Clear and concise direction on points above
2.02	Helen Kay	Barbican Association	The City to lead in delivering an enriched approach to providing an environment which delivers for business, residents, visitors, the environment and biodiversity
2.02	Jeremy Gray	City Property Association	We are of the view that the new Local Plan needs to be sufficiently flexible to allow the competing demands of policy to be achieved whilst allowing high quality, inclusive and sustainable development. At the same time the Plan needs to avoid ambiguity.
2.02	John Schofield	City of London Archaeological Trust	The Local Plan can help to facilitate the City's role as a leading world class city by more integration of its buildings with its heritage, and more examples of remembering and honouring that heritage. If you show you are proud of your past, and retain parts of that past whenever possible (given that so much of the past City is now gone), then people will enjoy living and working here. The City should have a varied, colourful texture with many allusions to its past history and achievements. That will enhance productivity in the future world city and make it an attractive place to work, both for us and for foreigners.
2.02	Elaine Elstone	Tetlow King for Rentplus	The Plan can provide a flexible framework for meeting housing needs by adapting its policies to seek affordable housing of all tenures, including rent to buy, alongside market housing. In this way developers are given the certainty of support by the City Corporation in delivering viable housing schemes appropriate to each site.

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2.02	Anonymous 1		Enable and promote suitable sites for tall buildings which can provide increased flexible office space which can also provide more public realm by having smaller footplates
2.02	Peter Bennett		There is a concern that the timescale for approving, implementing and subsequently adapting the Plan might be too extended to deliver the flexibility needed to maintain the City's economic status.
2.03	Oliver Caroe	Chapter of the Cathedral Church of St Paul	<p>We generally support the five strategic objectives including promotion of high quality of architecture and street scene appropriate to the City's position at the historic core of London, complementing and integrating the City's heritage assets and supporting the continued development of the City as a cultural destination for its own communities and visitors, as well as an environment for people to live and work.</p> <p>St Paul's is a spiritual focus for London, the nation and the wider world. The City is also home to many active Parish and Ward churches which are actively contributing to the community. We are keen, therefore, to highlight spiritual nourishment and wellbeing as important components of what the City can offer both its communities and visitors alike.</p>
2.03	Leonard Goodrich	Chancery Lane Association	Yes the five key objectives are still valid
2.03	Jeremy Gray	City Property Association	We continue to support the five strategic objectives as set out in the Local Plan. We feel there is merit in reviewing the status and role of the Key City Places which are mentioned in Strategic Objective 2. We also feel that there would be merit in giving more prominence to public realm, and the pedestrian environment in the Objectives.
2.03	Tom Noble	City Public Realm, CoL	Strategic objectives need to be updated to reflect the increasing importance of outdoor space and greening in supporting the increasing need for flexible workspace/agile working and contribution to public health and well-being.



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2.03	Fred Rogers		The five objectives may be relevant but whether these are strategic or even sustainable and desirable is another matter. The post Brexit settlement will determine the future of the economy and the City may also have to come to terms with a post-expert world.
2.03	Graham Saunders	Historic England	Strategic Objective 3 – we support the referencing of heritage assets, but we would advise that the Strategic Objective of delivering high quality architecture should seek to conserve and enhance as well as complement and integrate with the City’s heritage assets. Be more proactive in its intentions for the historic environment.
2.03	David Rees		The five strategic objectives listed under paragraph 2.6 are still relevant. Objective 1 should not be used to justify a monoculture of offices at the expense of creating a vibrant
2.03	Anonymous 1		Retain buildings which are historical, of high quality, good examples of their period and just because they are beautiful and add to the built environment of the City which makes it more attractive to workers and business.
2.03	Yarema Ronish		The five strategic objectives listed under paragraph 2.6 are still relevant. Objective 1 should not be used to justify a monoculture of offices at the expense of creating a vibrant
2.03	Fiona Meyringer		One objective should be about residents - e.g. How can you make life better for City residents?
2.03	Keira Murphy	Environment Agency	We support your objective to be at the forefront of action on climate change and other sustainability challenges that face high density urban environments. Could the River Thames be specifically mentioned in this objective as it is important for CoL in an environmental

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2.03	Rita	Cadavez	All points are still valid. However, regarding 3. and 5. the City could benefit from providing more community services to residential neighbourhoods and improved circulation and open spaces within the square mile.	
2.03	Natasha	Downie	Historic Royal Palaces	Given the close proximity of the Tower WHS to the City and the benefits to the area adjacent to the Tower that could be generated by the City's wider objectives, we also support the aims of draft Strategic Objectives 3, 4 and 5.
2.03	Charlotte	Fletcher	Needs to include objectives about cultural hub/not just financial centre	
2.03	Paul	Martinelli	They are still relevant	
2.03	Peter	Bennett	A new strategic objective could be to qualify all the other objectives with the statement the City has to remain internationally competitive as a business location in terms of its relative cost and quality, and the over-riding need to be able to adapt and change quickly in response to changing world economic circumstances.	
2.03	Daniel	Palman	Berkeley Homes	The strategic objectives should make reference to the delivery of new homes within the City of London. Residential development as part of a vibrant mix within central areas, especially the CAZ and City Fringe is a key strategic policy in the London Plan.
2.03	David	Coleman	Yes, but it should be made clear that in objective 4 the reference to sustainability includes health and wellbeing.	

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2.03	John	Schofield	City of London Archaeological Trust	CoLAT welcomes Strategic Objective 3, 'to promote a high quality of architecture and street scene appropriate to the City's position at the historic core of London, complementing and integrating the City's heritage assets..' It is these two last ideas which could be further examined: whether the Corporation's policies and practices really do make the new architecture complement and integrate with the City's heritage assets.
2.03	George	Snape	TfL	TfL supports the draft strategic objectives, particularly in terms of its response to climate change and sustainability, alongside the key objective of maintaining the core business function of the City. The desire to improve the effectiveness and efficiency of infrastructure in the City is also supported. TfL would welcome further discussions on how these objectives
2.03	Heather	Hilburn		The five strategic objectives listed under paragraph 2.6 are still relevant. Objective 1 should not be used to justify a monoculture of offices at the expense of creating a vibrant
2.03	Jonathan	Whitby		The five strategic objectives listed under paragraph 2.6 are still relevant. Objective 1 should not be used to justify a monoculture of offices at the expense of creating a vibrant
2.03	John	Lett	GLA	The Local Plan's existing five strategic objectives are supported. However, a sixth objective would be valuable to add, focused on spreading the benefits of the City's investment and growth to all Londoners.
3.01	Rita	Cadavez		The premise that the City is one of the world's major commercial centers is what characterizes it at its core. It makes sense to allow for a nuclear area (Liverpool st. station - Moorgate - Old Street) with concentration of offices. Outside this core it would be interesting to develop smaller plates for shared co-working e.g. young professionals/ companies in a more flexible and informal layout.

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3.01	Charlotte Fletcher		I think flexibility on land use should be incorporated across the city with no "Commercial Core" restrictions
3.01	Paul Martinelli		The City should be all Commercial Core. We should be partnering with our neighbours for other provision.
3.01	Natasha Downie	Historic Royal Palaces	Historic Royal Palaces would support the hotel cluster to the north of the Tower of London being retained as such and the riverside remaining in appropriate mixed use, in both cases to encourage visits to the Tower of London WHS.
3.01	Adam Cornish	Quod for Travis Perkins plc	The expected level of development in the City over the life of the Plan will require a supply of building materials and local builders' merchants may be needed to locate in the City to support the building trade. TP supports the proposals to allow a more flexible mix of uses outside of an office core, however the 'flexible use' area should not be limited to housing and hotels but a range of employment uses and employment generating sui generis uses, should be promoted in this area. This will lead to sustainable mixed use developments coming forward in the City. At Battersea Park Road in Wandsworth a 'One Stop' Travis Perkins builders' merchant operates on the ground floor of a five storey building with flats above. This branch also provides an active frontage at street level providing the same function as a standard shopfront. This is exactly the kind of development TP would like to bring to the City to support the local building trade.
3.01	Polly Barker	TfL Property	We welcome further consultation on areas which may feature in an identified "Commercial Core", and would request a plan is used to define this. TfL Property agrees that outside of the core commercial areas there should be sufficiently flexible policies that encourage a range of complementary land uses, which could include housing, to support the City's growth, whilst ensuring these do not hinder the competitiveness of the City.

Question	Name		Organisation	Comment Summary
3.01	Heather	Hilburn		<p>The following areas should be outside of any identified “commercial core” in which only offices and complementary uses are permitted:</p> <ul style="list-style-type: none"> <li>• Existing hotel and residential clusters</li> <li>• The riverside, which should be mixed use</li> </ul>
3.01	Leonard	Goodrich	Chancery Lane Association	<p>We support the vision of a commercial core. Chancery Lane should be outside the core so that it can benefit from more flexible uses including more residential which would minimise office vacancies.</p> <p>Office to residential permitted development rights could be applied, when the current exemption expires in 2019, outside the commercial core including in Chancery Lane.</p>
3.01	Tom	Noble	City Public Realm, CoL	<p>If deciding to apply a 'Commercial Core', recommend considering the definition of this to allow for activity that will make this area attractive to businesses and others. The Riverside would benefit from a mixed use approach with more cafes and restaurants, complemented by new public spaces and River entrances.</p>

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3.01	Jeremy Gray	City Property Association	<p>We do not support the identification of a Commercial Core, which we consider would not be sustainable to the functioning of the City in the long term. We also do not think that such a policy would be sufficiently flexible to adapt to emerging market trends over the life of the Plan. This is particularly important, given that the Square Mile is now considered to be more than just a financial and business centre. This is evidenced by the emergence of Technology sector, which is increasingly shifting from the City Fringe to the Square Mile. We feel strongly that the City should support this diversification through its planning policies. The Local Plan should continue to support the square Mile as a business district, but should also allow complementary business activities throughout its geographic extent. We consider the City should continue to only allow housing in or near the existing clusters. We consider that hotels should be allowed where appropriate and where these support the overall mix of the City. It is expected that the demand for hotels will continue to grow in the City over the Plan period, and this should be acknowledged and reflected in policy. The positive role that hotels can play in providing added character and amenity to an area should be recognised. We are concerned that this approach has the potential to create outer and inner zones which could disrupt the current beneficial commercial mix found throughout the City, and adversely affect the City office market. It is far more sustainable to mix uses, rather than creating zones, which</p>
3.01	David Coleman		<p>There should be an Article 4 Direction over the entire City to account for the intense competition for land. This would achieve a 'plan led' system.</p>
3.01	Daniel Palman	Berkeley Homes	<p>We consider that there is a strong argument that any commercial core identified in the City should also contain non-commercial uses such as residential, which can successfully complement office use. Any emerging policy should not be overly restrictive of non-commercial uses where it can be demonstrated that the balance of uses creates sustainable places. Outside the 'core' we support a flexible approach to allowing a mix of land uses.</p>
3.01	David Rees		<p>The following areas should be outside of any identified "commercial core" in which only offices and complementary uses are permitted:</p> <ul style="list-style-type: none"> <li>• Existing hotel and residential clusters</li> <li>• The riverside, which should be mixed use</li> </ul>

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3.01	Yarema	Ronish		<p>The following areas should be outside of any identified “commercial core” in which only offices and complementary uses are permitted:</p> <ul style="list-style-type: none"> <li>• Existing hotel and residential clusters</li> <li>• The riverside, which should be mixed use</li> </ul>
3.01	Jonathan	Marginson	DP9 for Northern & Shell	<p>The 10 Lower Thames Street site falls within an area defined as the Thames Policy Area within the current Local Plan. The area includes a mixture of offices, retail, leisure and residential uses reflecting its location next to the river. It is not an area which is dominated by office uses, and indeed has a mixed use character which is typical of other parts of River Thames frontage in Central London. Recognising this distinct character, the Local Plan, under Policy CS9, seeks to ensure that the City capitalises on its unique riverside location.</p> <p>Whilst our client’s site is currently in office use, it is not considered to form part of the ‘commercial core’ being physically separated by the heavily trafficked Lower Thames Street and forming part of the river frontage. It is considered that the site, and area between London Bridge and Tower Bridge requires a more tailored approach to land use planning which recognises the different role that this part of the City performs. It is therefore considered that a more flexible land use approach to this part of the City should be adopted which includes residential, office, leisure and retail at ground floor.</p>
3.01	Jonathan	Whitby		<p>The following areas should be outside of any identified “commercial core” in which only offices and complementary uses are permitted:</p> <ul style="list-style-type: none"> <li>• Existing hotel and residential clusters</li> <li>• The riverside, which should be mixed use</li> </ul>
3.01	Helen	Kay	Barbican Association	<p>Support identifying a commercial core, where only offices are permitted. We would go further and suggest its corollary, that outside the commercial core, in areas with residential clusters (eg the 4 residential wards) residential needs should have priority.</p>
3.01	John	Lett	GLA	<p>The City’s proposals to protect the commercial core(s) are supported but the commercial core is not defined in the Issues &amp; Options document.</p>

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3.01	Yvonne Courtney		The City is special compared to the rest of London and should remain so. An increase of more hotels/residences would be best in areas where this already exists, eg, the Barbican area. It's possible that the City c/should consider alternative workspaces - that can cater for more creative/tech businesses. Plus encourage more 'vertical' services/retail (like in New York/Tokyo) - using former office spaces above shops in old buildings for salons, galleries,
3.01	Fred Rogers		The "Commercial Core" is already protected with very little housing being developed in the City compared with office space and hotel rooms. There should be a lot more housing development in the City, but that will happen as demand for offices falls as a result of changes in working practices, developing technology, the sheer cost of services, particularly legal and, of course Brexit. The new Local Plan should identify the need to enable conversion of commercial to residential use without planning permission by reversing the current exemption in planning law. The north bank of the Thames should be developed to rival Southbank.
3.01	George Snape	Tfl	Recent evidence points to the possibility that the CAZ will not have enough capacity for anticipated employment growth into the 2040s. The City benefits from extraordinary public transport and agglomeration of office uses and this should continue and be maximised into the future as opposed to losing key sites to housing and other non office uses.
3.01	Peter Rose		More flexible in allowing a mix of land use. Limit number of bars and late night operation. Prevent congregation of smokers outside at night creating nuisance for residents.



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3.01	Merlen			<p>The City of London should remain what it is: a financial centre.</p> <p>The panorama of office buildings in the City is spectacular and must remain so. The City is a economic engine for the UK. It is an example for other financial centres in the world. This should be protected.</p> <p>Commerce and work must be promoted. This will not be achieved with hotels or residential buildings.</p>
3.02	Adam	Cornish	Quod for Travis Perkins plc	The Local Plan should allow for a mix of traditional and emerging employment uses to come to the City. By adding “employment generating sui generis uses” as a policy or site allocation in the Local Plan, this will ensure that no particular employment use is prevented from locating in the City during the life of Local Plan.
3.02	Rita	Cadavez		Converting larger office spaces into flexible smaller units could be an appealing solution for young professionals to settle in the City and contribute to a more varied commercial setting.
3.02	Leonard	Goodrich	Chancery Lane Association	There are potential benefits in allowing areas to develop that combine larger amounts of residential space mixed with smaller office units that would suit modern businesses such as tech companies, and modern business trends such as co- working. A smaller amount of office space in such areas would lessen the impact on them of periods of turbulence that would result in lower office occupancy rates. These areas would also offer units with manageable amounts of office space for businesses scaling up. The Chancery Lane area could benefit from
3.02	Fred	Rogers		The provision of workspaces incorporating living accommodation, through reversing the City Corporation's exemption from permitted development, would help provide flexibility. Are there any developments either in progress or planned which offer space for SME’s or, more accurately, space which is affordable for businesses that are currently having to carry virtually all the responsibility for the country’s prosperity at the same time as all the risk?

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3.02	Merlen			We must work together with educators so that the City maintains its excellence and its workers know how to tackle future economic crises.
3.02	Charlotte	Fletcher		more flexible leases and ability to adapt space to the changing times
3.02	Ivo	de Wit		People are starting to use office more temporary like WeWork <a href="http://www.wework.com">www.wework.com</a> and pop-up stores like <a href="http://www.appearhere.co.uk">www.appearhere.co.uk</a>
3.03	Leonard	Goodrich	Chancery Lane Association	A well designed criteria based policy could allow a more flexible approach. We support the production and publication for consultation of a draft criteria based policy.
3.03	Paul	Martinelli		Yes, but after assessing the reduction in average office space per worker. The target should not be a figure to hit and exceed but a limit used to restrict development where appropriate.
3.03	Merlen			New developments should be mostly offices.
3.03	Charlotte	Fletcher		criteria based policy
3.03	Jeremy	Gray	City Property Association	We support the continued setting of office floorspace targets, but it must be acknowledged that over the next market cycle, London will be entering a period of some economic uncertainty, following the Referendum result in June, particularly in terms of the future of banking and finance occupiers. On this basis we would wish to ensure the Plan provides sufficient flexibility in terms of the office policies (particularly in terms of the policies relating to the change of use to alternative uses) and associated viability matters.

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3.03	Fred Rogers		The short answer is “no”. The question is why does there have to be any term plans at all? The Square Mile is surely small enough not to need specific policies, as the pollution and sustainability problems of constantly demolishing and rebuilding cannot continue, whether or
3.04	Leonard Goodrich	Chancery Lane Association	We support a more diverse employment base in appropriate areas of the City, although this is compatible with maintenance of the City’s distinctive employment base within a commercial core. The Chancery Lane area is one area that is well suited to this with a higher proportion of residential, associated service uses and small office units to encourage more diverse
3.04	Ivo de Wit		The environment for the City of London is changing as a result of a lower take-up of space by traditional financial institutions. Older warehouses can be transformed into creative/tech space especially around Smithfield market.
3.04	Adam Cornish	Quod for Travis Perkins plc	The Local Plan should encourage new and emerging employment sectors by promoting a range of uses within the Local Plan policies. Allocating sites for a range of employment uses, including sui generis builders’ merchants, will ensure that services which support the City’s building trade can locate within the City. A Glossary should be added to the Local Plan and sui generis builders’ merchants should be included within the definition of an employment use.
3.04	Merlen		I think we have to diversify more. The financial sector in the City must be the most important as this is the one that has helped the City to obtain its current position. As for the second, the City should maintain its global importance through technological development. Technology is advancing in all productive sectors and would be a great way to defend against economic crises nearby.

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3.04	Jeremy Gray	City Property Association	It is important that the Plan provides sufficient support for a diverse mix of employment generating uses. We would not want to dilute the City's primary financial and business function but flexibility is required to support, for example, SMEs' changing working patterns and emerging sectors, such as Fin Tech and the TMT sector. In this respect we would also like to see the Plan being "outward looking" in terms of its relationship with the adjoining
3.04	Fred Rogers		It is difficult to see how it may be possible to plan for new industries without knowing what these may be. Certainly businesses such as GrowUp Urban Farms in Beckton could be facilitated in commercial premises as easily as industrial ones. Global warming will mean we have more sunlight and the opportunities of using the existing tall buildings, in particular, for harnessing that energy for use within the City must be acted upon. Unfortunately, it is difficult to see how the financial and business service industry will need ever more offices, with or without Brexit. Even if there was a demand then there are more economically viable and ever expanding areas in London outside the City to locate to.
3.04	John Lett	GLA	Policies to encourage a diverse range of employment uses would be welcomed, especially in areas which have potential to support specialisms and agglomerations outside the Commercial Core
3.04	Charlotte Fletcher		diversify more, but not so as to lose the historic overall function as financial hub of the UK
3.04	Rita Cadavez		It might be advantageous to provide diversity, so as not to have a such "deserted" area over weekends where office spaces dominate the urban grid.
3.05	Paul Martinelli		We should encourage refurbishment above replacement in smaller developments.

Question	Name		Organisation	Comment Summary
3.05	Leonard	Goodrich	Chancery Lane Association	It is very important that policy should protect a range of office sizes and employment opportunities in parts of the City to contribute to the vitality of the wider City. We would support policy protection for SMEs in areas like the Chancery Lane area that could mix residential and associated service space with smaller office units and therefore accommodate SMEs (alongside existing larger businesses)
3.05	Rita	Cadavez		Offices suitable for more SMEs is an idea that in principle could be advantageous.
3.05	Charlotte	Fletcher		Explore what is wanted by the SME's and be adaptable
3.05	Fred	Rogers		To provide a wider range of office sizes and types, the need for subsidises has to be addressed. Planning for space is no good without planning the occupation of that space and revenue received from CILs would assist, but there has to be provision in s106 agreements for funding for subsidy, as well as reduced business rates. Were City Corporation to develop its own property, it could offer subsidised rents, as well as providing a range of office sizes and
3.05	Richard	Hillebron	Conservation Area Advisory Committee	The concept of a range of available office space such as to accommodate SME's is, on the face of it, welcome. However, where such small enterprises are focussing on inexpensive floor space they are more likely to seek space in fringe areas rather than the City as such. It is probably preferable to remain silent on the division of floor space into units and leave this for the market to decide.
3.05	Merlen			You have to make people understand that the city is a jewel, a jewel inside London and you have to take care of it. It is a jewel of great importance that makes the United Kingdom continue to hold importance in the world.  Clarifying this - I think it has to have political protection.

Question	Name		Organisation	Comment Summary
3.06	Jeremy	Gray	City Property Association	We do not feel it is for the planning system to judge on floorplate sizes, but we would wish the Plan to provide sufficient support for a variety of floorspace requirements to support the diverse needs of the various business and financial sectors. Office floorspace needs to be flexible to reflect future demand, as does any policy or guidance on this matter.
3.06	Polly	Barker	TfL Property	Any emerging policies should allow for sufficient flexibility for differing floor space sizes, including large floorplates, to ensure a range of size and types of employment uses are continued to be attracted to the City of London.
3.06	John	Lett	GLA	A flexible approach to accommodating a range of office floorspace demand should be maintained. There is likely to be a continuing need for a mix of floorspace demands, including some large floorplate occupiers.
3.06	Charlotte	Fletcher		I think we need both large floorplate offices and more flexible floorplates.
3.06	Rita	Cadavez		Yes to more flexible floorplates.
3.06	Fred	Rogers		No, the current construction methods are too reliant on floor plates for integrity, and more framed buildings, even if entailing uniform spaces, should be encouraged. At the same time, consideration has to be given to constructing more temporary and/or adaptable structures.
3.06	Leonard	Goodrich	Chancery Lane Association	Large floorplate offices are probably still required in the City, particularly in the commercial core, but more flexible floorplates and building designs will increasingly be needed, in particular in areas outside the commercial core. Flexibility in such areas would allow for responding to trends in working practices and economic changes that could affect the growth of different business sectors. Flexibility would also allow such areas to provide the right mix of service space required by the mix of businesses and residents that inhabit the area at any

Question	Name	Organisation	Comment Summary
3.07	Fred Rogers		It is difficult to answer this question without knowing what needs to be planned for. City Corporation could instigate such an approach or it could require developers to do so.
3.07	Merlen		The City Corporation has to plan everything to be functional for a future in which skyscrapers spread and thousands of people need to walk through the streets of the City to their jobs.
3.07	Jeremy Gray	City Property Association	We continue to support the City on its work to facilitate utility infrastructure in the Square Mile. The CPA will continue to support a strategic and collaborative approach to these issues. Where possible the Local Plan should actively seek better cooperation and funds on these matters, to ensure the resilience of the City is maintained.
3.07	Tom Noble	City Public Realm, CoL	Recommend making a specific reference to low emissions/ green infrastructures. It is important to also ensure that the City does not bear the cost of utility infrastructure. This cost should be borne by the utility companies and developers, freeing up City funds to enhance the street environment for the benefit of the public.
3.07	Charlotte Fletcher		Yes! And fine the utility companies who do not work together and who fail certain SLA's
3.07	David Coleman		The City is surely the place to require a deeply cooperative approach to utility infrastructure management? Promote a Private Bill if necessary.
3.07	Paul Martinelli		We need to limit growth to fewer larger developments which can fund infrastructure.
3.07	Rita Cadavez		Yes the City Corporation should instigate a more strategic and collaborative approach to implementation and funding of utility infrastructure.

Question	Name		Organisation	Comment Summary
3.07	John	Lett	GLA	<p>The Issues and Options paper rightly highlights the importance of utilities infrastructure. Taking a long term view of the needs of the various utilities will be an important planning tool. The London Infrastructure Plan 2050 and the Infrastructure Delivery Board should assist with the consideration of these important issues.</p> <p>It will also be important to ensure that measures are undertaken to reduce the demands of new development on such infrastructure, for example by reducing energy and water consumption, re-using materials and reducing waste.</p>
3.08	Yarema	Ronish		<p>There should be an objective to achieve full 4G coverage for all the major phone networks in the whole of the City. BT is rolling out its LinkUK programme to replace phone booths with freestanding panels incorporating free wifi, phone charging, maps and advertising. Initially, this is only happening in Camden. Is this something the City plans to take forward, consistent with Strategic Objective 5?</p>
3.08	Fred	Rogers		<p>One permanent street structure is, of course, the street lamp and these could be used for relaying local Wi-Fi networks. A mobile street structure is the bus, and Wi-Fi should be installed in every TfL bus and also could provide local networks.</p>
3.08	Sharon	Ament	Museum of London	<p>We welcome the emphasis at 3.8 placed on ensuring that the utilities needed for the Square Mile are delivered. This is vital to the “software” we will need at the Museum and a subject the design team will be focused on.</p>
3.08	Heather	Hilburn		<p>There should be an objective to achieve full 4G coverage for all the major phone networks in the whole of the City. BT is rolling out its LinkUK programme to replace phone booths with freestanding panels incorporating free wifi, phone charging, maps and advertising. Initially, this is only happening in Camden. Is this something the City plans to take forward, consistent with Strategic Objective 5?</p>



Question	Name	Organisation	Comment Summary
3.08	Yvonne Courtney		There should be an objective to achieve full 4G coverage for all the major phone networks in the whole of the City. BT is rolling out its LinkUK programme to replace phone booths with freestanding panels incorporating free wifi, phone charging, maps and advertising. We understand this is only happening in Camden initially? Is this something the City plans to take forward?
3.08	Peter Rose		Use it or lose it strategy for 'dark fibre' that has already been installed.
3.08	Merlen		Skyscrapers should play a fundamental role in the City, not just for office space but also digital infrastructure such as high quality wifi and telecommunications. Cultural heritage and the elegance of the City should always be respected.
3.08	Jeremy Gray	City Property Association	Digital and telecoms infrastructure must also continue to be prioritised, to ensure the City is able to compete with other World cities.
3.08	David Rees		There should be an objective to achieve full 4G coverage for all the major phone networks in the whole of the City. BT is rolling out its LinkUK programme to replace phone booths with freestanding panels incorporating free wifi, phone charging, maps and advertising. Initially, this is only happening in Camden. Is this something the City plans to take forward, consistent with Strategic Objective 5?
3.08	Natasha Downie	Historic Royal Palaces	Historic Royal Palaces would support the provision of digital connectivity infrastructure where this can be sited sensitively and not have adverse effects on heritage assets, or the public realm adjacent to the Tower WHS.

Question	Name	Organisation	Comment Summary
3.08	Jonathan Whitby		There should be an objective to achieve full 4G coverage for all the major phone networks in the whole of the City. BT is rolling out its LinkUK programme to replace phone booths with freestanding panels incorporating free wifi, phone charging, maps and advertising. Initially, this is only happening in Camden. Is this something the City plans to take forward, consistent with Strategic Objective 5?
3.09	Yvonne Courtney		Pollution/noise/dust/vibration impacts from constructions sites/utilities infrastructure is a growing issue and extremely debilitating.
3.09	Helen Kay	Barbican Association	Much tougher noise and pollution standards during construction
3.09	Fred Rogers		Off-site assembly and construction must be demanded, along with the use of lighter and more adaptable materials, particularly where short-life buildings are being constructed. A lot more use must be made of solar panels to reduce the demand on the existing mains electricity supply and low DC voltage internal systems should also be demanded. Local composting networks should be considered for foul waste.
3.09	Charlotte Fletcher		Difficult but set strict codes of conduct, ensure full consultation and agreement with all neighbours and instigate fines for not adhering
3.09	Peter Rose		Restriction on noisy nighttime working
3.09	Merlen		An economic security environment should be established so that new developments can be constructed more quickly.

Question	Name		Organisation	Comment Summary
3.09	Tom	Noble	City Public Realm, CoL	The Low Emission Neighbourhood work addresses issues arising from construction, e.g. using consolidation centres. Planning conditions could also be used to assist, as well as possible compensation payments for occupation of the public highway during construction.
3.10	Yvonne	Courtney		<p>The key issues concerning night time entertainment are:</p> <ol style="list-style-type: none"> <li>1. Late night licensed premises in the City tend to result in a boisterous atmosphere which is off-putting to residents and visitors. This is quite different to dinners and events such as concerts, films, markets, etc which create a celebratory, inclusive atmosphere.</li> <li>2. Greater co-ordination of responsibilities between planning, licensing, environmental health, policing and street cleaning would help. Perhaps a 'night mayor' who acts as a link between officials and licensed premises would be worth considering?</li> <li>3. Dispersal of patrons leaving licensed premises is the key problem. If not managed well, revellers wander in the streets causing noise and disturbance and soiling pavements. Clear dispersal routes are needed to direct revellers towards transport links and prevent them from gathering in places where they can cause a nuisance. Late night licensed premises - and promoters who hire out the premises at weekends should contribute to the cost of night stewards to direct revellers to suitable transportation.</li> <li>4. Public realm areas near licensed premises and Night Tube stations should have all night toilet facilities (such as retractable urinals).</li> </ol>
3.10	Tom	Noble	City Public Realm, CoL	Clear dispersal routes should be planned with the public realm. It would be essential to commission a study of the impact of the night-time economy (environmental/cleansing/noise/crime/ASB) so that policies could be properly formulated to manage it better.

Question	Name	Organisation	Organisation	Comment Summary
3.10	David	Rees		<p>The key issues concerning night time entertainment are:</p> <ol style="list-style-type: none"> <li>1. Late night licensed premises tend to create a boisterous atmosphere which is off-putting to residents and visitors. This is quite different to dinner events and evening concerts which create a celebratory atmosphere.</li> <li>2. Division of responsibilities between planning, licensing, environmental health, policing and street cleaning. Collaboration between departments has improved since the 2003 licensing laws came into effect, but there is room for further collaboration. Amsterdam has a 'night mayor' who acts as a link between public officials and licensed premises.</li> <li>3. Dispersal of patrons leaving licensed premises is a challenge. If this is not managed well, revellers wander in the streets causing noise and disturbance and soiling pavements. Clear dispersal routes are needed to direct revellers towards transport links and prevent them from gathering in places where they can cause a nuisance. Late night licensed premises should contribute to the cost of hiring night stewards to direct revellers to suitable transportation.</li> <li>4. Public realm areas near licensed premises and Night Tube stations should have all night</li> </ol>
3.10	Fred	Rogers		<p>Night time entertainment has to be more than selling food and drink but there is a singular lack of other venues outside the Cultural Hub. There is virtually no provision for young residents and in Mansell Street there is a planned reduction in existing space. The provision of sports facilities is extremely limited with Golden Lane Sports &amp; Fitness Centre being the only public facility within the Square Mile.</p> <p>The development of a Northbank could include similar facilities to Southbank and, with its existing transport facilities, has its own dispersal route. Somewhere in the new Local Plan provision must be made for the replacement of the Smithfield Meat Market and this would create a good opportunity to provide recreation and entertainment facilities instead.</p>

Question	Name	Organisation	Comment Summary
3.10	Heather Hilburn		<p>The key issues concerning night time entertainment are:</p> <ol style="list-style-type: none"> <li>1. Late night licensed premises tend to create a boisterous atmosphere which is off-putting to residents and visitors. This is quite different to dinner events and evening concerts which create a celebratory atmosphere.</li> <li>2. Division of responsibilities between planning, licensing, environmental health, policing and street cleaning. Collaboration between departments has improved since the 2003 licensing laws came into effect, but there is room for further collaboration. Amsterdam has a 'night mayor' who acts as a link between public officials and licensed premises.</li> <li>3. Dispersal of patrons leaving licensed premises is a challenge. If this is not managed well, revellers wander in the streets causing noise and disturbance and soiling pavements. Clear dispersal routes are needed to direct revellers towards transport links and prevent them from gathering in places where they can cause a nuisance. Late night licensed premises should contribute to the cost of hiring night stewards to direct revellers to suitable transportation.</li> <li>4. Public realm areas near licensed premises and Night Tube stations should have all night</li> </ol>
3.10	Leonard Goodrich	Chancery Lane Association	We believe that there should be more residential use space in the Chancery Lane area which makes it unsuitable for the promotion of night-time entertainment uses (although not unsuitable for bar and restaurant uses subject to normal hours restrictions).
3.10	Paul Martinelli		Dispersal routes are a key solution.
3.10	Merlen		Entertainment spaces should be developed away from the City's core and not impact on office space. It should be noted that the City is a work zone and may have leisure activities but these should be minimal.
3.10	Peter Rose		Limit size, number and concentration of bars. Limit late night opening. Control noise generation outside premises at night particularly smokers.

Question	Name	Organisation	Comment Summary
3.10	Charlotte	Fletcher	Need to promote and provide good plans of where nightspots are and have better police presence.
3.10	David	Coleman	Planning has a crucial role to play in shaping night time entertainment. The local plan needs to flesh out the short scoping statement in para 3.14 that correctly identifies the growing pressures and concerns on demands. What is the City's vision in response? I suggest it is something more like Covent Garden than Soho. Although the Barbican/Golden Lane is the largest concentration of homes, I would not use that to dump noisy activities on some of the smaller groups of homes dotted around the City. Everyone is entitled to a good night's sleep. Management of dispersal is the crucial issue and city-wide dispersal routes are worth investigating. The key issue for planning is to insist that dispersal policies are included in applications and it is clear that failure to provide convincing plans for dispersal without impacting on residential amenity could be a reason for refusal. Dispersal is one aspect of venue management which can make an enormous difference to the impact of a development on residential amenity. There should be a policy supporting the use of planning conditions for
3.10	Rita	Cadavez	One of the great consequences of being generally a "work" area of the city is that it becomes very quiet after work hours or weekends. However, this means also that there are not many commercial services and leisure and retail spaces during these times. It could be interesting to provide more such services and night life entertainment within the triangle region of Farringdon - Barbican - St Pauls.
3.10	Helen	Kay	Barbican Association
			The Local Plan should identify the large residential clusters as areas to restrict night time entertainment uses. We propose the 4 residential wards, including Aldersgate and Cripplegate. Dispersal routes that discouraged people leaving night time venues from using the streets immediately around the Barbican Estate and overlooked by flats would be helpful.

Question	Name		Organisation	Comment Summary
3.10	John	Lett	GLA	<p>London is becoming more of a 24hour city. With the introduction of night tube services this role is set to increase. The City is notable in having a relatively low resident population and generally good public transport access; this may well offer good further opportunities for an already growing night time economy within the City. Some of the recent growth in the night time economy has been close to the boundary with adjoining boroughs and will need careful consideration with those authorities.</p>
3.10	Yarema	Ronish		<p>The key issues concerning night time entertainment are:</p> <ol style="list-style-type: none"> <li>1. Late night licensed premises tend to create a boisterous atmosphere which is off-putting to residents and visitors. This is quite different to dinner events and evening concerts which create a celebratory atmosphere.</li> <li>2. Division of responsibilities between planning, licensing, environmental health, policing and street cleaning. Collaboration between departments has improved since the 2003 licensing laws came into effect, but there is room for further collaboration. Amsterdam has a 'night mayor' who acts as a link between public officials and licensed premises.</li> <li>3. Dispersal of patrons leaving licensed premises is a challenge. If this is not managed well, revellers wander in the streets causing noise and disturbance and soiling pavements. Clear dispersal routes are needed to direct revellers towards transport links and prevent them from gathering in places where they can cause a nuisance. Late night licensed premises should contribute to the cost of hiring night stewards to direct revellers to suitable transportation.</li> <li>4. Public realm areas near licensed premises and Night Tube stations should have all night</li> </ol>

Question	Name	Organisation	Comment Summary
3.10	Jonathan Whitby		<p>The key issues concerning night time entertainment are:</p> <ol style="list-style-type: none"> <li>1. Late night licensed premises tend to create a boisterous atmosphere which is off-putting to residents and visitors. This is quite different to dinner events and evening concerts which create a celebratory atmosphere.</li> <li>2. Division of responsibilities between planning, licensing, environmental health, policing and street cleaning. Collaboration between departments has improved since the 2003 licensing laws came into effect, but there is room for further collaboration. Amsterdam has a 'night mayor' who acts as a link between public officials and licensed premises.</li> <li>3. Dispersal of patrons leaving licensed premises is a challenge. If this is not managed well, revellers wander in the streets causing noise and disturbance and soiling pavements. Clear dispersal routes are needed to direct revellers towards transport links and prevent them from gathering in places where they can cause a nuisance. Late night licensed premises should contribute to the cost of hiring night stewards to direct revellers to suitable transportation.</li> <li>4. Public realm areas near licensed premises and Night Tube stations should have all night</li> </ol>
3.11	Helen Kay	Barbican Association	Bollards and minimal amounts of plate glass (this also helps reduce light pollution)
3.11	John Lett	GLA	The City and some of its buildings and institutions are potential security targets and it is right that this matter is given detailed consideration in the City of London Plan.
3.11	Yarema Ronish		<p>The safety and security of public realm can be enhanced by overlooking, pleasant lighting and complementary adjoining uses such as pavement cafes. Public realm which is not overlooked by street frontages should be overlooked by ground floor uses which are likely to be occupied on evenings and weekends (hotels, office reception, retail and cafes in some areas). In the case of larger public open areas, a programme of events can provide animation while deterring unwanted activities. Hostile vehicle mitigation should be permitted for buildings whose owners have identified a need for it. This should be attractively designed to harmonise with the streetscape.</p>



Question	Name	Organisation	Comment Summary
3.11	Charlotte	Fletcher	No blind spots, CCTV in right locations, joined up approach from all security working in the City
3.11	Yvonne	Courtney	The safety and security of public realm can be enhanced by overlooking, pleasant lighting and complementary adjoining uses such as pavement cafes. Too many new buildings have 'rude' facades at ground level, which is ugly, uninviting and unsafe after dark. Hostile vehicle mitigation should be permitted for buildings whose owners have identified a need for it. This should be attractively designed to harmonise with the streetscape.
3.11	Heather	Hilburn	The safety and security of public realm can be enhanced by overlooking, pleasant lighting and complementary adjoining uses such as pavement cafes. Public realm which is not overlooked by street frontages should be overlooked by ground floor uses which are likely to be occupied on evenings and weekends (hotels, office reception, retail and cafes in some areas). In the case of larger public open areas, a programme of events can provide animation while deterring unwanted activities. Hostile vehicle mitigation should be permitted for buildings whose owners have identified a need for it. This should be attractively designed to harmonise with the streetscape.
3.11	Merlen		<p>The buildings should remain elegant as 30 St Mary Axe and with different illumination effects such as the tip of Tower 42.</p> <p>The City is the most important world financial centre and its security must be at a level to be able to stop attacks of all type.</p>

Question	Name	Organisation	Comment Summary
3.11	Jonathan Whitby		The safety and security of public realm can be enhanced by overlooking, pleasant lighting and complementary adjoining uses such as pavement cafes. Public realm which is not overlooked by street frontages should be overlooked by ground floor uses which are likely to be occupied on evenings and weekends (hotels, office reception, retail and cafes in some areas). In the case of larger public open areas, a programme of events can provide animation while deterring unwanted activities. Hostile vehicle mitigation should be permitted for buildings whose owners have identified a need for it. This should be attractively designed to harmonise with the streetscape.
3.11	Rita Cadavez		London is the city with most CCTV cameras in the world. Safety can be provided by well designed public and open spaces and clear routes and entrances to buildings.
3.11	David Rees		The safety and security of public realm can be enhanced by overlooking, pleasant lighting and complementary adjoining uses such as pavement cafes. Public realm which is not overlooked by street frontages should be overlooked by ground floor uses which are likely to be occupied on evenings and weekends (hotels, office reception, retail and cafes in some areas). In the case of larger public open areas, a programme of events can provide animation while deterring unwanted activities. Hostile vehicle mitigation should be permitted for buildings whose owners have identified a need for it. This should be attractively designed to harmonise with the streetscape.
3.11	Fred Rogers		The retention of the public realm should not be prejudiced by the security of property.
3.11	Tom Noble	City Public Realm, CoL	Crowded places can be designed to incorporate security measures. Area-wide approaches are

Question	Name	Organisation	Comment Summary
3.12	Oliver Caroe	Chapter of the Cathedral Church of St Paul	<p>The Cathedral is concerned with, and supportive of, planning policy measures to tackle crime and anti-social behaviour including the ability to disperse or evacuate quickly in the event of a security incident. We would welcome clearer design policies for the public realm, coupled with active policing and management measures, to limit anti-social behaviour and activity that can damage the environment in modest but qualitatively significant ways (such as skateboarding).</p> <p>We are concerned that a scheme has been announced publicly for a new 'ring of steel' in the commercial heart of the city but no announcement has come forward about similar plans (for both permanent and temporary works) around the Cathedral. We would welcome early resolution of this uncertainty.</p>
3.12	Rita Cadavez		By re-qualifying the existing spaces into better designed areas.
3.12	Heather Hilburn		The design of public open spaces should avoid blind corners and encourage overlooking. Entrances to buildings should be well overlooked, and preferably located on busy street frontages. Building frontages should be designed without internal corners, which encourage urination.
3.12	Charlotte Fletcher		Yes we should include further planning policy measures to tackle crime and anti-social behaviour. Strict enforcement. Ability to ban individuals from City
3.12	Merlen		Avoid excess air transport over the City. There should be police reinforcement on the London Stock Exchange and greater security such as camera and metal detectors for the most important and emblematic buildings.

Question	Name	Organisation	Comment Summary
3.12	Natasha Downie	Historic Royal Palaces	Historic Royal Palaces would welcome the inclusion of appropriate planning policy measures to address crime and anti-social behaviour issues in public areas around the Tower, for example, on Tower Hill and in Byward Street.
3.12	Yarema Ronish		The design of public open spaces should avoid blind corners and encourage overlooking. Entrances to buildings should be well overlooked, and preferably located on busy street frontages. Building frontages should be designed without internal corners, which encourage urination.
3.12	Ivo de Wit		Crime prevention is already good, but more equipment and camera use will improve detection and identification like implemented in downtown New York by NYPD.
3.12	Fred Rogers		Provision of facilities, accommodation, clothing and food for intentional rough sleepers and the homeless would all help reduce some minor crime and anti-social behaviour. However, alcohol related offences are unlikely to decrease until there is a culture of demand, rather than supply, led drinking in this country. Perhaps restrictions on cheap fast food outlets will ensure that more time and money is spent on food, thus reducing or controlling alcohol intake.
3.12	Jonathan Whitby		The design of public open spaces should avoid blind corners and encourage overlooking. Entrances to buildings should be well overlooked, and preferably located on busy street frontages. Building frontages should be designed without internal corners, which encourage urination.
3.12	David Rees		The design of public open spaces should avoid blind corners and encourage overlooking. Entrances to buildings should be well overlooked, and preferably located on busy street frontages. Building frontages should be designed without internal corners, which encourage urination.

Question	Name		Organisation	Comment Summary
3.12	Tom	Noble	City Public Realm, CoL	Crowded places can be designed to incorporate security measures. Area-wide approaches are preferred to avoid an adhoc approach and gaps. Also public spaces are already routinely
4.01	Peter	Bennett		Areas of Change is a useful concept but should not be too rigidly defined as they themselves will be subject to change. The Plan needs to be flexible in this respect.
4.01	John	Lett	GLA	The use of Key City Places provides a focus for the main areas of change within the City.
4.01	Jeremy	Gray	City Property Association	We consider there would be merit in reviewing all of the existing Key City Places ('KCP') and the associated policy and guidance in the new Plan. We consider that area based policies focussing on areas of change is a sound concept, but these need to be sufficiently flexible and adaptable to ensure these promote rather than constrain development, and are also able to reflect and respond to emerging market and economic changes within each area. In particular we feel the "North of the City" and the "Thames and Riverside" KCP should be reviewed both in terms of their geographical extent and their policy guidance. It is considered that some of the aims and objectives reflected in these policies are already somewhat "out of date".
4.01	Jonathan	Whitby		The Key City Places are shown as vague blobs on maps. The maps do not show street names so it is quite difficult to verify whether a development site is in a Key City Place or not. More accurate maps are needed to enable applicants and consultees to determine whether a site is located in a Key City Place or not.
4.01	Helen	Kay	Barbican Association	Neutral on Key City Places. Residents haven't noticed that the designation of North of the City has helped protect residential amenity

Question	Name		Organisation	Comment Summary
4.01	Yarema	Ronish		The Key City Places are shown as vague blobs on maps. The maps do not show street names so it is quite difficult to verify whether a development site is in a Key City Place or not. More accurate maps are needed to enable applicants and consultees to determine whether a site is located in a Key City Place or not.
4.01	Tom	Noble	City Public Realm, CoL	'Key City Places' should be retained in the new Local Plan and should not be replaced by areas of change. This is because the whole City can be identified as an area of change. Key City Places
4.01	Graham	Saunders	Historic England	<p>Key City Places – in principle we welcome the approach of a 'places' orientated Local Plan. However we would advise that the 'places' identified should be rooted in their historical development and resulting characteristics as expressed in their urban form, street patterns, urban grain, scale, architectural form and activities. This evidence should be then gathered, understood and used as a baseline from which to inform development and change. Although some details are provided on the existing characteristics of each 'place' this is limited. And at present the extent and justification of 'places' appear to be driven by the demand for development and its form, which can result in challenges to achieving the aims of sustainable development and its net gains.</p> <p>Once clearly evidenced and identified, we would seek further clarification on how the strategic issues identified for each 'place' will then be developed. For example is it envisaged that 'masterplans' for each 'place' will be developed in consultation with others – thus providing a robust development framework for change?</p>
4.01	Rita	Cadavez		It could be beneficial to look at current established areas and to question if they are still adequate for contemporary ways of working.
4.01	Fred	Rogers		It is difficult to plan for something that is unexpected, whatever the areas are called. However, in an area the size of the City, integration could be both expected and required.

Question	Name		Organisation	Comment Summary
4.01	Leonard	Goodrich	Chancery Lane Association	<p>We feel the concept is useful and should be retained, and that the focus should remain on those areas where significant change is expected.</p> <p>“Areas of change” sounds restless and could unsettle businesses and residents considering relocating to those areas. “Key City Places” sounds more positive and is the better term.</p>
4.01	David	Rees		<p>The Key City Places are shown as vague blobs on maps. The maps do not show street names so it is quite difficult to verify whether a development site is in a Key City Place or not. More accurate maps are needed to enable applicants and consultees to determine whether a site is located in a Key City Place or not.</p>
4.01	Heather	Hilburn		<p>The Key City Places are shown as vague blobs on maps. The maps do not show street names so it is quite difficult to verify whether a development site is in a Key City Place or not. More accurate maps are needed to enable applicants and consultees to determine whether a site is located in a Key City Place or not.</p>
4.02	Leonard	Goodrich	Chancery Lane Association	<p>The Chancery Lane area requires a particular focus as it is on the edge of the City, is therefore different in character from more central areas and requires different strategic management. For example, it requires management that would need to increase the proportion of residential use and associated service uses, and to ensure that retained office uses would support a greater diversity of businesses than in much of the City.</p>
4.02	Rita	Cadavez		<p>The area around St. Pauls Cathedral could be another key point. Considering the great historical importance of this monument, the spaces that surround it as well as the routes existing lack identity and hierarchy.</p>

Question	Name		Organisation	Comment Summary
4.02	Jeremy	Gray	City Property Association	<p>In addition, we feel that there would be merit in exploring new and updated area policies for:</p> <ul style="list-style-type: none"> <li>- Smithfield/Cultural Hub</li> <li>- Liverpool Street/Broadgate</li> <li>- Aldgate</li> <li>- Eastern Cluster</li> </ul> <p>It is considered that the existing Cheapside and St Paul's KCP could be omitted from the new Local Plan.</p>
4.02	John	Lett	GLA	<p>Areas of change should include City Fringe/Tech City Opportunity Area and the Farringdon/Smithfield Area for Intensification. Key City Places should identify any commercial core areas that they contain.</p>
4.02	Fred	Rogers		<p>There is a substantial chunk of the western part of the City - the area between Fleet Street, Chancery Lane, Holborn Viaduct/Holborn and Farringdon Road - which lacks a designation despite a substantial amount of development in this area. However, the arrival of the Elizabeth Line at Farringdon will mean there will be a four-way rail system on its doorstep.</p>
4.02	Tom	Noble	City Public Realm, CoL	<p>A new Fleet Street 'Key City Place' should be added as this area needs attention and is suffering from under-investment. There is potential to work with the GLA and neighbouring boroughs to develop a joined up approach to its enhancement and better links to the River</p>
4.02	Helen	Kay	Barbican Association	<p>The Local Plan should treat residential areas (most easily identified as the residential wards) differently from the rest of the City, giving protection from excessive development, evening and night time activity, noise pollution and light pollution.</p>
4.03	Fiona	Meyringer		<p>This is unintelligible</p>



Question	Name		Organisation	Comment Summary
4.03	Fred	Rogers		The further concentration of new offices around the Eastern Cluster and the redevelopment of 5 Broadgate suggest that Liverpool Street/Broadgate should become part of the Eastern Cluster. On the completion of the Moorgate Elizabeth Line Station the Eastern Cluster should also absorb the area on the north of London Wall, including London Wall Place.
4.03	Tom	Noble	City Public Realm, CoL	The North of the City/Cultural Hub should be two separate 'Key City Places' and not one. The Cultural Hub extends to the centre of the City also. If anything the North of the City 'Key City Place' should be dropped off the list to avoid confusion and instead focus on the Cultural Hub. Broadgate area/NE does not warrant being a 'Key City Place' as most of the Crossrail change will be over in a
4.03	Rita	Cadavez		Focus on the latter two areas would be beneficial.
4.03	Sharon	Ament	Museum of London	We don't have an especially strong view on whether you should divide the focus between the north west and north east. We would however observe that the West Smithfield/Barbican area will, in 10 years' time, be transformed by the Elizabeth Line, the new Museum and Beech Street creating a cluster along with the Barbican Centre of world class cultural institutions.
4.03	Yarema	Ronish		The areas to the east and west of Moorgate are quite different in character. The visitor attractions which are part Cultural Hub are located west of Moorgate and should be in a key City place. The area to the east of Moorgate is dominated by offices and in my view no different from the main fabric of the City.

Question	Name	Organisation	Comment Summary
4.03	David Rees		The areas to the east and west of Moorgate are quite different in character. The visitor attractions which are part Cultural Hub are located west of Moorgate and should be in a key City place. The area to the east of Moorgate is dominated by offices and in my view no different from the main fabric of the City.
4.03	Heather Hilburn		The areas to the east and west of Moorgate are quite different in character. The visitor attractions which are part Cultural Hub are located west of Moorgate and should be in a key City place. The area to the east of Moorgate is dominated by offices and in my view no different from the main fabric of the City.
4.03	Jonathan Whitby		The areas to the east and west of Moorgate are quite different in character. The visitor attractions which are part Cultural Hub are located west of Moorgate and should be in a key City place. The area to the east of Moorgate is dominated by offices and in my view no different from the main fabric of the City.
4.03	Helen Kay	Barbican Association	Separate Liverpool Street/ Broadgate area from the rest of the North of the City Cultural hub activities will need to be carefully planned to respect residential amenity and the heritage importance of the Barbican and Golden Lane estates.
4.03	Jeremy Gray	City Property Association	We would support the sub-division of this KCP, comprising the Cultural Hub in the North-West and the Liverpool Street/Broadgate area in the North-East.
4.03	John Lett	GLA	The identification of areas around the Crossrail Stations in the North of City Cultural Hub is likely to be a useful focus for significant further development; particular attention should be paid to linking to strategies in the adjoining boroughs.

Question	Name		Organisation	Comment Summary
4.04	Natalie	Broughton	London Borough of Hackney	It is anticipated in the City's Local Plan that growth in the Cultural Hub will generate additional visitors and subsequent demand for hotels and other services including night-time entertainment. We welcome the City's aspiration for a coordinated approach with areas beyond the City's boundary on these issues and look forward to working together on this.
4.04	Rita	Cadavez		Provision of more accommodation facilities (hotels & short term stays) and better connecting routes to cultural public areas and buildings. Requalifying some of the existing streets turning them possibly to pedestrian routes. Better designated cycleways could help improve connectivity between the new cultural hub and the other areas of the City.
4.04	Yarema	Ronish		<p>The area to the west of the Barbican already has a pleasant and varied streetscape, a good mix of restaurants and sandwich shops and a number of attractive public open spaces, The key challenges to address are:</p> <ul style="list-style-type: none"> <li>• softening and improving the permeability of the northern and western edges of the Barbican and the southern part of Smithfield Market.</li> <li>• creating active frontages to all sides of new large buildings.</li> <li>• providing signage and wayfinding cues to assist visitors</li> <li>• linking the Cultural Hub to Farringdon station, which is in the adjoining borough of Islington.</li> </ul>
4.04	Jonathan	Whitby		<p>The area to the west of the Barbican already has a pleasant and varied streetscape, a good mix of restaurants and sandwich shops and a number of attractive public open spaces. The key challenges to address are:</p> <ul style="list-style-type: none"> <li>• softening and improving the permeability of the northern and western edges of the Barbican and the southern part of Smithfield Market.</li> <li>• creating active frontages to all sides of new large buildings.</li> <li>• providing signage and wayfinding cues to assist visitors</li> <li>• linking the Cultural Hub to Farringdon station, which is in the adjoining borough of Islington.</li> </ul>

Question	Name	Organisation	Comment Summary
4.04	Tom Noble	City Public Realm, CoL	This is 2 questions in one. The CPR team are currently producing a strategy for the Cultural Hub Look and Feel which will answer the first part of the question when it is completed next year. Pedestrian and Vehicle management is a separate matter and I am not clear on what is being asked about the hospital and the meat market? If the question is should the market relocate out of the City, then probably yes, but in the longer term.
4.04	Peter Bennett		Beech Street needs to be a priority area for reduced traffic, increased pedestrian use and improved environment, including introducing new uses in adjacent premises. Open areas adjacent to Fann Street, both in the Golden Lane Estate and in the Barbican should be improved visually and in terms of public access, as a key facility of the Cultural Hub. The tired and neglected appearance of Crescent House and the retail premises below need upgrading as part of the gateway to the Cultural Hub. Barbican Tube Station: step-free access is an essential part of the proposed Cultural Hub and an upgrade is required to the whole area around the Station, including the steps to the
4.04	Paul Martinelli		Time separation of pedestrians and vehicles .
4.04	Fred Rogers		If the move of the Museum of London to Smithfield Central Market goes ahead and funding is not available for the proposed new concert hall on the Museum site, whatever is built there must have the consent and approval of local residents. The future of Smithfield has to be considered without its meat market. It is an anachronism in the 21st Century and does nothing for the reputation and environment of the City.

Question	Name	Organisation	Comment Summary
4.04	Heather Hilburn		<p>The area to the west of the Barbican already has a pleasant and varied streetscape, a good mix of restaurants and sandwich shops and a number of attractive public open spaces, The key challenges to address are:</p> <ul style="list-style-type: none"> <li>• softening and improving the permeability of the northern and western edges of the Barbican and the southern part of Smithfield Market.</li> <li>• creating active frontages to all sides of new large buildings.</li> <li>• providing signage and wayfinding cues to assist visitors</li> <li>• linking the Cultural Hub to Farringdon station, which is in the adjoining borough of Islington.</li> </ul>
4.04	Sakiba Gurda	London Borough of Islington	<p>We welcome the acknowledgement that a coordinated approach with neighbouring boroughs will be required as the Cultural Hub develops.</p>
4.04	David Rees		<p>The area to the west of the Barbican already has a pleasant and varied streetscape, a good mix of restaurants and sandwich shops and a number of attractive public open spaces, The key challenges to address are:</p> <ul style="list-style-type: none"> <li>• softening and improving the permeability of the northern and western edges of the Barbican and the southern part of Smithfield Market.</li> <li>• creating active frontages to all sides of new large buildings.</li> <li>• providing signage and wayfinding cues to assist visitors</li> <li>• linking the Cultural Hub to Farringdon station, which is in the adjoining borough of Islington.</li> </ul>
4.04	Jeremy Gray	City Property Association	<p>We feel that there is merit in promoting a new KCP in the North-West relating to the Cultural Hub initiative, which would provide guidance to applicants, developers and occupiers on the aims and objectives for this area and to ensure development and regenerative benefits are maximised in this area.</p> <p>We fully support the cultural hub initiative and the diversification of uses, where appropriate, to ensure the initiative is a success.</p>

Question	Name	Organisation	Comment Summary
4.04	Helen Kay	Barbican Association	<p>The local plan needs to observe the delicate balance that exists between the activities of the Cultural Hub and the residential area it sits within. While the cultural institutions themselves rarely disturb residential amenity, it is the bars, restaurants, and events such as weddings associated with them that disturb residents.</p> <p>The Cultural Hub organisations should invest in better sound insulation, better management and better dispersal policies. The City needs to limit evening and night-time activities in open areas near residents' flats.</p> <p>Plans should be designed to attract visitors to attend the cultural institutions and not just to "hang out" in the public space around the area. Public space should therefore belong to Cultural Hub institutions and not be part of a general thoroughfare. Pavements should be widened to accommodate more pedestrians and there should be clear designated routes for traffic to Smithfield and St Barts.</p>
4.04	David Coleman		<p>As the cultural hub concept is fleshed out, I would like to see consideration given to building up a Ranger Service. This would be composed of paid employees from the various venues plus volunteers. It would help to knit together the management of the public realm with the management of the venues. At night it would implement a flexible, more cost-effective approach to dispersal; during the day it would help draw people into the venues and cross-market their attractions.</p>
4.04	Sharon Ament	Museum of London	<p>We strongly endorse the focus you intend to take on the north of the city and the role of culture here and welcome the references to the role a new Museum of London at West Smithfield could play. We are very aware of the importance of planning effectively for the new Museum especially in relation to transport and movement of people, the current operations at Smithfield markets and the wider communities around West Smithfield.</p>
4.05	John Luckhurst	London Borough of Bexley	<p>The opening of the Elizabeth Line and the provision of more flexible and adaptable workspaces and new types of employment will improve connections and job opportunities for Bexley residents in the City.</p>

Question	Name		Organisation	Comment Summary
4.05	Sakiba	Gurda	London Borough of Islington	We welcome the recognition that there is potential for further business intensification around Liverpool Street/Broadgate linking with the Tech City area and would be supportive of policies that recognise the needs of technology sector companies.
4.05	Rita	Cadavez		Yes, providing more flexibility in workspaces might help refresh and regenerate new potential in this area.
4.05	Tom	Noble	City Public Realm, CoL	It is difficult to see how technology sector companies could be supported by the plan. Are they a different use class? What are their accommodation requirements? As far as I can tell, these companies choose locations based on the needs of their workforce so a high quality and permeable public realm with more green space would assist, but this would also assist any business.
4.05	Natalie	Broughton	London Borough of Hackney	<p>The North of the City / Cultural Hub is identified in the City of London's Plan as a Key City Place. This area adjoins Hackney borough, so we are particularly interested to be kept updated with regards to development activity around Liverpool Street Station and Broadgate, particularly if the City wishes to promote intensification of business and employment in this area.</p> <p>Hackney is also in the early stages of producing an Area Action Plan (AAP) for Shoreditch. The AAP will provide policy and guidance on future development in this area, covering a number of topics of relevance to the City including tall buildings, public realm improvements, the night-time economy and connectivity to the City.</p>
4.05	Fred	Rogers		This seems to be a matter of the horse and the stable door. Where is there within this area of the City that is undeveloped? Development for the sake of profit demands just that and leaves no room for the niceties of more flexible and adaptable workspaces without financial

Question	Name		Organisation	Comment Summary
4.05	Jeremy		City and Westminster Property Association	We feel that it is important that the Liverpool Street/Broadgate KCP is sufficiently outward looking to ensure policies take advantage of the adjacent markets in other boroughs. We also consider the new Local Plan should increase support for the technology sector and other markets in the City Fringe, which could in particular be addressed in the Liverpool Street/Broadgate KCP policy. In addition, this KCP is expected to benefit and change as a result of Crossrail opening in 2018. Policies need to be drafted to ensure the benefits can be captured to the advantage of the Square Mile.
4.06	George	Snape	Tfl	While the City's aspirations to remove traffic from the Bank junction are understood, the wider implications on general traffic in the City as well as on bus routings will have to be understood and mitigated where appropriate if a scheme here is to be taken forward.
4.06	Yvonne	Courtney		The Cheapside and St Paul's area has a distinctive character as a result of the 7 day a week vibrancy created by One New Change, Cheapside and St Paul's Cathedral. This area should continue to be a Key City Place, and is a template for how the rest of the City could be
4.06	Jeremy	Gray	City Property Association	Whilst recognising that the current area based policy for Cheapside and St Paul's has been a success, we do consider that this area policy could be reviewed now, given the development and regenerative works that have taken place in the area over the last 10 years. It is also considered that the area is sufficiently covered by other spatial planning policies in the Plan, which can guide future development, and ensure the continued appeal of this area. The CPA continues to fully support the City on the highway improvements and changes being proposed to the Bank Junction. It is considered that the highway proposals and associated change can be covered by a specific transport policy on this topic, rather than a KCP policy.
4.06	Heather	Hilburn		The Cheapside and St. Paul's area has a distinctive character as a result of the 7 day a week vibrancy created by One New Change, Cheapside and St Paul's Cathedral. This area should continue to be a Key City Place, and is a template for how the rest of the City could be



Question	Name		Organisation	Comment Summary
4.06	Oliver	Caroe	Chapter of the Cathedral Church of St Paul	The Cathedral supports retaining a specific policy for Cheapside and St Paul's as a Key City Place – bearing in mind the need for integration with North of the City/the Cultural Hub and ease of wayfinding and pedestrian flows. The Cathedral responded to the consultation on the Cheapside and Guildhall Area Enhancement Strategy, and the Fleet Street enhancement strategy, which we warmly support, and we are keen to know how implementation is progressing. We recognise opportunities for reinforcing the identify and significant place of St Paul's as one of actual and perceived 'key spaces' in London.
4.06	Peter	Bennett		Yes, and the Plan should be extended to incorporate the retail elements of Cornhill and link to Fenchurch Street and Leadenhall.
4.06	Yarema	Ronish		This area has a distinctive character as a result of the 7 day a week vibrancy created by One New Change, Cheapside and St Paul's Cathedral. This area should continue to be a Key City Place, and is a template for how the rest of the City could be improved.
4.06	Tom	Noble	City Public Realm, CoL	This Place should be dropped from the list as most of the change has either occurred already or is about to. Plus it overlaps with the Cultural Hub.
4.06	Jonathan	Whitby		The Cheapside and St Paul's area has a distinctive character as a result of the 7 day a week vibrancy created by One New Change, Cheapside and St Paul's Cathedral. This area should continue to be a Key City Place, and is a template for how the rest of the City could be
4.06	Fred	Rogers		There is no need to retain a specific policy for Cheapside and St. Paul's as a Key City Place, apart from continued safeguarding, increased pedestrianisation and resolving the access to the Cultural Hub issue.

Question	Name	Organisation	Comment Summary
4.06	John Lett	GLA	The anticipated changes to the Cheapside and St Pauls area will need to protect the fabric and setting of the historic environment in this area, and the promotion of an improved pedestrian environment is an important ambition.
4.06	Rita Cadavez		Yes. This area lacks character and identity but for St Pauls Cathedral. The main retail streets and commercial areas give a somewhat generic provision but lacking the potential to match other main commercial areas of London.
4.06	David Rees		The Cheapside and St Paul's area has a distinctive character as a result of the 7 day a week vibrancy created by One New Change, Cheapside and St Paul's Cathedral. This area should continue to be a Key City Place, and is a template for how the rest of the City could be
4.07	Fred Rogers		Paternoster Square should be demolished. A reduction in traffic is essential and closing St Martin's Le Grand and the southern arc of the Museum roundabout to traffic and making King Edward Street and Montague Street two-way could achieve the link to the Cultural Hub. This would entail only one major pedestrian crossing between St Paul's and the Museum roundabout with Gresham Street, Little Britain (east) and Angel Street becoming dead ends.
4.07	David Rees		The challenge in linking Cheapside to the Cultural Hub are the large monolithic buildings located on the north side of Newgate Street. The streets leading north from Newgate Street give no indication that they lead somewhere interesting. Some vibrant public art on St Martin le Grand and Greyfriars Church Garden would be very helpful in drawing visitors northward towards the Cultural Hub.

Question	Name	Organisation	Comment Summary
4.07	Yarema	Ronish	The challenge in linking Cheapside to the Cultural Hub are the large monolithic buildings located on the north side of Newgate Street. The streets leading north from Newgate Street give no indication that they lead somewhere interesting. Some vibrant public art on St Martin le Grand and Greyfriars Church Garden would be very helpful in drawing visitors northward towards the Cultural Hub.
4.07	Rita	Cadavez	By adding provision of varied stores (eg not the typical High Street look) and facilities. Good examples are the nearby Spitalfields mrkt area and Angel (upper street). This will need to be better connected to the cultural hub: current routes are confusing and interrupted. There is no identity (therefore no appeal) to walk through the existing routes.
4.07	Jonathan	Whitby	The challenge in linking Cheapside to the Cultural Hub are the large monolithic buildings located on the north side of Newgate Street. The streets leading north from Newgate Street give no indication that they lead somewhere interesting. Some vibrant public art on St Martin le Grand and Greyfriars Church Garden would be very helpful in drawing visitors northward towards the Cultural Hub.
4.07	Peter	Bennett	Cheapside should link to the Cultural Hub at the western end of London Wall, as well as at Moorgate.
4.07	Paul	Martinelli	Continuing emphasis on street scene improvements and enhanced street cleaning
4.07	Helen	Kay	Barbican Association
			It should be made obvious to visitors who want to reach the cultural hub how to get there from Cheapside. But there is no natural link between Cheapside and the Cultural Hub, and an artificial one should not be created or assumed. Cheapside should be self sufficient in bars and restaurants and not rely on those from the cultural hub. Indeed, it may be more natural to encourage patrons of the Cultural hub to restaurants/bars on Cheapside.

Question	Name		Organisation	Comment Summary
4.07	Heather	Hilburn		The challenge in linking Cheapside to the Cultural Hub are the large monolithic buildings located on the north side of Newgate Street. The streets leading north from Newgate Street give no indication that they lead somewhere interesting. Some vibrant public art on St Martin le Grand and Greyfriars Church Garden would be very helpful in drawing visitors northward towards the Cultural Hub.
4.08	Tom	Noble	City Public Realm, CoL	Intensification should only occur if it can be proved that the streets and public realm can cope with the increased numbers of people. The ECC area strategy will inform this change.
4.08	Daniel	Rech	Quod for Merchant Land Investment Ltd	The Eastern Cluster remains one of the city's most sustainable, accessible locations. Growth should inherently be focused within such locations. The Eastern Cluster designation has seen a series of tall buildings come forward, which our client is strongly in support of, in general terms. This, in turn, has assisted in easing pressure on wider delivery of significant commercial buildings in other locations across the City. An openness to the delivery of tall buildings in this location, alongside an emphasis on providing high quality office space for SMEs, will ensure that the planning foundations are in place to facilitate the market delivering office accommodation to suit the market requirements. Moreover, a positive position in respect of the delivery of tall buildings within this location will add certainty for developers and tenants alike, a fundamental cornerstone of preserving the long-term future of the City and the investment patterns therein.
4.08	Jeremy	Gray	City Property Association	The Eastern cluster KCP needs to be retained and updated. With transport upgrades coming forward at Bank Underground and Liverpool Street station, as well as other transport infrastructure improvements, we consider that there are further opportunities for intensification and densification of the tall buildings cluster.
4.08	Rita	Cadavez		Perhaps not so much intensification (as already proposed in the current plan) but rather better and larger public open spaces.

Question	Name	Organisation	Comment Summary
4.08	Graham Saunders	Historic England	<p>We note that the City is developing a 3D modelling of the cluster, which is welcomed. However this valuable piece of evidence appears not to be publically available for scrutiny, as part of the development of the Local Plan. We would advise that greater transparency is provided on the details of this method of shaping the extent and scale of the Cluster and how it related to the significance of heritage assets in the surrounding area. Will the evidence gathered then be used to define with great clarity the development and design parameters for future proposals, in a manner similar to design codes? This is particularly important in the case of the Tower of London World Heritage Site (WHS) and its Outstanding Universal Value (OUV), as contributed from its setting. In particular we are keen to ensure both the defined Local Setting and wider setting is recognised and used to inform the management of the Cluster. The extent of the Eastern Cluster should be much clearer and overlaid onto an OS map for the purpose of clarity. We note that the Evidence Summary does include a clear map, which should be used in the Local Plan. However what is clear in this evidence is that the Cluster area contains conservation areas and view protection areas, which are considered inappropriate for tall buildings. This could raise policy confusion, when the extent of the Cluster includes these inappropriate areas. Greater clarification is needed.</p>
4.08	Natasha Downie	Historic Royal Palaces	<p>Historic Royal Palaces has a long-standing concern about the continuing increase in height and scale of buildings within the current Eastern Cluster because of the Cluster’s increasing visual dominance in the designated views of the Tower and the related gradual reduction in the visual separation between the Cluster and the WHS.</p> <p>We would be less concerned about further intensification within the Cluster by buildings that would be concealed within the silhouette already defined by existing buildings or consented schemes. We would oppose the ‘filling-in’ of the gap between the Cluster and 20 Fenchurch Street; and the development of taller buildings in the Aldgate area, which lies within the protected vista of LVMF view 25A.1 from the Queen’s Walk.</p> <p>We would be concerned about any expansion of the existing policy area, or intensification of tall buildings in the eastern segment of the existing area, particularly within the viewing cone of LVMF view 25A.1.</p>

Question	Name		Organisation	Comment Summary
4.08	John	Lett	GLA	The intensification of built development in the Eastern Cluster is supported, including a concentration of tall buildings. The area has excellent public transport links, some under-used land and buildings and is relatively free from constraints relating to tall buildings.
4.08	George	Snape	Tfl	Although intensification of uses in areas of high public transport accessibility can bring significant benefits, TfL considers that the area is coming under major pressure in terms of movement across all modes of transport. In particular there is heavy pedestrian footfall in the peaks, and loading and servicing are an issue. Further intensification of development should be underpinned by measures to deal with these challenges.
4.08	Fred	Rogers		With planning permission being granted to 1 Undershaft, there would appear to be little scope for too much further intensification but the pull of the cluster on the Walkie Talkie building is likely to lead to increased demand for intensification.
4.08	Paul	Martinelli		Yes, intensification within the Eastern Cluster should be encouraged.
4.09	Tom	Noble	City Public Realm, CoL	This will be answered in part by the completion of the area strategy. Further studies may also be required.
4.09	Fred	Rogers		Further infrastructure improvement will only increase demand for more development.
4.09	Yvonne	Courtney		Leadenhall Market is a lost opportunity. It has the potential to be a destination foodie market (like Maltby Street) with a mix of up-and-coming gastronomic street food operators complementing the existing outlets/shops.

Question	Name	Organisation	Comment Summary
4.09	George Snape	Tfl	TfL considers changes that are needed to the existing infrastructure include increasing footway widths where possible, improving crossing facilities and better freight handling methodologies. There is a need to develop alternative walking routes through development sites rather than creating additional pedestrian trips on existing roads in order to ease the pedestrian burden. Further travel demand management could also be considered to reduce the need to travel in peak times.
4.09	Jeremy Gray	City Property Association	We recognise the challenges created by an ever increasing cluster of tall buildings and in particular pedestrian movements, pavement widths and the need for future amenities and public realm, but the CPA considers it is imperative that the City provide more and diverse high quality floorspace in towers to compete not only with other parts of London but also other World cities. High density working in towers in the Eastern Cluster (particularly given the heritage and views constraints, in other parts of the Square Mile) is an important element to ensuring the City's continued success.
4.09	Jean-Pierre Laake		Make streets safer for cyclists, more segregated infrastructure and pedestrianisation.
4.10	Heather Hilburn		A high quality public realm is vital to mitigate the dominance of tall buildings. There should be proper community consultation on public realm schemes. There should be as many pedestrian routes as possible. Pedestrian routes through buildings are only desirable if they are under a glazed roof, and animated with retail, for example Leadenhall Market and One New Change. Undercroft space should not be accepted as a substitute for public open space. The current programme of public art in the Eastern Cluster is very helpful in animating the tall buildings at ground level, and should be formalised into a policy.
4.10	Fred Rogers		The increased number of pedestrians should mean that Bishopsgate should become traffic

Question	Name		Organisation	Comment Summary
4.10	Daniel	Rech	Quod for Merchant Land Investment Ltd	The demands on street and leisure space should be flexible to accommodate significant growth in the Eastern Cluster and other high growth locations, in order that prescriptive standards are not applied rigidly at the expense of the delivery of much-needed floorspace, and should fit with the respective constraints and characteristics of specific sites on a case-
4.10	Jonathan	Whitby		A high quality public realm is vital to mitigate the dominance of tall buildings. There should be proper community consultation on public realm schemes. There should be as many pedestrian routes as possible. Pedestrian routes through buildings are only desirable if they are under a glazed roof, and animated with retail, for example Leadenhall Market and One New Change. Undercroft space should not be accepted as a substitute for public open space. The current programme of public art in the Eastern Cluster is very helpful in animating the tall buildings at ground level, and should be formalised into a policy.
4.10	Yarema	Ronish		A high quality public realm is vital to mitigate the dominance of tall buildings. There should be proper community consultation on public realm schemes. There should be as many pedestrian routes as possible. Pedestrian routes through buildings are only desirable if they are under a glazed roof, and animated with retail, for example Leadenhall Market and One New Change. Undercroft space should not be accepted as a substitute for public open space. The current programme of public art in the Eastern Cluster is very helpful in animating the tall buildings at ground level, and should be formalised into a policy.
4.10	Jean-Pierre	Laake		Yes, make streets safer for pedestrians and cyclists, more segregated infrastructure for cyclists and pedestrianisation.
4.10	Jeremy	Gray	City Property Association	We fully support opportunities for pedestrianisation or part pedestrianisation (in terms of restricted vehicular movements during peak hours) and also potentially opportunities for shared surfaces. As and when sites come forward in the Cluster, we consider policies should look at opportunities for enhanced permeability and the provision of public realm open space.



Question	Name		Organisation	Comment Summary
4.10	Tom	Noble	City Public Realm, CoL	Yes, there will be a need for more pedestrianized routes and timed closures but we need to first
4.10	Rita	Cadavez		It makes sense to think that public realm should be looked at for improvement in this cluster. Could fewer but larger (and centrally located) open spaces be a possibility?
4.10	George	Snape	Tfl	In Tfl's opinion special emphasis should be placed on measures to improve the capacity of the public realm to cope with increased pedestrian movement in the Eastern Cluster. However, it is important to understand what this means for other modes and what changes to the modal mix would be required to support any further growth in pedestrian provision.
4.10	Yvonne	Courtney		A high quality public realm is vital to mitigate the dominance of tall buildings. There should be proper community consultation on public realm schemes. There should be as many pedestrian routes as possible. Pedestrian routes through buildings are only desirable if under a glazed roof, and animated with retail, for example Leadenhall Market and One New Change. Undercroft space should not be accepted as a substitute for public open space.
4.10	David	Rees		A high quality public realm is vital to mitigate the dominance of tall buildings. There should be proper community consultation on public realm schemes. There should be as many pedestrian routes as possible. Pedestrian routes through buildings are only desirable if they are under a glazed roof, and animated with retail, for example Leadenhall Market and One New Change. Undercroft space should not be accepted as a substitute for public open space. The current programme of public art in the Eastern Cluster is very helpful in animating the tall buildings at ground level, and should be formalised into a policy.
4.10	John	Lett	GLA	Strengthening pedestrian connections to the east and into adjoining Tower Hamlets, would be a positive strategic objective.

Question	Name		Organisation	Comment Summary
4.11	Tom	Noble	City Public Realm, CoL	East of the City 'Key City Place' sounds like a good idea. Focus will be on balancing community needs (resi/office/visitor) and the crucial role that the public realm has in stitching everything
4.11	Natasha	Downie	Historic Royal Palaces	The Aldgate area also lies centrally within the 'protected vista' included in the view from LVFM Assessment Point 25A.1 and the 'Protected Silhouette' applied to the White Tower between LVMF Assessment Points 25A.2 and 25A.3. Any moderately tall buildings within this viewing cone could appear behind the White Power and encroach on its iconic silhouette. Historic Royal Palaces would be concerned about any proposed change to the designation or extension of the existing Aldgate area that might result in, or could encourage, new tall buildings, either office or residential, in this area of high sensitivity in the backdrop to the
4.11	Yarema	Ronish		<p>The Aldgate area should be bounded by:</p> <ul style="list-style-type: none"> <li>• Devonshire Square and New Street</li> <li>• White Kenett Street</li> <li>• Stoney Lane</li> <li>• Creechurch Lane</li> <li>• Jewry Street</li> <li>• Crosswall</li> <li>• The City's east boundary</li> </ul> <p>This is a vibrant area with residential, offices and small retail and A3 premises. It will become even more vibrant once the Aldgate Gyratory scheme is completed.</p>

Question	Name	Organisation	Comment Summary
4.11	Heather Hilburn		<p>The Aldgate area should be bounded by:</p> <ul style="list-style-type: none"> <li>• Devonshire Square and New Street</li> <li>• White Kenett Street</li> <li>• Stoney Lane</li> <li>• Creechurch Lane</li> <li>• Jewry Street</li> <li>• Crosswall</li> <li>• The City's east boundary</li> </ul> <p>This is a vibrant area with residential, offices and small retail and A3 premises. It will become even more vibrant once the Aldgate Gyratory scheme is completed.</p>
4.11	Yvonne Courtney		<p>The Aldgate area should be bounded by:</p> <ul style="list-style-type: none"> <li>• Devonshire Square and New Street</li> <li>• White Kenett Street</li> <li>• Stoney Lane</li> <li>• Creechurch Lane</li> <li>• Jewry Street</li> <li>• Crosswall</li> <li>• The City's east boundary</li> </ul> <p>This is a diverse area with residential, offices, small retail and A3 premises. It will become even more vibrant once Aldgate Square is completed.</p>
4.11	John Lett	GLA	<p>Significant recent and on-going development around Aldgate is changing the nature of this area. This combined with the removal of parts of the gyratory road network and the creation of pedestrian /park areas where there was formerly highway, is leading to a much improved local environment. There is further scope for re-development and synergies/links to the immediately adjoining areas within LB Tower Hamlets are actively encouraged.</p>

Question	Name		Organisation	Comment Summary
4.11	Jeremy	Gray	City Property Association	<p>We consider that there is still merit in retaining the Aldgate KCP. We also consider this KCP could be extended to become an East of City area which reflects the unique character and challenges of this part of the City. It is considered that this extended KCP could draw on the guidance and policies in the Mayor's City Fringe SPG, where appropriate, such that the policy supports the location and the diverse mix of uses and associated challenges found in this sub-area. Future policy needs to recognise that this area is more mixed use than other parts of the City. This is something that should be embraced and supported to ensure that this area continues to thrive, whilst also supporting the City's overall Strategic Objectives.</p> <p>The CPA wishes to ensure that this area also benefits from development and opportunities in the adjoining boroughs, particularly in terms of linkages with Whitechapel High Street etc.</p>
4.11	Sophie	Hall-Thompson	London Borough of Tower Hamlets	<p>Planning Officers agree with the scope for improved movement around Aldgate and support improvements to the public realm as well as greater emphasis being placed on the encouragement of sustainable modes of transport through dedicating greater space to pedestrians and cyclists.</p>
4.11	Polly	Barker	TfL Property	<p>The Aldgate area should be promoted as a mixed residential and commercial location to ensure the current mixed use and vibrant centre is maintained. TfL Property has identified Aldgate Bus Station as a potential development site, within Aldgate and we would welcome discussions with the City of London about the future of this site - both in isolation and in the wider context of adjoining land holdings currently owned by third parties.</p>

Question	Name	Organisation	Comment Summary
4.11	Jonathan Whitby		<p>The Aldgate area should be bounded by:</p> <ul style="list-style-type: none"> <li>• Devonshire Square and New Street</li> <li>• White Kenett Street</li> <li>• Stoney Lane</li> <li>• Creechurch Lane</li> <li>• Jewry Street</li> <li>• Crosswall</li> <li>• The City's east boundary</li> </ul> <p>This is a vibrant area with residential, offices and small retail and A3 premises. It will become even more vibrant once the Aldgate Gyratory scheme is completed.</p>
4.11	David Rees		<p>The Aldgate area should be bounded by:</p> <ul style="list-style-type: none"> <li>• Devonshire Square and New Street</li> <li>• White Kenett Street</li> <li>• Stoney Lane</li> <li>• Creechurch Lane</li> <li>• Jewry Street</li> <li>• Crosswall</li> <li>• The City's east boundary</li> </ul> <p>This is a vibrant area with residential, offices and small retail and A3 premises. It will become even more vibrant once the Aldgate Gyratory scheme is completed.</p>
4.11	Paul Martinelli		<p>Yes, the Aldgate area still merits its own Key City Place. The area should not be extended. The main policy focus of any newly designated area should be street scene and street cleaning.</p>
4.11	Rita Cadavez		<p>Enlarging the limits of this area could bring advantages in terms of better connectivity to existing areas of interest. Aldgate still merits its Key place as there's still possibly margin for improving existing routes (pedestrian and cycles as well as main streets).</p>

Question	Name	Organisation	Comment Summary
4.11	Fred	Rogers	The incorporation of the adjoining areas into an East of City makes sense, particularly if similar resources are employed to improve both the Middlesex Street and Mansell Street residential areas. However, the absence of any extension to Sir John Cass School is both alarming and unwarranted.
4.12	Fred	Rogers	Proper protection for the residential areas should have been considered and provided for in all relevant planning approvals.
4.12	Heather	Hilburn	Residential amenity can be protected by refusing permission for nightclubs and bars. However bars in hotels are acceptable.
4.12	David	Rees	Residential amenity can be protected by refusing permission for nightclubs and bars. However bars in hotels are acceptable.
4.12	Yarema	Ronish	Residential amenity can be protected by refusing permission for nightclubs and bars. However bars in hotels are acceptable.
4.12	Jonathan	Whitby	Residential amenity can be protected by refusing permission for nightclubs and bars. However bars in hotels are acceptable.
4.12	Rita	Cadavez	By bearing in mind the functions introduced don't disturb quiet residential areas. A mixed use environment has potential to make places attractive if planned/ designed well.
4.12	Tom	Noble	City Public Realm, CoL
			Focus will be on balancing community needs (resi/office/visitor) and the crucial role that the public realm has in stitching everything together, plus the need for a study into the impact of the night-time economy.

Question	Name	Organisation	Comment Summary
4.12	Yvonne Courtney		Residential amenity can be protected by refusing permission for nightclubs and bars which mostly attract out of towners unaware that there are residents in the area. However bars in hotels are acceptable. The City needs to help foster the kind of businesses/leisure venues that attract a more discerning calibre of patron (like Marylebone High Street and St James's
4.13	Ivo de Wit		The waterfront could be used as a communal area to help bring people together in the City.
4.13	Jeremy Gray	City Property Association	<p>The Thames and the Riverside KCP understandably has a distinct character but we see no immediate need for further or more prescriptive policies for this area which can be covered by existing land use policies. Whilst some more limited housing development may be appropriate, we cannot see an overwhelming case for promoting one particular land use over any other.</p> <p>We continue to support opportunities for enhanced pedestrian movement in this sub-area as well as new areas for public realm. In particular, the City must utilise the Thames as a resource and look to the South Bank as an example to learn from. We consider there is a great opportunity to create a new piece of amenity/ leisure space for the City, which should be</p>
4.13	Rita Cadavez		Yes. The riverfront is an important asset of the London cityscape and should be seen as an opportunity for bringing more leisure and sports activities for everyone. Example of a good, well planned, riverside is Lyon.
4.13	Fred Rogers		The Northbank is considerably underdeveloped but it does not need more offices. Instead there has to be a lot more imagination in planning for the redevelopment, starting with the CoL Boys School site.
4.13	James	Port of London Authority	The PLA welcomes the continued inclusion of the Thames and the Riverside as a Key City Place in the City of London's Local Plan and the PLA's comments are concentrated on this section of the Issues and Options paper.

Question	Name	Organisation	Comment Summary
4.13	Yvonne Courtney		Offices alone do not provide sufficient vibrancy to the Riverside Walk. A more vibrant range of uses should be permitted on the City's riverside to link visitor attractions and improve the amenity of the Riverside Walk. These uses could include cafes/restaurants, sport/recreation, cultural venues, hotels, etc. Offices fronting the Thames should provide sunlit public outdoor space with ample seating at River Walk level. This will provide amenity for office workers and weekend visitors.
4.13	Jonathan Marginson	DP9 for Northern & Shell	A flexible approach should be adopted to land uses along the river between London Bridge and Tower Bridge. We would support more prescriptive guidance on the development potential of this area including the appropriate uses of sites in order to achieve a
4.13	Natasha Downie	Historic Royal Palaces	A predominance of offices facing the Riverside Walk tends to result in a lack of vibrancy along the route. Historic Royal Palaces would support a wider range of uses being allowed, to ensure this important pedestrian link to the Tower of London is more attractive to potential
4.13	John Lett	GLA	The City's overall approach to the River Thames area is supported. Recognising the need to raise tidal flood defences is welcomed, although within such limited space and historic environments, this will be challenging.



Question	Name	Organisation	Comment Summary
4.13	Heather Hilburn		<p>Offices alone do not provide sufficient vibrancy to the Riverside Walk. A more vibrant range of uses should be permitted on the City's riverside to link visitor attractions and improve the amenity of the Riverside Walk. These uses could include:</p> <ul style="list-style-type: none"> <li>• Cafes and restaurants</li> <li>• Sport and recreation</li> <li>• Cultural venues</li> <li>• Public transport</li> <li>• Offices</li> <li>• Hotels</li> <li>• Residential</li> </ul> <p>Offices fronting the Thames should provide sunlit public outdoor space with ample seating at River Walk level. This will provide amenity for office workers and weekend visitors.</p>
4.13	Yarema Ronish		Offices alone do not provide sufficient vibrancy to the Riverside Walk.
4.13	David Coleman		The Riverside is one of only three small areas in the City which meets WHO guidance on peace and quiet for recreational areas (see Open Spaces Strategy). The Plan should offer the strongest protection to this rare commodity, ruling out further retail and leisure uses and requiring redeveloped offices to pull back slightly from the river, making more space for
4.13	Keira Murphy	Environment Agency	Development on the riverside should bear in mind the vulnerability classification from the Planning Practice Guidance (tables 1-3) and the sequential approach in the NPPF (para 100-

Question	Name		Organisation	Comment Summary
4.13	Jonathan	Whitby		<p>Offices alone do not provide sufficient vibrancy to the Riverside Walk. A more vibrant range of uses should be permitted on the City's riverside to link visitor attractions and improve the amenity of the Riverside Walk. These uses could include:</p> <ul style="list-style-type: none"> <li>• Cafes and restaurants</li> <li>• Sport and recreation</li> <li>• Cultural venues</li> <li>• Public transport</li> <li>• Offices</li> <li>• Hotels</li> <li>• Residential</li> </ul> <p>Offices fronting the Thames should provide sunlit public outdoor space with ample seating at River Walk level. This will provide amenity for office workers and weekend visitors.</p>
4.13	Tom	Noble	City Public Realm, CoL	<p>There should be a greater mix of uses on the Riverside with more retail/restaurant and resi to add vitality and interest throughout the week. Buildings should also be encouraged to have a riverfront entrance and should allow sufficient space for a generous riverwalkway with new public spaces where possible. The new TTT works will create a major new public space which needs to be activated by commercial uses.</p>
4.14	Jeremy	Gray	City Property Association	<p>Where practical, feasible and viable we would support greater use of the River for the transportation of people and the servicing of buildings.</p>
4.14	Tom	Noble	City Public Realm, CoL	<p>Yes, in particular the reuse of redundant piers needs to be encouraged.</p>

Question	Name	Organisation	Comment Summary
4.14	Heather	Hilburn	Public transport on the river should be encouraged, and unused piers should be brought back into use. This will reduce current congestion at Tower Pier. Use of the river for servicing buildings in the City should only be allowed where this does not interfere with pedestrian use of the Riverside Walk. The covered walkway at Walbrook Wharf which is closed to pedestrians during servicing movements is an example of servicing which detracts from pedestrian amenity, and should not be repeated.
4.14	Jonathan	Whitby	Public transport on the river should be encouraged, and unused piers should be brought back into use. This will reduce current congestion at Tower Pier. Use of the river for servicing buildings in the City should only be allowed where this does not interfere with pedestrian use of the Riverside Walk. The covered walkway at Walbrook Wharf which is closed to pedestrians during servicing movements is an example of servicing which detracts from pedestrian amenity, and should not be repeated.
4.14	James	Trimmer	Port of London Authority
			The PLA welcomes reference to its Vision for the Thames and would like to work with the City of London on the possible reinstatement of Swan Lane Pier, locations for new moorings, potential opportunities at Customs House and potential for greater use of the river for future servicing of City buildings.
4.14	Fred	Rogers	Greater use should be made of water transport, especially for freight but there is the danger that the river will become too busy. Also there appears to be no control over the amount of pollution generated by river traffic.
4.14	Yvonne	Courtney	Public transport on the river should be encouraged, and unused piers should be brought back into use. This will reduce current congestion at Tower Pier. Use of the river for servicing buildings in the City should only be allowed where this does not interfere with pedestrian use of the Riverside Walk. The covered walkway at Walbrook Wharf which is closed to pedestrians during servicing movements is an example of servicing which detracts from pedestrian amenity, and should not be repeated.

Question	Name		Organisation	Comment Summary
4.14	Rita	Cadavez		Though not sure how, it would be good to think that the river could be used as a way for better transport.
4.14	John	Lett	GLA	The promotion of river transport is welcomed. The replacement Blackfriars Pier should offer some scope for improved river services. The continued use of Walbrook Wharf for river freight is in line with London Plan policy and welcomed, and opportunities to expand river freight will generally be encouraged, although it is difficult to see a lot of scope for this at present. The use of river transport during construction/demolition phases of riverside development is one area where a requirement/preference for those modes could reasonably be expressed.
4.14	George	Snape	Tfl	TfL is very supportive of increased passenger and freight movement on the river, and would welcome retention and enhancement of river transport infrastructure at Blackfriars Pier and Walbrook Wharf. TfL would also welcome the encouragement by the City of London of greater use of the river for deliveries and servicing during construction and subsequently. TfL believes that bringing piers back into operation is certainly worth investigation – this topic will be looked at in the Pier Strategy that TfL and the Port of London Authority will be working on together. In respect of the proposal to reopen Swan Pier the City of London may like to also look at the possible reinstatement of Custom House Pier to see which may present the greater opportunity for the City of London and river services.
4.14	David	Rees		Public transport on the river should be encouraged, and unused piers should be brought back into use. This will reduce current congestion at Tower Pier. Use of the river for servicing buildings in the City should only be allowed where this does not interfere with pedestrian use of the Riverside Walk. The covered walkway at Walbrook Wharf which is closed to pedestrians during servicing movements is an example of servicing which detracts from pedestrian amenity, and should not be repeated.

Question	Name		Organisation	Comment Summary
4.14	Yarema	Ronish		Public transport on the river should be encouraged, and unused piers should be brought back into use. This will reduce current congestion at Tower Pier. Use of the river for servicing buildings in the City should only be allowed where this does not interfere with pedestrian use of the Riverside Walk. The covered walkway at Walbrook Wharf which is closed to pedestrians during servicing movements is an example of servicing which detracts from pedestrian amenity, and should not be repeated.
4.14	Natasha	Downie	Historic Royal Palaces	Historic Royal Palaces would support great use being made of the river for public transport and unused piers being brought back into use. This would benefit the Tower WHS by helping to reduce current congestion on Tower Pier.
4.15	Tom	Noble	City Public Realm, CoL	Yes. However, the flood defence is a key issue. May be useful to have a policy for this.
4.15	Graham	Saunders	Historic England	The River Thames is a strategic asset of significant heritage interest in terms of the development of the City and Greater London. It provides especially in the heart of London 'breathing' space in which to appreciate and understand the City and its development. A change in policy direction supporting development both along the River, including its wharves, would impact upon the qualities the River provides. In addition if development was encouraged along the foreshore then careful consideration would need to be made to the areas heritage interest in terms of archaeology and built heritage.
4.15	Yarema	Ronish		A more flexible approach could be taken to development on or over the river, consistent with creating a vibrant Riverside Walk while securing flood defences and future maintenance of the embankment. If a more flexible approach is taken to development on the riverside, additional guidance on riverside views would be required.
4.15	Rita	Cadavez		Yes.

Question	Name	Organisation	Comment Summary
4.15	John Lett	GLA	The aim of completing the Thames Path around Queenhithe, and maintaining an open river are supported is supported. Any development into the river – such as for piers, essential infrastructure etc. should be kept to a minimum and maintain open river views.
4.15	Natasha Downie	Historic Royal Palaces	We would hope that a more flexible approach, consistent with creating a vibrant Riverside Walk, might be taken to development on or over the river, while securing the necessary flood defences and future maintenance of the river bank.
4.15	David Coleman		The openness of the river landscape is absolutely a key feature of the City environment. In addition to public benefits for quiet recreation and biodiversity, this landscape benefit should be afforded the highest level of protection. No garden bridges!
4.15	Fred Rogers		The river needs to be seen and enjoyed. Not covered up by ever more unnecessary
4.15	Jeremy Gray	City Property Association	We endorse the sentiment of question 4.15, and the CPA supports the City on the various initiatives for the River.
4.15	Heather Hilburn		A more flexible approach could be taken to development on or over the river, consistent with creating a vibrant Riverside Walk while securing flood defences and future maintenance of the embankment. If a more flexible approach is taken to development on the riverside, additional guidance on riverside views would be required.
4.15	Jonathan Whitby		A more flexible approach could be taken to development on or over the river, consistent with creating a vibrant Riverside Walk while securing flood defences and future maintenance of the embankment. If a more flexible approach is taken to development on the riverside, additional guidance on riverside views would be required.

Question	Name	Organisation	Comment Summary
4.15	Keira Murphy	Environment Agency	<p>Development on or over the river should be resisted and continue the protection of the foreshore in line with Policy 7.28 of the London Plan.</p> <p>For developments close to the river, land should be safeguarded to enable future flood defence raising, provision of amenity for residents and visitors and enhancement of biodiversity.</p> <p>Maintaining the openness of the river allows for inspection, maintenance and improvement</p>
4.15	David Rees		<p>A more flexible approach could be taken to development on or over the river, consistent with creating a vibrant Riverside Walk while securing flood defences and future maintenance of the embankment. If a more flexible approach is taken to development on the riverside, additional guidance on riverside views would be required.</p>
5.01	Yvonne Courtney		<p>The City should adopt a more considered approach to the massing of buildings, taking into account cityscape, quality of views, protected views and heights of buildings. At the moment each tall building takes a different approach to massing, which means that the City lacks a coherent identity.</p>
5.01	Yarema Ronish		<p>The City should adopt a more considered approach to the massing of buildings, taking into account cityscape, quality of views, protected views and heights of buildings. At the moment each tall building takes a different approach to massing, which means that the City lacks a coherent identity.</p>

Question	Name	Organisation	Comment Summary
5.01	Oliver Caroe	Chapter of the Cathedral Church of St Paul	<p>The Cathedral is keen to endorse the highest quality design and materials in buildings (new and proposed alterations) and public realm and also to promote and enhance rigour in assessing the visual and qualitative impact of proposed developments – including impacts of daylight, wind, noise, pollution or pedestrian flows which define how public spaces can be occupied. In our responses to a number of planning consultations we have sought to highlight where impact assessments fall short of expectations. We would welcome stronger guidance and advice which ensures quantifiable standards are achieved.</p> <p>Chapter would endorse a clearly expressed aspiration for a comprehensive programme of environmental and public realm enhancement around the Cathedral which might lead to an ‘Area Strategy’ for the St Paul’s Conservation area and public realm. There are existing City programmes for Fleet Street and Cheapside enhancement strategies and an emerging Churchyard Programme – we would like to see these enhancement strategies ‘joined up’. Branding this enhancement initiative as a ‘World Square for St Paul’s’ – in a holistic area strategy - might be a useful driver for change over the period of the Local Plan. Chapter would want to partner the City on giving form to this concept if members are so minded.</p>
5.01	Graham Saunders	Historic England	<p>Design – we would seek to ensure the heritage interest and distinctiveness of a place, space or buildings are used to inform the development and delivery of high quality proposals and changes (NPPF para 58). This includes demonstrating a clear understanding of the significance of heritage assets, whether they are directly affected, or would be impacted through their</p>
5.01	Fred Rogers		<p>Whatever, design issues are to be considered, the Local Plan should clearly set out not only what “good” design is required to be but also the specific parameters against which it is to be</p>
5.01	Heather Hilburn		<p>The City should adopt a more considered approach to the massing of buildings, taking into account cityscape, quality of views, protected views and heights of buildings. At the moment each tall building takes a different approach to massing, which means that the City lacks a coherent identity.</p>



Question	Name		Organisation	Comment Summary
5.01	Polly	Barker	TfL Property	TfL Property will always seek to ensure quality development and support policies which seek this. However, we would request that any further detail within the design policies should be sufficiently flexible to adapt to the differing economic viability of development schemes so as not to restrict delivery and to ensure conformity with para 14 of the NPPF.
5.01	Chris	Thomas	British Sign & Graphics Association	We consider the existing policies on advertisement control to be far too rigid, prescriptive and detailed. Careful consideration must be given to all development proposals, but this must not prevent development and progress. City centres must continually renew their offering and attractions. We propose that the present detailed policies be completely deleted. They could be replaced with a very simple policy to the effect that all advertisements must be considered on the basis of amenity and public safety; that special attention will be required where listed buildings/ancient monuments (and their settings) may be affected; and that all advertisements must preserve or enhance the character or appearance of the conservation area. We do not see how such an approach could weaken the Council's ability to control advertisement displays; yet it would demonstrate that the Council are open to new
5.01	Jonathan	Whitby		The City should adopt a more considered approach to the massing of buildings, taking into account cityscape, quality of views, protected views and heights of buildings. At the moment each tall building takes a different approach to massing, which means that the City lacks a coherent identity.
5.01	Jeremy	Gray	City Property Association	We consider the City's current design policies are working well and we do not consider that there is any immediate need for significant alterations or revisions to the current design policies. We support the City's approach to advertising, although it is important that occupier and
5.01	Rita	Cadavez		While the concentration of high rise buildings in the City is one of the main attractions of this area, a lot could be improved, eg. the aesthetic and built quality of major developments; the quality of the surrounding public spaces; and better connections on approaching some"iconic" buildings.

Question	Name	Organisation	Comment Summary
5.01	Jane	Bickerton	Footpaths that connect the various art and cultural sights. Clear signage for public transport. A walking only environment. Specific times for required van deliveries. Electric transport with a focus on the disabled. Creative spaces developed for artists and craftsmen. Livery halls providing historical references to mastering particular skills. Noise and air environmental pollution need careful consideration and the strategic use of plants etc could facilitate this.
5.01	Helen	Kay	Barbican Association *Daylight and sunlight. We would like to see calculations made by developers exclude the effect of balconies. The fact that they can use the existence of balconies to show that their buildings do not much affect daylight and sunlight – when they manifestly do – adds injury to insult for residents. This provision alone has allowed huge buildings to be built close to residential flats, spoiling the listed landscape, reducing daylight and increasing light pollution from artificial lighting. *The current restrained policy on advertising is welcomed *Roof terraces cause nuisance next to residential areas - their use should be restricted after 7pm. * Plate glass windows should be limited in order to reduce light exposure, reduce danger of
5.01	Sakiba	Gurda	London Borough of Islington We support an approach to design that seeks to better integrate sustainability, access, safety and security requirements into design from the earliest stages, and agree that it would be beneficial to combine these policies insofar as possible.
5.01	David	Rees	The City should adopt a more considered approach to the massing of buildings, taking into account cityscape, quality of views, protected views and heights of buildings. At the moment each tall building takes a different approach to massing, which means that the City lacks a coherent identity.

Question	Name	Organisation	Comment Summary
5.02	David Rees		<p>Hotel uses should be encouraged:</p> <ul style="list-style-type: none"> <li>• Near major visitor attractions</li> <li>• Near major transport nodes, especially those with direct links to airports</li> </ul> <p>Large hotels should only be located on sites which are suitable for taxi and coach drop-off and servicing.</p>
5.02	Paul Martinelli		<p>The City should be the destination not the hotel area. We should retain the City as a commercial centre with a strong heritage and cultural offering. Hotel use should be</p>
5.02	Jeremy Gray	City Property Association	<p>The CPA supports hotels in appropriate locations which support business and tourist functions. It is expected that the Cultural Hub initiative, the opening of Crossrail and the continued development of the City generally will increase demand for hotel rooms. Hotels could be encouraged in the Cultural Hub, although a geographic based policy, which identifies some areas while excluding others, for hotels is not necessarily supported. Each site must be considered on its own merits. We consider that hotels should be allowed where appropriate and where these support the overall mix of the City. It is expected that the demand for hotels will continue to grow in the City over the Plan period, and this should be acknowledged and reflected in policy. Hotels can play a positive role in providing character and amenity and this</p>
5.02	Jonathan Whitby		<p>Hotel uses should be encouraged:</p> <ul style="list-style-type: none"> <li>• Near major visitor attractions</li> <li>• Near major transport nodes, especially those with direct links to airports</li> </ul> <p>Large hotels should only be located on sites which are suitable for taxi and coach drop-off and servicing.</p>
5.02	Fred Rogers		<p>There are far too many hotels and not enough hostels and similar accommodation.</p>

Question	Name		Organisation	Comment Summary
5.02	Sakiba	Gurda	London Borough of Islington	The consultation document identifies that the Cultural Hub will generate a significant number of visitors. This will necessitate additional facilities such as hotels. We note that the consultation document proposes a co-ordinated approach with areas immediately beyond the City's boundary. Islington has limited capacity for new hotels beyond those identified in the development pipeline. We note that boroughs further afield, specifically well-connected locations within 30 minutes of specific tourist attractions, could play a role in meeting demand for visitor accommodation (the so-called 'dispersal approach').
5.02	Yarema	Ronish		<p>Hotel uses should be encouraged:</p> <ul style="list-style-type: none"> <li>• Near major visitor attractions</li> <li>• Near major transport nodes, especially those with direct links to airports</li> </ul> <p>Large hotels should only be located on sites which are suitable for taxi and coach drop-off and servicing.</p>
5.02	Rita	Cadavez		Hotel provisions should preferably have easy connections to main mobility points such as rail/ tube. St Pauls and Farringdon/ Barbican/ Smithfield might be points for consideration.
5.02	John	Lett	GLA	The provision of additional hotel accommodation (for instance in City fringe areas) is welcomed in principle and needs to be balanced against the other functions of the CAZ. Areas around the fringes of the City with good public transport access and avoiding the Commercial Core are likely to be best able to support this fine balance.
5.02	Heather	Hilburn		<p>Hotel uses should be encouraged:</p> <ul style="list-style-type: none"> <li>• Near major visitor attractions</li> <li>• Near major transport nodes, especially those with direct links to airports</li> </ul> <p>Large hotels should only be located on sites which are suitable for taxi and coach drop-off and servicing.</p>

Question	Name		Organisation	Comment Summary
5.02	Yvonne	Courtney		<p>Hotel uses should be encouraged:</p> <ul style="list-style-type: none"> <li>• Near major visitor attractions</li> <li>• Near major transport nodes, especially those with direct links to airports</li> </ul> <p>Large hotels should only be located on sites which are suitable for taxi and coach drop-off and servicing. Too many 'apart-hotels' are taking over traditional buildings (with fairly low calibre branding/service/clientele etc) which could be more dynamically used as creative hubs / meeting points, exercise studios, etc.</p>
5.02	Helen	Kay	Barbican Association	Hotels are not a good mix with residences because of hotel patrons arriving at all hours of the day and night. Hotels near St Paul's could serve the cultural hub.
5.03	Paul	Martinelli		There should be a zero hotel bedroom target.
5.03	Helen	Kay	Barbican Association	Targets for numbers of new hotel bedrooms are not supported. The City is already well served with hotels both inside and outside the Square Mile. Hotel growth should be restricted to areas adjacent to St Paul's where it will serve principal business areas and the cultural hub.
5.03	Jane	Bickerton		Hotels in the area should be encouraged to support art and design including where possible references to the history of the livery halls.
5.03	Fred	Rogers		Already there are almost as many hotel rooms as residents and even more are in the pipeline whilst no more cheap accommodation is planned.
5.03	Jeremy	Gray	City Property Association	A policy which sets a target for a specific number of hotel rooms is not supported.

Question	Name		Organisation	Comment Summary
5.04	Paul	Martinelli		The purpose of Crossrail is to enable easier entry and access the busy City area.
5.04	Jane	Bickerton		Accommodation in the arts and cultural sector should cater more to the tourist.
5.04	David	Rees		It is not practical to prioritise accommodation for business visitors. Hotels trade 7 days a week, so they cater to a mix of visitor types.
5.04	Oliver	Caroe	Chapter of the Cathedral Church of St Paul	Visitors are key to the current and future sustainability of St Paul's in all aspects of its mission. The Cathedral recognises a balance is required between business and visitor accommodation but would be keen to see initiatives that promote visits to the City and prolonged stays (and associated spending); thus the Cultural Hub is warmly welcomed. The Cathedral endorses guidance that promotes the role of a high standard of public realm in supporting a diverse range of activities, experiences and cultures.
5.04	Ivo	de Wit		There is more tourism which requires additional hotels and restaurants.
5.04	Helen	Kay	Barbican Association	Hotel accommodation for business visitors should be prioritised over accommodation for tourists. The whole thrust of City Strategy is that the City is a business district, the engine of a vast economy. It's a very small area (with congested streets) and not far to visit for tourists staying in surrounding areas. There is no need to build hotels to accommodate tourists.
5.04	Jeremy	Gray	City Property Association	The market, rather than planning, should determine the type of hotel accommodation that is to be provided.

Question	Name	Organisation	Comment Summary
5.04	Jonathan	Whitby	It is not practical to prioritise accommodation for business visitors. Hotels trade 7 days a week, so they cater to a mix of visitor types.
5.04	Fred	Rogers	It is difficult to understand why any visitors would wish to stay in the City when there are far better offers elsewhere in London. There is no evidence that visitors to the Cultural Hub would require hotels, especially without the proposed concert hall. The introduction of 24-hour tube services must lead to similar rail services, particularly within Greater London.
5.04	Heather	Hilburn	It is not practical to prioritise accommodation for business visitors. Hotels trade 7 days a week, so they cater to a mix of visitor types.
5.04	Yarema	Ronish	It is not practical to prioritise accommodation for business visitors. Hotels trade 7 days a week, so they cater to a mix of visitor types.
5.04	Rita	Cadavez	Both business and tourist visitors are important and should have designated accommodation in the City.
5.04	Yvonne	Courtney	Prioritising accommodation for business visitors is probably the most appropriate - and possibly high end cultural visitors.
5.05	Jonathan	Whitby	The Local Plan should encourage more visitors in line with the Visitor Strategy and Cultural Strategy. Visitors need to be able to find their way, move around the City safely on foot, be able to stop for hot drinks and food, find a toilet and be able to sit and rest in a pleasant environment. Appropriate seating and public art should be provided. A3 uses should be encouraged on tourist routes. The City should continue the provision of public art in the Eastern Cluster and other visitor routes.

Question	Name		Organisation	Comment Summary
5.05	Rita	Cadavez		The City has a great cultural centre at its core, plus a few galleries but the major difficulty is in dealing with deserted areas during non-working hours. It might be interesting if some more flexibility would be provided for the use of spaces on street level.
5.05	Segun	Lee-French	Arts Development Officer Libraries, Arts, Work and Adult Learning Children's Services Islington Council	Yes, more activities in the street bring life to the City, particular in the evenings and weekends, when the low numbers of residents can make the City feel like a ghost town.
5.05	Heather	Hilburn		The Local Plan should encourage more visitors in line with the Visitor Strategy and Cultural Strategy. Visitors need to be able to find their way, move around the City safely on foot, be able to stop for hot drinks and food, find a toilet and be able to sit and rest in a pleasant environment. Appropriate seating and public art should be provided. A3 uses should be encouraged on tourist routes. The City should continue the provision of public art in the Eastern Cluster and other visitor routes.
5.05	Sharon	Ament	Museum of London	Whilst a new Museum of London will undoubtedly attract more visitors, if it is well designed and well managed, then the impact on the local area can be minimised, whilst at the same time bringing economic and social benefit to the businesses and residential communities nearby. At present we are not considering the promotion of on street activity in and around West Smithfield, be that street entertainment, food stall, tourist stands or other types of temporary installations.
5.05	Peter	Rose		Much better litter collection particularly at weekends to cater for increased visitor numbers.
5.05	Jane	Bickerton		Artists and craftsmen should be given incentives to provide on street workshops along walk only streets in the arts and cultural hub.



Question	Name	Organisation	Comment Summary
5.05	Ross Anthony	Theatres Trust	<p>The local plan should support the arts and culture at all levels and ensure that all residents and visitors have access to a wide range of cultural opportunities. Policies should protect, support and enhance cultural facilities and activities, and promote cultural led development as a catalyst for regeneration in opportunity areas.</p> <p>Safeguarding and protecting existing cultural venues is important as they are often targeted for replacement by for more commercially lucrative developments.</p> <p>In line with the NPPF, the Theatres Trust would support the retention (though updated) of existing policy CS11 and DM11.1.</p>
5.05	Yarema Ronish		<p>The Local Plan should encourage more visitors in line with the Visitor Strategy and Cultural Strategy. Visitors need to be able to find their way, move around the City safely on foot, be able to stop for hot drinks and food, find a toilet and be able to sit and rest in a pleasant environment. Appropriate seating and public art should be provided. A3 uses should be encouraged on tourist routes. The City should continue the provision of public art in the Eastern Cluster and other visitor routes.</p>
5.05	Oliver Caroe	Chapter of the Cathedral Church of St Paul	<p>The promotion of visitors must be supported by the provision of facilities for all people to facilitate their stay in the City. We feel that the provision of public WCs is essential so that one can plan a day out as a visitor to the City; about which current policy is quiet. The provision of 'changing places' and facilities for people with disabilities in a co-ordinated way</p>
5.05	Jack Skillen	Team London Bridge	<p>There is scope to celebrate the Thames more, and we suggest working in partnership to deliver innovative solutions that promote the area to more visitors and enhance the river</p>
5.05	Fred Rogers		<p>No, the Local Plan should not encourage uses and activities which attract more visitors, until there is clean air and no traffic.</p>

Question	Name		Organisation	Comment Summary
5.05	Trevor	G		Yes, the Local Plan should attract non-business visitors. Yes, this should include on-street activities. If technology and popular culture can be combined with history to attract a younger audience from teens to thirties, that would ensure the City provides value for more than tourists from abroad and retirees. On-street activities could include activities that encompass some of the vast history of the City e.g. re-enactments, historical story-telling with outdoor large screens, street art. The tunnel is a dull, dreary and often dirty first impression when approaching the Barbican. As an example, the Beech Street tunnel is a dull, dreary and often dirty first impression when approaching the Barbican. If this tunnel was to become walls where artists could exhibit their work, this would extend the culture of the Barbican to much wider audience. It could also entice more of the public to visit the Barbican
5.05	Helen	Kay	Barbican Association	<p>We see no point in attracting visitors just for the sake of it. The City is interesting enough to attract visitors already, and if the cultural hub institutions put on attractive events and exhibitions visitors will come anyway.</p> <p>What sort of cultural hub do you want to encourage? There are plenty of places in London for any visitor (or resident) to get street food (including in the City). There is no need to create more, particularly around residential areas.</p> <p>The approach to St Pauls from the Millenium Bridge and on the bridge itself is spoilt by street vendors and entertainers.</p>
5.05	Jeremy	Gray	City Property Association	The CPA supports the Cultural Hub and the diversification of the City's primary business function to ensure the City is more attractive to visitors. There will also be a benefit to the evening and weekend economies, which should be encouraged. The City should also continue to promote public realm, landscaping, public art, street markets etc which would provide amenities for workers, visitors and tourists.
5.05	Natasha	Downie	Historic Royal Palaces	The City is already encouraging more visitors through its Visitor Strategy and Cultural Strategy, to which the Tower contributes; the new Local Plan should reflect these strategies.

Question	Name	Organisation	Comment Summary
5.05	Yvonne Courtney		More and more visitors are visible at the weekend, especially in the Eastern cluster which is making an impact on noise/litter etc. This should continue to be at the forefront of all new developments, ensuring that old passageways and pedways are protected. It is frustrating that certain public realm thoroughfares are gated/locked at the weekend. The public art scheme in the Eastern cluster attracts tourists, but there needs to be more engagement/collaboration with local artisans/creatives, which will have more resonance/help people feel proud of where they live and work.
5.05	David Rees		The City is already encouraging more visitors through its Visitor Strategy and Cultural Strategy. Therefore the Local Plan should follow suit. Visitors need to be able to find their way, move around the City safely on foot, be able to stop for hot drinks and food, find a toilet and be able to sit and rest in a pleasant environment. The City should carry out research on existing visitor routes, including at weekends, and show these routes on a diagram. Visitor routes should be enhanced to reduce street clutter and improve wayfinding and pedestrian safety. A3 uses should be encouraged on tourist routes.
5.06	Jane Bickerton		The focus of the hub should be on our arts and cultural heritage as well as its future development. So I would argue that the Barbican is not an appropriate business base for Gnewt Cargo which is undergoing a pilot study to be based there. It would increase traffic flow in the neighbourhood adding to noise, air and traffic movement in Low Emission Neighbourhood. It would increase concerns about health and safety.
5.06	Jeremy Gray	City Property Association	We consider policies in respect of heritage assets should continue to reflect the National Planning Policy Framework and the Planning Practice Guide.

Question	Name	Organisation	Comment Summary
5.06	Fred Rogers		<p>By 2035, post WW2 building will be up to 90 years old, whilst early 21st Century buildings will be 35 years old. Already buildings built within the last 35 years have been listed and a greater respect will need to be shown to all post WW2 buildings to preserve those that have survived so far. There should certainly be protection for nondesignated heritage assets.</p> <p>Heritage assets must, of course, be protected and offending development proposals rejected. There is also a sustainable case for the whole of the Square Mile being made a conservation area.</p>
5.06	John Lett	GLA	<p>The City has a good record of protecting and enhancing the historic environment and protected views and bringing historic buildings back into viable uses. A continuation of this approach is encouraged and careful attention to the setting of the Tower of London is encouraged, in close co-operation with LB Tower Hamlets.</p>
5.06	Graham Saunders	Historic England	<p>We welcome the City's commitment to developing a Historic Environment SPD, with the need to gather evidence to inform this important and useful piece of planning. This approach with clear policy hooks in the Local Plan should help inform the management of all heritage assets and their settings plus provide support to the conservation and enhancement of non-designated heritage assets, which contribute to the diversity and attractiveness of the City. The Local Plan could also provide a policy that encourages heritage-led regeneration, whether this is the sensitive adaptation and re-use of heritage assets, or as part of a wider townscape rejuvenation scheme. The policy could for example include principle, which should be applied to ensure heritage assets are not unnecessarily lost or harmed, but integrated successfully into new proposals and uses. This could include understanding with clarity the significance of an asset, in order to identify the opportunities for change.</p>
5.06	Paul Martinelli		<p>Growth should be vertical rather than lateral.</p>

Question	Name		Organisation	Comment Summary
5.06	Oliver	Caroe	Chapter of the Cathedral Church of St Paul	The Cathedral is supportive of a Local Plan that helps to conserve and enhance the significance of the heritage assets and their setting. Policies and guidance should consider non-designated heritage assets as these are part of the rich historic fabric of the City. This raises questions of process and how these assets will be identified and taken into account. We look forward to seeing the forthcoming Heritage Assets Supplementary Planning Document (SPD) due for consultation.
5.06	Richard	Hillebron	Conservation Area Advisory Committee	The current Local Plan was of course adopted quite recently in 2015. It contains admirable policies dealing with the way that the Local Plan can help new development conserve and enhance the significance of heritage assets (DM 12.1 to 5). These should be repeated. Similarly, it does the same for settings (DM21.1 4.) Non designated heritage assets are rather more problematic in that they might mean different things to different people. If they are within a conservation area or in the setting of a listed building then they could be given some protection by that means.
5.06	Sharon	Ament	Museum of London	We note that at 2.2 you report that the City welcomes around 10.5 million visitors pa. The Plan implies at 5.6 that you seek to attract more visitors and this is welcome. We wonder if a target will be set for this? From our perspective, a bigger and better Museum of London can play a key role in achieving this growth. We currently attract over 1 million visitors a year, and aspire to attract over 2 million visitors to a new museum.
5.06	Tom	Noble	City Public Realm, CoL	If the setting of a heritage asset is considered significant, that should form part of either the listing or the Conservation Area designation. Including policies on non-designated heritage assets is not considered to add value as such assets may take a whole host of different forms. Developments affecting such assets should be dealt with on a case-by-case basis.

Question	Name		Organisation	Comment Summary
5.06	Helen	Kay	Barbican Association	<p>We would like to see the Barbican and Golden Lane estates designated as conservation areas. At present the fact of being listed has not prevented the setting of the Barbican estate being spoilt by modern buildings of much vaster scale and completely unrelated architectural styles being built within metres of the estate.</p> <p>The City has many heritage assets and it has not in general served them well. They are dwarfed by modern commercial buildings of indifferent quality and mediocre design.</p>
5.06	Rita	Cadavez		<p>Heritage assets deserve their place in the modern city within the urban grid. This could be an opportunity to open some spaces to the public and to have interested groups/ organizations exploring the spaces (eg cinema projections in existing places/ requalification of spaces for use of the public)</p>
5.07	Trevor	G		<p>My suggestion in 5.5 (relating to on-street activities such as street art) can be used to boost future relevance of heritage assets to a much wider audience. An audience that currently may have little interest but could be made to feel invited with an artwork they feel they have access to.</p>
5.07	Richard	Hillebron	Conservation Area Advisory Committee	<p>The use of Heritage assets will depend on what proposals are brought forward by those involved in the ownership and management of them. A good example is the concept of the Museum moving to the problematic Smithfield site.</p>
5.07	Tom	Noble	City Public Realm, CoL	<p>Heritage assets take many forms and it should be down to individual designers to ensure that the functionality of such assets is maximized for future benefits.</p>
5.07	Fred	Rogers		<p>The flexible and adaptable use of heritage assets should be addressed by those better equipped to do so.</p>

Question	Name	Organisation	Comment Summary
5.07	Sharon	Ament	Museum of London In relation to Question 5.7 we believe the answer is a resounding “yes” and that is what we will seek to deliver at West Smithfield.
5.07	Rita	Cadavez	Heritage assets deserve their place in the modern city within the urban grid. This could be an opportunity to open some spaces to the public and to have interested groups/ organizations exploring the spaces (eg cinema projections in existing places/ requalification of spaces for use of the public)
5.07	Helen	Kay	Barbican Association Do not surround heritage assets with inappropriately designed and oversized blocks so that their legacy can be protected and residents, workers and visitors are able to view and enjoy them. The Barbican podium was an innovation ahead of its time and the extension of these through the City could give pedestrians greater safety and an enhanced experience especially at peak times. The London Wall Place scheme has created such an above pavement thoroughfare. The Current Barbican Highwalks network should be protected where it extends beyond the estate, lest the Barbican be cut adrift from its surrounding City Future plans should build on the current north-south routes and east-west routes across the Barbican Estate via the existing Highwalks and the existing surrounding streets at street level
5.07	Jane	Bickerton	The heritage assets can be extended through related contemporary skills and products in their local vicinity. The rich heritage can also be shared through creative IT approaches.
5.08	Rita	Cadavez	Yes, there should be a specific policy that protects the setting and Outstanding Universal Value of the Tower of London World Heritage Site..

Question	Name		Organisation	Comment Summary
5.08	Jeremy	Gray	City Property Association	We consider that existing policies coupled with the London Plan and London View Management Framework policies are sufficient to protect the setting and Outstanding Universal Value of the Tower of London WHS. In addition the Tower of London Management Plan remains a material consideration.
5.08	Trevor	G		This site should be protected and potentially made more accessible. The view on to the Tower of London from the Sky Gardens is a view that very few people would have ever seen. It really does show off the magnitude and brilliance of the site. This is an example of something that may have been considered too close to the site but I think has actually done it a lot of good thanks to the public garden area within the tower.
5.08	Jane	Bickerton		A policy perhaps that is integrated as well as separated. I do not understand the best approach to this but the arts and cultural hub has St Barts the oldest hospital in the world by some accounts and its area includes Charterhouse and Barts the Great.
5.08	Graham	Saunders	Historic England	We also support the intention of the City to take account of the international status of the Tower of London WHS. In this context we support the inclusion of a policy that recognises the OUV and setting of the WHS, both in terms of Local and wider settings; and links to the Tower of London WHS Management Plan and its actions.
5.08	Tom	Noble	City Public Realm, CoL	The designation of 'World Heritage Site' should be sufficient to protect the setting of the Tower of London; therefore additional policies are considered to be superfluous.



Question	Name		Organisation	Comment Summary
5.08	Natasha	Downie	Historic Royal Palaces	<p>Historic Royal Palaces would welcome and support the inclusion in the City's new Local Plan of a specific policy to protect the setting and Outstanding Universal Value (OUV) of the WHS, not least to bring together in one place all the considerations that apply to proposed development within the setting.</p> <p>It would be particularly helpful if this policy referred to the need for developers to take account of the updated WHS Management Plan 2016, which has been approved by the UNESCO's World Heritage Committee.</p>
5.08	Segun	Lee-French	Arts Development Officer Libraries, Arts, Work and Adult Learning Children's Services Islington Council	Yes, there should be a specific policy that protects the setting and Outstanding Universal Value of the Tower of London World Heritage Site.
5.08	Richard	Hillebron	Conservation Area Advisory Committee	Current Policy CS 13 does protect the setting of the Tower of London World Heritage Site and should be repeated.
5.08	Fred	Rogers		Yes, there should be a specific policy that protects the setting and Outstanding Universal Value of the Tower of London World Heritage Site.
5.08	Helen	Kay	Barbican Association	The answer is probably Yes given the importance of the site and the present thoughts of improving connectivity from the Tower through the City. In this regard however it will be interesting to note the recommendations made by the UNESCO World Heritage Committee 2016 and then respond accordingly.

Question	Name		Organisation	Comment Summary
5.09	Graham	Saunders	Historic England	We support the retention of the protected views. However we would seek to ensure views identified as part of conservation area appraisals both within and outside of the City, but looking back in, is given policy consideration in the Local Plan. In addition we would advise that while the LVFM view (River Prospect 10, Tower Bridge and Townscape View 25, the Queen's Walk to the Tower of London) should be identified the 'setting' of the Tower of London is a much broader concept and is not encompassed by fixed views. In this context consideration should be given to the setting of the WHS as part of the mechanism for
5.09	Helen	Kay	Barbican Association	Yes. In such an important and historic area, the protection of such views as those of St Paul's Cathedral and other significant City buildings and skylines are vitally important.
5.09	Jane	Bickerton		I think we should try to maintain local view protection and be very careful with new building
5.09	Oliver	Caroe	Chapter of the Cathedral Church of St Paul	Views management and protection is vital, including at local level. The Cathedral wishes to engage more deeply with the London Views Management Framework and views protected by the GLA and the Mayor of London to ensure that these policies remain understood and fit for purpose. Recent publicity and planning decisions identifies shortcomings. Chapter supports the City in maintaining the current level of protection, which we feel is both necessary and effective, however there are emerging questions on view protection principles and development pressures that we feel should be clarified, because the primary objective of policy must be to give developers and land-owners certainty.
5.09	Richard	Hillebron	Conservation Area Advisory Committee	The current approach to view protection is admirable and should be maintained. In particular it is noted that the City now has access to a 3D model which identifies all conservation areas and viewing corridors and backdrops. Tall buildings would be inappropriate in such areas. This overlay demonstrates where any new tall building may possibly be feasible.

Question	Name	Organisation	Comment Summary
5.09	Peter Rose		More focus on view protection within the City
5.09	Tom Noble	City Public Realm, CoL	The current approach to local view protection through implementation of the LVMF should be maintained.
5.09	Fred Rogers		Yes, the City Corporation should maintain the current approach to local view protection in the
5.09	Paul Martinelli		Yes, the current approach to local view protection in the City should be maintained.
5.09	Jeremy Gray	City Property Association	The CPA supports the current approach to local view protection and we do not see any immediate case or need, to review or change current view protection policies.
5.09	Natasha Downie	Historic Royal Palaces	Insofar as this applies to the Tower WHS and its local setting, Historic Royal Palaces would support maintaining the City's current approach, in particular in relation to the recommendations contained in the Tower Management Plan 2016 and the Tower of London Local Setting Study 2010. We would ask that the new Local Plan continues to cite the latter as guidance to be taken into account by developers drawing up development proposals likely to affect the key local views of and from within the WHS as identified in the Study.
5.09	Rita Cadavez		Yes if possible.
5.09	Trevor G		The Sky Garden is an example of a building that may have interrupted views for some but has opened up views to the public now. This type of roof area that opens views to the public should be encouraged.

Question	Name		Organisation	Comment Summary
5.10	Jeremy	Gray	City Property Association	We understand that the new Mayor of London will shortly be reviewing the London View Management Framework, and we would suggest that any review of local view protection should be considered as part of this exercise.
5.10	Tom	Noble	City Public Realm, CoL	Current view protection policies affect development in the City by restricting the height of developments. If the policies are changed, heights in locations where policies are relaxed would certainly increase.
5.10	Natasha	Downie	Historic Royal Palaces	<p>Historical Royal Palaces would be very concerned about any reduction in the City's current view protection policies that could result in an increase in the impact of major development on the setting of the Tower of London WHS.</p> <p>Paragraph 5.22 comments that 'There has been a substantial increase in tall building developments in the last 10 years in the City... There are currently [September 2016] 14 tall buildings in the development pipeline in the City. Further schemes are likely to come forward over the life of the new Plan'. It also notes that tall buildings are not the only means of accommodating growth and other options need to be explored in areas where tall buildings are not appropriate.</p>
5.10	Fred	Rogers		The current view protection policies prevent abusive development, which could not be resisted without them.
5.10	Paul	Martinelli		We have sufficient space for the period covered within this Local Plan without amending the current views policy.

Question	Name		Organisation	Comment Summary
5.10	Amiel	Ziv		The current viewing corridors are an unnecessary burden on London's development. It greatly limits our ability to continue to innovate and offer a wide range of buildings to companies. The City of London should seek to reduce the number of protected views and narrow them as Ken Livingstone did when he was mayor.
5.10	Helen	Kay	Barbican Association	The current protection policies help to prevent obscuration of key significant views. The view protection policies have worked well for nearly 80 years and it would be nice to think that they will continue to do so for the next 80 - or more.
5.10	Jane	Bickerton		If the view protection policies were changed it would change the uniqueness of the City of London. I think the new buildings around the Gherkin are too crowded and look as if they are competing and trying to put each other down. I believe we need to foster a cooperative and not bullying view.
5.10	Rita	Cadavez		View protection allows for recognition of known monuments/ buildings and is therefore a medium to a better orientation and to recognizing a place.
5.11	Jane	Bickerton		Yes, we should be recognising and protecting new views from publicly accessible locations. I am personally aware of how the Gherkin has become fenced in over the past 10 years. However, I love that I can look at St Pauls from One New Change which in view supports our fabulous buildings in the City.
5.11	Jeremy	Gray	City Property Association	We do not support the protection of new views from publicly accessible locations.
5.11	Trevor	G		Yes, Sky Garden is one example of a view that should be protected.

Question	Name	Organisation	Comment Summary
5.11	Helen Kay	Barbican Association	The answer should clearly be Yes but given the density of building, both current and proposed, in such an already overcrowded area it is hard to think what or how many "new views" could either be recognised let alone protected.
5.11	Fred Rogers		The reduction of genuinely public space has made it more important than ever those that still exist offer the opportunity of seeing as much as possible. The absence of a proper piazza, which could be created in front of St Paul's with the demolition of Paternoster Square, provides no public space like Trafalgar Square for instance. Guildhall Yard should provide a suitable space but fails to do so.
5.11	Oliver Caroe	Chapter of the Cathedral Church of St Paul	We would support specific policy that protects setting and Protected Views. The City landscape is changing so quickly – we would support recognising and protecting new views from publicly accessible locations and further analysis of short range views.
5.11	Tom Noble	City Public Realm, CoL	No, the City Corporation should not be recognising and protecting new views from publicly accessible locations.
5.12	Natasha Downie	Historic Royal Palaces	<p>HRP would be concerned about any proposal to spread the Cluster, or to change the policy area that might result in tall buildings appearing randomly within the setting of the WHS, particularly in the backdrop to the Tower.</p> <p>Figure 11 illustrates 'areas inappropriate for tall buildings' as identified in the current Local Plan. Historic Royal Palaces would be very concerned about any proposal to accommodate new tall buildings in the area of the Eastern Cluster, including the Aldgate area, presently shown on this map to be areas where 'tall building of world class architecture and sustainable and accessible design' would be allowed in principle.</p> <p>Noting the Paragraphs under Transport, Streets and Walkways, Historic Royal Palaces would welcome the opportunity to be consulted on any issues, particularly around pedestrian crossings and walkways, which are likely to affect visitors to and from the Tower of London.</p>

Question	Name		Organisation	Comment Summary
5.12	David	Coleman		The cluster approach has advantages, but only when it can be precise. There was a time when the vague “North of London Wall” cluster looked like it would result in a wall of high buildings all along the Eastern side of the Barbican. There should be recognition in the plan of the importance of the Barbican as a major landscape feature in the City. Retaining a variety of views into and out of the Barbican should be a material consideration for any planning application. I am not seeking here a St Paul’s style set of protected views, but a general policy
5.12	Graham	Saunders	Historic England	It is noted the whole of the City is classed as being sensitive for tall buildings, with specific areas highlighted as inappropriate. We would advise that figure 12 needs to include both terms as it currently suggests areas inappropriate without the additional qualification of sensitivity for the whole of the City. It is noted that 3D modelling is being applied to the Eastern Cluster. However it is not clear whether the same rigorous approach is being used for other clusters and areas of the City where tall buildings are considered ‘sensitive’ only and proposals are coming forward. The use of 3D modelling with a robust understanding of the heritage interest of a place should help inform where and how high density developments can be delivered. This could include development forms, that are mid-range in height and not
5.12	Leonard	Goodrich	Chancery Lane Association	Tall buildings within the City are appropriate if in clusters. Clustering should continue.
5.12	Rita	Cadavez		Yes but in specific designated areas- Liverpool St and Eastern cluster. Would be possible towards Chancery Lane / western cluster?
5.12	John	Lett	GLA	The City’s approach to Tall Buildings is supported providing it is backed by clear locational guidance and robust policy to secure high quality design as set out in the London Plan.
5.12	Trevor	G		Keeping tall buildings in the east could ensure that the historical sites and significance are not literally shadowed and converted into yet another sky scraper city. London should keep a relative low skyline and not become a Manhattan.

Question	Name	Organisation	Comment Summary
5.12	Fred Rogers		It depends whether or not tall buildings are being built to fulfil a need or an ego. However, until pollution and traffic are under proper control, no more tall buildings should be
5.12	Jonathan Whitby		Tall buildings should not dwarf adjoining city churches or Grade I listed buildings, or overshadow open spaces.
5.12	Richard Hillebron	Conservation Area Advisory Committee	It is recognised that the City has to play a part in regeneration and renewal in order to keep its significant importance as a world first class City.
5.12	David Rees		Tall buildings should not dwarf adjoining city churches or Grade I listed buildings, or overshadow open spaces.
5.12	Sophie Hall-Thompson	London Borough of Tower Hamlets	Planning Officers express concerns relating to the identification of much of the Eastern Cluster in 'Figure 12: Areas Inappropriate for Tall Buildings' as being appropriate for tall buildings. A sensitive approach must be applied to LBTH's Conservation Areas and UNESCO World Heritage Site, namely the Artillery Passage Conservation Area and the Tower of London. The appropriateness of the Eastern Cluster for tall buildings should be considered with respect to the Tower Hamlets Development Management Document (2013) which requires development to protect and enhance the borough's heritage assets, their setting and their significance. Please also see the Council's Regulation 18 Draft Consultation Document and supporting documents which outline policies of relevance. I particularly draw your attention to "DH3 The Historic Environment" and the content within related to local



Question	Name		Organisation	Comment Summary
5.12	Daniel	Palman	Berkeley Homes	Berkley supports tall building development. The City Corporation should continue to promote tall buildings in appropriate locations and which are of high quality and exceptional architecture. The appropriateness of tall buildings will be guided by a number of factors including location, key strategic views and environmental and heritage designations including the City's Conservation Areas and the impact on key monuments and listed buildings as well as the existing surrounding built environment. We consider that Local Plan Core Strategic Policy CS12 provides sufficient guidance and flexibility in the approach to tall
5.12	Yarema	Ronish		Tall buildings should not dwarf adjoining city churches or Grade I listed buildings, or overshadow open spaces.
5.12	Yvonne	Courtney		Tall buildings should not dwarf adjoining city churches or Grade I listed buildings, or overshadow open spaces (like the recently completed Creechurch Place - aka Darth Vader -
5.12	Sakiba	Gurda	London Borough of Islington	With regard to tall buildings, we note the significant number of proposals currently in the pipeline, and consider that any future proposals are likely to be more appropriate where they correlate with existing clusters.
5.12	Polly	Barker	TfL Property	TfL Property supports the continued promotion of tall buildings development in the City.
5.12	Natalie	Broughton	London Borough of Hackney	There are many areas within the City where tall buildings are inappropriate because of protected views and conservation areas. However there are designated zones where tall buildings are permitted; one such area is around Liverpool Street in the north of the City. Hackney would like to work together with the City of London with regards to development of tall buildings in this area and on any evidence base to support the tall building strategy.

Question	Name	Organisation	Comment Summary
5.12	Heather Hilburn		Tall buildings should not dwarf adjoining city churches or Grade I listed buildings, or overshadow open spaces.
5.12	Jeremy Gray	City Property Association	The CPA supports the continued promotion of tall building development in the City in appropriate locations and of high quality designs. High density development in tall buildings represents a sustainable form of development where they forms clusters and this form of development should therefore be encouraged in the City. We continue to support the grouping of tall buildings in the Eastern Cluster and the CPA would be keen to ensure that all development opportunities to expand and densify this cluster are supported (subject to other policies in the Plan). Policy should not preclude a tall building outside of the Eastern Cluster should the opportunity represent itself, particularly around transport hubs and at other landmark points, which are more able to accommodate tall buildings. It is noted that the City recently approved a tall building at 2&3 Finsbury Avenue.
5.12	Helen Kay	Barbican Association	The continued development of tall buildings seems inevitable given the constraints on space but whether they should continue to be promoted is open to debate. One absolutely key requirement is that clusters of tall buildings should be forbidden around residential areas. Given the scale of the clustering of buildings already in the City let alone the number of those which have been proposed but have not yet reached completion , it is hard to see any other area which could accommodate tall buildings "without compromising its distinctive character and heritage".
5.12	Oliver Caroe	Chapter of the Cathedral Church of St Paul	The Cathedral is unsure currently how to respond to questions about tall building development and would welcome further discussion with your planning team. There is a concern that the primary Eastern City cluster could extend well beyond the boundary originally envisaged which would be detrimental to the general character of the City, not just the wider setting of St Paul's.

Question	Name	Organisation	Comment Summary
5.12	Jane	Bickerton	As shared above I believe that the cluster of buildings in the east of the city is no longer an elegant addition to the sky line. I think the urban designers, engineers and architects of our City need to be of the highest calibre.
5.12	Paul	Martinelli	Yes, tall buildings should continue to be promoted and clustered.
5.12	Peter	Rose	Limit number and size of the cluster. Make sure that transport is adequate.
5.12	Tom	Noble	City Public Realm, CoL
			Tall buildings, if exceptionally designed, particularly at ground floor level, can significantly enhance the City. Any application for a tall building should fundamentally consider it's local context and impact on the immediate and adjacent streetscape and microclimate. Whilst there may be some merits to visually clustering tall buildings together, this may compound problems associated with tall buildings in the local area. In addition to this, concentrating all of the densest development in one location is likely to put even more strain on local infrastructure and in particular the pedestrian environment in this area. A comprehensive urban design analysis should be undertaken that fully considers issues such as the local context and proximity to public transport over and above long distance views in order to establish whether there are any other areas within the City that can accommodate tall buildings.
5.13	David	Rees	All of the impacts mentioned in the question are relevant. Other relevant impacts include daylighting of nearby buildings and sunlighting of nearby public open spaces. Tall buildings should be required to provide a well designed public open space. This public open space should be uncovered, not part of an undercroft. It should be accessible to the public, unlike the space in front of 1 Leadenhall which has been fenced off.

Question	Name		Organisation	Comment Summary
5.13	Helen	Kay	Barbican Association	Strict examination of all such planning proposals must be made to ensure e.g appropriate distance from other buildings, appropriate location and scale, consideration of the potential impact on the working and residential populations of wind tunnels, air pollution, shadow and loss of natural light. Sufficient landscaping and the creation of green space is absolutely key in such areas. Perhaps there should be stronger arguments made for a more diverse city approach i.e. to provide a more diverse range of building ages, heights, sizes and costs which could provide a variety of economic opportunities at a broader range of price points.
5.13	Yvonne	Courtney		Additional relevant impacts include daylighting of nearby buildings and sunlighting of nearby public open spaces. Tall buildings should be required to provide a well designed public open space which should be uncovered, not part of an undercroft. It should be accessible to the public, unlike the space in front of 1 Leadenhall which has been fenced off. Nor are 'public parks' at the top of buildings sufficient to compensate for their towering presence - the 'Walkie Talkie' is a huge failure in that respect.
5.13	Oliver	Caroe	Chapter of the Cathedral Church of St Paul	The Cathedral is keen to protect permeability and retain existing pedestrian routes with equal access for all, with enhancement of sightlines. We would encourage the City to reach a good understanding of the operation of the existing tall buildings cluster and gain a better understanding of development capacity; so that the impacts of change can be assessed and proposed change is evidence-based, and defensible based on evidence. Visualisation tools should emerge which allow specialist and general evaluation of the impacts.
5.13	Jane	Bickerton		These require advice from the experts who can communicate the complexities of these issues to us when they present new buildings.
5.13	Richard	Hillebron	Conservation Area Advisory Committee	The technical impacts of tall buildings such as pedestrian movement, public realm, micro climate and wind effect should continue to be addressed in all relevant applications.

Question	Name	Organisation	Comment Summary
5.13	Tom Noble	City Public Realm, CoL	Understanding the microclimate created by tall buildings is fundamental to their success as this will strongly impact on people's enjoyment of the public realm at ground floor. A clear understanding of the movements generated by a new tall building will ensure that appropriate mitigation can be established and the necessary contributions made as part of the planning process. Building protection measures need to be considered and fully integrated into the fabric of the building, rather than relying on HVM bollards/structures in
5.13	Keira Murphy	Environment Agency	Other factors to consider in relation to the impact of tall buildings is their proximity to the River Thames and any impacts on the integrity of existing flood defences or the shading of the foreshore which could potentially have a detrimental impact on river and foreshore habitat.
5.13	Jonathan Whitby		All of the impacts mentioned in the question are relevant. Other relevant impacts include daylighting of nearby buildings and sunlighting of nearby public open spaces. Tall buildings should be required to provide a well designed public open space. This public open space should be uncovered, not part of an undercroft. It should be accessible to the public, unlike the space in front of 1 Leadenhall which has been fenced off.
5.13	Yarema Ronish		All of the impacts mentioned in the question are relevant. Other relevant impacts include daylighting of nearby buildings and sunlighting of nearby public open spaces. Tall buildings should be required to provide a well designed public open space. This public open space should be uncovered, not part of an undercroft. It should be accessible to the public, unlike the space in front of 1 Leadenhall which has been fenced off.
5.13	Fred Rogers		The question of whether the wider impacts of tall building proposals should be addressed depends on whether or not tall buildings are being built to fulfil a need or an ego. However, until pollution and traffic are under proper control, no more tall buildings should be

Question	Name	Organisation	Comment Summary
5.13	Graham Saunders	Historic England	We would also seek to ensure in all tall buildings cases (in terms of all forms of impacts whether on the ground or in views) that the significance of all heritage assets whether within the City or outside its boundaries are considered. Not just listed buildings within the City as suggested (para 5.21). As already highlighted this point is particularly important for the appreciation of the setting of the Tower of London WHS and its OUV.
5.13	Heather Hilburn		All of the impacts mentioned in the question are relevant. Other relevant impacts include daylighting of nearby buildings and sunlighting of nearby public open spaces. Tall buildings should be required to provide a well designed public open space. This public open space should be uncovered, not part of an undercroft. It should be accessible to the public, unlike the space in front of 1 Leadenhall which has been fenced off.
5.13	John Schofield	City of London Archaeological Trust	Tall buildings: are also relevant to heritage assets. The church of St Helen Bishopsgate now has a permanent shadow on it from the Cheesegrater tall building to the south.
5.13	Jeremy Gray	City Property Association	In addition to the points mentioned at Question 5.13 it is considered that policy should have regard for solar reflection/glare.
5.14	Jane Bickerton		Yes, the Local Plan should include reference to the CAA's Tall Building Policy.
5.14	Rita Cadavez		Yes, the Local Plan should include reference to the CAA's Tall Building Policy.
5.14	Daniel Palman	Berkeley Homes	We agree that there is merit in including reference to the CAA's London Tall Building Policy in the support text of the tall building policy.
5.14	Helen Kay	Barbican Association	Yes the Local plan should include reference to the CAA's London tall building policy

Question	Name	Organisation	Comment Summary
5.14	Amiel Ziv		The Civil Aviation Authority's policy of objecting to applications over 1,000 feet is based on an arbitrary number. It is based on the fact that 1,000 is a round number and easy to remember. The City of London should challenge this arbitrary number. The tallest building in London should not be the Shard, but a building located in the City. The CAA should work around London's needs, not the other way round.
5.14	Fred Rogers		Yes, the Local Plan should include reference to the CAA's London Tall Building Policy.
5.14	David Rees		The Local Plan should include reference to the CAA's London Tall Building Policy to provide more comprehensive policy guidance.
5.14	Jeremy Gray	City Property Association	We agree it would be prudent to make reference to the CAA's London Tall Building policy.
5.14	Tom Noble	City Public Realm, CoL	This is the CAA's policy, not the City's so there is no need to duplicate in the Local Plan – any developer of a tall building exceeding 305m AOD will have to take this into account when submitting an application.
5.14	Jonathan Whitby		The Local Plan should include reference to the CAA's London Tall Building Policy to provide more comprehensive policy guidance.
5.14	Richard Hillebron	Conservation Area Advisory Committee	This may possibly be more appropriate for the London Plan.
5.14	Yarema Ronish		The Local Plan should include reference to the CAA's London Tall Building Policy to provide more comprehensive policy guidance.

Question	Name	Organisation	Comment Summary
5.14	Heather	Hilburn	The Local Plan should include reference to the CAA's London Tall Building Policy to provide more comprehensive policy guidance.
6.01	Leonard	Goodrich	<p>Chancery Lane Association</p> <p>Smart grid technology has huge potential for both enhancing sustainability and empowering residents and businesses to benefit from demand management innovations. Innovations are already appearing on the grid, so it seems sensible to support these developments in whatever way possible at the Local Plan level.</p> <p>District heating has some potential, particularly where waste heat not associated with burning fossil fuels is concerned (e.g. waste heat from the Underground). But there are problems – waste heat from burning fossil fuels is associated with air quality impacts that are probably unacceptable in an urban centre with already high levels of air pollution, and the heating-supply model limits consumer choice of heating source. A better focus might be on energy efficiency standards for new buildings, retrofitting for old buildings and the promoting of alternative low-carbon heat technologies, for example air source heat pumps.</p>
6.01	Helen	Kay	<p>Barbican Association</p> <p>Sustainability will be crucial in the life of the next City Plan and for all those who live and work in the area.</p> <p>District heating networks – Buro Happold 2013 report found that there is enough heat in London to meet 70% of the city's heating. Apart from reduced costs this initiative would make a difference to fuel security and carbon emissions. The Local Plan should include a feasibility study at the very least.</p> <p>Smart Grid Technologies - planning positively for green infrastructure (PPS12) is vital for health and well-being. Providing amenity green space, play and public art spaces in our urban environment needs a strategic approach.</p> <p>There are many new initiatives that the City Plan should include. Already there are floor tiles and street lamps that generate electricity and a developer could be encouraged in the planning system to cover our busiest streets with floor tiles adjacent to their building.</p>



Question	Name		Organisation	Comment Summary
6.01	Tom	Noble	City Public Realm, CoL	The City has an existing and operational CHP plant (combined heat and power) located in smithfield. Perhaps more attention/encouragement ought to be reflected in our policies to reduce highway activity to achieve power to all new developments where viable. A Sustainable Lighting
6.01	John	Lett	GLA	The Plan should support district heat networks; the City is likely to have a number of sources which would be appropriate to capture waste heat and detailed advice should be sought from the GLA Energy team.
6.01	Rita	Cadavez		Yes. New developments could provide for collection points for recycling and refuse. A main location for mail collection could also be considered for better and controlled access during planning stage.
6.01	William	O'Dowd		Yes. The main point is to identify what occupancy there will be in current or new-build buildings in the future. Residential properties should have smart heating, solar energy and high-tech insulation
6.01	Peter	Bennett		Overall City cost competitiveness needs to be maintained.
6.01	Fred	Rogers		Yes. Technology is ever developing and the Local Plan should require observance of best practice in respect of a more sustainable, low-carbon, city, at the time of planning application. Such a policy should apply to all developments.

Question	Name	Organisation	Comment Summary
6.01	Jeremy Gray	City Property Association	The CPA strongly support sustainable development and climate change initiatives. Given the life span of the Plan, we do not consider the Plan should specify or identify particular technologies or infrastructure. We therefore recommend that the Local Plan reflect London Plan policies on this topic. Support for low carbon technologies should also be promoted.
6.01	Sakiba Gurda	London Borough of Islington	We welcome the recognition that both the sustainability of individual buildings and wider infrastructure (e.g. district heating/cooling, smart grid technologies, green infrastructure, sustainable transport) must be promoted through the Plan to enable a more sustainable, a low carbon future. We would therefore be supportive of policies which sought the further expansion of infrastructure such as the Citigen district heating system.
6.02	John Lett	GLA	It is appropriate to design buildings to cope with the future climate and to operate as efficiently as possible. There are some notable concerns about controlling temperatures within glazed and tall buildings under hot conditions. Given that glazed and tall buildings may be particularly prevalent within the City, this merits particular attention in the Plan.
6.02	William O'Dowd		Streets should have better run-off facilities to deal with heavy rain or localised flooding. Rain water should be collected rather than run into the river. Buildings should incorporate roof gardens and terraces. Building projects should take the creation of wind tunnels into account so as not to increase wind in streets with high-rise buildings in particular.
6.02	Rita Cadavez		Eg. covered pathways and covered areas for public transport stops (for public realm).

Question	Name		Organisation	Comment Summary
6.02	Tom	Noble	City Public Realm, CoL	The City Corporation ought to utilise the planning system to ensure water management is factored in as early on as possible during the preapp negotiation process. Developers must demonstrate how they intend to manage water sustainably. These measures ought to be secured through CIL/S278/S106 contributions. There ought to be an updated SPD on SUDs guidance to provide some clarity for developers and the City itself must adopt sustainable practices in their own developments and other enhancement schemes.
6.02	Leonard	Goodrich	Chancery Lane Association	<p>Requirements for sustainable drainage systems for new developments should be maintained. Green infrastructure, including green roofs and walls on new developments, would perhaps be a cost-effective and amenity-enhancing way for further reducing surface water run-off and mitigating the tendency of urban centres to generate high temperatures that is likely to be worsened by climate change.</p> <p>The planning system is a means of ensuring such measures are secured in new developments on private land (by way of conditions and planning obligations). The Community Infrastructure Levy could be used to pay for public green infrastructure and public land released for this</p>
6.02	Jeremy	Gray	City Property Association	We would not advocate the Local Plan setting out specific climate resilience measures.
6.02	Helen	Kay	Barbican Association	Low carbon climate resilient infrastructure is important to protect ICT and transport systems in the City. Refurbishing buildings is more sustainable than demolition and rebuild. Many of us in the Barbican have seen much of the latter bordering the Estate in the last 20 years.
6.02	Fred	Rogers		Climate resilience measures which follow best practice guidance to achieve the result at the time of a planning application should be incorporated into new development.

Question	Name	Organisation	Comment Summary
6.03	Rita	Cadavez	Yes, we should identify and encourage specific local measure to improve air and water quality, conserve water and minimise flood risk, minimise noise and light pollution and eliminate potential land contamination.
6.03	Leonard	Goodrich	<p>Chancery Lane Association</p> <p>We would support actions to bring about improvements in the environment generally and air quality in particular. Encouraging sustainable transport is one obvious way of doing this, by improving cycling infrastructure and making streets more pedestrian friendly. Narrow one-way streets such as Chancery Lane could increase the amount of street space devoted to pedestrians and cyclists at the expense of space for motor vehicles.</p> <p>Discouraging private car use should also be considered, through measures such as parking restrictions on driving at times of peak congestion. Pedestrianisation of appropriate streets where possible would both encourage active transport and discourage motor transport and could have wider amenity benefits.</p> <p>Incentivising last-minute delivery by emission-free vehicles would improve air quality, reduce noise pollution and if that meant more deliveries by lighter vehicles and bike couriers it would also improve pedestrian safety and minimise maintenance costs.</p>
6.03	William	O'Dowd	Yes, buildings could be coated with sound absorbing material near ground level so that high-rise buildings do not create a canyon effect and reverberate noise. Street lighting should be incorporated into building facades and be solar powered. Office buildings should have automatic off-on sensors for lights when rooms/floors are unoccupied.

Question	Name	Organisation	Comment Summary
6.03	Keira Murphy	Environment Agency	<p>Air Quality Management Plans should provide further information on local measures to improve air quality. Our only comment is that on waste sites, operations should be carried out in an enclosed space so that dust and particulates do not escape and affect neighbouring areas.</p> <p>Sustainable drainage measures will be a key way of achieving an improvement in water quality as well as a reduction in surface water runoff. CoL could be strong on this issue (where the evidence supports) especially in areas identified at high risk of surface water flooding. The London Plan has endorsed 105 litres per head per day as the target for water efficiency in new households, to be in line with the new Building Regulations. Water efficient taps, showers and other appliances as well as rainwater harvesting and grey water recycling will</p>
6.03	Helen Kay	Barbican Association	<p>Air quality in London is the worst in Europe and the data on Beech Street tunnel is of great concern. Our local plan must be robust in its commitment to improve.</p> <p>Specific measures would be welcome to residents. We suggest:</p> <ul style="list-style-type: none"> <li>-tougher standards on vehicles</li> <li>-reduced numbers of vehicles in the City. Reduce numbers of minicabs and delivery vans.</li> <li>-tougher standards on light pollution, including enforcement action where it causes a persistent nuisance</li> <li>- much tougher noise and pollution standards for contractors – quieter machinery, activities; better acoustic and dust hoarding; better enforcement of standards.</li> <li>- no routine Saturday noisy works in residential areas.</li> </ul> <p>We would welcome a robust approach to offices that cast intrusive light into dwellings. Although developments are built to statutory guidelines we have much experience of lights being left on during weekends and holiday periods where there is no-one in the offices and for blinds not being used.</p>
6.03	Peter Bennett		<p>Measures to police existing pollutants, eg stationary vehicles with engines running, need to be enforced.</p>

Question	Name		Organisation	Comment Summary
6.03	Fred	Rogers		Yes, whatever sustainable and low carbon local measures should be identified that will improve air and water quality, conserve water, minimise flood risk, minimise noise and light pollution and eliminate potential noise pollution.
6.03	Tom	Noble	City Public Realm, CoL	The LEN appears to ignore some of the City's most polluted streets as a priority. Lower/Upper Thames Street, Victoria Embankment and Bishopsgate to name but a few are not included as part of low emissions neighbourhoods. They are some of the most heavily congested and through peak hours (ie: Southwark Bridge). Perhaps specific measures for these areas is
6.03	Jack	Skillen	Team London Bridge	Poor air quality is affecting the health and wellbeing of many thousands of people working and visiting London, particularly in Central London along main roads, including Borough High Street (on to London Bridge) and Tower Bridge Road. The pollution in this area impacts on people walking and cycling through the area every day – whether they are moving from Southwark to City or vice versa. TLB would be keen for City of London to prioritise tackling poor air quality, through the number and cleanliness of vehicles using the network (that it can affect) and through mitigation measures such as planting and greening to limit the impact. It should use the planning system where it can to support such measures. The City should work closely with neighbouring BIDs and boroughs concerning their property holdings in those
6.03	Jeremy	Gray	City Property Association	The CPA would support in principle local measures to the matters identified at question 6.3.
6.04	Natasha	Downie	Historic Royal Palaces	Historic Royal Palaces would welcome the opportunity to be consulted on any issues, particularly around pedestrian crossings and walkways, which are likely to affect visitors to and from the Tower of London.
6.04	Fred	Rogers		Banning all private cars from the Square Mile and ensuring that all other traffic meets ULEZ regulations.

Question	Name		Organisation	Comment Summary
6.04	Leonard	Goodrich	Chancery Lane Association	It could introduce parking restrictions designed to discourage private car use (e.g. by reducing land devoted to parking and introducing higher charges) and introduce restrictions on driving at times of peak congestion. The best overall strategy for reducing congestion is to encourage modal shift away from private cars to public transport and active transport.
6.04	Jack	Skillen	Team London Bridge	<p>TLB is embarking on a freight reduction project through servicing and delivery plans for local businesses and estates, such as London Bridge Quarter, London Bridge Station and London Bridge City (formerly More London). It is important that we work together to support joint aims to tackle congestion as traffic moves through neighbouring areas. Options may include rail and river freight, which could support strategies on both sides of the river.</p> <p>A particular issue relates to the alignment from Borough High Street to Bishopsgate, which does not offer any safe cycling facilities and has very high numbers of pedestrians crossing. Where solutions can be looked at jointly we would welcome this.</p>
6.04	William	O'Dowd		Private car usage should be banned during normal working hours. Buses, Taxis and light commercial vehicles should be zero emission.
6.04	Peter	Bennett		Bus routes should be rationalised, avoiding Bank wherever possible. Distribution Centres should be developed to reduce the number of white-van trips. Cyclists should comply with the Highway Code. Plans should be considered to develop strategic infrastructure tunnels to reduce, in the long term, the frequency of streetworks.
6.04	Helen	Kay	Barbican Association	Improved public transport is key to mitigating traffic congestion. In the middle term future, TfL plans to increase the frequency of trains and also extend working hours (Night Tube) on all lines passing through the City. These, generally desirable developments, must, however, only be done following modernisation of track and trains (particularly on the sub-surface lines which pass directly under City residential areas) with “state of the art” noise and vibration reducing technologies. Congestion in the City is a problem and it is important for the Plan to

Question	Name		Organisation	Comment Summary
6.04	Tom	Noble	City Public Realm, CoL	Make better use of existing parking infrastructure. The City has a number of large car parking spaces which ought to be utilised for alternative uses as well as improving provision in new developments.
6.04	Fiona	Meyringer		Stop motorised traffic going down Beech Street - make it for pedestrians & cyclists only.
6.04	Richard	Whitlock	Richard Whitlock LTD	Residents are being increasingly disturbed by late night taxis that use East Harding Street as an all night cut through from local offices. The road surface is granite sets. This, combined with noisy taxi's pulling away in a low gear around the bend makes for some sleepless nights. I absolutely do not wish to impede on the efficient running of the city, but may I request some solutions: These would include quieter road surfaces, timed restrictions on night-time through traffic and rising bollards to prevent out-of-hours vehicles from accessing the area.
6.04	George	Snape	Tfl	Actions to reduce congestion in the City could include incentivising servicing and deliveries to be made outside of peak times, alongside improving conditions for pedestrians and cyclists to encourage uptake of these modes by both commuters and businesses. Other methods could include working with TfL to improve bus journey times and making efficient use of space on the roads. However, this will have to recognise the strategic function of different roads within the City.
6.04	Richard	Hillebron	Conservation Area Advisory Committee	In dealing with congestion it might be appropriate to consider street clutter as imposing restrictions on pedestrian movement. It could be worthwhile to consider a policy which requires removal of redundant street clutter.



Question	Name		Organisation	Comment Summary
6.04	Jeremy	Gray	City Property Association	<p>The CPA in principle support the use of consolidation centres, which have the potential to reduce delivery and servicing vehicle movements by half thus impacting directly on issues such as congestion, pollution and air quality. Where feasible and viable, the City should promote consolidation centres for new major development schemes, whilst recognising that such an approach may not be achievable in each and every case. TfL is currently working on consolidation for existing businesses through other methods including collective procurement, nominated carriers, bunching orders, etc. Where appropriate, the City could encourage similar improvements to delivery and servicing strategies for existing businesses, and the City of London markets. Another action to mitigate the impact of delivery and servicing vehicles on congestion would be to retime delivery and servicing vehicles outside of peak hours, especially office hours. This would also reduce the risk of collision between HGVs and vulnerable road users.</p> <p>A review of TfL buses' occupancy at peak times would be helpful to understand if their impact can be reduced. TfL increased bus service frequencies from 2000 onwards to help deal with the congestion on the LUL underground services whilst the line upgrades were being completed and as this programme of works is being finalised, along with the opening of</p>
6.04	David	Coleman		<p>Encouraging and enabling will clearly not deliver the improvements needed. A start: rigorously enforce the 20mph limit.</p>

Question	Name		Organisation	Comment Summary
6.04	Simon	Munk	London Cycling Campaign	<p>Rather than aiming just to reduce congestion in the City the aim should be to transform the City into a healthier, cleaner and happier place to work and live. This will benefit residents and employees and will encourage businesses to remain in or relocate to the City. It will enable London to remain competitive with other European financial centres which are already implementing scalable and sustainable transport policies. Cycling and walking are key components to achieving this. Creating an environment where cycling is a choice for any Londoner, who wants to ride the streets conveniently and without fear, should be a very high priority.</p> <p>Key actions to achieve this are to:</p> <ul style="list-style-type: none"> <li>- Create a network of high-quality, direct routes separate from high volumes and/or speeds of motor vehicle traffic to/from all key destinations and residential areas in the borough and beyond.</li> <li>- Ensure separation from high volumes and/or speeds is via protected space for cycling, or volumes and speeds reduced to low levels.</li> <li>- Ensure all Highways work is designed to accommodate growth in cycling.</li> <li>- Make "Direct Vision" lorries, with minimal "blind spots" the standard HGV type used in the City, including implementing a more aggressive timeline for the City than is being proposed by the Mayor for London overall.</li> </ul>
6.04	Rita	Cadavez		Review delivery times; limit access to large vehicles during busy hours.
6.05	Richard	Hillebron	Conservation Area Advisory Committee	Interaction between buildings and the street is beneficial to passers-by in terms of appearance as well as security. Compelling off street servicing for medium sized buildings would require some bland frontage and be inconsistent with this principal.

Question	Name	Organisation	Comment Summary
6.05	Jeremy Gray	City Property Association	Reducing delivery and servicing activity during peak office arrival and departure hours would be beneficial and participate in reducing traffic congestion. It is acknowledged though that this may not be realistically achievable for all existing buildings. This should be particularly encouraged for large scale schemes which can also work with a consolidation centre. The City should also continue to encourage the provision of off-street servicing facilities in all major development schemes where feasible. It is not always possible to provide off-street servicing areas in medium sized buildings.
6.05	Peter Bennett		Night-time deliveries should be avoided in residential areas.
6.05	David Coleman		Encouraging and enabling will clearly not deliver the improvements needed. A start: require all offices with internal loading bays to take deliveries at night time only, with significant financial penalties for noise disturbance (the door mechanisms alone of some of these would wake local residents!);
6.05	George Snape	Tfl	<p>More deliveries taking place outside peak periods should be encouraged and is in line with TfL's Londonwide retiming programme. Given that the issues raised by retiming are often site and development specific it may be beneficial to fully consider the time periods for delivery within a delivery and servicing plan on a site by site scheme by scheme basis.</p> <p>Off-street servicing areas could be promoted within medium sized and larger developments but they need to be appropriate for the function of the building(s) and the goods they may receive, rather than simply the size of development. Consideration should also be given to appropriate loading facilities for residential developments, in particular car free developments, where vehicles delivering, collecting or servicing the residents' needs have sufficient space to stop and wait whilst unloading and loading.</p> <p>Another area which could be explored is shared freight infrastructure as part of neighbourhood wide delivery and servicing plans. Developments in an area can contribute to and make use of a local shared servicing facility and then goods can be consolidated and distributed to offices, residential and commercial buildings using electric vans or cargo bikes</p>

Question	Name		Organisation	Comment Summary
6.05	Helen	Kay	Barbican Association	<p>The LEN initiative is a good one.</p> <p>Night time deliveries are unacceptable in residential areas and should remain forbidden. Off street servicing areas in medium size buildings would be welcome.</p> <p>There should be a strategy in the plan that protects the well-being of residents from noise of night deliveries</p>
6.05	Rita	Cadavez		Possibly. Yes.
6.05	Leonard	Goodrich	Chancery Lane Association	<p>Occupiers of developments of all sizes should be encouraged or required to accept deliveries outside peak periods as far as possible given the nature of their businesses.</p> <p>We would support requirements for new medium-sized buildings to provide off-street servicing areas, but these areas should be specifically designed for use by smaller, emissions free vehicles including courier vehicles to encourage increased use of such vehicles.</p>
6.05	William	O'Dowd		No, the commercial sector does not conform to normal working hours and would be undermined by restrictions. Residents would not enjoy high volumes of commercial vehicles and noise pollution during the night. Where feasible the majority of deliveries should be early
6.05	Fred	Rogers		Banning private cars altogether should enable deliveries to take place without causing disturbance in residential areas.
6.05	Simon	Munk	London Cycling Campaign	<p>Occupiers of large developments should generally be required to only accept deliveries outside peak periods, including at night-time. Medium-sized buildings should be required to provide off-street servicing areas and consideration should be given to the feasibility of creating shared service areas for smaller businesses.</p> <p>There should also be greater vigilance to prevent vehicles, e.g. delivery and private hire vehicles, causing congestion by waiting illegally outside offices during daytimes (and where restricted evenings also).</p>

Question	Name		Organisation	Comment Summary
6.05	Tom	Noble	City Public Realm, CoL	Whilst the City promotes deliveries between 7pm and 7am in a number of arterial streets to improve pedestrian movement, yes developments must utilise off-peak times including night time more for deliveries.
6.06	Jonathan	Whitby		Consolidation centres should be promoted via planning conditions to reduce congestion from goods deliveries vehicles and improve pedestrian safety.
6.06	Jeremy	Gray	City Property Association	<p>In principle, the CPA support consolidation centres and the City should encourage consolidation centres and develop internal discussions regarding solutions that would benefit the most businesses and local residents such as:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Consolidation centre for single tower building or for a few developments located in a single area (eg. Eastern Cluster)</li> <li><input type="checkbox"/> Consolidation centre for retail and restaurants if feasible</li> <li><input type="checkbox"/> Use single waste collection services provider (cf. Fitzrovia BID)</li> <li><input type="checkbox"/> Bunching individual orders for office buildings</li> <li><input type="checkbox"/> Use single nominated carrier for delivering all goods in an area</li> <li><input type="checkbox"/> Collective procurement (eg. Using a single supplier for all office supplies)</li> </ul> <p>The consolidation centres would need to be well outside the City but could be used to serve different developments and/or other central London boroughs. Consolidation centres can impact on local traffic and congestion where they are located so this would need to be discussed with the relevant local authority.</p>
6.06	David	Rees		Consolidation centres should be promoted via planning conditions to reduce congestion from goods deliveries vehicles and improve pedestrian safety.
6.06	David	Coleman		Encouraging and enabling will clearly not deliver the improvements needed. A start: move to set up mandatory parcel consolidation centres with foot or electric delivery for the last mile.

Question	Name	Organisation	Comment Summary
6.06	Heather	Hilburn	Consolidation centres should be promoted via planning conditions to reduce congestion from goods deliveries vehicles and improve pedestrian safety.
6.06	Peter	Bennett	Yes, the City should promote consolidation centres.
6.06	Yarema	Ronish	Consolidation centres should be promoted via planning conditions to reduce congestion from goods deliveries vehicles and improve pedestrian safety.
6.06	Tom	Noble	City Public Realm, CoL
			Although it is likely the centres may fall outside of the City where this Plan has no jurisdiction it is possible to promote efficiencies of scale/service outside the City. Some industries have moved successfully, i.e. Billingsgate.
6.06	Yvonne	Courtney	Consolidation centres should be promoted via planning conditions to reduce congestion from goods deliveries vehicles and improve pedestrian safety.
6.06	Simon	Munk	London Cycling Campaign
			Consolidation centres should be promoted and the City of London should cooperate with neighbouring boroughs to achieve this. Consideration should be given to reducing the growing numbers of personal deliveries being made by LGV etc. to workers in the City. Innovative approaches to solving this and other freight and delivery issues should be considered and developed, including encouraging “last mile” deliveries by cargo bike, moving goods by river and/or canal and rewarding businesses who achieve more efficient servicing and delivery arrangements.
6.06	Fred	Rogers	Consolidation centres should not be promoted where these clash with residential amenity. However, the significant reduction in banning cars and requiring ULEZ compliance should free up space for reasonable deliveries.

Question	Name		Organisation	Comment Summary
6.06	Helen	Kay	Barbican Association	We recognise that delivery vans do cause problems in the City, both air pollution and congestion. It is not clear that decanting deliveries into smaller vehicles will reduce congestion, though if the vehicles are electric it may ease pollution. Consolidation centres near residences are inappropriate because they generate traffic and hence noise 24 hours a
6.06	Oliver	Caroe	Chapter of the Cathedral Church of St Paul	The Cathedral recognises that long term trends for reduction of traffic pressures will come from a wide range of policy drivers. The emergence of 'consolidation' for major developments may result in a welcome reduction in commercial vehicles. We would observe that the Cathedral's need for deliveries is unusual and does not easily lend itself to consolidation, were this to become an expectation.
6.06	George	Snape	Tfl	<p>TfL welcomes in principle the promotion of consolidation centres for new developments. Consolidation centres are just one form of consolidation and there are other types that could deliver traffic reduction benefits within the City. All forms of consolidation centres should be promoted which include:</p> <ul style="list-style-type: none"> <li>- Procurement led consolidation soluons;</li> <li>- Supply chain consolidatiosolutions;</li> <li>- Micro consolidatio centres;</li> <li>- Urban consolidatio centres; and</li> <li>- Technology solutions such as business to business load sharing</li> </ul> <p>A 2005 study by University of Westminster highlighted key issues around the effectiveness of consolidation centres, including their financial viability and that the transport benefits are unproven at network level. However, this study is now quite old. TfL are considering the potential for different freight policies, including ones promoting the use of consolidation, as part of the Mayor's Transport Strategy.</p>
6.06	Rita	Cadavez		Yes, the City should promote consolidation centres.

Question	Name		Organisation	Comment Summary
6.06	Jack	Skillen	Team London Bridge	As part of our approach to tackling congestion, TLB will be working with Southwark Council and neighbouring boroughs (south of the river) to identify solutions, and a consolidation centre may be part of this. To make sure that heavy traffic linking to any consolidation centre is not actually increased on key routes across the river (a natural bottleneck for traffic), there should be agreement that we will look for options in south London, and the City should only seek options north of the river.
6.07	Simon	Munk	London Cycling Campaign	While electric vehicles can play a part in improving air quality, in particular for public transport vehicles, they can't reduce congestion or improve health outcomes on inactivity. The focus should primarily be on achieving a shift from motor vehicles to other, more efficient and healthy, travel modes i.e. cycling and walking or public transport. Spending money on cycling infrastructure has been shown to dramatically boost health outcomes in an area. Spending on cycling schemes outranks all other transport modes for return on investment (including avoiding costs associated with pollution) according to a DfT study. Reducing overall motor vehicle traffic capacity may not decrease congestion but will free up space for less polluting modes, encourage modal shift and reduce pollution in itself.
6.07	Leonard	Goodrich	Chancery Lane Association	<p>We would support all of these proposals for reducing the impact of motor vehicle traffic on air quality. Electric vehicles have enormous potential to improve urban air quality and numbers have been growing exponentially (albeit from a very low base). Lack of provision of charging infrastructure could stymie uptake of a technology that has the potential to solve one of the City's most pressing issues.</p> <p>Car-free days could encourage otherwise reluctant car travellers to seek out alternatives that might then become habitual, and generally raise awareness of the benefits of reduced motor vehicle use. They might have the additional benefit of attracting curious visitors to the City. If car-free days are not within the Corporation's sole power, it should collaborate with other authorities as necessary to bring them about.</p>
6.07	Jonathan	Whitby		Electric charging points should be provided in car parks. This will be helpful to our visitors.



Question	Name	Organisation	Comment Summary
6.07	Helen Kay	Barbican Association	Promotion of safe cycling with more cycle-ways and electric cars would make a real difference to air quality. Providing electric charging points has to be part of a local plan, electric cars will be the norm in 10 years, charging needs to be convenient and reliable. In the future residents will require more charging points in the Barbican car parks.
6.07	Heather Hilburn		Electric charging points should be provided in car parks. This will be helpful to our visitors.
6.07	Jack Skillen	Team London Bridge	<p>While electric vehicles can impact positively on air quality, they do not reduce congestion, so a priority focus should be measures which support walking and cycling linked to excellent public transport. Currently, walking and cycling provision on both bridges as they connect to the City/London Bridge areas is poor, with poor air quality. The City could look at transferring existing parking spaces over to car-sharing schemes only (Zip-Car for example). We could jointly look at better use of river transport (more ferry piers etc).</p> <p>The air quality on Tower Bridge Road is very poor, and measures should be sought to mitigate the impact on residents and visitors in the area, for example through use of green walls and roofs, wider pavements and street trees that come as far as the river. We would be keen to work in partnership with the City and TfL to deliver such measures. TLB has installed a 'Fresh Air Square' (with two more planned) as a local green installation providing relief from poor air quality – some of the learning from this may be applied to pavements with heavy footfall and poor air quality.</p>
6.07	William O'Dowd		Electric vehicles seem to be the preferred option in the future, although it's not clear how the generating capacity will be raised and how the charge will be delivered in such a confined space. Perhaps underground charging areas could be incorporated. Air filters/extractors should be incorporated into places such as Upper and Lower Thames St. and the Barbican
6.07	David Coleman		Encouraging and enabling will clearly not deliver the improvements needed. A start: set a deadline when all buses, taxis, rubbish collection and delivery vans entering the City must be electric.

Question	Name		Organisation	Comment Summary
6.07	Tom	Noble	City Public Realm, CoL	The impact of motor vehicle traffic on air quality can be reduced by more electrical charging points and the promotion of electrical vehicle incentives. There are no current policies which address motor cycles parking provision on street. On street car parking provision must be reduced with better use made of a permit system and existing NCP car parks/developments.
6.07	Yarema	Ronish		Electric charging points should be provided in car parks. This will be helpful to our visitors.
6.07	Rita	Cadavez		Yes, we should encourage alternative modes of travel, including electric vehicles.
6.07	Fred	Rogers		The City Cororation is already in breach of pollution reduction laws so it is a bit late asking for ideas but the need for all construction machinery to comply with ULEZ regulations must be enforced. Electric vehicles are necessary but there has to be more advanced and accessible charging arrangements.
6.07	Oliver	Caroe	Chapter of the Cathedral Church of St Paul	We are keen to endorse measures to reduce traffic pollution, and having made an enormous investment in cleaning the Cathedral (inside and out). The monitoring of soiling and damage to heritage assets caused by air pollution should be supported.
6.07	George	Snape	Tfl	TfL and the Mayor will implement the Ultra Low Emission Zone, which will help tackle poor air quality in the City and elsewhere in the zone. Whilst it is noted that there are relatively few trips by private car in the City and consequential air quality impacts, mode shift is more difficult for freight and construction activities, however the use of cleaner vehicles, cargo bikes, consolidation centres and out of peak trips can all contribute to air quality improvements. Electric vehicle charging infrastructure will be part of the solution as the fleet of motor vehicles changes, however it is important to provide these strategically to cater for necessary trips and not incentivise use of electric vehicles for trips that could be better made by walking, cycling and public transport.

Question	Name		Organisation	Comment Summary
6.07	David	Rees		Electric charging points should be provided in car parks. This will be helpful to our visitors.
6.07	Jeremy	Gray	City Property Association	<p>Alternative modes of travel for commuting purposes should be increasingly advertised. Additional cycling infrastructure in central London is increasing cyclist safety however it is still perceived as a mode of travel with risks. Advertising safer routes to the City and a particular business or office could encourage more commuters to take on cycling to work. This cycle safety would be enhanced by no longer permitting motorcycles to share bus lanes as the speed difference is significant.</p> <p>Further provision of electric vehicle charging points should also be sought. Street clutter is a challenge and electric vehicle charging points should be provided within all proposed developments and existing developments where possible. Technology is advancing and the provision of rapid electric vehicle charging points for loading bays in new developments could encourage more electric delivery and servicing vehicles traveling to sites. This would have a direct beneficial impact on air pollution.</p> <p>The current Mayor for London is also working on a new Ultra Low Emission Zone (ULEZ) to be implemented potentially as early as 2019. The City Corporation can encourage new developments to use a fleet of delivery and servicing vehicles which are already compliant with the new ULEZ standards. The City Corporation should also be reviewing this carefully in the light of its own servicing and waste refuse vehicles fleet.</p>
6.08	Leonard	Goodrich	Chancery Lane Association	We would support full or partial pedestrianisation of appropriate streets. One-way streets such as Chancery Lane do not need to devote as much space as they currently do to motor vehicles. On such streets the amount of street space devoted to pedestrians and cyclists could be increased at the expense of space for motor vehicles. That said, pragmatic and efficient solutions need to be found to the essential delivery needs to commercial occupiers.

Question	Name		Organisation	Comment Summary
6.08	Jack	Skillen	Team London Bridge	City of London can improve access to open pedestrian space for people walking between the City and the London Bridge station area by quickly helping to find a resolution to the Colechurch House building – which has created substandard pedestrian connections both over and under London bridge and poor route legibility. Also, the disused space adjacent to 201 Tooley Street, owned by the City, can be brought in to use. Moreover, part of the London Bridge Plan is to create a Thames Esplanade under London Bridge – linking the Thames path on either side, and the City can help facilitate use of its bridge for this purpose.
6.08	Oliver	Caroe	Chapter of the Cathedral Church of St Paul	The Cathedral is keen to promote all physical and spiritual aspects of wellbeing, supported by excellent public space and air quality. We support the potential pedestrianisation of St Paul’s Churchyard (with due consideration of the need for equal access including for those less able to walk; and ease of vehicle drop-off for disabled visitors).
6.08	Helen	Kay	Barbican Association	We would support pedestrian-only streets that allow vehicle access to residents’ homes.
6.08	William	O’Dowd		Certain types of vehicle should be restricted at the busiest pedestrian times. Large developments should incorporate raised pedestrian walkways with flora.
6.08	Tom	Noble	City Public Realm, CoL	It will be necessary to restrict certain types of vehicular access outside of peak-times. This way pedestrian movement can be maximised where servicing is a requirement. Where possible walking routes must be improved through pedestrianisation.

Question	Name		Organisation	Comment Summary
6.08	Simon	Munk	London Cycling Campaign	<p>Section 106 and CIL funding should be used to improve conditions for cycling and walking. Planning for new developments should consider and prioritise space for cycling and walking within the development. In general, reducing parking, waiting and loading areas, and road capacity and through routes will encourage modal shift and create more space for cycling and walking infrastructure.</p> <p>The City should have a network plan for cycling and walking based on demand/potential for both modes and new planning applications should be required to be compatible with this. Yes, on certain streets in areas of high congestion motor vehicle traffic should be removed some or all of the time (although the default should be to continue to enable cycling). As well as this, restrictions to certain types of vehicles should be considered to restrict their route choice.</p> <p>The City has shown it is willing to implement bold and high profile schemes to remove through motor vehicle traffic from streets – it should continue the work it has started, such as at Bank</p>
6.08	Peter	Bennett		<p>The Cheapside model for pedestrians could be used elsewhere: wider pavements, more trees and planting and calmed traffic.</p>
6.08	Rita	Cadavez		<p>Main existing routes need some re qualification. These routes could be improved. Perhaps better open spaces would need to become less dispersed and have more character and better accessibility.</p>
6.08	George	Snape	TfL	<p>TfL welcomes the proposal to increase space for pedestrians. It is vitally important that planning decisions in the City take account of the need to keep developments and streets permeable so that pedestrians can access more routes and are not funnelled down main streets where there is more conflict with other road users. This will be especially important as population and employment growth continues and public transport trips into the City and</p>

Question	Name	Organisation	Comment Summary
6.08	Fred Rogers		More open space and pedestrian routes can be created by limiting the area that can be built over. Whilst not in the City, the construction of Tottenham Court Road Elizabeth Line Station will produce, for the public realm, a significant area previously occupied by the fountain outside Centre Point. Aldgate is a positive but other areas, like Paternoster Square, are not public realm and need to be.
6.08	Jeremy Gray	City Property Association	Pedestrian space in the City is vital and the need for it will continuously increase with the number of future developments planned. The CPA appreciates the need to provide additional open, public space and facilitate pedestrianisation, where possible. Pedestrian connections should be encouraged through major new developments at ground floor level with pedestrian passages or retail arcades, as should greater pedestrianisation generally. However, policy should acknowledge that pedestrian links at ground floor will not be deliverable on all sites. Crowd flow modelling undertaken at key junctions of the Eastern Cluster has shown that footway widths will become a huge constraint on future pedestrian flows. There will need to be further transfer of vehicular carriageway space to additional pedestrian space, and all major development schemes should be encouraged to do so. The highway works proposed as part of the 6-8 Bishopsgate scheme provide a very good example. The CPA fully supports the proposal of limiting general traffic at Bank Junction, and it will be interesting to see how this is implemented to the benefit of vulnerable road users and the public realm, and for this approach to be implemented more widely across the City. In addition, systems such as an automated underground cycle parking facility could be further studied to reduce the footprint of short-stay cycle parking on prime pedestrian space.
6.08	David Coleman		I would prefer to keep most roads open to all traffic, reducing and calming the traffic in the way suggested above. However I would look for opportunities to increase peace and quiet by closing small stretches of road neighbouring areas already quiet, such as green spaces.
6.09	Fred Rogers		Cycling should only be encouraged in areas where there is no other traffic.

Question	Name	Organisation	Comment Summary
6.09	Rita	Cadavez	It would be beneficial to increase cycling parking. Large developments should provide a reasonable percentage of off-street parking.
6.09	Simon	Munk	London Cycling Campaign
			Requirements for cycle parking in developments should be increased (consideration for cycle parking should include residents, workers, visitors to both ground floor and upper floor businesses, and include provision for a wide range of cycles e.g. handcycles, cargo bikes). Requirements for showers and changing facilities should also be implemented. In addition to these measures, which can be seen as a tax for businesses, incentives such as rate rebates should be considered for businesses that achieve high levels of cycling by employees or suppliers. More public cycle parking is required also and the City should plan for this.
6.09	Jeremy	Gray	City Property Association
			The London Plan standards for cycle parking are in line with increasing cycle mode share to 15% across central London. It is challenging for many schemes to meet this level of cycle parking so the CPA considers that the London Plan is at about the right standard for the next decade and includes an element of future proofing. A mix of cycle storage types for different types of bike are also encouraged.
			The challenge of meeting the current London Plan cycle parking numbers for staff parking will make it extremely difficult or likely impossible to provide off-street parking inside the development for the public – for reasons of capacity and for security reasons. Visitor cycle parking in developments would mean providing a segregated access so the additional burden of providing this public facility would be significant and not practical.
6.09	Leonard	Goodrich	Chancery Lane Association
			Cycling parking requirements should be increased and large developments should be required to provide off-street public cycle parking spaces. The recent rapid increase in cycling rates means that existing facilities are often inadequate. There are many reasons to believe cycling numbers will increase – modal shift to active transport is a likely consequence of initiatives such as the Ultra-Low Emission Zone and other initiatives that are likely to be required so that the government meets its legal obligations on air quality. Electric bikes are a relatively new and rapidly improving technology that could lead to significantly higher future rates of cycling. The new improved cycling infrastructure in London could cement the burgeoning cycling culture and create momentum that will result in ever higher numbers of





Question	Name		Organisation	Comment Summary
6.09	William	O'Dowd		Buildings should have bike bays incorporated into ground floor walls so that bikes can be pushed into the wall so that they do not protrude onto the street.
6.09	Tom	Noble	City Public Realm, CoL	Cycle parking provision must be increased in developments. Attempts to reduce street clutter are often compromised by ill thought out cycle parking on street. When poorly conceived /placed the action simply negates the initial pedestrian benefit of widening footways. The cycle hire stations have created a demand which somewhat displaces the need to upsize the volume of street furniture required for cycles.
6.09	Oliver	Caroe	Chapter of the Cathedral Church of St Paul	We would like to see an increase in on-street cycle parking where this can be achieved without harm to the environment.
6.09	George	Snape	Tfl	TfL is aware that demand for cycle parking in the City is relatively high compared to other parts of London and is expected to increase further. TfL would welcome the proposed cycle parking review, which could also consider whether there should be specific requirements for supporting cycle infrastructure within or shared by developments additional to the requirements in the London Plan. Short stay cycle parking is often an issue in the City, with a lack of space on highway or within areas of public realm meaning that many recent developments have failed to meet London Plan standards. We would be interested whether there are any more innovative solutions for public cycle parking that would minimise street level space requirements, such as underground parking accessed from the public realm.
6.09	Helen	Kay	Barbican Association	Cycle parking in developments and a safe route from areas outside the City are crucial to encouraging greener travel. Requiring large developments to provide off street public cycling spaces would be an excellent initiative. Pedestrian overcrowding is a problem in the City. Consider requiring large developments to leave open space at ground level and include walkways at higher level.

Question	Name		Organisation	Comment Summary
6.10	Tom	Noble	City Public Realm, CoL	Off-street motorcycle provision is necessary as they are exempt from paying for on-street parking and emit pollution (to a lower extent). The lack of a motorcycle parking policy in the new plan has perpetuated a level of conflict unnecessarily. They can park for free in NCPs and must utilise that provision more.
6.10	Leonard	Goodrich	Chancery Lane Association	Only if accompanied by measures to ensure that motorcycles used in the City do not contribute unduly to air and noise pollution and only if statistics suggest that their use is
6.10	Fred	Rogers		No there should not be more on-steet or off-street motorcycle parking in the City.
6.10	George	Snape	Tfl	TfL would welcome an evidence-based review of motorcycle parking in the City. However the review should not be informed solely by demand, but also policy objectives regarding the safety of all road users, air quality, noise, mode shift toward active travel and public transport and the need to use limited space efficiently. The provision of on and off-street motorcycle parking should be seen in the context of the trade-offs required to provide it, e.g. less space for cycle parking, pedestrians, cyclists and amenity space. Motorcycle use could also discourage walking and cycling be it directly or through an adverse impact upon the pedestrian and cycle environment.
6.10	Jeremy	Gray	City Property Association	The CPA does not consider this to be a priority. The existing City policy does ensure additional off-street motorcycle parking is provided where new developments provide off-street car parking. Motorcycles have poor emissions and travel at speeds that are difficult and dangerous for vulnerable road users to share space with. Cycling and walking are a higher priority for the provision of on-street space, and should be encouraged over and above motorcycle journeys and parking. We would also recommend that the City explores the use of electric bikes as a potential replacement of motorbike trips. These can potentially encourage more people to travel by bike and would be better than motorcycles for both air quality and vulnerable road user safety. The Local Plan could include specific standards regarding the provision of electric bike charging points within proposed developments and could encourage the provision of such infrastructure on-street in addition.

Question	Name		Organisation	Comment Summary
6.10	Helen	Kay	Barbican Association	Motor cycle parking, more? I don't think so
6.10	William	O'Dowd		No there should not be more on-steet or off-street motorcycle parking in the City.
6.11	Nicholas	Hannon	Slough Borough Council	Although now rescinded as legislation for compliance, SBC believes these management plans can still provide some of the best practice delivery for waste management and principles driving the waste hierarchy for management of resources for large scale developments.
6.11	Leonard	Goodrich	Chancery Lane Association	We support the promotion of circular economy principles, zero waste plans and on-site management of waste for large developments.
6.11	Sakiba	Gurda	London Borough of Islington	We agree that circular economy principles should be promoted through the Local Plan.
6.11	John	Luckhurst	London Borough of Bexley	All suitable measures available to the City of London should be included to secure waste reduction associated with development. Waste minimisation and 'circular economy' principles should be promoted, along with zero waste plans and on-site management of waste for large developments.
6.11	Jeremy	Gray	City Property Association	We encourage the City to promote policies in relation to reducing waste, although flexibility needs to be provided to take account of site specific considerations. Policies should therefore not be too prescriptive on this topic, and should reflect national guidance.

Question	Name		Organisation	Comment Summary
6.11	Manpreet	Kanda	Royal Borough of Kensington and Chelsea	The City of London should promote all three approaches in Question 6.11 to reduce waste associated with development. The RBKC draft policy on waste promotes the waste hierarchy as set out in the Waste Management Plan for England. It is considered that the City of London should also refer the hierarchy.
6.11	Archie	Onslow	North London Waste Plan	<p>Large quantities of construction and demolition waste is generated in the City. This provides an opportunity to focus on maximising the re-use and recycling of this waste stream, including on-site recycling.</p> <p>For waste storage and collection from new developments, useful advice is contained in a report published by LWARB in December 2014: Waste Management Planning Advice for New Flatted Properties – Project Report. The report suggests best practice for developers as well as Boroughs and also includes case studies.</p> <p>For on-site management of waste, there are some examples of AD facilities being incorporated into large-scale development, including in the City. This is something the North London Boroughs have considered and we would be interested in sharing information on this.</p>
6.11	Fred	Rogers		Developments must not be permitted without waste reduction being guaranteed. Any sustainable and low-carbon measures to ensure waste reduction must be imposed on all developments.
6.11	Rita	Cadavez		Yes, we should promote circular economy principles, zero waste plans and on-site management of waste for large developments.
6.11	William	O'Dowd		Yes. The river should be used to take waste away. Food and drink outlets should be compelled to use 100% recyclable materials in their packaging/cutlery.

Question	Name	Organisation	Comment Summary
6.11	Keira Murphy	Environment Agency	<p>The principles of the circular economy should be promoted. Measures that could be adopted to reduce the waste associated with development include; the adoption of site waste management plans for all major developments with targets set for the beneficial use of materials and the promotion of the principles of the waste hierarchy, and; the adoption of environmental standards for the design and construction of developments through the use of standards such as CEEQUAL and BREEAM .</p> <p>It is also important that in new developments, particularly high rise flatted properties that best practiced for the collection and handling of wastes and recyclables within buildings is considered. Standards for waste storage and collection could be set through the planning process so that architects address the issues of resource management and recycling at the design stage for the whole lifecycle of the building – construction use and demolition.</p>
6.11	Helen Kay	Barbican Association	<p>The Barbican Estate has a very good waste collection and recycling system and the house groups are happy to work with CoL to ensure that residents make full use of this.</p>
6.11	Richard Hatter	Thurrock Borough Council	<p>Thurrock supports the policy approach suggested for the new Local Plan to promote the circular economy principles and on site management for waste in large development where possible.</p> <p>Circular economy principles are promoted in the current adopted Further Alterations to the London Plan (FALP) of 2016. In addition the City of London has to export its waste for management elsewhere. In order to assist in addressing this issue the following are supported:</p> <p>The use of Site Management Plans to treat C,D&amp;E waste where possible on site in large developments;</p> <p>A policy approach to seek food treatment on site in large commercial developments; and</p>

Question	Name	Organisation	Comment Summary
6.12	Fred Rogers		<p>If waste management facilities cannot be provided in the Square Mile, the facility at Southwark appears to be very effective in dealing with the City waste but levels of recyclable waste could be improved.</p> <p>As far as possible, the Local Plan should enable the City Corporation to impose planning conditions requiring all new developments and changes of use to have credible and approved waste reduction programmes.</p>
6.12	Archie Onslow	North London Waste Plan	<p>The City will continue to rely on waste management facilities outside its area as it is not possible to build the range of facilities required to meet waste management needs. Most London Boroughs find themselves in the same position, including the North London Boroughs. In London, co-operation between Boroughs can be facilitated through the London Waste Planning Forum as well as writing directly to each recipient authority. The Forum's website on the Knowledge Hub includes a list of contacts for waste planning authorities in London and in the greater south east to help with the duty to co-operate.</p>
6.12	Keira Murphy	Environment Agency	<p>Bearing in mind the lack of space and a lack of under-utilised brown field sites in the City of London it is unlikely ever to be able to achieve self-sufficiency for waste treatment and disposal. However that reliance can be reduced by the adoption of waste minimisation and avoidance measures where practicable, and targets set to reduce per capita and per business waste generation. The City of London may want to consider setting its own targets above those in the London Plan due to its unique character.</p> <p>With respect to the co-operation with neighbouring authorities the authority should continue to engage with the South East London waste planning group and ensure that authorities that may be receiving wastes from the area via the private sector are engaged through the 'duty to cooperate' process. This should involve continuing engagement with the London Waste Planning Forum and the other strategic stakeholders such as the GLA. Also an analysis of waste flows should be undertaken using available data such as the 'waste data interrogators' (and other sources) to establish which authorities receive significant tonnages of waste from the CoL so that they can be engaged with directly.</p>

Question	Name		Organisation	Comment Summary
6.12	Manpreet	Kanda	Royal Borough of Kensington and Chelsea	The continuation of exporting waste to waste planning authorities outside of the City should only be based on a thorough assessment of the potential capacity available within the City and ability of the recipient authorities to continue receiving waste from the City. It is noted that Table 25 of the Waste Arisings and Waste Management Capacity Study indicates the recipients of waste from the City, these authorities should be the starting point for
6.12	Tom	Noble	City Public Realm, CoL	The City should continue to co-operate with other LAs to provide appropriate waste planning.
6.12	Richard	Hatter	Thurrock Borough Council	<p>Thurrock acknowledges previous contact in July 2016 and requests continued engagement on waste issues under the duty to co operate. The City is unlikely to be able to provide capacity to manage its waste arisings but should promote innovative and small scale waste management to reduce the total amount of waste. The City's Waste Arisings and Waste Management Capacity Study Review is welcomed and its findings are noted.</p> <p>Thurrock supports the policy approach set out in the Further Alterations to the London Plan 2016 to ensure net self sufficiency for London's Local Authority Collected Waste (LACW) and Commercial and Industrial Waste (C&amp;I) waste by 2026, including the City's continued engagement with the south east London Waste Planning group and the London Waste Planning Forum.</p> <p>Construction demolition and excavation waste (CD&amp;E) is not currently apportioned through the London Plan and there is no agreed apportionment of such waste from London to wider South East authorities. CD&amp;E waste is subject to significant fluctuations in quantity and destination. As the City currently identifies that it will not be able to manage a significant element of its future CD&amp;E waste, it will need to look at alternative and innovative approaches to reduce this waste stream. During the preparation of the local plan the City should continue to engage constructively, actively and on an on-going basis with the London boroughs and other waste planning authorities under the duty to cooperate to assess potential options elsewhere.</p> <p>Thurrock is reviewing its Waste Planning and does not expect to make provision for LACW, C&amp;I or CD&amp;E waste from London after 2026. Waste management capacity in Thurrock is</p>
6.12	William	O'Dowd		A new plant should be built downstream to recycle more of London's commercial waste.

Question	Name		Organisation	Comment Summary
6.12	Nicholas	Hannon	Slough Borough Council	Given the exceptionally small size and scale of the City and the exceptionally high retail value of land it is unlikely that any practical waste management facilities on an economically viable scale could be delivered within the City although an Options Appraisal might be worth pursuing to ensure that you have given this due regard.
6.12	John	Luckhurst	London Borough of Bexley	<p>Given the unique nature of the City it would seem appropriate to continue this approach to waste; Bexley Council has an agreement with the City Corporation to meet the City's 100,000 tonne apportionment. Cooperation between local authorities is necessary to ensure that sufficient sites are allocated in appropriate locations.</p> <p>The City Corporation should continue to cooperate directly with the South East London Joint Waste Planning Group and contribute to the South East London waste technical paper. Cooperation should, however, also continue to take place, through the London Waste Planning Forum, with other London boroughs, other waste planning authorities in the wider south east region and the Greater London Authority.</p>
6.13	Nicholas	Hannon	Slough Borough Council	Walbrook Wharf should be categorised as a key asset for the ongoing waste and resource management of both commercial and residual waste streams in the City. Slough Borough Council cannot comment on whether or not there are there any other sites in the City which could be used for waste management but again, referring the small scale and size of the City of London an Options Appraisal including a site location survey might be worth pursuing to ensure that you have given this due regard.
6.13	William	O'Dowd		There are no other suitable waste sites in the City. Waste should be extracted and pooled with other boroughs.
6.13	Rita	Cadavez		We should possibly not continue to safeguard Walbrook Wharf as a waste site.



Question	Name		Organisation	Comment Summary
6.13	John	Luckhurst	London Borough of Bexley	The City Corporation should continue to safeguard Walbrook Wharf as a waste site. It is unlikely that there are any other sites in the City which could be used for waste management given the value of land in the area. However, the recommendation of the 'Waste Arisings and Waste Management Capacity Study Review 2016,' which confirms there is scope for dedicated or shared waste treatment facilities, particularly for food waste, within existing and new commercial developments is supported. As part of the planning process, developers of new buildings and complexes should be encouraged to include waste management provision in their planning applications.
6.13	Leonard	Goodrich	Chancery Lane Association	We support Walbrook Wharf as a waste site of a sort that contributes to other key objectives such as high levels of sustainability and reduction of road congestion in the City.
6.13	Peter	Bennett		Walbrook Wharf should continue to play a role in waste management but should also be considered for further development for other uses.
6.13	Manpreet	Kanda	Royal Borough of Kensington and Chelsea	Wallbrook Wharf is safeguarded in the Mayor's Safeguarded Wharves Review March 2013; therefore, it would be reasonable to continue to safeguard it in line with the Review. The City should encourage developers to make use of the rail and the waterway network for the transport of construction waste.
6.13	Tom	Noble	City Public Realm, CoL	Walbrook Wharf must remain a waste site because it is a valuable service. Given the City's size it is necessary to manage some waste outside of the City which makes sense given the number of assets the City manages beyond the City walls.
6.13	Helen	Kay	Barbican Association	We are not sure whether Walbrook Wharf should be safeguarded

Question	Name		Organisation	Comment Summary
6.13	John	Lett	GLA	The City should continue to use and protect the Walbrook Wharf site as both a waste and a river freight operation. If there is scope to undertake more 'circular economy' activities at the site, that would generally be welcomed. It is anticipated that there may be limited scope for more such waste management uses within the City, although such uses may be able to operate on temporary planning permissions whilst sites are awaiting re-development.
6.13	Keira	Murphy	Environment Agency	<p>Yes, Walbrook wharf should be protected as an important strategic waste site, not just for CoL but for the Central London authorities as a whole. The wharf plays an important role in the sustainable transport of large tonnages of wastes from the area, reducing transport emissions due to road haulage and other benefits.</p> <p>We understand from previous engagement with CoL that the tonnage of waste handled at the wharf has dropped off in recent years due to a declining residual waste arising being collected by the authority.</p> <p>If this means that there is some significant excess capacity that could be utilised by other operators then this should be investigated, especially for 'problem' wastes such as the large tonnages of excavated materials and construction and demolition wastes being produced in London, as suitable sustainable transport hubs are in very short supply in the heart of London.</p>
6.13	Archie	Onslow	North London Waste Plan	Safeguarding of waste sites or re-provision of replacement capacity is a requirement of the London Plan. The Walbrook Wharf site is also important as it enables sustainable transportation of waste by water. This is particularly useful in London for diverting heavy and bulky CD&E waste away from the roads, for example for large-scale infrastructure projects like the Thames Tideway Tunnel.
6.13	Jeremy	Gray	City Property Association	The CPA supports the safeguarding of Walbrook Wharf as a waste site.

Question	Name	Organisation	Comment Summary
6.13	Fred Rogers		<p>Any waste that has to be removed from the City is best removed either by water or rail, depending on its destination. Walbrook Wharf should continue to be safeguarded and the possibility of a railhead being available explored. Perhaps there is a possibility of the Elizabeth Line being used for the transportation of waste, particularly eastwards from Stratford?</p> <p>However, waste will continue to be taken to the Southwark facility by road until a facility is built either in the city or at a wharf/railhead. If land is too expensive for social housing it presumably is too expensive for waste.</p>
6.13	James Trimmer	Port of London Authority	<p>Under 'Waste and the Circular Economy' there is a reference to any proposal for alternative use of Walbrook Wharf needing to include re-provision of the waste site and evidence that the wharf was no longer required. This is not the correct approach under the test to be followed under the relevant London Plan policy. If Walbrook Wharf was no longer utilised for the transport of waste by water, it would still be a safeguarded wharf. If a proposal was advanced for a non wharf use on the site, rather than an alternative waterborne cargo handling use it would, as required by the London Plan need to be demonstrated that Walbrook Wharf was not viable or capable of being made viable for waterborne cargo</p>
6.14	Harold Garner	London Borough of Camden	<p>Camden does not apply national standards to smaller developments but seeks prior approval for minor development in Local Flood Risk Zones (defined in our SFRA).</p>
6.14	Jeremy Gray	City Property Association	<p>We support applying SUDS standards to major developments, but do not consider these should be applied to minor developments. We feel that there will be viability and feasibility concerns with SUDS standards being applied to minor developments. We consider that the difference between minor and major development is an appropriate distinction on this</p>
6.14	Rita Cadavez		<p>Yes for both scales of development.</p>

Question	Name	Organisation	Comment Summary
6.14	John Lett	GLA	The application of SUDS to smaller scale development merits consideration, although it will also be necessary to consider other issues such as additional pumping for attenuation tanks.
6.14	Fred Rogers		There is no reason why all future developments should not be required to incorporate national SuDS standards.
6.14	William O'Dowd		Just larger developments but they should be mindful of any residual damage to adjacent smaller projects.
6.14	Tom Noble	City Public Realm, CoL	All development must utilise the SUDs hierarchy of delivery. Where there are major developments with the largest footprint they have the potential to create the most impact so they ought to provide the necessary infrastructure for a more comprehensive SUDs. Where there are modest development it is necessary to be aware of what excess water run-off will mean for these sites.
6.14	Keira Murphy	Environment Agency	<p>This will very much depend on the evidence from your Strategic Flood Risk Assessment and Surface Water Management Plans. If these evidence base documents recommend standards for both major and smaller developments, these should be incorporated into your future policies.</p> <p>There is an issue with only applying standards to major developments in that we may find the cumulative impacts from permitted development and the smaller developments counter-balance the benefits achieved on larger sites. Ideally we want managing surface water sustainably to be a city wide aim.</p> <p>The City's underground sewer network has a lack of capacity to cope with surface water runoff and particularly during heavy rainfall. Combined sewers are prevalent in the area and during heavy rainfall, runoff can enter the foul sewer network in a combined system. It is preferable to discharge water directly to the river or a separate surface water sewer to help alleviate</p>

Question	Name		Organisation	Comment Summary
6.14	Manpreet	Kanda	Royal Borough of Kensington and Chelsea	We consider that the national SuDS standards will be a good starting point for all developments. Using the same standards for all developments will give developers certainty on the requirements. On the other hand, if you have specific issues in the City that need addressing then you may want to consider adopting separate standards in some cases. The type of smaller developments with certain standards of SuDS should reflect those local issues: it could be development at ground level which could have or lead to considerable drainage implications and small development located in a Critical Drainage Area / hotspot or which could potentially have drainage implications for a Critical Drainage Area/hotspot.
6.15	Manpreet	Kanda	Royal Borough of Kensington and Chelsea	RBKC's current draft policies have included more emphasis on the need of adequate risk measures and their maintenance to ensure that they remain operational and provide adequate protection for the lifetime of development. Therefore, we consider that adequate measures should be required and the measures specified should be the ones shown in the Flood Risk Assessment which normally accompanies planning applications.
6.15	John	Lett	GLA	The approach to Flood Risk Management is forward looking and seeks to address the particular challenges flood risk poses to the City.
6.15	Jeremy	Gray	City Property Association	We would suggest that the City follow national and regional guidance in respect of flood resistance and resilience measures.
6.15	William	O'Dowd		Yes. Ground floor non-porous materials and flood resilient doors and windows.
6.15	Fred	Rogers		Yes. Whatever highest-level measures are best practice at the time of the planning
6.15	Rita	Cadavez		Yes, we should require flood resistance and resilience measures for new development and refurbishment schemes within the City Flood Risk Area.

Question	Name	Organisation	Comment Summary
6.15	Harold Garner	London Borough of Camden	Given the likely financial cost of flooded commercial buildings flood resistance and resilience measures should be required. BREEAM may provide a useful starting point on measures to use.
6.15	Keira Murphy	Environment Agency	A Strategic Flood Risk Assessment will be able to specify the flood resistance and resilience measures required for new development in the City Flood Risk Area. The SFRA may require a refresh to review the City Flood Risk Area in light of changes to flood modelling and climate change, and to consider the specific measures that may be appropriate.
6.15	Tom Noble	City Public Realm, CoL	There must be flood resilience measures in the City Flood Risk Area. It is important that any measures must be bound to development permissions in these areas. Because Flood Risk Areas go beyond the City it is probably necessary to ensure LA neighbours adhere to a common policy to avoid commuting flood issues elsewhere. Perhaps an SPD of Flood Risk Management is necessary to ensure developers are informed and water management becomes part of their planning approval covenant and conditioned as such and not relegated to informatives.
7.01	Yvonne Courtney		<p>Open spaces and green areas are vital to achieving the five strategic objectives set out in paragraph 2.6. and should not be sacrificed to development pressures. Existing open spaces should be protected from encroachment and overshadowing and enhanced through proper maintenance.</p> <p>More open space can be provided by insisting on the provision of public open space at ground level in large and tall building developments. Skygardens can provide amenity for office workers but are probably not enjoyed by residents and in no way a substitute for high quality public open space at ground level.</p> <p>The City's programme of streetscape improvements has been very beneficial and should be continued. The City is renowned for maintaining its own planted areas to a high standard.</p>

Question	Name	Organisation	Comment Summary
7.01	Mohammed Khan		Yes, there is a need for open space for the users of the city. Both workers and residents will enjoy the city otherwise it will turn into a sardine can and the city may lose its attraction. Expansion of the city is a good idea as it will help other surrounding areas to develop and make lives better for residents if managed properly.
7.01	Oliver Caroe	Chapter of the Cathedral Church of St Paul	As an important part of the overall environment providing welcome space for rest, play and quiet contemplation, the Cathedral is committed to the Churchyard Enhancement Programme and protection and enhancement of existing open spaces. We feel that these spaces are also important resources for seeking solace, calm, places for reflection as well as active learning and can support community cohesion, if managed well.
7.01	Fiona Meyringer		Yes, existing open spaces should be protected. Prioritise it over office buildings.
7.01	Tom Noble	City Public Realm, CoL	Open Spaces in the City should be preserved and enhanced as they provided the supporting "tissue" for social interaction and humanizes a city. New public spaces must be provided in support of the increasing office floorspace. Without this extra space, the City will fail to retain its status as the
7.01	David Coleman		Private open space should certainly be encouraged, but it is no substitute for public open space and that is the greater priority. The pressure on open spaces of a growing working population would justify a planning obligation on all new office development to pay into a City wide fund for purchasing new sites or extending existing ones.

Question	Name		Organisation	Comment Summary
7.01	John	Lett	GLA	Open space is at a premium in such a densely developed part of London. There are some good quality open spaces, and clearly in many cases the open spaces need to be able to accommodate large numbers of people.
7.01	David	Rees		Existing open spaces should be protected from encroachment and overshadowing, and enhanced through proper maintenance. More open space can be provided by insisting on the provision of public open space at ground level in large and tall building developments. Skygardens can provide amenity for office workers, but are not a substitute for high quality public open space at ground level. The City's programme of streetscape improvements has been very beneficial and should be continued. The City maintains its own planted areas to a
7.01	Peter	Bennett		Yes, existing open spaces should be protected and enhanced. The vast open spaces and gardens in the Barbican Estate could be made available to the wider public to help deliver more open space in the City.
7.01	John	Schofield	City of London Archaeological Trust	We commend the policy statements in paragraphs 7.1 and 7.2 about the need for and management of open spaces. Please remember also that all spaces, both old and new, have a history which should be made evident in the space itself. Historic spaces must be valued because they are historic, and because they serve as places of memory. The former City must not be wiped away. To be an international cultural hub, you must have a heritage to celebrate and remember.
7.01	Sharon	Ament	Museum of London	West Smithfield does provide an opportunity to enhance some of the open spaces around it as part of the plans for a new Museum. How this is handled with the roads around the markets is to be considered further. We are though keen to ensure that all open space around the Museum is well maintained and attractive.



Question	Name	Organisation	Comment Summary
7.01	Yarema	Ronish	Open spaces and green areas are vital to achieving the five strategic objectives set out in paragraph 2.6. They should not be sacrificed to development pressures. Existing open spaces should be protected from encroachment and overshadowing, and enhanced through proper maintenance. More open space can be provided by insisting on the provision of public open space at ground level in large and tall building developments. Skygardens can provide amenity for office workers, but are not a substitute for high quality public open space at ground level. The City's programme of streetscape improvements has been very beneficial and should be continued. The City maintains its own planted areas to a high standard. Skygardens can provide amenity for office workers, but are not a substitute for high quality public open space at ground level. The City's programme of streetscape improvements has been very beneficial and should be continued. The City maintains its own planted areas to a high standard.
7.01	Peter	Rose	Make open space a condition of new developments.
7.01	Helen	Kay	Barbican Association
			We should continue to protect and enhance the open spaces in the City, particularly those in the Listed Grade II* within the Barbican Residential Estate. This protection should include the protection of the levels of daylight and sunlight that reach these spaces. Roof-top terraces and sky-gardens are no substitute. Indeed, we should not encourage the building of roof-top terraces on office blocks within or across the street from the residential clusters of the Barbican and Golden Lane as misuse of these terraces can result in nuisances being caused to residents. Where such terraces are built, their usage should be limited to Mon-Fri, 0800 – 1900.
7.01	Fred	Rogers	Yes, we should continue to protect or enhance existing open spaces in the City. Delivering more open space will be difficult as, other than through closing roads to traffic, demolition of existing buildings is the only, unlikely option, as much as doing so at Paternoster Square would be very beneficial. CoLC must ensure that existing open spaces, such as those on the Guinness Trust Estate in Mansell Street are not lost. Bernard Morgan House is another example of potential loss of open space.

Question	Name	Organisation	Comment Summary
7.01	Jeremy Gray	City Property Association	The CPA strongly supports the protection and enhancement of open spaces and the City should look for opportunities to deliver more open space in major redevelopment schemes where appropriate, feasible and viable.
7.01	Heather Hilburn		Open spaces and green areas are vital to achieving the five strategic objectives set out in paragraph 2.6. They should not be sacrificed to development pressures. Existing open spaces should be protected from encroachment and overshadowing, and enhanced through proper maintenance. More open space can be provided by insisting on the provision of public open space at ground level in large and tall building developments. Skygardens can provide amenity for office workers, but are not a substitute for high quality public open space at ground level. The City's programme of streetscape improvements has been very beneficial and should be continued. The City maintains its own planted areas to a high standard.
7.01	Rita Cadavez		Open spaces in the City need to be enhanced. Perhaps better open spaces rely on less disperse smaller areas and rather more on larger central spaces.
7.01	Jonathan Whitby		Open spaces and green areas are vital to achieving the five strategic objectives set out in paragraph 2.6. They should not be sacrificed to development pressures. Existing open spaces should be protected from encroachment and overshadowing, and enhanced through proper maintenance. More open space can be provided by insisting on the provision of public open space at ground level in large and tall building developments. Skygardens can provide amenity for office workers, but are not a substitute for high quality public open space at ground level. The City's programme of streetscape improvements has been very beneficial and should be continued. The City maintains its own planted areas to a high standard.
7.02	Peter Rose		There should be a mixture of greenery and harder surfaces within open spaces.

Question	Name	Organisation	Comment Summary
7.02	Jonathan Whitby		A modest element of planting should be provided even in the smallest public realm proposals.
7.02	Jeremy Gray	City Property Association	The make-up of an open space in terms of hard and soft landscaping should be considered on its individual merits. Clearly a mix of both is often preferable. We do not consider policy should be prescriptive in terms of what should be sought in new open spaces.
7.02	David Coleman		The benefits of relaxing in a green setting have been well proved, so the dominant style of open space should be greenery wherever possible. However this needs to be combined with hardened space to handle large numbers of visitors. It should be accepted that the scope for biodiversity gain in publicly accessible open spaces is very limited in the City.
7.02	Yarema Ronish		A modest element of planting should be provided even in the smallest public realm proposals.
7.02	John Lett	GLA	Whilst additional green open spaces are very much welcomed and often preferred, there is likely to be some occasions when hard open spaces are more practical.
7.02	Fred Rogers		As much greenery as possible should be the requirement. Maintenance costs can be recovered in a number of ways but the City Corporation has to acknowledge the fantastic job its Open Spaces team achieves and increase its resources rather than threaten them.
7.02	Yvonne Courtney		A modest element of planting should be provided even in the smallest public realm proposals and developers should be required to maintain public open spaces within their site

Question	Name	Organisation	Comment Summary	
7.02	Heather	Hilburn	A modest element of planting should be provided even in the smallest public realm proposals.	
7.02	Fiona	Meyringer	Greenery should be given priority. Developers should contribute to ongoing maintenance to the same extent that they contribute to ongoing maintenance of the buildings.	
7.02	David	Rees	A modest element of planting should be provided even in the smallest public realm proposals. Developers should be required to maintain public open spaces within their site	
7.02	Tom	Noble	City Public Realm, CoL	The design of each space will depend on context and site conditions. Green spaces also contribute to mitigate the impacts of noise and air pollution as well as improving the quality of life. Yes, developers must contribute but there are already mechanisms in place for this through CIL.
7.02	Sakiba	Gurda	London Borough of Islington	Priority should be given to greenery within open spaces due to the multiple demonstrable benefits of this; harder surfaces do not offer the same benefits around, for example, reducing the effects of pollution and climate change, biodiversity or relaxation/tranquillity. Well-designed spaces with soft landscaping can be used year-round.
7.02	Helen	Kay	Barbican Association	Priority should be given to greenery.
7.02	Rita	Cadavez		Permeable spaces would be appreciated. Yes.
7.03	Peter	Bennett		In limited circumstances buildings could contain public space/employee recreational space. However, the City needs to remain internationally cost-competitive and avoid imposing too much burden on property owners and developers.

Question	Name	Organisation	Comment Summary
7.03	Yvonne Courtney		Yes, buildings over a certain size should contain a proportion of public open space at ground level. Employee recreational space is also desirable, but should not be a substitute for public open space.
7.03	Rita Cadavez		Yes, buildings over a certain size should contain a proportion of public space and/or employee recreational space within the building, including roof space.
7.03	Jonathan Whitby		Yes, buildings over a certain size should contain a proportion of public open space at ground level. Employee recreational space is also desirable, but should not be a substitute for public open space.
7.03	Sharon Ament	Museum of London	Relating to question 7.3 we will be seeking to create a large area of formal and informal spaces for the staff and visitors within the West Smithfield development.
7.03	David Rees		Yes, buildings over a certain size should contain a proportion of public open space at ground level. Employee recreational space is also desirable, but should not be a substitute for public open space.
7.03	Tom Noble	City Public Realm, CoL	Public spaces should be visible and accessible at street level in order to support a dynamic street life. Roof space is not a suitable alternative.
7.03	Helen Kay	Barbican Association	We should require buildings over a certain size to contain a proportion of public space and/or employee recreational space within the building, but NOT including roofspace where the building is close to the residential clusters. Developers should be encouraged to make more imaginative use of internal atriums, for example to include climbing walls.

Question	Name	Organisation	Comment Summary
7.03	Fred Rogers		Whilst the motive is good, the reality is not, as the Walkie Talkie confirms. Unless space is dedicated to the public by deed, there is little point in imposing conditions requiring public access. Developments should enable proper use of roof spaces, but the provision of employee recreational space must be down to the occupant and not the City Corporation.
7.03	Heather Hilburn		Yes, buildings over a certain size should contain a proportion of public open space at ground level. Employee recreational space is also desirable, but should not be a substitute for public open space.
7.03	Yarema Ronish		Yes, buildings over a certain size should contain a proportion of public open space at ground level. Employee recreational space is also desirable, but should not be a substitute for public open space.
7.03	Mohammed Khan		Buildings over a certain size should definitely contain a proportion of public space and/or employee recreational space within the building.
7.03	John Lett	GLA	The use of roof gardens/terraces to provide open space is welcomed. Provision of more public access to these roof level spaces could offer some particularly impressive public spaces.
7.03	Jeremy Gray	City Property Association	We would be concerned with the introduction of a one size fits all policy relating to public space and/or employee recreational space within buildings, including roofspace. We do not consider it is appropriate to provide public space or viewing galleries in all major developments or tall buildings. A policy which leads to a proliferation of viewing galleries is not considered sustainable, or necessarily in the best interests of the City. Employee recreational space is an important consideration, but the provision of this space in buildings should be left to the market and not driven by planning policy.

Question	Name	Organisation	Comment Summary
7.03	Peter Rose		Yes, buildings over a certain size should contain a proportion of public space and/or employee recreational space within the building.
7.03	Fiona Meyringer		Yes, buildings over a certain size should be required to contain a proportion of public space and/or employee recreational space within the building.
7.04	Rita Cadavez		Small gardens with seating. Community spaces that could be used for activities when needed. Yes, the Local Plan should specify what should be sought in new open spaces, depending on their location and character.
7.04	Tom Noble	City Public Realm, CoL	Sky gardens are not always opened to the general public, often only offer restricted access and cater for the needs of only one group of people, office workers. Through multiple public consultation exercises, the City community has expressed their interest and support to have open green spaces at street level, where a diversity of users and uses is welcomed. Sky gardens or terraces could offer alternative spaces for the public but should be considered as an additional amenity, rather than a replacement of a more traditional public square.
7.04	Helen Kay	Barbican Association	Where there is space in a large development, say in a courtyard, away from the residential clusters, the hard landscaping should include facilities like volleyball, netball or basket ball pitches. These require little upkeep, and new office blocks often already include changing and shower room (for bicycle users).
7.04	Fred Rogers		Any type of recreational facility must be based on surveyed demand at the relevant time. The Local Plan must contain requirements to provide public open spaces and be supported by dedication but, within that framework, the City should require innovative proposals from developers.

Question	Name	Organisation	Comment Summary
7.04	Yvonne Courtney		Small sunlit areas with seating are needed for City workers. The team who designed the City's recent streetscape enhancements should develop guidance for seating, planting, lighting and other facilities for open spaces.
7.04	Mohammed Khan		Seating, eating area, rain sheltered space and recreational outdoor options.
7.04	Yarema Ronish		Small sunlit areas with seating are needed for City workers. Larger sunlit open spaces with seating are needed next to visitor attractions, with easy access to toilets and A3 uses. The team who designed the City's recent streetscape enhancements should develop guidance for seating, planting, lighting and other facilities for outdoor open spaces.
7.04	Fiona Meyringer		Water, trees and wildlife are most needed in the City.
7.04	Ivo de Wit		There is a trend towards sustainable and recreational space.
7.04	David Rees		Small sunlit areas with seating are needed for City workers. Larger sunlit open spaces with seating are needed next to visitor attractions, with easy access to toilets and A3 uses. The team who designed the City's recent streetscape enhancements should develop guidance for seating, planting, lighting and other facilities for outdoor open spaces.
7.04	Heather Hilburn		Small sunlit areas with seating are needed for City workers. Larger sunlit open spaces with seating are needed next to visitor attractions, with easy access to toilets and A3 uses. The team who designed the City's recent streetscape enhancements should develop guidance for seating, planting, lighting and other facilities for outdoor open spaces.



Question	Name	Organisation	Comment Summary
7.04	Jonathan Whitby		Small sunlit areas with seating are needed for City workers. Larger sunlit open spaces with seating are needed next to visitor attractions, with easy access to toilets and A3 uses. The team who designed the City's recent streetscape enhancements should develop guidance for seating, planting, lighting and other facilities for outdoor open spaces.
7.04	Oliver Caroe	Chapter of the Cathedral Church of St Paul	We would endorse the City providing greater guidance on new open spaces in terms of seating, planting and other facilities, depending on their location and character. We hope that policy will start to clarify and enable the (sympathetic) commercial use of open space in a way that supports public activity and undergirds the high quality management and maintenance of open space. The Cathedral envisages that modest commercial use of open spaces, if well judged and managed, could provide a public benefit and hopes this ambition can be recognised as an issue for
7.04	Jeremy Gray	City Property Association	The provision of open space and recreational space depends on many factors, which are not the same on every site. Again we would discourage a prescriptive policy on this topic, whilst supporting the ambition of the policy sentiment.
7.05	Rita Cadavez		Boundaries could be amended.

Question	Name	Organisation	Comment Summary
7.05	Helen Kay	Barbican Association	<p>Yes, the boundaries of existing PSCs should be amended, and yes it is still appropriate to prioritise A1 units over other retail uses in PSCs.</p> <p>In addition, we should constrain future increases of retail facilities in or opposite the main residential clusters, particularly that of the Barbican. Where it is necessary and appropriate to have A1 and A2 services, these should be allowed. The opening times of A3 facilities, and the nuisance that their patrons can cause on the pavements outside of them, make them problematic.</p> <p>In particular, we are concerned by the rise in general of retail facilities that are A3 at breakfast or lunchtime but morph into an A4-type establishment in the evening.</p> <p>As far as A5 establishments are concerned: We would like permissions for A3 establishments in or opposite the Barbican Residential Estate to be conditioned in such a manner to disallow an A5 element, so that no nuisance is caused by a Deliveroo / UberEat or similar bicycle / scooter / motorbike delivery service.</p>
7.05	Natalie Broughton	London Borough of Hackney	<p>We note that the City of London identifies five Principal Shopping Centres (PSCs). Those at Liverpool Street and Moorgate are in closest proximity to and of greatest relevance to Hackney.</p> <p>The Shoreditch AAP will explore the issue of retail in greater detail and we will explore the</p>
7.05	Leonard Goodrich	Chancery Lane Association	<p>It is appropriate to prioritise A1 units, although consideration should be given to the way other retail uses, in particular A3 / A4 / A5, in combination with A1 units, encourage people to visit areas with a lot of A1 units, serve the needs of workers in the City, and contribute more generally to sound placemaking.</p>
7.05	Mohammed Khan		<p>No. There should be a diversification of business types in the city to create a growing economy. Concentrating one type of business will be challenging to transport, labour market</p>

Question	Name		Organisation	Comment Summary
7.05	Sakiba	Gurda	London Borough of Islington	The document seeks views on a more flexible approach to retail, due to the changing nature of how people shop. While having a baseline level of A1 uses is important to ensure that basic retail needs can be catered for, it seems sensible to plan for flexibility so that retail areas can adapt to changing circumstances, for example, the increasing focus on the night-time
7.05	Sharon	Ament	Museum of London	We recognise that the Farringdon area is not currently a Principal Shopping Centre (PSC) in the City. However with the arrival of the Elizabeth Line and the fact that Farringdon is so well connected, there will continue to be growth in both commercial and residential development in the coming years and demand for shopping, restaurants etc is likely to continue to increase. We expect to provide exciting curated food and beverage experiences. It therefore may be the case that the answer to Question 7.5 over time is that the Farringdon area might
7.05	Fred	Rogers		<p>“No longer needed” (7.5) seems to be subjective to isolated units and would appear to encourage developers to force, particularly, small retailers out of business in order to redevelop. On top of this is the likely loss of small retailers as a result of retirement. CoLC has to ensure these businesses continue by the creation of non-designated heritage and/or community assets, so restricting adverse changes of use/development and, where it is the landlord, subsidising rents, especially for community use.</p> <p>The large retailers may bring the businesses rates and, some, the glamour but independent retailers and businesses have to be retained and encouraged. Those businesses should be nurtured and encouraged to both survive and grow. Whilst street markets would enhance parts of the city, especially at the weekends, the competition to adjoining boroughs, as well as the city’s own independents is not justifiable. It is perhaps a sad reflection on CoLC that despite its origins, it no longer has a street market.</p>
7.05	Tom	Noble	City Public Realm, CoL	Retail links are key elements to maintain an active street life, but a diverse range of businesses should be encouraged. These links should be taken into account when considering future developments in order to consider their impacts and how they can support these activities. In regards to the prioritisation of different typologies of retail units, the City should strike a balance in order to provide a dynamic, socially inclusive and diverse street

Question	Name	Organisation	Comment Summary
7.05	Jeremy Gray	City Property Association	We support the PSCs and their role. We consider there would be merit in reviewing the current boundaries of the existing PSCs, given recent developments in and around the PSCs and market trends in respect of retailing. We see the benefit of prioritising Class A1 units over other retail use application, but policy should allow sufficient flexibility to ensure the continued vitality and viability of the PSCs, particularly in the face of competition from online retailing. Policy should not be too prescriptive such that the PSCs see vacant units arising as a result. The PSCs should provide flexibility to allow a mix of retail (and leisure) uses to ensure their continued vitality and viability.
7.06	Rita Cadavez		These retail areas seem to currently exist rather separated from the rest of the City.
7.06	Sophie Hall-Thompson	London Borough of Tower Hamlets	Planning Officers support the principal of Retail Links to encourage movement as indicated in Figure 14. The route from Leadenhall Market heading north-east would encourage exploration of areas and visitor attractions within Tower Hamlets
7.06	Mohammed Khan		Yes, isolated retail units should continue to be protected.
7.06	Jeremy Gray	City Property Association	Policy should also support the role of retail (A1 and A3) in creating active frontages and meeting occupier demand outside of the PSCs.
7.06	Peter Rose		Allow retail uses throughout .Limit bars and late night venues. Control nighttime noise and nuisance.
7.06	Peter Bennett		Isolated retail units are often unviable and unattractive. Retail should be encouraged in key areas only.

Question	Name	Organisation	Comment Summary
7.06	Helen Kay	Barbican Association	Existing isolated retail units should be protected.
7.06	Tom Noble	City Public Realm, CoL	Retail links do serve a clear purpose when developed as part of a wider strategic approach for the City environment. This links should be supported by a way-finding strategy, an inclusive, safe and inviting street environment that responds to the dynamism of these retail corridors.
7.06	Fred Rogers		It is difficult to understand the purpose of retail links. "No longer needed" (7.5) seems to be subjective to isolated units and would appear to encourage developers to force, particularly, small retailers out of business in order to redevelop. CoLC has to ensure these businesses continue by the creation of non-designated heritage and/or community assets, so restricting adverse changes of use/development and, where it is the landlord, subsidising rents, especially for community use. The large retailers may bring the businesses rates and, some, the glamour but independent retailers and businesses have to be retained and encouraged. Those businesses should be nurtured and encouraged to both survive and grow. Whilst street markets would enhance parts of the city, especially at the weekends, the competition to adjoining boroughs, as well as the city's own independents is not justifiable. It is perhaps a sad reflection on CoLC that despite its origins, it no longer has a street market.
7.06	Leonard Goodrich	Chancery Lane Association	Retail at street level should be allowed throughout the City unless there is a strong reason not to allow it. We are not convinced of the need for protection of isolated and small groups of retail units.
7.07	Jeremy Gray	City Property Association	We see no real need to review the City's existing housing policies or residential areas over and above those changes required to bring them in line with national regulations and guidance and regional policy and guidance.

Question	Name	Organisation	Comment Summary
7.07	David Rees		Residential development should be permitted anywhere in the City as long as the particular site is not considered suitable for offices, and residential amenity consistent with a city centre location can be achieved. Residential development can coexist side by side with offices, there are many good examples of this in the City. However residential development should preferably not be located on principal streets or dispersal routes, to avoid night-time noise nuisance from revellers. Conversely, drinking establishments should be located on principal streets, not quiet back streets. Large window to wall ratios should be encouraged in housing developments, to ensure adequate residential daylighting and avoid future issues
7.07	Jonathan Marginson	DP9 for Northern & Shell	Whilst we would not suggest that the boundaries of existing residential areas are defined, we do consider that it is appropriate to define clearly in the Plan where residential development will be accepted. We consider that residential uses are appropriate along the river between London Bridge and Tower Bridge.
7.07	Fred Rogers		Why office use should continue to be a priority after Brexit remains a mystery. Housing should be encouraged throughout the City, subject to amenity issues.
7.07	Mohammed Khan		Yes, boundaries need to be marked clearly and the City should be free from any new developments as housing needs can be fulfilled by neighbouring boroughs.
7.07	Elaine Elstone	Tetlow King for Rentplus	The delivery of housing to meet local needs is critically important to achieving mixed and balanced communities across the City, and should be encouraged wherever possible to maximise housing supply.
7.07	Leonard Goodrich	Chancery Lane Association	We would object to defined boundaries if the Chancery Lane area were not included within a residential area. In general terms defined boundaries would reduce flexibility in the system. Overall our preference would be for the alternative approach of permitting residential development on any suitable non-office site in the City

Question	Name	Organisation	Comment Summary
7.07	Yvonne Courtney		Residential development in the City could be considered – only where a site is not suitable for offices, retail or cultural use. Residential development can coexist side by side with offices – ideally not on principal streets/dispersal routes, to avoid night-time noise nuisance from revellers. Conversely, drinking establishments should be located on principal streets, not quiet back streets. Large window to wall ratios should be encouraged to ensure adequate residential daylighting and avoid future issues with right of light.
7.07	Rita Cadavez		Yes. Probably a good idea to allow for different types of residential development where not suitable for office use (eg. co-working units and housing-studios)
7.07	Peter Rose		Residential development should be permitted more generally.
7.07	George Snape	Tfl	TfL recommends that residential development should be focused on existing residential areas whose boundaries should be defined in the plan. New residential development should be located near to existing amenities. The City benefits from extraordinary public transport and agglomeration of office uses and this should continue and be maximised into the future.
7.07	John Lett	GLA	This may mean that housing continues to be provided close to existing residential areas, where there are more local services, and should be outside the Commercial Core area(s).
7.07	Jonathan Whitby		Residential development should be permitted anywhere in the City as long as the particular site is not considered suitable for offices, and residential amenity consistent with a city centre location can be achieved. Residential development can coexist side by side with offices, there are many good examples of this in the City. However residential development should preferably not be located on principal streets or dispersal routes, to avoid night-time noise nuisance from revellers. Conversely, drinking establishments should be located on principal streets, not quiet back streets. Large window to wall ratios should be encouraged in housing developments, to ensure adequate residential daylighting and avoid future issues

Question	Name	Organisation	Comment Summary
7.07	Peter Bennett		Residential development should be constrained within the City to existing areas of concentration. The proliferation of residential development across the City would have a huge negative impact on the ability of the City to change and adapt its commercial offer in the
7.07	Heather Hilburn		Residential development should be permitted anywhere in the City as long as the particular site is not considered suitable for offices, and residential amenity consistent with a city centre location can be achieved. Residential development can coexist side by side with offices, there are many good examples of this in the City. However residential development should preferably not be located on principal streets or dispersal routes, to avoid night-time noise nuisance from revellers. Conversely, drinking establishments should be located on principal streets, not quiet back streets. Large window to wall ratios should be encouraged in housing developments, to ensure adequate residential daylighting and avoid future issues with right of light.
7.07	Helen Kay	Barbican Association	No, we should not define the boundaries of existing residential areas more clearly to indicate where in the City further residential development would be permitted. Indeed, we should encourage residential development adjacent and close to the existing residential areas, as long as it does not affect the daylighting and sunlighting of existing residences. We are very keen that residential areas should be recognised and amenity protected within them by separate rules limiting noise and light pollution and busy activity in evenings, night times, and weekends. To the extent possible it would make sense to encourage further residential development within or close to those areas so they can share some protection.
7.07	Yarema Ronish		Residential development should be permitted anywhere in the City as long as the particular site is not considered suitable for offices, and residential amenity consistent with a city centre location can be achieved. Residential development can coexist side by side with offices, there are many good examples of this in the City. However residential development should preferably not be located on principal streets or dispersal routes, to avoid night-time noise nuisance from revellers. Conversely, drinking establishments should be located on principal streets, not quiet back streets.



Question	Name		Organisation	Comment Summary
7.07	Daniel	Palman	Berkeley Homes	<p>In our view the Council should adopt a flexible approach which provides some certainty that residential development will be permitted within residential areas but is not overly restrictive in preventing residential use within other areas of the City.</p> <p>Each development site and application for residential development should be considered on a site-by-site basis on its own merits. Not every site will be suitable for office use and where it can be demonstrated that residential amenity can be achieved and the development meets other policies in the Local Plan then residential use should be supported and approved.</p>
7.07	Polly	Barker	TfL Property	<p>TfL Property recognises that most residential units are concentrated in certain areas within the City. TfL Property is of the view that although boundaries could be made clearer, residential-led developments could be permitted anywhere in the City as long as suitable amenity can be achieved and it does not compromise its economic competitiveness.</p>
7.08	Peter	Bennett		<p>The City should not provide any more residential units than the absolute minimum within its existing boundaries.</p>
7.08	Elaine	Elstone	Tetlow King for Rentplus	<p>As far as possible it is important for housing targets to be ambitious, seeking to meet as much housing need as can be viably delivered. This is particularly important in seeking to deliver affordable housing. We would support the Plan seeking to meet or exceed the London Plan housing target.</p>
7.08	Daniel	Palman	Berkeley Homes	<p>The Council's housing target should be based on a robust evidence base to fully understand its objectively assessed housing need. The City of London Strategic Housing Market Assessment (June 2016) and SHMA Update (September 2016) identifies a need for 126 dwellings over the plan period 2014 – 2036 which is slightly lower than the London Plan target of 141 dwellings over a period from 2015 – 2025. Whilst the evidence base prepared on behalf of the Council is up-to-date, the City should aspire to meet and exceed the higher figure in the London Plan. The City should contribute to meeting London's housing need as a whole which extends beyond borough boundaries.</p>

Question	Name	Organisation	Comment Summary
7.08	Mohammed Khan		No - the city should remain exempt.
7.08	Polly Barker	TfL Property	TfL Property would encourage the City to meet the London Plan housing target as a minimum. However this should be managed in a way which does not compromise the strategic CAZ roles.
7.08	John Lett	GLA	The City's commitment to meet its London Plan housing target is welcomed. This will need to be managed in ways which do not compromise the City's strategic CAZ roles.
7.08	Leonard Goodrich	Chancery Lane Association	Given the need to address the level set in the London Plan, and the inherent uncertainty in an forward-looking housing need assessment (such that it could easily be an underestimate of future housing need), we feel that the pragmatic solution would be to at least meet the London Plan target. Given the apparent consensus that there is a housing shortage in London we would support the proposition that there is a need to exceed the London Plan housing target.
7.08	Jeremy Gray	City Property Association	We understand the existing Local Plan policies on housing have exceeded Local Plan targets and as such the City's policy position should allow future targets to be met or exceeded (as expected by City Hall).
7.08	Fred Rogers		The City Corporation should encourage the building of as many new homes as possible within the Square Mile, including affordable, if not social ones.
7.08	Helen Kay	Barbican Association	We would support the City taking measures to prevent residential units being bought by overseas investors and never occupied. Unoccupied flats should attract increasing penalties the longer they are unoccupied and the money spent building more affordable and social

Question	Name	Organisation	Comment Summary	
7.08	Rita	Cadavez	The City is an exceptional location in London where commercial and office functions are key. Even though it seems like a fair principle to try to achieve the housing target it ought to prove difficult.	
7.08	Sophie	Hall-Thompson	London Borough of Tower Hamlets	It is recommended that the City of London aims to meet the strategic housing supply targets within London Plan 2015.
7.09	Yarema	Ronish		From a design point of view, it is feasible to incorporate residential and non-residential uses. The non-residential uses should be kept below 25% of the total floor area, so that residential leaseholders can apply for the right to manage the residential portion.
7.09	Daniel	Palman	Berkeley Homes	It is definitely feasible for residential and non-residential uses to be successfully incorporated within a building and Berkeley has a strong record of demonstrating that this is achievable. As set out in London Plan paragraph 4.15: "London's economic growth depends heavily on an efficient labour market and this in turn requires adequate housing provision to sustain it. This can be partly addressed through mixed use development, to deliver a mix of uses across an area, including but not necessarily exclusively, in mixed use buildings." The combination of residential and non-residential uses can assist with creating and shaping places and support both the key strategic function of the City of London's economic importance and delivering much needed new homes.
7.09	David	Rees		From a design point of view, it is feasible to incorporate residential and non-residential uses. The non-residential uses should be kept below 25% of the total floor area, so that residential leaseholders can apply for the right to manage the residential portion.
7.09	Yvonne	Courtney		Non-residential uses should be kept below 25% of the total floor area, so that residential leaseholders can apply for the right to manage the residential portion.

Question	Name	Organisation	Comment Summary
7.09	Leonard Goodrich	Chancery Lane Association	Co-existence of residential and non residential uses in the same building could be feasible and so should not be ruled out, but should be subject to assessment on case-by-case basis.
7.09	Polly Barker	TfL Property	TfL Property considers it feasible for residential units to be incorporated in a building with non-residential uses provided that residential amenity is suitable and that the residential components complement and do not strategically constrain other uses. Housing will continue to play a role in maintaining the mixed use character of the city and therefore proposals which combine residential and non residential uses should be considered, but should not compromise the strategic value of the CAZ. TfL Property has identified a small number of potential sites within the City of London which may have scope for bringing forward residential, or a mix of residential and non residential development and would welcome
7.09	Peter Bennett		The co-existence of residential and commercial uses would fundamentally undermine the flexibility needed to meet changing business needs and is unlikely to be acceptable in current development funding terms.
7.09	Mohammed Khan		Residential needs should not be focus of the city.
7.09	Fred Rogers		There is no reason why there should not be mixed developments. It simply depends on how the differing uses are mixed.
7.09	Rita Cadavez		Yes, and this could allow for interesting design solutions toward a good policy for integration.
7.09	Jeremy Gray	City Property Association	We do not support a policy encouraging the mixing of commercial and housing in one building in the City although we can see that in certain circumstances such a proposal would be sustainable and the City should not preclude such an approach by a restrictive policy.

Question	Name	Organisation	Comment Summary
7.09	Helen Kay	Barbican Association	Our experience is that such dual use buildings can be very difficult when it comes to protecting residential amenity, unless a strong management agreement to protect residential amenity is included in the Planning conditions. This is difficult to achieve when the same developer wants maximum flexibility from both types of usages.
7.09	Sophie Hall-Thompson	London Borough of Tower Hamlets	Planning Officers would be interested to see the evidence base relating to the suitability of co-locating housing and offices.
7.09	Jonathan Whitby		From a design point of view, it is feasible to incorporate residential and non-residential uses. The non-residential uses should be kept below 25% of the total floor area, so that residential leaseholders can apply for the right to manage the residential portion.
7.09	Adam Cornish	Quod for Travis Perkins plc	Residential units can be successfully incorporated into a building with non-residential uses and co-existence would certainly not undermine the operation of the City or residential amenity. As mentioned, Travis Perkins' builders' merchant branches have been successfully incorporated into mixed-use schemes in London, including at Battersea Park Road in Wandsworth and on St Pancras Way. TP is currently considering similar developments on their existing sites across London and on other sites that they may seek to acquire in the
7.09	Heather Hilburn		From a design point of view, it is feasible to incorporate residential and non-residential uses. The non-residential uses should be kept below 25% of the total floor area, so that residential leaseholders can apply for the right to manage the residential portion.
7.10	Mohammed Khan		There should be short term accommodation like hotels rather than long term residential homes. This will help provide for the increasing number of visits across different affordability
7.10	Rita Cadavez		Yes. Plus rental accommodation; short-term stay housing (week or monthly rentals).

Question	Name		Organisation	Comment Summary
7.10	Helen	Kay	Barbican Association	We should discourage hostel accommodation, student accommodation and short term letting (less than six months) close to or in the current residential clusters as these can have a negative impact on residential amenity.
7.10	Fred	Rogers		<p>The loss of the Barbican YMCA has had a negative impact on the supply of hostel accommodation, as has the closure and disposal of Bernard Morgan House. More hostels are needed. Also more student type accommodation is required, particularly with flexible tenancy offers to city workers as well as students. The absence of key worker accommodation should also be rectified.</p> <p>It is notable that the needs of residents is the penultimate topic of the consultation. A reminder that we know where we stand as far as the City is concerned. Certainly the elderly seeking sheltered accommodation have a limited choice - 19 flats in Tudor Rose Court and nine flats in Iveagh Court, Mansell Street. That seems to be a miserable offering and provision should match need.</p>
7.10	Elaine	Elstone	Tetlow King for Rentplus	We strongly recommend that the Plan seek to meet the needs of those households who aspire to home ownership but are currently locked out by prohibitively expensive private sector rents and the difficulties of saving for a mortgage deposit by encouraging delivery of rent to buy housing across the City.
7.11	Peter	Bennett		Provision of affordable housing is more appropriate elsewhere in neighbouring boroughs where there is less competition from commercial users. Commuted sums for this purpose are the best solution.
7.11	Rita	Cadavez		Yes (first question) - the level of affordable housing required in the City should be increased.

Question	Name	Organisation	Comment Summary
7.11	Fred Rogers		<p>The Local Plan's requirement for 30% "affordable" homes on site has hardly been met, since every case appears to be "exceptional". Even then, the "in lieu" receipts, currently a net £40 million, seem to average a lot less than 60%.</p> <p>The Mayor of London is proposing a universal 35% "affordable" on-site provision and the Local Plan should reflect the Mayor's policy. The "exceptional" opt out, if there has to be one, should certainly include a "claw back" provision for developers' profits in excess of viability assessments.</p> <p>The City Corporation must continue to seek alternative means of providing "affordable" homes for rent as the building of "starter" homes will not be feasible without subsidy. That subsidy, along with institutional funds can be best used in providing more "affordable" homes for rent, even if outside the Square Mile.</p> <p>Whilst the number of second homes is shown as 1,400, there is no indication of the number of empty homes or homes offered as serviced apartments. Brexit will have a positive impact on housing supply as the number of foreign nationals reduces.</p>
7.11	Mohammed Khan		No, the level of affordable housing required in the City should not be increased.
7.11	Helen Kay	Barbican Association	No, the level of affordable housing required in the City should not be increased to allow the supply of rented affordable housing to be retained alongside starter homes. However, the approach to seeking commuted sums and delivering affordable housing outside the City should be amended so that the new housing (built outside the City) is within 2.0 km of the City's boundaries thus making it easy for lower paid City workers and keyworkers.
7.11	Elaine Elstone	Tetlow King for Rentplus	The delivery of Rentplus homes as the sole, or part affordable housing tenure on new developments will help diversify local housing stock within the City. The delivery of starter homes, as set out in the draft technical regulations consultation, will significantly reduce the level of rented accommodation that will be delivered by the Plan targets. It would be highly beneficial to raise the level of affordable housing in order to retain a greater supply of other affordable housing tenures, including rent to buy, alongside starter homes.

Question	Name		Organisation	Comment Summary
7.11	Daniel	Palman	Berkeley Homes	<p>The proposed level of affordable housing required in the City should be established through a robust evidence base to ensure that the Local Plan meets the objectively assessed need for affordable housing in the housing market area taking into account housing affordability and housing typologies. In doing so, the level of affordable housing will need to take into account wider housing policy set at the regional level by the Mayor of London and national policy such as starter homes, albeit this may be subject to caveats given the uniqueness of affordability in the City.</p> <p>The proposed policy and level of affordable housing should be flexible to allow developments to be assessed on a site-by-site basis when viability is a key component of deliverability (as set out at NPPF paragraph 173). There is a need to encourage rather than stifle the delivery of new development in the City through unrealistic affordable housing targets.</p> <p>It is recognised that land within the City is an expensive and limited resource and there are competing pressures from land use too. The approach to seeking a commuted sum and working with housing partners to deliver new affordable housing on sites in the City fringe and in neighbouring Boroughs, is supported and welcomed. This is consistent with both the NPPF and London Plan.</p>
7.11	Leonard	Goodrich	Chancery Lane Association	<p>We would support an increase in the level of affordable housing required in the City. Starter homes alone would not adequately address housing needs, nor would they provide the benefits that a range of affordable housing could (such as enabling key workers to live nearer their work and so reduce strain on the transport system, and allowing for the existence of missed communities).</p> <p>Ideally affordable housing would be provided on site as it would bring benefits to the City and guard against the creation of mono-cultures and investor-only developments.</p>
7.11	Jeremy	Gray	City Property Association	<p>We support the City's current approach to affordable housing. There is no certainty that the Starter Homes initiative will come to fruition. In the event that it does, the City may need to adjust the affordable housing policy accordingly.</p>
7.12	Helen	Kay	Barbican Association	<p>No there are no areas of the City suitable for "permission in principle" for housing led development</p>



Question	Name	Organisation	Comment Summary
7.12	Mohammed Khan		No there are no areas of the City suitable for "permission in principle" for housing led development
7.12	Fred Rogers		No, there are no areas of land in the City that should be considered suitable for 'permission in principle' for housing-led development through the Local Plan review.
7.12	Jonathan Marginson	DP9 for Northern & Shell	<p>We consider that such an approach is appropriate so that there is clear policy guidance on those areas that are suitable for residential. We would wish to put forward the site at 10 Lower Thames Street as suitable for residential development as part of a mixed-use scheme that include offices and retail. This building is currently in office use, but provides poor quality accommodation which does not meet modern office occupier needs.</p> <p>Viability tests have shown that there are insufficient levels of return to make an office refurbishment viable, due to the heritage policy designations restricting development. A redevelopment would be viable if the scheme was mixed use. The presence of mixed use including residential in this location would not restrict commercial development elsewhere, nor harm the ability of the City to meet its current and future office requirements.</p> <p>A mixed-use scheme that includes both residential and office development has the potential to deliver high quality office floorspace to meet modern occupier requirements as well as deliver housing for the City without affecting the core commercial area. A mixed-use scheme on the site would provide activity throughout the day and night, helping to enliven the river frontage and support retail and leisure uses.</p> <p>The opportunities and benefits presented by a mixed-use approach and the long term viability of developing Lower Thames Street mean that there are sound planning reasons why the current policy approach requires re-consideration.</p>
7.12	Rita Cadavez		St Pauls and Smithfield.

Question	Name	Organisation	Comment Summary
7.13	Helen Kay	Barbican Association	The NHS primary care strategy enables patients to register at surgeries other than where they live. City workers can use City GP practices yet there is only one NHS doctors' surgery within the City. This is unacceptable. Where very large redevelopment schemes come forward, the City should step in and demand the space for an NHS doctors' surgery, at ground or upper ground level, at a reasonable rent for the usage, for residents and office workers. There should be an NHS doctors' surgery in each of the four quarters of the City.
7.13	James Watson	CAMRA	We believe that pubs are an essential feature of any British community and the City is in a strong position where its existing facilities are enjoyed by visitors, residents and commuters alike. We see the development of traditional pubs for alternative more profitable uses like housing or office space as a major threat to the future vibrancy and vitality of the City. We would urge the City of London Corporation to introduce a best practice pub protection policy in line with the broad requirements of the NPPF and the London Plan.
7.13	Fred Rogers		Any facilities needed by city workers other than primary medical care has to be provided either by the market or their employers, many of who are already doing so. Facilities required by residents should be the primary responsibility of CoLC and should include enhanced community facilities in the four primary residential areas.
7.13	Jeremy Gray	City Property Association	The CPA wishes to continue to see a diverse range of facilities and services to meet current and future City office needs. We consider the City's current policies are appropriate to achieve these facilities and services.
7.14	Jeremy Gray	City Property Association	We consider the City should plan to meet the need for social and community services in the Square Mile. With an ever growing City population and workforce, social and community services are considered hugely important to the functioning of a sustainable City.

Question	Name		Organisation	Comment Summary
7.14	Tom	Noble	City Public Realm, CoL	Working with neighbouring boroughs to provide facilities makes sense.
7.14	Helen	Kay	Barbican Association	As far as the physical infrastructure and buildings are concerned, these needs should be met within the City. This does not exclude partnering with neighbouring boroughs as far as administration and personnel are concerned. If the necessary infrastructure and buildings are not put up within the City, there is the very great risk that the larger neighbouring borough erects the facility close to the middle of that borough, but far from the City's residential
7.14	James	Watson	CAMRA	We would urge the City of London Corporation to introduce a best practice pub protection policy in line with the broad requirements of the NPPF and the London Plan. We recently contributed to the policy adopted by the Borough of Brent, which we append below for your information. We also include a model planning policy put together by CAMRA's central planning advisory group. Together, these should be sufficient for you to draft something suitable and appropriate for the City.
7.14	John	Lett	GLA	Social and community infrastructure will be an important consideration. Given the unique nature of the City, it is acceptable to consider shared provision with adjoining London Boroughs, although as the Issues and Options paper points out, there may be particular demand for certain types of daytime services for the working population.
7.14	Fred	Rogers		The City Corporation has, including with neighbouring boroughs, to ensure that adequate "statutory" medical and other services are available for both residents and workers.

Question	Name		Organisation	Comment Summary
General comments - A World Financial and Business Centre	Peter	Bennett		There is a great danger in trying to plan too much and too rigidly in the City of London. The Plan needs to allow and encourage commercial property development and adaptation of buildings to meet the needs of businesses which themselves will be evolving. As long as the buildings can be adapted to meet future changes in demand, this is as much as a Plan should try to achieve. The Plan should be responsive rather than predictive.
General Comments - A World Financial and Business Centre	Daniel	Rech	Quod for Merchant Land Investment Ltd	<p>Our client is strongly in favour of allowing the market to decide on the appropriate format of office provision within the City of London, and it is fundamental that the market should be able to respond to shifting trends in the office market to ensure that office supply (including refurbishment and replenishment) should not be unnecessarily constrained by new policies seeking to restrict the loss of smaller offices, that may be outdated, or may not simply be the most efficient use of land to meet office demand. Therefore, our client is keen to ensure that office space remains a priority, including that which serves SME need. There should be no restrictive policies introduced to constrain supply in this way.</p> <p>Additionally, in order to maintain a competitive supply of flexible office accommodation our client is keen to ensure that servicing requirements are applied flexibly and pragmatically.</p>
General Comments - A World Financial and Business Centre	Tom	Noble	City Public Realm, CoL	Paragraphs 3.1 and 3.3 consider how offices can suit occupiers' needs, and ensuring the City is an attractive business location. Recommend considering the public realm and street activity here too. Ask why is it that businesses like google and apple are not locating in the City? Newer sectors may want more than just a corporate office space.

Question	Name	Organisation	Comment Summary
General Comments - A World Financial and Business Centre	Natalie Broughton	London Borough of Hackney	<p>We note that employment projections suggest significant increased growth in employment in the City. This may have implications for the parts of Hackney that adjoin the City, particularly the City Fringe and Shoreditch, and the relationship between employment demand and supply in this area will be an important issue for both Plans.</p> <p>Shoreditch and the City Fringe are characterised by technology and creative businesses and we note with interest reference to the emerging trend of creative / tech businesses expanding south into the City. We would be interested to see the City's evidence base demonstrating this trend. We will need to work together to ensure this growth in different types of businesses is managed sustainably and the needs including affordability and flexibility in unit size of different sectors are met.</p> <p>We would be keen to work together with the City of London and the GLA on any potential future for expansion of the Central Activities Zone (CAZ).</p> <p>Hackney has an existing policy encouraging the provision of affordable office space whereby 10% of the new floorspace provided within major commercial development schemes, and within new major mixed-use schemes in the Borough's designated employment areas, should be affordable workspace. We note that the City does not currently have a policy and we would suggest that, given that affordable employment space is key to the successful growth of small and start-up businesses, this is an area that the City may wish to explore.</p> <p>We note that the City of London has exemption from permitted development rights until May 2019 and that after this time an Article 4 Direction will be made. Hackney is in the same position in the City Fringe Area. Joint working in this area would be useful.</p>
General Comments - A World Financial and Business Centre	Sakiba Gurda	London Borough of Islington	<p>We understand that the City has significant levels of projected jobs growth, and note that Islington's Employment Land Study (2016) projects large employment growth in Islington. A balanced approach which maximises development (particularly office development) to meet jobs growth, coupled with careful planning for complementary land uses, would be an appropriate way of ensuring that this jobs growth is met.</p>
General comments - City Communities	Mohammed Khan		<p>There needs to be more inclusion of surrounding boroughs in order to better co-ordinate the needs of the City and that the other boroughs benefit from the economic success of the City.</p>

Question	Name		Organisation	Comment Summary
General Comments - City Culture and Heritage	Sharon	Ament	Museum of London	As set out in our opening comments, we welcome the emphasis placed on culture at 5.6.
General Comments - City Culture and Heritage	Sharon	Ament	Museum of London	We recognise the importance of the heritage in the City and especially how this is reflected in the built environment. The RSA Heritage Index puts the City at the top of the list regarding heritage assets. West Smithfield is an important part of the historic fabric and we are very aware of the recent planning issues surrounding its future.
General Comments - City Culture and Heritage	John	Schofield	City of London Archaeological Trust	We commend the policies set out in paragraphs 5.10 to 5.14. The question is whether the City is doing enough in these areas. We would be interested in hearing the City's own answer to its Question 5.7.
General Comments - City Culture and Heritage	John	Schofield	City of London Archaeological Trust	A visitor strategy for the 39 surviving parish churches in the City should be produced by the Corporation and Diocese of London to recognise their important role as 'historic and visitor attractions.' They should also be mentioned in the Local Plan.
General comments - City Culture and Heritage	Jane	Bickerton		The City has managed to maintain an intimacy that is rare in my experience in the centre of Cities. I would ask that this human and often quite personal focus on the City inhabitants, workers and visitors continue to be fostered and celebrated in all the best possible ways available.

Question	Name	Organisation	Comment Summary
General Comments - City Culture and Heritage	Graham Saunders	Historic England	<p>The Evidence Summary document provides useful background information on the City's heritage, protected views and tall building proposals, past current and future. It also provides a useful starting point in which to understand the relationship between these different policy areas. What has become clear from the evidence provided is that it focuses on factual points, and does not provide any sense of value judgements. For example a number of the tall building proposals would have raised the need to balance the potentially challenging policy perspectives, with the issue of 'harm' being addressed. It is not clear from the evidence provided how heritage issues were considered in these interrelated cases, and whether the existing heritage, views and tall buildings policies are effective in meeting national policy requirements of achieving sustainable development.</p> <p>In addition is it not clear from the evidence provided whether the condition of the historic environment has improved, and to what extent it contributes to the wider social, cultural, economic and environmental character of the City. You could consider adding an indicator within the Annual Monitoring Framework measuring the number of applications permitted that resulted in harm to the historic environment that could not be mitigated.</p>
General Comments - City Culture and Heritage	Anonymous 1		Create a cohensive skyline of elegant towers of varying heights of 30 plus which are not too close to each other due to some of the very narrow streets. Prevent the development of groundscrapers which are built right up to the plot limits and give nothing back to the streetscape apart from large gloomy and unfriendly buildings.
General Comments - Environmental Sustainability	Sharon Ament	Museum of London	We strongly endorse the approach to sustainability as set out in 6.1 to 6.5. The design team for the new museum will seek to deliver as environmentally sustainable a museum as
General Comments - Environmental Sustainability	Sharon Ament	Museum of London	We note at 6.7 the significant improvements that will be derived from the opening of the Elizabeth Line (Crossrail) in 2018/19. We are already aware of the importance of planning effectively for deliveries and coach visitors to a new Museum and note the importance of managing these as highlighted at 6.9. We will be factoring cycling and cycle parking into our plans. We expect the Museum development to contribute towards safer transport in the area.

Question	Name	Organisation	Comment Summary
General Comments - Environmental Sustainability	Ray King	Railwatch	<p>In general, I believe the historic parts of the City are completely overshadowed by intrusive road traffic, with its associated noise and air pollution. Every effort should be made to reduce the impact of road traffic and to improve facilities for pedestrians and cyclists.</p> <p>Threadneedle Street is a good example. This could and should be made accessible only for buses, cyclists, pedestrians and deliveries. Many other streets in the city fall into the same</p>
General Comments - Environmental Sustainability	Yarema Ronish		<p>There are a number of unsafe pedestrian crossings in the City where cars are not required to stop. These crossings have dropped kerbs and traffic islands but no traffic lights or road markings. These should be upgraded to proper pedestrian crossings.</p>
General Comments - Environmental Sustainability	Jonathan Whitby		<p>There are a number of unsafe pedestrian crossings in the City where cars are not required to stop. These crossings have dropped kerbs and traffic islands but no traffic lights or road markings. These should be upgraded to proper pedestrian crossings.</p>
General Comments - Environmental Sustainability	Graham Saunders	Historic England	<p>We would seek to ensure climate change measures policies and proposals are balanced against the need to conserve and enhance the historic environment including its heritage</p>
General Comments - Environmental Sustainability	Heather Hilburn		<p>There are a number of unsafe pedestrian crossings in the City where cars are not required to stop. These crossings have dropped kerbs and traffic islands but no traffic lights or road markings. These should be upgraded to proper pedestrian crossings.</p>



Question	Name	Organisation	Comment Summary
General Comments - Environmental Sustainability	Nicole Harris	Tfl (Taxi rank & private hire)	<p>Taxis and phvs provide an essential door to door service and all taxis also have mobility features such as wheelchair ramps which many passengers rely on.</p> <p>New developments within the City should ensure that a dedicated taxi rank is provided where taxis can legally ply for hire. This will ensure that passengers can easily access taxi services and will also help to prevent illegal touting which is likely to increase where no rank is in place. Taxis can also wait with their engines off at taxi ranks so this will also help with minimising harmful emissions in the City.</p> <p>There is also discussion within the document regarding the night time economy and how this will be served. Providing taxi ranks, even on a part time basis to serve restaurants, bars, etc ensures that people are quickly and easily dispersed after a night out and this can help to minimise illegal and criminal activity within the area.</p>
General comments - Environmental sustainability	William O'Dowd		<p>Unfortunately it will not be possible to ban all vehicles from The City as, with a rising population in particular, there will always be a myriad of services and consumables that will need to be delivered to both business and residential properties.</p>
General Comments - Environmental Sustainability	Archie Onslow	North London Waste Plan	<p>The North London Boroughs have previously engaged with the City of London, as part of the duty to co-operate, on waste flows between our areas. We welcome the inclusion of waste as a topic area in the Issues and Options document and also welcome the City's plan to meet the London Plan apportionment targets through an agreement with the South East London Boroughs grouping. London Plan apportionment targets for net self sufficiency only apply to household and commercial and industrial waste streams.</p>
General Comments - Environmental Sustainability	M Hayden		<p>Policies should be put in place to halt the decline in sparrows and other songbirds</p>

Question	Name	Organisation	Comment Summary	
General Comments - Environmental Sustainability	George	Snape	Tfl	It is noted that this section of the document is very much focused on walking, cycling and freight with little mention of public transport and particularly buses. Buses have a role to play in getting people into the City over middle distances, including from mainline rail stations and for those who are less able to use active forms of travel. This section should recognise the important role that buses play within the hierarchy of transport in the City, and should set out a vision for their future role.
General Comments - Environmental Sustainability	Fiona	Meyringer		Why is pollution not a valid ground on which to object to planning applications? This came up at the meeting on Wednesday. If there are statutory or other reasons for this, it would be helpful if this could be explained, because it is surprising.
General Comments - Environmental Sustainability	Oliver	Caroe	Chapter of the Cathedral Church of St Paul	We would welcome any policy which ensures that 'drones' cannot be used for deliveries in the square mile.
General Comments - Environmental Sustainability	Fiona	Meyringer		Where are the questions on how to improve quality of life for existing residents? Noise, light and air pollution are getting really bad. Someone at the meeting has been advised by her doctor to move out of the City because air quality is so poor. I know this subject is on the agenda, but progress is glacial and it is unacceptable that levels of pollution are in breach of

Question	Name	Organisation	Comment Summary
General Comments - Key City Places	Heather	Hilburn	<p>The City's Riverside Walk should be improved to provide more animation and improve amenity and connectivity. The City's Riverside Walk has numerous obstructions which require pedestrians to detour around large buildings. The City needs a plan to reclaim obstructed portions of the riverfront, even if this means building walkways on or over the river. The Riverside Walk should be safeguarded, so that obstructions and bottlenecks can be removed whenever development takes place. The Riverside Walk is too narrow, and should be widened to allow comfortable pedestrian circulation as well as seating. The Riverside Walk should include attractive pedestrian links northward to the rest of the City. This means providing wider pavements, separating servicing and pedestrian movement, and providing visual interest and animation to the side facades of buildings fronting the Thames. A plan is needed to improve the appearance and pedestrian permeability of Lower Thames Street. Currently there is no coherency to building facades fronting the Thames. SPG guidance is needed to secure a more harmonious river frontage when seen from the South Bank. Cafes and restaurants should be encouraged along the Thames, including outdoor eating areas on the river, provided that any amenities on the water do not obstruct views from the Riverside Walk. Publicly accessible toilets should be provided at regular intervals along the Riverside</p>
General Comments - Key City Places	Jonathan	Whitby	<p>The City's Riverside Walk should be improved to provide more animation and improve amenity and connectivity. The City's Riverside Walk has numerous obstructions which require pedestrians to detour around large buildings. The City needs a plan to reclaim obstructed portions of the riverfront, even if this means building walkways on or over the river. The Riverside Walk should be safeguarded, so that obstructions and bottlenecks can be removed whenever development takes place. The Riverside Walk is too narrow, and should be widened to allow comfortable pedestrian circulation as well as seating. The Riverside Walk should include attractive pedestrian links northward to the rest of the City. This means providing wider pavements, separating servicing and pedestrian movement, and providing visual interest and animation to the side facades of buildings fronting the Thames. A plan is needed to improve the appearance and pedestrian permeability of Lower Thames Street. Currently there is no coherency to building facades fronting the Thames. SPG guidance is needed to secure a more harmonious river frontage when seen from the South Bank. Cafes and restaurants should be encouraged along the Thames, including outdoor eating areas on the river, provided that any amenities on the water do not obstruct views from the Riverside Walk. Publicly accessible toilets should be provided at regular intervals along the Riverside</p>

Question	Name	Organisation	Comment Summary
General Comments - Key City Places	Yvonne Courtney		The City's Riverside Walk should be improved to provide more animation and improve amenity and connectivity. It currently has numerous obstructions which require pedestrians to detour along roads/around large buildings. The City needs a plan to reclaim obstructed portions of the riverfront, even if this means building walkways on or over the river. The Riverside Walk should include attractive pedestrian links northward to the rest of the City: wider pavements and visual interest/animation to the side facades of buildings fronting the Thames. A plan is urgently needed to improve the appearance/pedestrian permeability of Lower Thames Street which is currently a barrier/no-go zone. Cafes and restaurants should be encouraged along the Thames, including outdoor eating areas on the river, provided that any amenities on the water do not obstruct views from the Riverside Walk. Publicly accessible toilets should also be provided at regular intervals along the Riverside Walk.
General Comments - Key City Places	James Trimmer	Port of London Authority	It is noted that the Adopted Local Plan Thames and Riverside Diagram shows a riverside walk completion area around Queenhithe Dock, and is therefore recommended that the full draft of the Local Plan encourages the 'closing of gaps' on the existing Thames Path in order to meet the Council's aspirations to complete the Riverside Walk around Queenhithe.

Question	Name	Organisation	Comment Summary	
General Comments - Key City Places	Yarema	Ronish	<p>The City's Riverside Walk should be improved to provide more animation and improve amenity and connectivity. The City's Riverside Walk has numerous obstructions which require pedestrians to detour around large buildings. The City needs a plan to reclaim obstructed portions of the riverfront, even if this means building walkways on or over the river. The Riverside Walk should be safeguarded, so that obstructions and bottlenecks can be removed whenever development takes place. The Riverside Walk is too narrow, and should be widened to allow comfortable pedestrian circulation as well as seating. The Riverside Walk should include attractive pedestrian links northward to the rest of the City. This means providing wider pavements, separating servicing and pedestrian movement, and providing visual interest and animation to the side facades of buildings fronting the Thames. A plan is needed to improve the appearance and pedestrian permeability of Lower Thames Street. Currently there is no coherency to building facades fronting the Thames. SPG guidance is needed to secure a more harmonious river frontage when seen from the South Bank. Cafes and restaurants should be encouraged along the Thames, including outdoor eating areas on the river, provided that any amenities on the water do not obstruct views from the Riverside Walk. Publicly accessible toilets should be provided at regular intervals along the Riverside</p>	
General Comments - Whole Plan	Polly	Barker	TfL Property	<p>TfL Property recognises the need for the City of London to maintain its competitiveness due to its leading role in both the London and national economy. As a landowner, TfL Property agrees that a flexible approach to planning is required, particularly following potential uncertainty of development following the decision to leave the EU and the continued high demand for new development. TfL Property supports the continued promotion of tall buildings within the City of London.</p>
General Comments - Whole Plan	Ivo	de Wit		<p>The environment for the City of London is changing as a result of: 1) Brexit, 2) Lower take-up of space by traditional financial institutions, 3) Different companies that expand in the city like data analysis companies</p>

Question	Name	Organisation	Comment Summary
General Comments - Whole Plan	Patrick Streeter	City of London Corporation	When listing our stakeholders we often omit the average City worker, who may spend his entire working life stuck in a City office and be obliged to use noisy, cramped, polluted and dangerous streets and pavements every day. The City is not an island, but part of Greater London and indeed the United Kingdom. We must see it in a wide context. There are no clear data plotting maximum daytime population and the transport capacity. We should consider the worse possible scenario, which we do not.
General Comments - Whole Plan	Fiona Meyringer		Finally, can I suggest that consultations like this are made more accessible and intelligible to residents? Perhaps make it shorter than 76 pages and flag it up on the weekly BEO newsletters, and the Cripplegate newsletters etc.
General Comments - Whole Plan	Tom Noble	City Public Realm, CoL	The second public consultation in 2018 should still take on board the issues raised by the consultees. This will also allow for more flexibility around the re-shaping of the document if necessary, depending on the outcome of the Brexit. Should the Local Plan be planned for approval just after the launch of the London Plan, instead of starting the review of the Local Plan when the London Plan gets approved?
General Comments - Whole Plan	Elaine Elstone	Tetlow King for Rentplus	We represent Rentplus, a company providing an innovative affordable housing model aimed at delivering discounted rented homes to buy for people aspiring to own their own home but trapped by ineligibility for other affordable housing. The Government recognises the benefits of the Rentplus affordable housing model and is expected to incorporate this within the definition of affordable housing as set out in the NPPF. We are encouraging planning authorities, including the City Corporation, to incorporate the tenure within Local Plans.

Question	Name		Organisation	Comment Summary
General Comments - Whole Plan	Steven	Linden	Linden & Co (Antiques) Ltd	<p>As you are aware there is a possibility that Chancery House, which includes the London Silver Vaults, could possibly be redeveloped after all of the leases in the building expire in 2021 or any time after that. If this happens the Silver Vaults could not just relocate, it will be lost forever. Chancery House was rebuilt and opened in 1953 after suffering bomb damage during the WW11 and the London Silver Vaults which is housed in the basement of Chancery House, was specially built with security in mind and is listed to be in the top 10 most secure buildings in the world. Apart from the huge steel door at the entrance each individual shop has a steel vault door also and all of the walls have submarine netting within them. If it were possible to replace the steel doors etc, it would not be economically feasible to rebuild the London Silver Vaults. In a separate part of our basement we still have the Chancery Lane Safe Deposit Company which has 5000 safes of which over 3000 are presently rented out to clients. The London Silver Vaults attracts over 30000 visitors each year from the UK and all over the world.</p> <p>We were invited to join the Chancery Lane Association because we were considered to be the largest retail draw in the area, and we have been a member since its conception over 10 years ago. I am aware that some councils in central London are concerned that important landmarks, like the Silver Vaults, are disappearing and destroying our rich culture which is the very reason people from all over the world visit our great city.</p>
General Comments - Whole Plan	Oliver	Caroe	Chapter of the Cathedral Church of St Paul	<p>The key observation from Chapter is that there are a number of areas of detail and mutual interest on which we would seek to make arrangements for further dialogue and discussion. We are especially interested in policy development in the area of spirituality, wellbeing, social cohesion, diversity and equality that are not strongly or explicitly represented in the consultation. Therefore we would like to identify opportunities where these concerns can find expression and due recognition in policy development.</p>
General Comments - Whole Plan	Sharon	Ament	Museum of London	<p>We support the direction of travel in this draft Plan and are grateful for the opportunity to contribute. We believe that our move will help preserve the intangible as well as the built heritage of the West Smithfield area and strengthen the City's role across a broad range of important issues highlighted in the plan.</p>

Question	Name	Organisation	Comment Summary
General Comments - Whole Plan	Gregory	Jones	<p data-bbox="972 121 2119 217">I suggest that the following supporting text and policy be added to the City plan. I suggest that the SPA should cover the area around the existing silver vaults. POLICY [INSERT]: SILVER VAULTS SPECIAL POLICY AREA</p> <ol data-bbox="972 272 2074 1110" style="list-style-type: none"> <li data-bbox="972 272 2074 368">1. Development in the Silver Vaults Special Policy Area will complement and enhance its role as an international centre of excellence for the sale of “silver” (reference in this policy to silver is to include both silver and gold and related products and ancillary services).</li> <li data-bbox="972 424 1507 450">2. Existing silver retail uses will be protected.</li> <li data-bbox="972 505 2051 563">3. New silver retails units will be allowed, particularly at basement and ground floor levels, and will be secured by legal agreements.</li> <li data-bbox="972 619 2051 890">4. New A1 retail will only be permitted at ground, lower ground floor and first floor levels, subject to the following criteria, to be secured by legal agreement where appropriate: <ol data-bbox="972 691 1877 890" style="list-style-type: none"> <li data-bbox="972 691 1375 716">a) no silver retails uses being lost;</li> <li data-bbox="972 724 1615 750">b) each retail unit being no larger than 300 sqm gross;</li> <li data-bbox="972 758 1877 815">c) the retail use should sell bespoke, unique, limited edition or one of a kind products; and</li> <li data-bbox="972 823 2051 890">d) the retail function should be complementary to the character and function of the Special Policy Area.</li> </ol> </li> <li data-bbox="972 906 2024 963">5. Land use swaps will only be acceptable within the Special Policy Area where the other criteria within this policy are met, and where: <ol data-bbox="972 971 1722 1074" style="list-style-type: none"> <li data-bbox="972 971 1722 1029">a) there is no net loss of silver vault retail, outside of necessary minor alterations to facilitate the land use swap; and</li> <li data-bbox="972 1037 1946 1074">b) the accommodation offered provides higher quality or larger silver retail space.</li> </ol> </li> <li data-bbox="972 1082 2045 1110">6. New residential or office use is not generally appropriate within the Special Policy Area.</li> </ol>





Question	Name		Organisation	Comment Summary
General Comments - Whole Plan	Graham	Saunders	Historic England	<p>We would seek to ensure as a core principle that the Local Plan conserves heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations (NPPF para 17). This should be achieved through a positive strategy in the plan for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 126). This raises the need to develop and make accessible a robust evidence base which demonstrates clearly an understanding of the City’s historic environment, the significance of its heritage assets and their contribution to the wider environment (NPPF para 169). In the context of the above we would draw your attention to the following:</p> <p>Para 1.9 – reference is made to the need to undertake additional studies to inform the Local Plan. However it is not clear what this work entails and how it relates to the management of the historic environment.</p>
General Comments - Whole Plan	John	Lett	GLA	<p>The Mayor recognises the unique role of the City of London within the Central Activities Zone, London and the UK.</p> <p>General Conformity with the London Plan and Duty to Co operate are particularly important given City's tight boundary.</p>
General Comments - Whole Plan	Adam	Cornish	Quod for Travis Perkins plc	<p>We therefore request that “employment and employment generating uses” are added to the list of acceptable uses which could come forward mixed use sites in the City. Alternatively a new glossary could be added to the Local Plan which sets out that “employment uses” include sui generis employment generating uses such as builders’ merchants.</p>

Question	Name		Organisation	Comment Summary
IIA	Graham	Saunders	Historic England	<p>In our response to this version of the IIA scoping Report, we draw your attention to our letter (dated 25th February 2016) in response to the previous iteration of the IIA Scoping Report as published in January 2016. For example issues not yet addressed include:</p> <ul style="list-style-type: none"> <li>• Baseline – commentary on the condition of heritage assets in the City there are a small number of assets on Historic England’s Heritage at Risk Register (2016) (e.g. 1 listed building, 3 Places of Worship and 3 Schedule Monuments).</li> <li>• Compatibility Matrix – where the commentary on the relationship between heritage and economic growth objectives is ambiguous, yet on the matrix it is marked as a ‘x’, which suggests conflict. Greater clarity is needed.</li> </ul>
IIA	Keira	Murphy	Environment Agency	<p>Thank you for taking into account our previous comments at the scoping stage of the IIA. We welcome the changes you have made to the IIA report to the criteria questions for objectives on waste management, environmental protection, climate change and biodiversity and urban greening. There is also the opportunity to use the current WFD status of the New River and Thames (Middle) as an indicator for water quality or biodiversity. Both are currently achieving moderate status. The waterbody summary reports I’ve enclosed specify the reasons for not achieving good, and list the draft action measures required to achieve good</p>
Key Diagram	Natasha	Downie	Historic Royal Palaces	<p>With regard to Figure: Adopted Local Plan 2015 key diagram (page 17), Historic Royal Palaces would like to see the Eastcheap Retail link extended to the Tower of London, and a visitor route identified between the Monument and the Tower of London in any similar plan reproduced in the new Local Plan.</p>
Key Diagram	Richard	Hillebron	Conservation Area Advisory Committee	<p>We agree to the area at Farringdon being noted as an area for intensification particularly due to Crossrail. It will be very accessible. However, there are several views in this area including of St Paul’s and the protection of such views may make the area of intensification very difficult to achieve. Particular guidance on this aspect will be important.</p>
Key Diagram	Richard	Hillebron	Conservation Area Advisory Committee	<p>The concept of having pockets of residential in identified parts of the City is welcome rather than a more sporadic approach.</p>

Question	Name		Organisation	Comment Summary
Key Diagram	James	Trimmer	Port of London Authority	New location of Blackfriars Millennium Pier, east of Blackfriars Bridge, should be reflected in the Local Plan and Key Diagram.