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**Telephone** 07784239316**Email** Rob.McNicol@cityoflondon.gov.uk**3 December 2024****Dear Sir/Madam**

I write further to the submission of the City Corporation's Local Plan 'City Plan 2040' which was submitted to the Secretary of State for Housing, Communities and Local Government on 29 August 2024.

In the context of paragraph 1.6 of the Guide, the City Corporation is now submitting to the examination a list of proposed changes to the published plan- see Appendix 1. As before, the City Corporation does not believe Main Modifications to be required at this stage and these proposed changes are put forward to inform discussions at the hearing sessions. Should the Inspectors consider it appropriate, the City Corporation would welcome the opportunity for these to be discussed at the hearing sessions, and (in appropriate circumstances) for these to form the basis of Main Modifications, should the Inspectors consider Main Modifications necessary.

In the main the proposed changes are suggested to reflect the Regulation 20 representations on the City Plan (and reference numbers are indicated in the table) but others are put forward to take into account the outcomes of consultation on the City Corporation's draft Sustainability SPD. This list also includes some suggested changes which have been agreed with other parties in the course of the preparation of the various Statements of Common Ground. These are available on the Corporation's examination website: [City Plan 2040: Evidence Base - City of London](#). Other changes relate to updates to statistics, to reference new strategies or to clarify matters from the Explanatory Notes submitted alongside the City Plan. The City Corporation does not consider these proposed changes to be Main Modifications.

With further reference to the City Corporation's Sustainability SPD, this was consulted upon between 18 March and 17 May 2024. The City Corporation has since considered these representations and conducted additional expert work. It is therefore deemed appropriate to reflect these suggestions within the City Plan.

The City Corporation looks forward to working collaboratively with the Planning Inspectorate and other stakeholders on these matters.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Rob McNicol', with a stylized flourish at the end.

Rob McNicol, Assistant Director (Planning Policy and Strategy)

Appendix 1: Proposed changes to City Plan 2040, December 2024

Chapter	Paragraph	PC Number	Reason	Amended text
Chapter 1 Strategic Priorities	1.1.0	PC 1	Representations - R0214	1 Vision and Strategic Priorities 1.1.0 The City Plan sets out the City Corporation’s strategic priorities for planning the Square Mile, together <u>The strategic priorities form the Vision for the City over the plan period to 2040 and set a framework for the Strategic Policies and other policies under each chapter. Together with policies that they will guide decisions on planning applications.</u>
Chapter 1 Strategic Priorities	City Plan Vision	PC 2	Representations - R0214	By 2040 the City of London will have become: <ol style="list-style-type: none"> A stronger, more vibrant and competitive economy. The City of London has strengthened its position as a key driver of the UK economy by adding over 1.2 million square metres of new office space, concentrated in two distinct tall building clusters at Fleet Valley and the City Cluster. This vibrant environment, with its efficient and interconnected supply chains, has attracted a more diverse mix of businesses, making the City of London an unparalleled place to work and conduct business. A 7-day-a-week destination. The city’s world-renowned heritage is now complemented by new cultural attractions like the London Museum. Viewing galleries offer unique perspectives of the capital, drawing visitors from across London, the UK, and beyond on every day of the week. These visitors stay longer to enjoy the wide array of leisure activities that have emerged to support the new cultural facilities. Local communities benefit from the increased diversity and availability of these offerings, making the city a safer and more engaging place to explore and learn. A more sustainable city- The city has achieved its net zero aspirations and continues to lead in London’s climate change adaptation and mitigation efforts. It champions low-carbon infrastructure and technologies. The sustainability credentials of new and repurposed business spaces, along with a visibly greener and more biodiverse environment, attract visitors and investors. A more inclusive and healthier city- the city has been shaped by and for its communities, with physical and environmental enhancements making it more welcoming, safe, and inclusive for everyone. These improvements celebrate diversity and promote a healthy environment. Excellent public transport and increased opportunities for walking, cycling, and wheeling make the city more accessible and open to all. A place where heritage and positive change are celebrated-the city has been reshaped for its communities, blending historic character seamlessly with modern, high-quality developments. It features new high quality public spaces and newly revitalised focal points for the city, creating a more harmonious urban landscape.
Chapter 1 Strategic Priorities	1.1.1	PC 3	Representations - R0214	1.1.1 To help realise our vision for the Square Mile, the City Plan 2040 sets out strategic priorities that underpin the policies in the Plan. These priorities have been informed by stakeholders, national and London-wide policy, and the strategies of the City Corporation and other partners.
Chapter 1 Strategic Priorities	1.1.2	PC 4	Representations - R0214	1.1.2- As set out in paragraph 8 of the National Planning Policy Framework (NPPF)..... [Insert additional diagram showing the relationships between the Vision, the Strategic Priorities, the Spatial Strategy, the Strategic and other policies]
Chapter 2 Spatial Strategy	2	PC 5	Other - typographical error	Page 12- corrections to numbering to follow sequentially, eg 2.1, 2.2

Chapter	Paragraph	PC Number	Reason	Amended text
Chapter 2 Spatial Strategy	Figure 1	PC 6	Representations - R0218	Amendment to Figure 1 Key Diagram as follows: <u>Green Corridors Links</u> :
Chapter 3 Health, Inclusion and Safety	HL2 (1)	PC7	Other - updates	HL2 (1) Developers will be required to effectively manage the their proposal's impact of their proposals on air quality. Major developments must comply with the requirements of the Air Quality SPD for and submit an Air Quality Impact Assessments (AQIAs).
Chapter 3 Health, Inclusion and Safety	3.3.0	PC 8	Other - updates	3.3.0...The City, in common with all central London, has been declared an Air Quality Management Area, due to national <u>air quality targets not being met, health based objectives for the pollutants nitrogen dioxide (NO2) and small particles (PM10) not being met. National targets for PM 2,5 are also not met.</u>
Chapter 3 Health, Inclusion and Safety	3.3.1	PC 9	Other - updates	3.3.1...The City Corporation's Draft Air Quality Strategy aims to ensure that air quality in over 90% of the Square Mile meets <u>an annual average of 30µg/m³ NO₂ by 2030. the health-based Limit Values and World Health Organisation (WHO) Guidelines for NO₂ by the beginning of 2025.</u> Limits set for particulate matter (PM ₁₀) are generally met, although the national target for PM _{2.5} is not <u>currently</u> met anywhere in the City. The Air Quality Strategy aims to support the Mayor of London to meet the tighter <u>World Health Organisation (WHO) Guidelines and Interim Targets</u> for PM ₁₀ and PM _{2.5} by 2030".
Chapter 3 Health, Inclusion and Safety	Infographic, page 23	PC 10	Other - updates	90% of the Square Mile to meet an annual average of 30µg/m ³ for NO ₂ by 2030. 90% of the Square Mile to meet WHO air quality guidelines for NO₂ by 2025.
Chapter 3 Health, Inclusion and Safety	HL3 (1)	PC 11	Representations - R0125/R0162/R0004 /R0108/R0143	HL3 (1) A noise assessment will be required where noise sensitive uses may be impacted. there may be an impact on noise-sensitive uses. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect nearby land uses such as housing, hospitals, schools, nurseries, <u>places of worship, and quiet open spaces, including churchyards</u> ".
Chapter 3 Health, Inclusion and Safety	3.1.3	PC12	Representations - R0135	3.1.3... The City Corporation will work with the City and Hackney <u>North East London</u> -Integrated Care Board and other NHS and community organisations to regularly assess the need for health and social care facilities locally and sub-regionally.
Chapter 3 Health, Inclusion and Safety	3.1.5	PC 13	Representations - R0004/R0108/R0126/ R0141/R0143/R0269	3.1.5a <u>The City's many churches and other faith communities, including Bevis Marks Synagogue, make a highly significant contribution to the life of the City and its built environment. They play an important social, community and civic role, are a significant part of the architectural and historic character of the Square Mile, are visitor destinations that provide cultural experiences, as well as providing many of the City's open spaces.</u>
Chapter 3 Health, Inclusion and Safety	3.1.6	PC 14	Representations - R0004/R0126	3.1.6 Outdoor spaces and the public realm, <u>including churchyards</u> provide places for relaxation, amenity and leisure.....
Chapter 3 Health, Inclusion and Safety	HL6 (1)	PC 15	Representations - R0135	HL6 (1) "Requiring the provision of a range of directly accessible public toilet facilities suitable for a range of users <u>all within the community</u> including..."
Chapter 3 Health, Inclusion and Safety	3.7.2	PC 16	Representations - R0135	3.7.2 The City Corporation will require the provision of publicly accessible toilets in major retail, leisure, transport and commercial developments, secured through legal agreements, or through encouraging membership of the City's CTS, and will seek their provision where appropriate in other major developments such as office and hotel schemes. <u>The provision of new publicly accessible toilets should also meet the relevant London Plan (Policy S6) and Building Regulations (Part T) requirements.</u> The scheme allows the public to use toilet facilities in participating businesses, albeit that hours are often restricted.
Chapter 3 Health, Inclusion and Safety	HL7 (2)	PC 17	Representations - R0277	HL7 (2) Existing public sport and recreational facilities will be protected in situ, unless:

Chapter	Paragraph	PC Number	Reason	Amended text
Chapter 3 Health, Inclusion and Safety	3.8.1	PC 18	Representations - R0277	3.8.1 The City Corporation will protect existing public sports and recreation facilities in situ, where there is a need, and encourage the provision of new public and private facilities that meet Sport England's Active Design principles. Where in situ provision is not feasible, services should be delivered from other facilities without reducing the level of provision. However, any proposals involving the loss of public sport and recreational facilities must be accompanied by evidence of a lack of need for those facilities. Current public facilities and uses should be retained where a continuing need exists. <u>However, the loss of private facilities may be acceptable in certain circumstances to allow suitable responses to market demand and effective business planning.</u>
Chapter 4 Housing	S2 (2) (a) S2 (2) (b)	PC 19	Representations- R0292	2. Ensuring sufficient affordable housing is provided. <u>Incentivising affordable housing delivery</u> to meet the City's housing need and contributing to London's wider housing needs by: <ul style="list-style-type: none"> ia. ensuring the delivery of <u>applying the Mayor's threshold approach of a minimum of 35% affordable housing and a minimum of 50% affordable housing on public sector land;</u> b. requiring residential developments with the potential for 10 or more units to provide a minimum of 35% affordable housing on-site. Exceptionally, new affordable housing may be provided off-site, or through an equivalent cash in lieu payment, if evidence is provided to the City Corporation's satisfaction that on-site provision cannot be satisfactorily delivered and is not viable; and c. providing an appropriate mix of affordable tenures, addressing identified need in the City of London, including social or London affordable rented housing and <u>where appropriate</u> intermediate housing (living rent, shared ownership or other genuinely affordable products) for rent or sale. 3. Requiring a publicly accessible viability and feasibility assessment to be submitted to justify any proposals that do not meet on-site or off-site affordable housing requirements in this policy. Where policy targets are not able to be met when an application is decided, the City Corporation will require an upwards only review mechanism to be applied to ensure that the benefits of any subsequent uplift in values or reduction in costs are reflected in affordable housing contributions.
Chapter 4 Housing	4.1.2	PC 20	Other – updates/typographical error	4.1.2...Other residential areas are located in Smithfield, the Temples...
Chapter 4 Housing	4.1.8	PC 21	Housing Explanatory Note – para 6.9 R0292	4.1.8 In line with the findings of the SHLAA, the London Plan requires the City of London to deliver 1,460 new homes during the period 2019/20 – 2028/29. This includes the 740 units that the London Plan sets as a target to be provided on small sites of less than 0.25 hectares in size over the 2019/20 – 2028/29 period. Beyond 2028/29, the London Plan requires boroughs and the City to draw on the capacity work which underpins the London Plan's target and any local evidence of capacity, as well as rolling forward London Plan small sites estimates, when setting longer term targets. <u>Analysis of the remaining capacity from the 2017 SHLAA suggests the target of 102 per annum will remain appropriate as a minimum. However, the City Corporation will work in collaboration with the Mayor of London in the current digital SHLAA for the upcoming London Plan to identify additional capacity and the setting of housing targets in the draft new London Plan, the outputs of which will be used to inform targets in the period post 2028/29.</u>
Chapter 4 Housing	4.1.10	PC 22	Representation - R0176/R0103/R0292	4.1.10 ... This Local Plan therefore seeks to meet the City of London's London Plan housing target between 2025/26 and 2029/30 (<u>an average 146 dwellings per annum for the first 4 years and 102 dwellings in the fifth year</u>) and to meet the housing requirement identified by the national standard method from 2030/31 up to 2039/40...
Chapter 4 Housing	4.1.11	PC 23	Other - update	4.1.11 The City Corporation's housing pipeline shows that approved applications would result in completions for the first five year plan period (2025/26 to 2029/30) of 570 617 units. This would be below the housing requirement for the first five years of the Plan, which is 686; however, it is expected that sufficient windfall sites would come forward to meet the housing requirement in the City Plan.
Chapter 4 Housing	4.2.11	PC 24	Representations - R0292	4.2.11 ...On public sector owned land, the higher 50% target will be applied as set out in the London Plan, except where, in accordance with London Plan policy H4, there is a portfolio agreement with the Mayor of London

Chapter	Paragraph	PC Number	Reason	Amended text
Chapter 4 Housing	4.2.15	PC 25	Housing Explanatory Note- para 8.7	2.2.15 ...Both the The City's SHMA (2023) and SHMA Supplement (2024) found that the need for intermediate housing products was relatively low at around 12% of the need for affordable housing. Therefore, given the scale and nature of developments within the Square Mile, it is considered and that social rented units would will often most successfully address the City's affordable housing needs. However, different and innovative forms of affordable housing are being developed and the viability and suitability of particular tenures is likely to change over the Plan period. The tenure of affordable housing will therefore need to be determined on a site-by-site basis, considering having regard to evidence of need (as set out in the SHMA and its Supplement) in the City and London Plan requirements.
Chapter 4 Housing	4.40	PC 26	Representation – R0218	The net loss of existing housing units, including to other residential products such as student or co-living, will be resisted because of the limited opportunities to replace it in the City.
Chapter 4 Housing	HS6 (2)	PC 27	Representation- R0188/R0176	HS6 (2) Proposals for PBSA should be supported by and secured through a nominations agreement with an identified further or higher educational institutions operating in the City of London or the CAZ.
Chapter 4 Housing	HS6 (3)	PC 28	Representation - R0176	HS6 (3) 35% of student accommodation rooms on a site should be secured as affordable student accommodation as defined through the London Plan and associated guidance.
Chapter 4 Housing	4.8.3	PC 29	Representation – R0176/R0188	4.8.3 Student accommodation, like all development in the Square Mile, should meet the highest standards of accessibility and inclusive design. To help achieve this, the appropriate proportions of accessible rooms should be provided, in line with guidance issued by the Greater London Authority, which advises that the relevant part of London Plan Policy E10 Part H applies to development proposals for new non-self-contained student accommodation. <u>In accordance with Policy VT3 disabled parking is expected to be provided for student accommodation.</u>
Chapter 5 Offices	5.1.1	PC 30	Representation – R0099, R0119, R0122, R0166, R0169, R0173, R0174, R0176, R0179, R0194, R0200, R0211, R0213, R0270, R0273	The minimum requirement of overall office floorspace target of 1,200,000m2 net internal area is derived from the estimated growth in office employment between 2021 and 2040...
Chapter 5 Offices	5.1.2	PC 31	Representation – R0099, R0119, R0122, R0166, R0169, R0173, R0174, R0176, R0179, R0194, R0200, R0211, R0213, R0270, R0273	The minimum requirement demand target is the central of three projections, based on different scenarios for office attendance, office densities, occupancy rates and employment projections. The central figure target is aligned with GLA 2022-based long term employment projections for London and the Square Mile.
Chapter 5 Offices	5.3.9	PC 32	Representation - R0114	5.3.9...Where a change in of use is proposed from office floorspace to another use,... ...It would also include where the change of use of office floorspace at ground and lower ground levels improves the vibrancy of an area by introducing more active frontages and delivering more permeable buildings and spaces. <u>Proposals involving a change of use to residential will be expected to provide viability assessments where not within or adjacent to the residential area.</u>

Chapter	Paragraph	PC Number	Reason	Amended text
Chapter 7 Culture and Visitors	S6	PC 33	See Culture and Visitors Explanatory Note para 5.1	S6 ...enhance the City of London's cultural infrastructure... S6 (2)a wide range of cultural infrastructure, and leisure, and recreation and visitor... S6 (3)...areas of cultural infrastructure significance including cultural buildings and leisure, and recreation and visitor facilities... S6 (5)...seeking opportunities to embed heritage in the cultural infrastructure offer... S6 (7)... supports the City's cultural infrastructure or businesses primary business or cultural role of the City... S6 (8)... especially in areas of night-time activity and around cultural infrastructure, including and tourist... S6 (9)...Maintaining the City's cultural infrastructure, including existing artworks...
Chapter 7 Culture and Visitors	7.1.0	PC 34	See Culture and Visitors Explanatory Note para 5.1	7.1.0.....in the streets and informal spaces in between and to recognise this the plan takes forward a 'Cultural Ecosystem' approach deployed in the Cultural Planning Framework. The City of London contains a huge concentration of arts, leisure, recreation and cultural facilities and spaces that contribute to its uniqueness and complement its primary business function. Within the Cultural Ecosystem, cultural infrastructure makes up the primary sites where culture is either produced or consumed. This includes production in creative education, workspaces, studios and livery halls; and consumption in museums, art galleries, cinemas, livery halls, libraries, theatres, and performance venues. These include buildings, structures and spaces where culture is either consumed (culture consumption spaces) or produced (culture production spaces) such as creative workspaces, arts galleries, studios, museums, theatres, Livery Halls, libraries, music, sports, entertainment and performance venues; and complementary uses which contribute to the primary culture, leisure and recreation function such as restaurants, retail, hotels, open spaces and tourism facilities. Cultural contributors are complimentary uses that facilitate cultural infrastructure, these can include restaurants, bars, clubs, public houses, retail areas and tourism facilities.....
Chapter 7 Culture and Visitors	7.1.4	PC 35	See Culture and Visitors Explanatory Note para 5.1	7.1.4...and changes of use to protect existing cultural infrastructure, and leisure, recreation and visitor, arts and cultural facilities....
Chapter 7 Culture and Visitors	7.1.5	PC 36	See Culture and Visitors Explanatory Note para 5.3	7.1.5 The City Corporation's Cultural Planning Framework (CPF) identifies focal areas across the Square Mile, and sets a broad framework that new cultural infrastructure, visitor attractions and complementary facilities will be expected to help realise. When developing cultural proposals applicants are expected to consider the recommendations of the CPF, however, following the adoption of the plan, the City Corporation will produce and consult on a Culture SPD.
Chapter 7 Culture and Visitors	CV1	PC 37	See Culture and Visitors Explanatory Note para 5.1	CV1 (Title) Protection of Existing Cultural Infrastructure, and Leisure, Recreation and Visitor Arts and Cultural Facilities. CV1 (1).... loss of existing cultural infrastructure, and leisure, recreation and visitor visitor, arts, and cultural facilities.... CV1 (2).... Proposals resulting in the loss of cultural infrastructure, and leisure, recreation and visitor arts and cultural facilities.... ...Loss of facilities will only be permitted where this would facilitate the overall enhancement of cultural, leisure, recreation or visitor, arts or cultural provision.....an alternative cultural, leisure, recreation or visitor, arts or cultural use at reasonable terms for such a use....
Chapter 7 Culture and Visitors	7.2.0	PC 38	See Culture and Visitors Explanatory Note para 5.1	7.2.0....accommodate these uses. In a cultural ecosystem approach, these arts and cultural organisations and facilities are also known as sites of cultural production and/or cultural consumption.....
Chapter 7 Culture and Visitors	7.2.2	PC 39	See Culture and Visitors Explanatory Note para 5.1	7.2.2....applicants will be required to demonstrate that an existing cultural infrastructure, and leisure, recreation and visitor, arts or cultural facilities has been marketed....

Chapter	Paragraph	PC Number	Reason	Amended text
Chapter 7 Culture and Visitors	CV2	PC 40	See Culture and Visitors Explanatory Note para 5.1	CV2 (Title) Policy CV2: Provision of Cultural Infrastructure, Arts, Culture and Leisure, Recreation and Visitor Facilities CV2 ...provide new cultural infrastructure, leisure, recreation and visitor arts, cultural and leisure facilities... CV2 (2)...on-site for cultural infrastructure, arts, culture or leisure, recreation or visitor facilities; CV2 (3)...make provision for cultural infrastructure, arts, culture or leisure, recreation or visitor facilities of a scale commensurate with the size of the development, or to provide off-site provision or contributions towards cultural infrastructure, arts, culture and leisure, recreation or visitor facilities and infrastructure . CV2 (4)...provision of cultural infrastructure, arts, culture and leisure, recreation or visitor facilities...
Chapter 7 Culture and Visitors	7.3.0	PC 41	See Culture and Visitors Explanatory Note para 5.1	7.3.0...The provision of new cultural infrastructure, arts, culture and leisure, recreation and visitor facilities....
Chapter 7 Culture and Visitors	7.3.2	PC 42	See Culture and Visitors Explanatory Note para 5.1	7.3.2...including the type and scale of the cultural infrastructure, arts, culture or leisure, recreation or visitor offer...
Chapter 7 Culture and Visitors	7.3.3	PC 43	See Culture and Visitors Explanatory Note para 5.1	7.3.3 Cultural infrastructure, Arts, culture and leisure, recreation and visitor facilities...
Chapter 7 Culture and Visitors	7.3.4	PC 44	See Culture and Visitors Explanatory Note paras 5.1 and 5.4.3	7.3.4...management requirements of cultural infrastructure and leisure, recreation or visitor facilities provided in new developments prior to approval. An outline robust management plan for operational and management arrangements should be submitted as part of the Culture Plans at the pre-application stage, to be completed in detail at application stage.
Chapter 7 Culture and Visitors	CV3	PC 45	See Culture and Visitors Explanatory note para 5.1	CV3 The provision of facilities that meet the needs of visitors in within new cultural infrastructure developments and in nearby open spaces...
Chapter 7 Culture and Visitors	CV4 (2)	PC 46	Representation - R0195	CV4 (2) Do not result in unacceptable adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts
Chapter 7 Culture and Visitors	CV6 (1)	PC 47	Representation - R0247	CV6 (1)...public and private land and buildings ; b. protecting existing works of art, statues, memorials and other objects of communal and cultural significance;... e. encouraging the use of new emerging artists, and those from under-represented groups and public art programmes
Chapter 9 Design	S8 (4)	PC 48	Other - draft Sustainability SPD	S8 (4) Delivers world class sustainable buildings that are adaptable and informed by , designed with best practice circular economy principles and that treat materials as a valuable resource.
Chapter 9 Design	S8 (5)	PC 49	Other - draft Sustainability SPD	S8 (5)Embeds climate resilience into the early design concept to and contributes to the resilience of the Square Mile; and..
Chapter 9 Design	S8 (6)	PC 50	Other - draft Sustainability SPD	S8 (6) Seeks opportunities to contribute to the wider sustainability of the City and (where relevant) neighbouring boroughs, especially where development would result in substantial embodied carbon emissions.
Chapter 9 Design	S8 (8)	PC 51	Representation - R0179	S8 (8) Delivers buildings and spaces that have the right an appropriate scale, massing, built form and layout, with due regard to the existing and emerging urban structure, building types, form and proportions identified in the Character Areas Study.

Chapter	Paragraph	PC Number	Reason	Amended text
Chapter 9 Design	S8 (9)	PC 52	Representation - R0082	S8 (9) Optimises pedestrian movement by maximising permeability at street level, providing external and where feasible internal pedestrian routes which are inclusive, welcoming, convenient, comfortable and attractive, enhancing the City's characteristic network of accessible buildings, streets, <u>squares</u> , courts and alleys;
Chapter 9 Design	9.1.0	PC 53	Other - draft Sustainability SPD	9.1.0 As a world leading financial and professional services centre, with many important heritage assets and high quality buildings, the City requires world leading design in all aspects of the built environment, including the sustainability of new, <u>retrofitted</u> and refurbished buildings.
Chapter 9 Design	9.1.1	PC 54	Other - draft Sustainability SPD	9.1.1 Retrofitting existing buildings will in many cases result in lower whole lifecycle <u>upfront embodied</u> carbon emissions (in total, and per square metre) than demolishing and redeveloping sites, and helps to minimise the use of materials.
Chapter 9 Design	9.1.3	PC 55	Other - draft Sustainability SPD	9.1.3 An understanding of the potential for retaining and retrofitting existing buildings should therefore be the starting point for appraising site options, alongside a robust analysis of the <u>whole life-cycle</u> carbon of different development approaches.
Chapter 9 Design	9.1.4	PC 56	Other - draft Sustainability SPD	9.1.4 Options appraisals should also be informed by the potential for wider environmental <u>sustainability benefits for the site, its context and the whole City</u> before considering the many wider other design and planning matters set out in this policy and other policies throughout the Plan, and using this work to inform the design of the proposed scheme.
Chapter 9 Design	9.1.5	PC 57	Other - draft Sustainability SPD	9.1.5 Development with a substantial embodied carbon impact should seek to incorporate environmental sustainability benefits on site or to contribute to offsite measures in the wider local area that contribute to substantial improvements for the sustainability of the City. Opportunities for such measures may vary on a site by site basis due to the specifics of the location, context, building use and type of a site.
Chapter 9 Design	DE1 (1)	PC 58	Other - draft Sustainability SPD	DE1 (1) Development proposals should follow <u>adopt</u> a retrofit first approach, thoroughly exploring the potential for retaining and retrofitting. At the project outset, potential options for retention and retrofit should be explored to reduce carbon emissions and material waste.
Chapter 9 Design	DE1 (2)	PC 59	Other - draft Sustainability SPD	DE1 (2) All major development must undertake an assessment of the <u>feasible</u> options for the site, in line with the City Corporation's Carbon Options Guidance Planning Advice Note, and should use this process to establish to inform the most sustainable and suitable approach for the site.
Chapter 9 Design	DE1 (3)	PC 60	Other - draft Sustainability SPD	DE1 (3) Development proposals should minimise whole life-cycle carbon emissions. Major developments must submit a whole life-cycle carbon assessment <u>at planning stage and post construction.</u>
Chapter 9 Design	DE1 (7)	PC 61	Other - draft Sustainability SPD	7. Development should be designed to incorporate circular economy principles throughout the life-cycle of the building through: a. Flexible building design to accommodate evolving working and living patterns, reducing the need for redevelopment; b. Floorspace adaptability to maximise the lifespan of buildings; c. <u>Retention, refurbishment, retrofit and reuse</u> Reuse, refurbishment and retention of existing buildings, structures and materials to reduce reliance on virgin resources; d. Designing for disassembly, reuse and recycling of deconstruction materials; e. Maximum use of recycled materials in development and off-site construction methods to reduce wastage; and f. Designs which enable durability, modularity, sharing of goods and services and reuse of supplies and equipment, minimising waste during the building's operational phase
Chapter 9 Design	DE1 (8)	PC 62	Other - draft Sustainability SPD Representations- R0176	DE1 (8) Proposals for major development will be required to: a. Achieve a minimum BREEAM rating of "excellent" and aim for "outstanding" against the current, relevant BREEAM criteria at the time of application, obtaining maximum credits for the City's priorities (energy, water, materials, waste and pollution). Climate resilience credit should be achieved for the waste category. The adaption to climate change credit Wst 05 must be achieved in the <u>waste category</u> ; b. Commit to achieving a minimum NABERS UK rating of 5 stars; <u>Commit to a minimum NABERS UK Base Build energy rating of 5 stars for new build and 4 stars for retrofit developments (offices only);</u> c. Demonstrate that London Plan guidance on <u>operational</u> carbon emissions and air quality requirements have been met on site.

Chapter	Paragraph	PC Number	Reason	Amended text
Chapter 9 Design	9.2.0	PC 63	Other - draft Sustainability SPD	9.2.0 Materials – retaining reducing embodied carbon emissions from new build construction through retrofit and in-existing buildings and materials, and improving resource efficiency.
Chapter 9 Design	9.2.3	PC 64	Other - draft Sustainability SPD	9.2.3 Proposals for substantial demolition and reconstruction should have regard to the whole-life carbon whole life-cycle carbon impact, resource and energy use, when compared to the existing building.
Chapter 9 Design	9.2.9	PC 65	Representations - R0119/R0172/ R0173/R0174/ R0175/ R0190/R0197/ R0200/R0208	9.2.9 For major development (where the floorspace to be created by the development is 1,000sqm+, the site is 1 hectare or more, a residential development of 10+ dwellings, or a residential development on a site of 0.5 hectares or more) the following information should be provided: <ul style="list-style-type: none"> - A BREEAM pre-assessment or design stage assessment including a summary of the credits to be targeted in each category. Planning conditions will be used to require submission of a post construction BREEAM certificate to demonstrate implementation of the approved designs, achievement of the City’s priority credits and identify any performance gaps between design and completed development. - A Design for Performance (DfP) Agreement to the required Base Build NABERS UK energy rating (offices only). The DfP Agreement should set out how the design intent for energy efficiency will be maintained from design through to occupation and rating. Planning conditions will be used to require submission of a NABERS certificate after the rating period. - An energy assessment in line with the Mayor of London’s Energy Planning Guidance - An options appraisal following the City Corporation’s Carbon Options Guidance Planning Advice Note to develop a low carbon solution that optimises social, economic and environmental sustainability benefits - An air quality assessment to meet the requirements of the London Plan demonstrating that the development will not result in deterioration in air quality be at least Air Quality Neutral, in line with the City of London Air Quality SPD. - Details of collective infrastructure and other environmental sustainability improvements for the site, its context or the City as a whole. which has been incorporated to address environmental challenges. - Details of the proposed adaptation and resilience measures to make the building resilient to the climate and weather patterns it will encounter during its lifespan. - Whole life-cycle (WLC) carbon assessments in line with the London Plan Guidance and City Corporation’s Carbon Options...
Chapter 9 Design	9.2.9	PC 66	Representation - R0159	9.2.9 Extensions <ul style="list-style-type: none"> • If a development proposal includes an extension greater than 25% of the existing floorspace or consists of a distinct structure greater than 1,000sq.m, the extension on its own should be treated as a major development and assessed accordingly, including consideration of London Plan carbon emission targets, carbon options appraisal and BREEAM requirements. For minor development <ul style="list-style-type: none"> • Although minor development may provide more limited opportunities for the incorporation of sustainability features it is important that sustainability is considered at the design stage for all projects. For most minor development inclusion of sustainability information in the Design and Access Statement will suffice. • For minor development that includes substantial works (including substantial retrofit, extension), more detailed sustainability information may be requested to demonstrate policy alignment, such as consideration of London Plan carbon emission targets, carbon options appraisal or BREEAM requirements.
Chapter 9 Design	DE3 (7)	PC 67	Other - draft Sustainability SPD	DE3 (7) The need to Opportunities to integrate high quality public art as part of the public realm design;
Chapter 9 Design	9.6.5/9.6.6	PC 68	Representation - R0214	New paragraph number 9.6.6 Retail entrances – including alterations to existing buildings – should be designed with level entrances and doorways that enable inclusive access by all.

Chapter	Paragraph	PC Number	Reason	Amended text
Chapter 10 Transport	S9 (4)(h)	PC 69	Representation - R0118	S9 (4)(h) Requiring developers to demonstrate, through Transport Assessments, Construction Logistics Plans, Travel Plans, Cycling Promotion Plans and Delivery and Servicing Plans
Chapter 10 Transport	Figure 7	PC 70	Other- typo	Figure 7: Temples
Chapter 10 Transport	10.1.6	PC 71	Representations - R0121	10.1.6 The City Corporation will work with TfL and Network Rail to prioritise investment in accessibility improvements to underground, DLR and mainline rail stations and will seek to identify opportunities to introduce step free access as part of new developments and major refurbishments.
Chapter 10 Transport	AT1 (c)	PC 72	Representations - R0121	AT1 (c) Opportunities to enable improved and new connections through to mainline railway stations to promote use.
Chapter 10 Transport	10.2.7	PC 73	Representations - R0121	10.2.7.... Applicants should work with relevant stakeholders such as TfL and Network rail and discuss the scope of the transport documentation required early in the pre-application stage to ensure that it provides evidence tailored to the City's specific circumstances.
Chapter 10 Transport	10.7.4	PC 74	Representations - R0030	10.7.4 Healthy Streets Plans will be developed by the City Corporation, working jointly with neighbouring boroughs where appropriate, to cover the following areas: City Cluster; Fleet Street; Liverpool Street; Aldgate, Tower and Portsoken; Bunhill, Barbican and Golden Lane; Fenchurch Street; Bank and Cheapside; and Riverside.'
Chapter 10 Transport	Figure 10	PC 75	Other - typo	Figure 10: Temples
Chapter 10 Transport	Figure 11	PC 76	Other - typo	Figure 11: Temples
Chapter 10 Transport	10.9.1	PC 77	Representations - R0118	10.9.1 "TfL Cycleways and the TfL cycle hire scheme...will be prioritised."
Chapter 10 Transport	AT2	PC78	Representations - R0118	... incorporating sufficient shower and changing facilities, and lockers/storage to support walking and cycling in accordance with the London Cycling Design Standards or similar future standard.
Chapter 10 Transport	AT3 (5)	PC 79	Representations - R0118	AT3 (5) Opportunities to provide space for dockless parking and TfL cycle hire docks should be explored where development would create or have an impact on existing public realm.
Chapter 11 Heritage and Tall Buildings	11.2.6	PC 80	Representations - R0096	All new development, including tall buildings, within a conservation area will need to demonstrate how it would preserve and (where possible) enhance the conservation area. In the design of new buildings or the alteration of existing buildings, developers should have regard to the character of conservation areas and their settings. This includes the size and shape of historic building plots, existing street patterns and the alignment and the width of frontages, materials, vertical and horizontal emphasis, layout and detailed design, bulk and scale, including the effects of site amalgamation on scale, and hard and soft landscaping. Regard should be paid to the richness, variety and complexity of the architectural form and detailing of buildings and to the broader character of the area.
Chapter 11 Heritage and Tall Buildings	11.3.8	PC 81	Representations - R0061	11.3.8 On sites where significant archaeological artefacts or features are discovered, there would be a presumption to retain them on site and display them in the most optimal place for appreciation by the public.
Chapter 11 Heritage and Tall Buildings	11.5.1	PC 82	Other - typographical error	11.5.1...These areas include relatively small parts of Smithfield, Fleet Street and the Temples...
Chapter 11 Heritage and Tall Buildings	11.5.2	PC 83	Representation - R0211	The City contains many tall buildings, some are located in clusters or as standalone features, and unusually some are also heritage assets. In particular, the eastern part of the City has a concentration of tall buildings including iconic skyscrapers such as the Gherkin, 22 Bishopsgate, and the Leadenhall building. Tall buildings impart the City of London's World City status to compete globally and to be a place where businesses seek to locate. Strategically planning for tall buildings in clusters can bring economic as well as townscape benefits. Clusters of tall buildings allow for concentration and agglomerations of businesses and related economic activity while they also provide higher densities and contribute towards creating a more defined impact on the overall City skyline. The eastern cluster forms a distinctive skyline with the highest density of commercial activity within the City and is required to accommodate a significant proportion of the City's future growth in office floorspace. Capacity modelling demonstrates that the two clusters of tall buildings are required if the City is to meet objectively assessed need for office capacity over the lifetime of this Plan. Taking into account the policies of the plan as a whole, there may be some circumstances where the redevelopment of an existing tall building could contribute towards meeting these needs.

Chapter	Paragraph	PC Number	Reason	Amended text
Chapter 11 Heritage and Tall Buildings	11.5.4	PC 84	Representation - R0211	For the purposes of Policy D9 of the London Plan, the tall buildings areas identified as being appropriate locations for tall buildings are the City Cluster and Fleet Valley areas. A comprehensive analysis of the character of the City informed the location of these tall building areas. The study found that, given its historic nature, and the prominence in local and wider strategic views, all parts of the Square Mile are sensitive or very sensitive to new tall buildings. The City Cluster and Fleet Valley areas are the only broad areas found to be less sensitive and less constrained relative to other areas. Outside the identified tall building areas, new tall buildings, particularly on sites where there is no tall building currently, would be likely to have significant impacts on heritage assets and on protected views from places within and outside the Square Mile, and could significantly undermine the prevailing townscape and character of the area.
Chapter 11 Heritage and Tall Buildings	11.5.12	PC 85	Representation - R0211	On sites that contain a tall building (both within and outside the tall building areas identified in Figure 14), the existence of a tall building is likely to be a material consideration in the determination of development proposals. The retrofit or redevelopment of sites with existing tall buildings outside of the tall building areas may therefore be considered appropriate, where demonstrated that they would meet the requirements of Policy S12 (8), (9) and (10) in relation to their impacts and design, and other relevant development plan policies.
Chapter 12 Open Spaces and Green Infrastructure	12.4.2	PC 86	Other - typographical error	12.4.2. 'Barbican Estate, and St Alphage's Garden and Barber Surgeons' Garden'.
Chapter 12 Open Spaces and Green Infrastructure	12.4.5	PC 87	Other - typographical error	12.4.5. Biodiversity Metric (DBM)-4.0'.
Chapter 13 Climate Resilience	13.3.7	PC 88	Representations - R0090	13.3.7 fitting non-return valves, positive pump devices or similar on plumbing to prevent sewer surcharge within the building.
Chapter 13 Climate Resilience	13.5.0	PC 89	Representations - RO112	13.5.0 The Thames Estuary 2100 (TE2100) project plan and City of London Riverside Strategy recognises the need for the raising of flood defences by up to 0.5m by 2050 and 1m a further 0.5m by 2100.
Chapter 13 Climate Resilience	13.5.1	PC 90	Representations - RO112	13.5.1 Discussions with the Environment Agency will be required to establish the most effective designs for improved flood defences and to incorporate an appropriate and adequate minimum set back from the defences to allow for future maintenance and raising in line with the TE2100 Plan.
Chapter 13 Climate Resilience	13.5.2	PC 91	Other - update	13.5.2 A strategic approach to flood defence raising will enable riparian developers to design buildings and the riverside environment to accommodate higher flood walls in line with TE2100 requirements. Riparian owners are responsible for the maintenance and enhancement of flood defences.
Chapter 13 Climate Resilience	13.6.4	PC 92	Representations - R0292	13.6.4. The City Corporation has an agreement with the London Borough of Bexley and participates in the South-East London Joint Waste Planning Group, which comprises the boroughs of Bexley, Bromley, Greenwich, Lewisham and Southwark along with the City of London. The Group has identified sufficient waste management capacity up to 2036 to meet the combined apportionment of each of its individual members. The City will continue to contribute to London-wide waste planning through membership of the London Waste Planning Forum. It will continue to work with the GLA, the Environment Agency and other waste planning authorities to improve waste planning, including where any surplus capacity is identified. The City Corporation will monitor waste movements to waste locations outside London and share the data with the GLA regularly.
Chapter 13 Climate Resilience	13.7.7	PC 93	Representations - R0121	13.7.7 The City Corporation will continue to work with the Port of London Authority, Marine Management Organisation, the Thames Estuary Partnership and the Environment Agency to enable sustainable use of the River Thames for the movement of freight and waste, including the reduction of emissions from river transport, and with Network Rail for any potential movement by rail.
Chapter 14 Temple, Thames Policy Area and KOAC	TP1	PC 94	Representations - R0222	TP1 The City Corporation will continue to support the unique functions of the Inner and Middle Temples as places of education and training and providers of common and collegiate facilities for barristers and students, including providing professional accommodation for barristers to support the Bar and maintain the Temple area.
Chapter 14 Temple, Thames Policy Area and KOAC	14.1.1	PC 95	Representations - R0217	14.1.1 The Inner and Middle Temple has a strong collegiate atmosphere due to the mix of workspaces, residential, commercial and communal uses. Temple Church makes a significant contribution to the history and character of the Temple. This mix of uses contributes to the historic interest and high environmental quality of the area and should be maintained.

Chapter	Paragraph	PC Number	Reason	Amended text
Chapter 14 Temple, Thames Policy Area and KOAC	14.2.3	PC 96	Representations - R0237	14.2.3 The City of London Thames Policy Area is designated as the part of the City where development and change could affect aspects of the river and its importance. Collaboration with riparian neighbouring boroughs, the Environment Agency, the Marine Management Organisation, <u>the Thames Estuary Partnership</u> , the Port of London Authority and the Mayor of London is essential to ensure that the strategies and plans for the river are realised.
Chapter 14 Temple, Thames Policy Area and KOAC	14.5.2	PC 97	Representations - R0176	14.5.2...while there have been significant improvements, most notably the removal of the Aldgate Gyatory and...
Chapter 14 Temple, Thames Policy Area and KOAC	Figure 27	PC 98	Representations - R0121	Revise Figure 27: Fenchurch Street station is mislabeled as Cannon Street station
Chapter 14 Temple, Thames Policy Area and KOAC	14.7.1	PC 99	Other - typographical error	14.7.1 The area is an established legal cluster, focused on the Temples in the City...
Chapter 14 Temple, Thames Policy Area and KOAC	14.8.2	PC 100	Representations - R0218	14.8.2 A Neighbourhood Area and Neighbourhood Forum for the Barbican and Golden Lane area were designated by the City Corporation on 18 July 2023. <u>The Forum is in the process of preparing a Neighbourhood Plan for the designated neighbourhood area.</u>
Chapter 14 Temple, Thames Policy Area and KOAC	14.8.7	PC 101	Representations - R0239	14.8.7 ...and will work closely with the Culture Mile BID to deliver public realm and cultural activation."
Chapter 14 Temple, Thames Policy Area and KOAC	Figure 31	PC 102	Representations - R0218	Figure 31- Error correction in location of open space on Moor Lane
Chapter 15 Implementation	S26	PC 103	Representations - R0118	<u>S26 (2) (i) strategic transport improvements</u>
Chapter 15 Implementation	S26	PC 104	Representations - R0292	<u>S26 (3) Apply the hierarchy approach as set out in London Plan Policy DF1 (d)</u> <u>S26 (4). Use of the Vacant Building Credit is not considered to be appropriate in the City of London.</u>
Glossary	n/a	PC 105	Representations - R0218	Neighbourhood Forum - a group which has been designated under the neighbourhood planning process for a specific designated neighbourhood area. A neighbourhood forum has the ability to prepare a Neighbourhood Plan. It is a statutory consultee on planning applications and depending on the status of the Neighbourhood Plan, will be consulted on the allocation of a proportion of Neighbourhood CIL receipts for applications permitted within its area.
Glossary	n/a	PC 106	Other - draft Sustainability SPD	Wider Environmental Sustainability benefits - measures related to minimising carbon emissions or improving climate resilience that <u>make a significant contribution towards the wider environmental sustainability of the City, going beyond what would otherwise be expected.</u>
Appendices	n/a	PC 107	Other - typographical error	In the Table of Contents and within the section. Appendices Appendices

Note- We draw your attention to four Statements of Common Grounds (SOCG15, SOCG17, SOCG20, SOCG21) which put forward potential changes to the contours for discussion at examination.