

The City of London's draft Local Plan – City Plan 2040

MAIN MATTERS, ISSUES AND QUESTIONS WITH DRAFT HEARINGS PROGRAMME

Inspectors

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and

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Hearings commence 1000 Tuesday 25 March 2025

City of London Corporation, Guildhall,
Basinghall Street, London EC2P 2EJ

This programme should be read in conjunction with
the Inspector's Briefing Note

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Web: [City Plan 2040 Examination in Public - City of London](#)

The Examination Library is managed by the Programme Officer and contains all submission documents, representations and information relating to the examination. It will be updated as further documents are submitted. Documents can be downloaded from the examination website. In the run up to the examination paper copies can be provided if necessary, by contacting the Examination Office, C/O Banks Solutions, 80 Lavinia Way, East Preston, West Sussex, BN16 1DD

Important Notes

- Participants should only respond to the questions which directly relate to their previously submitted written representations on the plan. Please clearly indicate in your statement(s) the question(s) you are answering.
- Further statements should be proportionate in length to the number of questions being answered and should not, in total, exceed 3,000 words per Matter.
- The plan is being examined as submitted by the Corporation. Therefore, at this stage, it is not necessary to consider the merits for development of sites not included in the plan (“omission sites”). Should it be determined that there is a need for additional or different sites to be allocated, we will, in the first instance, ask the Corporation to consider how it would wish to proceed with the Examination.
- The questions concerning soundness are primarily focussed on the plan’s policies. Insofar as they relate to the plan’s soundness other elements of the plan, including the supporting text, will be considered as part of the discussion of the relevant policies.

TIMETABLE

The Main Matters (MM) are set out in detail below.

WEEK 1

Day 1 – 1000 - Tuesday 25 March 2025

- Inspectors’ Opening Statement
- Corporation’s Opening Statement
- Main Matter 1 – Legal Requirements and Overarching Issues
- Main Matter 2 – Spatial Strategy
- Main Matter 3 – Housing (Policies S3 and HS1 to HS8)

Participants [Day 1]

City of London and TBC

Day 2 – 1000 - Wednesday 26 March 2025

- Main Matter 7 – Heritage and Tall Buildings (Policies S11 to S13 and HE1 to HE3) – Heritage element that will continue into Day 3

Participants [Day 2]

City of London and TBC

Day 3 – 1000 - Thursday 27 March 2025

- Main Matter 7 – Heritage and Tall Buildings (Policies S11 to S13 and HE1 to HE3) - Heritage element that will be a continuation from Day 2

Participants [Day 3]

City of London and TBC

Day 4 – Friday 28 March 2025 - Reserve

Reserve Morning if Required (MM1 to MM3, and MM7)

WEEK 2

Day 5 – 1000 - Tuesday 1 April 2025

- Inspector led recap from Week 1 - Housekeeping
- Main Matter 4 – Offices (Policies S4 and OF1 to OF3)
- Main Matter 5 – Retail (Policies S5 and RE1 to RE4)
- Main Matter 6 – Culture & Visitors (Policies S6 and CV1 to CV6)
- Main Matter 8 – Design (Policies S8 and DE1 to DE8)

Participants [Day 5]

City of London and TBC

Day 6 – 1000 - Wednesday 2 April 2025

- Main Matter 9 – The Temple, the Thames Policy Area & the Key Areas of Change (Policies TP1 and S17 to S25)
- Main Matter 10 – Healthy and Inclusive City (Policies S1 and HL1 to HL9)
- Main Matter 11 – Safe and Secure City (Policies S2 and SA1 to SA3)

Participants [Day 6]

City of London and TBC

Day 7 – 1000 - Thursday 3 April 2025

- Main Matter 12 – Open Spaces & Green Infrastructure (Policies S14 and OS1 to OS5)
- Main Matter 13 – Climate Resilience and Flood Risk (Policies S15 and CR1 to CR4)
- Main Matter 14 – Circular Economy and Waste (Policies S16 and CE1 to CE2)

Participants [Day 7]

City of London and TBC

Day 8 – Friday 4 April 2025 (Morning Only)

Reserve Morning if Required (MM4 to MM6 and MM8 to MM14)

WEEK 3

Day 9 – 1000 - Tuesday 29 April 2025

- Main Matter 15 – Transport and Servicing (Policies S9 and VT1 to VT5)
- Main Matter 16 – Active Travel and Healthy Streets (Policies S10 and AT1 to AT3)
- Main Matter 17 – Infrastructure (Policies S7 and IN1 to IN3)

Participants [Day 9]

City of London and TBC

Day 10 – 1000 - Wednesday 30 April 2025

- Main Matter 18 – Implementation (Policies S26 and PC1)
- Main Matter 19 – Monitoring

Participants [Day 10]

City of London and TBC

Day 11 – 1000 – Thursday 1 May 2025 (Morning Only)

Reserve Morning if Required (MM15 to MM19)

Participants [Day 11]

City of London and TBC

Please note

Timings - whilst the start time for each day is fixed, the morning, afternoon, and lunch breaks and close of sessions are dependent on the discussions during the hearing and therefore maybe subject to change.

The Inspectors' have set out their Main Matters and Issues below. These are based on the main headings and chapters of the City Plan 2040. This will allow everyone who wishes to make representations at the Hearing to participate at the appropriate time.

The hearings programme is draft and maybe subject to minor changes please ensure that you keep updated at the examination website.

MAIN MATTERS, ISSUES AND QUESTIONS (MIQs)

Abbreviations

CP – City Plan 2040
LP – The London Plan
NPPF – National Planning Policy Framework

Main Matter 1 – Legal Requirements and Overarching Issues

Duty to Cooperate

Has the Corporation met the duty to cooperate and is this clearly evidenced? In particular:

- Have all the relevant strategic matters in relation to this duty been clearly identified?
- Has the Corporation maximised the effectiveness of plan-making activities by engaging constructively, actively and on an on-going basis with the prescribed bodies, in the preparation of the Plan in the context of these relevant strategic matters? Does the evidence clearly set this out?

London Plan

- Is the CP in 'general conformity' with the LP as required by the provisions of Section 24 of the 2004 Act?

Does the CP meet all other legal requirements, specifically:

- Does the content and timescale for preparation of CP accord with the latest version of the Local Development Scheme?
- Has the CP consultation complied with the Statement of Community Involvement and public consultation requirements in the Town and Country Planning (Local Plan) (England) Regulations 2012?
- Has the CP been subject to a Sustainability Appraisal (SA) and have the requirements for Strategic Environmental Assessment been met? Is it clear how the SA influenced the final plan and dealt with mitigation measures?
- Have the requirements for appropriate assessment under the Habitats Regulations been met? Have the results of the Habitats Regulations Assessment been carried forward in the CP?
- Has the preparation of the CP complied with the Town and Country Planning (Local Plan) (England) Regulations 2012?
- Does the 'policies map' correctly illustrate geographically the application of policies of the CP?

Consistent with National Policy

Does the CP accord with national policy for plan making in the NPPF, specifically:

- Does the CP contribute to the achievement of the three dimensions of sustainable development – economic, social, and environmental?
- Has it been positively prepared 'in a way that is aspirational but deliverable'? (Paragraph 16 of the NPPF)
- Is the CP consistent with the NPPF in all other respects? Or if not, what is the justification for any inconsistency?
- Do the policies in the CP provide a clear indication of how a decision maker should react to a development proposal?

POLICIES

Main Matter 2 – Spatial Strategy

- Is the Spatial Strategy for the City of London justified by appropriate available evidence, having regard to national guidance and local context, including the London Plan?
- Is the plan period sufficiently defined i.e. clearly written and unambiguous?
- Is the Spatial Strategy for the City of London effective and will it ensure the delivery of the identified economic, social, and environmental objectives within the Plan period?

Main Matter 3 – Housing (Policies S3 and HS1 to HS8)

- In setting a minimum requirement of 1706 net additional dwellings for the plan period 2025/26 to 2039/40, does CP Policy S3 make adequate provision to meet the City's housing needs and does the plan clearly set out a delivery trajectory that is achievable?
- Is the plan consistent with the Government objective of significantly boosting the supply of homes, as expressed in the NPPF? Do the Corporation's latest HDT results have implications for the housing delivery and trajectory expectations in the submitted plan?
- In the absence of site-specific housing land allocations within the CP does the submitted evidence including past delivery support the Corporation's approach to housing delivery?

- Does the Plan adequately address the needs for all types of housing and the needs of different groups in the community?
- Is the requirement for affordable housing in the City adequately addressed by the CP?
- Should the affordable housing requirements for the City be clearly set out in a specific policy rather than as just part of the explanatory text?
- Are the policies relating to Housing positively prepared 'in a way that is aspirational but deliverable'?
- Are the housing policies clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?

Main Matter 4 – Offices (Policies S4 and OF1 to OF3)

- Do the strategy and policies relating to the provision of offices make adequate provision to meet the City's needs for the whole plan period (15 Years)?
- Are the policies relating to offices justified by appropriate available evidence, having regard to national guidance and local context; and are they in 'general conformity' with the LP?
- Are the policies relating to offices positively prepared 'in a way that is aspirational but deliverable'?
- Are the policies clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?

Main Matter 5 – Retail (Policies S5 and RE1 to RE4)

- Does the Plan's strategy and policies relating to Retail make adequate provision to meet the City's needs for the whole plan period (15 Years)?
- Are the policies relating to Retail justified by appropriate available evidence, having regard to national guidance and local context; and are they in 'general conformity' with the LP?
- Are the policies relating to retail positively prepared 'in a way that is aspirational but deliverable'?
- Are the policies clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?

Main Matter 6 – Culture & Visitors (Policies S6 and CV1 to CV6)

- Are the policies relating to Culture & Visitors justified by appropriate available evidence, having regard to national guidance and local context; and are they in 'general conformity' with the LP?
- Are Policies S6 and CV1 to CV6 positively prepared 'in a way that is aspirational but deliverable'?
- Are the policies clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?

Main Matter 7 – Heritage and Tall Buildings (Policies S11 to S13 and HE1 to HE3)

- Are the Heritage and Tall Buildings policies justified by appropriate available evidence, having regard to national policy and guidance and local context; and are they in 'general conformity' with the LP?

Heritage

- Are the Heritage policies justified by appropriate available evidence, having regard to national guidance and local context; and are they in 'general conformity' with the LP?
- Do the policies set a positive strategy for the conservation and enjoyment of historic environment in a manner appropriate to its significance?
- Is Policy HE1 (8) clearly defined and unambiguous in regard to the setting of heritage assets so that it is evident how a decision-maker should react to development proposals in a manner consistent with the statutory requirements in the Planning (Listed Buildings and Conservation Areas) Act 1990 and which gives sufficient protection to heritage assets?
- Are the Heritage policies clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?

Tall buildings

- Is Policy S12 (Tall Buildings) consistent with Policy D9 of the London Plan and is it informed by a proportionate evidence base?

- Are the policies relating to Tall Buildings clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?

Protected Views

- Is Policy S13 justified by appropriate available evidence, having regard to national guidance and local context; and are they in 'general conformity' with the LP?
- Is the Policy S13 clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals to ensure adequate protect and enhance significant City and strategic London Views?

Main Matter 8 – Design (Policies S8 and DE1 to DE8)

- Are the requirements for Design set out in Policies S8 and DE1 to DE8 justified by appropriate available evidence, having regard to national guidance, and local context, and are they in 'general conformity' with the London Plan?
- Are the policies relating to Design positively prepared 'in a way that is aspirational but deliverable'?
- Are the Design policies clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?

Main Matter 9 – The Temple, the Thames Policy Area & the Key Areas of Change (Policies TP1 and S17 to S25)

- Are the policies relating to The Temple, the Thames Policy Area & the Key Areas of Change justified by appropriate available evidence, having regard to national guidance and local context; and are they in 'general conformity' with the LP?
- Are the policies relating to The Temple, the Thames Policy Area & the Key Areas of Change positively prepared 'in a way that is aspirational but deliverable'?
- Are the policies clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?

HEALTH, INCLUSION & SAFETY

Main Matter 10 – Healthy and Inclusive City (Policies S1 and HL1 to HL9)

- Are the requirements for a Health and Inclusion set out in Policies S1 and HL1 to HL9 justified by appropriate available evidence, having regard to national guidance, and local context, and are they in 'general conformity' with the London Plan?
- Are the policies relating to Health and Inclusion positively prepared 'in a way that is aspirational but deliverable'?
- Are the policies clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?

Main Matter 11 – Safe and Secure City (Policies S2 and SA1 to SA3)

- Are the requirements for a Safe and Secure City set out in Policies S2 and SA1 to SA3 justified by appropriate available evidence, having regard to national guidance, and local context, and are they in 'general conformity' with the London Plan?
- Are the requirements for a Safe and Secure City set out in Policies S2 and SA1 to SA3 positively prepared 'in a way that is aspirational but deliverable'?
- Are the policies clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?

Main Matter 12 – Open Spaces & Green Infrastructure (Policies S14 and OS1 to OS5)

- Are the requirements for Open Spaces & Green Infrastructure set out in Policies S14 and OS1 to OS5 justified by appropriate available evidence, having regard to national guidance, and local context, and are they in 'general conformity' with the London Plan?
- Are the policies relating to Open Spaces & Green Infrastructure positively prepared 'in a way that is aspirational but deliverable'?

- Do the policies give clear direction as to how a decision maker should react to a development proposal?

Main Matter 13 – Climate Resilience and Flood Risk (Policies S15 and CR1 to CR4)

- Are the requirements for Climate Resilience and Flood Risk set out in Policies S15 and CR1 to CR4 justified by appropriate available evidence, having regard to national guidance, and local context, and are they in 'general conformity' with the London Plan?
- Are the policies relating to Climate Resilience and Flood Risk positively prepared 'in a way that is aspirational but deliverable'?
- Do the policies give clear direction as to how a decision maker should react to a development proposal?

Main Matter 14 – Circular Economy and Waste (Policies S16 and CE1 to CE2)

- Are the requirements for Circular Economy and Waste justified by appropriate available evidence, having regard to national policy and guidance, local context, and are they in 'general conformity' with the London Plan?
- Are the policies relating to Circular Economy and Waste positively prepared 'in a way that is aspirational but deliverable'?
- Do the policies give clear direction as to how a decision maker should react to a development proposal?

TRANSPORT

Main Matter 15 – Transport and Servicing (Policies S9 and VT1 to VT5)

- Are the requirements for Transport and Servicing justified by appropriate available evidence, having regard to national policy and guidance, local context, and are they in 'general conformity' with the London Plan?
- Are the policies relating to Transport and Servicing positively prepared 'in a way that is aspirational but deliverable'?
- Do the policies give clear direction as to how a decision maker should react to a development proposal?

Main Matter 16 – Active Travel and Healthy Streets (Policies S10 and AT1 to AT3)

- Are the policies relating to Active Travel and Healthy Streets justified by appropriate available evidence, having regard to national guidance, and local context, and are they in 'general conformity' with the London Plan?
- Are the policies relating to Active Travel and Healthy Streets positively prepared 'in a way that is aspirational but deliverable'?
- Do the policies provide clear direction as to how a decision maker should react to a development proposal?

Main Matter 17 – Infrastructure (Policies S7 and IN1 to IN3)

- Are the policies relating to Infrastructure requirements justified by appropriate available evidence, having regard to national guidance, and local context, and are they in 'general conformity' with the London Plan?
- Are the policies relating to Infrastructure positively prepared 'in a way that is aspirational but deliverable'?
- Do the policies provide clear direction as to how a decision maker should react to a development proposal?

Main Matter 18 – Implementation (Policies S26 and PC1)

- Are the policies relating to Implementation justified by appropriate available evidence, having regard to national guidance, and local context, and are they in 'general conformity' with the London Plan?
- Are the policies relating to Implementation positively prepared 'in a way that is aspirational but deliverable'?
- Do the policies provide clear direction as to how a decision maker should react to a development proposal?

Main Matter 19 – Monitoring

- Will the Corporation's monitoring and review processes for the CP be effective in assessing the success or failure of delivery and what alternatives might reasonably be provided if necessary?