


2024 Draft Local Plan response from Willoughby House Group

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To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>

 1 attachments (90 KB)

WHG RESPONSE TO CITY OF LONDON LOCAL PLAN 2024.pdf;

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Please find attached the Willoughby House Group response to the CoL Draft Local Plan 2024.

Regards,

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CITY OF LONDON LOCAL PLAN 2024

REGULATION 19 CONSULTATION

RESPONSE FROM WILLOUGHBY HOUSE GROUP

JUNE 2024

Background

Willoughby House Group is the RTA representing the interests of 150 homes and their occupants and owners at the eastern end of the Barbican estate. We welcome the chance to comment on the Regulation 19 Consultation Draft of the City of London Local Plan 2024.

Summary

Our view is that the Draft Plan is unsound in its present form. The policies within the current Draft Plan would not protect the character and appearance of the Barbican Estate, where we live, including its historic environment and amenities for residents and visitors alike. Our block is a listed building in a conservation area and should be protected by strong heritage policies that limit buildings higher than the reference height of the area and also protect important views. Downgrading this protection in the new plan is in contravention with the NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990, in our opinion. We support the submission of the Barbican Association, of which we are a member.

Policy changes

We would also like to see the following amendments to policy in City Plan 2040:

At the moment, Core Strategy Policy CS12 of the adopted 2015 City Plan identifies the need to: (i) Safeguard the City's listed buildings and their settings, while allowing appropriate adaption and new uses: (ii) Preserve and enhance the distinctive character and appearance of the City's conservation areas, while allowing sympathetic development within them. No similar stated aim has been included within the Draft 2040 Plan. We propose that the wording of current policy CS12 is reinstated in City Plan 2040.

City Plan 2040 does not meet the London Plan CG3 (E) requirement to "plan for appropriate health and care infrastructure to address the needs of London's changing and growing population".

(S1[6 a]) – should say – “do no demolition, deconstruction or construction on Saturday mornings in residential areas, and engage with neighbours before and during construction to minimise adverse impacts and mitigate any residual adverse impacts”;

(S1 [6 c]) – should reduce levels of all air pollutants to comply with the latest WHO guidelines for short and long term air quality

Policy (HL3) needs to be rewritten to require noise assessments to show how developments will make a positive contribution to bringing environmental noise levels within WHO guidelines.

Policy (HL5) needs to protect **and improve** existing social and community facilities in situ.

Strategic Policy (S4) needs to include addition to item 4 – “Ensuring that other new land uses within identified residential areas are compatible with residential amenity. This is in conformity with the agent of change principle, which is the principle “that the person or organisation responsible for change is responsible for managing the impact of that change. This includes impacts from noise, vibration and lighting. For example, a new residential development near an existing cultural use would be responsible for ensuring that residents are not disturbed by the activities of the cultural use. Similarly, a new cultural use near an existing residential development would need to ensure that existing residents are not disturbed.” [from Glossary definition]

Policy (HS1[3]) - should also include “c) resist loss of open space, amenity space/views and greening where existing residential estates are being redeveloped (HS1[3]) in the interest of improving the deficit of open space, tree canopy cover and greening in general in the City”.

Policy HS1[3] should also say “within the Smithfield and Barbican KAOC redevelopment of Listed housing should be ruled out in the lifetime of the Plan, with a focus on maintaining, repairing and upholding the fabric of the housing and buildings as significant heritage assets”.

Policy (HS3 [2]) – add “All development proposals should be designed to minimise overlooking and seek to protect the privacy, daylighting and sunlighting levels to adjacent residential accommodation. Developers should submit a Residential Visual Amenity Threshold (RVAT) assessment as part of applications within or on the boundaries of the City’s residential clusters. Light spill from development that could affect residential areas should be minimised by use of automated blinds”.

Policy (CV 5) - We note that the agent of change principle is only specified in relation to new residential development and not in evening and nighttime use. This policy should be strengthened in line with the NPPF and London Plan to specifically include the agent of change principle across all development.

Strategic Policy (S8) Design

(S8) – Sustainable design – add a new point “contribute to reducing urban heat island effect”

(S8 [13]) – says “... addressing solar glare, daylight and sunlight, wind conditions and thermal comfort” add “(including the urban heat island effect on surrounding area) and delivers improvements in air quality, reduction in urban heat, open space and views”;

S8[13] – replace “open space” with “the quantity of ground level open space”

S8[15] – add “at ground level where possible”

S8[17] – change to [“delivers a net increase of publicly available open space, at ground level, and overall....] and add [“green space”] to the list

Policy (DE2) Design Quality - (DE2 [2]) says "...loss of daylight and sunlight" add "and thermal comfort impacts at street level and to any surrounding sensitive sites such as residences or hospitals"... or intrusive solar glare..

DE2[2f] – add "Such greening biodiversity and public realm improvements should be at ground level. High level gardens will not be considered an adequate substitute for the loss of public realm and the loss of ground level open space will be resisted".

DE2[5] is supported. Changes to designs as a result of cost savings measures have led to worse design, reduced residential amenity, and breaches of planning policy

(DE2) Supporting text 9.3.7 says "plant should be located below ground". This should be made policy next to residential areas. (there is a lot of unused space at basement level in new developments in the City)

Policy DE4: Terraces and Elevated Public Spaces - (DE 4[1]) – substitute "considered" for "encouraged"

Policy (DE 4[1b]) reword to say "There would be no immediate overlooking of residential premises, unacceptable disturbance from noise or other significantly adverse impacts on residential amenity. Where there is a potential for a significantly adverse impact, the use of an extensive green roof and a restriction on access should be required as an alternative; near residences terraces should not be used between 6pm and 8am on weekdays and should be closed at weekends and bank holidays.

Policy DE7: Daylight and sunlight – together with (HS 3[3]) - daylight and sunlight – should be aligned to specify the meaning of "cumulative impact" and adding the requirement for an assessment to ensure that residences are not subject to unacceptable levels of daylight and sunlight as a result of development.

Policy DE8: Lighting - amended to say, "Automated blackout blinds should be fitted to office windows next to residences, to drop at 7pm".

(DE 8) – add controls over illuminated screen displays inside buildings but facing out over the public realm, and particularly facing homes

New Policy DE9 - Residential Amenity

"1. Development will be required to provide a high quality environment and a good standard of residential amenity for existing and future occupants of land and dwellings. Development which would have an unacceptable adverse impact on the residential amenity of existing or future occupants of land and dwellings will not be allowed.

2. Impact on residential amenity will be assessed to:

- i. protect the distinctive character of the existing building(s) and the surrounding area with respect to the design, scale and materials used on the building(s);
- ii. protect trees and other soft landscaping of amenity value, providing replacement planting where necessary;
- iii. ensure development will maintain a good standard of daylight, sunlight, outlook and privacy for all existing and future occupants of buildings;
- iv. avoid the introduction of unacceptable additional accesses, traffic or parking resulting in an increase of visual intrusion, noise or disturbance; and
- v. ensure that noise, disturbances, smells, fumes and other harmful effects from surrounding land uses and/or associated operations will not have an unacceptable adverse impact on residential amenity."

Policy VT2: Freight and Servicing - add new text:

“2. Major commercial development must provide for;

- a) servicing, including space for freight vehicles to turn around, to be entirely inside any development next to residences, and
- b) freight consolidation and use technological and procurement solutions that enable efficient servicing and deliveries to sites”.

And also add

“7. Streets that are:

- a) Next to residences, or
 - b) Designated cycle routes, or
 - c) Designated as pedestrian corridors or “healthy streets” or equivalent
- will not normally be permitted to be used as access routes to or from service bays”.

Policy HE1: Managing Change to the Historic Environment is UNSOUND Policy HE1(6) should be strengthened to require that opportunities to enhance conservation areas be positively sought and pursued, not merely ‘considered’. The word “immediate” should be deleted from Policy HE1[8].

Strategic Policy S12: Tall Buildings - we strongly object to the wording of Policy S12. The wording in the currently adopted local plan (CS14) should therefore be reinstated to say that tall buildings [defined as in CS14 as buildings “which significantly exceed the height of their general surroundings “] are inappropriate in conservation areas.

City Plan 2040 policy (S12 [10.f]) says “adequate distance between buildings to ensure high quality experience at the street level;”. This should be amended to say “adequate distance between buildings to ensure high quality sustainable townscape experience at all levels;”.

Strategic Policy S14: Open Spaces and Green Infrastructure - We support the “protection” of “existing open and green spaces”; instead of “promoting” greening, (S14) needs to create new ground level open space publicly accessible to all and to resist loss of such space in absolute terms.

Finally, we support the proposal from the Barbican Association and the Neighbourhood Forum for changes to the Barbican & Smithfield Key Area of Change (KAOC) Strategic Policy S23 and a new Strategic Policy for the Barbican & Golden Lane area of the KAO.