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Subject: Barbican and Golden Lane Neighbourhood Forum - response to City Plan 20240
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Attachments: [Final BGLNF response to City Plan 2040.pdf](#)
[Final BGLNF Supporting Evidence to the City Plan 2040 Reg 19 consultation.pdf](#)

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Attached is the Forum's response to the draft City Plan 2040 together with its supporting evidence. The Forum is a statutory consultee.

Best wishes,

Brenda Szlesinger and Peter Jenkinson (Co-Chairs of the Barbican and Golden Lane Neighbourhood Forum).

BGLNF

Representations on behalf of Barbican and Golden Lane
Neighbourhood Forum

to the City of London Corporation

Regulation 19 Consultation

City Plan 2040

June 2024

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1 Introduction

- 1.1 The Barbican & Golden Lane Neighbourhood Forum (“the Forum”) is designated to represent the planning and infrastructure aspirations of community organisations, businesses and residents in the north-west of the City of London. The Neighbourhood Area is within the proposed Barbican & Smithfield Key Area of Change (KAOC).
- 1.2 The Forum welcomes the City Plan 2040 and supports its ambitions to make the City a more sustainable place, and one where culture and amenity for the people who live and work here is improved. Environmental quality is an important foundation for strong economic growth and merits improvement to keep the City competitive globally.
- 1.3 The Forum was designated¹ in 2023, as the first Neighbourhood Forum in the City. Our Neighbourhood Plan is in preparation; the Forum considers it appropriate that this should be explicitly acknowledged and accommodated within City Plan 2040, particularly as the Barbican & Golden Lane Neighbourhood Plan is being prepared to be in conformity with City Plan 2040 when it is made. Work on the Neighbourhood Plan will continue after this submission to the City Plan 2040 Reg 19 consultation, and we look forward to presenting Inspectors with our most recent evidence and draft policy direction when the City Plan 2040 reaches the Inspection stage. In the meantime, our Housing Needs Analysis was published and provided to the City of London’s Local Plans team in March 2024 and discussions with them are ongoing.
- 1.4 We acknowledge that the NPPF (para 132) says that; *“Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers”*.
- 1.5 The Forum proposes;
- a) that the Barbican & Golden Lane Neighbourhood Area should be mapped in Figure 1: Key Diagram, as it is material to planning decision-making; and
 - b) that the Barbican & Golden Lane Neighbourhood Area should be referred to in the Spatial Strategy by adding a sub-paragraph 2.1 (12) to say *“a detailed Neighbourhood Plan for the Barbican & Golden Lane Neighbourhood Area will be brought forward in conformity with City Plan 2040.”*

¹ under the Localism Act 2011

- 1.6 We propose recognition of the Barbican & Golden Lane Neighbourhood Forum Area and anticipated Neighbourhood Plan; both should be acknowledged and allowed for in policy and policy maps, as we explain in detail within this response. It would also be helpful for the role and status of Neighbourhood Plans and Forums to be set out at least in the Glossary of the Plan, especially as the Barbican & Golden Lane Neighbourhood Forum is the first to be designated in the City and the addition of a Neighbourhood Plan to the existing planning hierarchy is relatively novel to applicants and decision-makers alike here.
- 1.7 The Forum supports the analysis that both Smithfield and Barbican are Key Areas of Change for the reasons set out by the City such as the anticipated moves of the Museum of London and Smithfield Market. The boundary of impact, in the main, is both justified and appropriate (S23 and policy maps [Figures 31 and 32]). It would be preferable, in the interests of clarity and consistency of policy, if the “Barbican” part of the KAOC was extended to be co-terminus with the designated boundary of the Barbican & Golden Lane Neighbourhood Area at its south-west corner (see Forum boundary map provided separately) to the west of Aldersgate Street and the south of London Wall.
- 1.8 The Forum questions, however, whether the City has provided any evidence to justify denying “Barbican” the same detailed policy consideration that “Smithfield” gets (S24) within the “Smithfield & Barbican” KAOC. The weight of evidence recognising the Barbican & Golden Lane Neighbourhood’s separate special character together with evidence of the scale of change affecting the whole KAOC means that denying it a sufficiently detailed policy framework to ensure that change is guided appropriately cannot be justified.
- 1.9 We therefore propose a strategic policy (S23B) to address the unmet requirements of the Barbican & Golden Lane, to provide greater clarity in guiding significant change, to avoid confusion and in so doing create more effective policy.
- 1.10 Within the Smithfield and Barbican KAOC, “Smithfield” is undefined which is neither justified nor effective. Aldersgate Street/Goswell Road (A1)² is a busy road running north/south and bisecting the KAOC. It a long-established dividing line between Smithfield and the Barbican & Golden Lane, and for this reason is also a boundary of the Barbican & Golden Lane Neighbourhood Area. We therefore propose that Aldersgate Street/Goswell Road (A1) is the obvious boundary dividing the two distinct parts of the KAOC.

² One road, two names – Aldersgate Street becomes Goswell Road at the junction of Fann Street

- 1.11 The Forum supports the City’s aim of delivering more homes, including affordable and specialist homes. London’s housing crisis threatens the City’s ability to deliver economic growth by undermining its attractiveness as place to live, work, invest and thrive.
- 1.12 The supply of affordable housing in the Barbican & Golden Lane Neighbourhood, and housing for older people and those with support needs, is a concern for the Forum. In preparation for our Neighbourhood Plan, our own professionally sourced Housing Needs Assessment from housing consultants (see our supporting evidence) concludes that the Area needs both affordable private rented dwellings, and specialist accommodation for older people and those with support needs.
- 1.13 Our evidence provides justification for amendments to the City Plan 2040 to;
- a) Recognise, map, explain and welcome the Barbican & Golden Lane Neighbourhood Area and Plan;
 - b) Extend the “residential area” to include the whole of the Forum Area boundary, as this was accepted by the City of London as a cohesive residential neighbourhood on designation;
 - c) Designate sites for housing;
 - d) Extend the Smithfield & Barbican KAOC boundary to be co-terminus with the Barbican & Golden Lane Neighbourhood Boundary at its south-west corner, in the interests of clarity and consistency;
 - e) Recognise the predominantly residential character of the Barbican & Golden Lane Neighbourhood by adding a Strategic Policy for Barbican & Golden Lane in the Smithfield & Barbican KAOC;
- 1.14 The Forum finds City Plan 2040 to be unsound with regard to Health, Offices, Heritage, Open Space and Climate policies, and has also set out suggested policy amendments in this response.
- 1.15 The Forum supports the broad strategy of the Plan and would welcome more robust evidence and clearer policy to identify the range of needs and balance the means of meeting them in this very crowded and congested place. Policy ambiguity encourages “gaming” of the planning system (always a risk where underlying asset values are amongst the highest in the UK) and with it an incremental weakening of protections that are essential to preserving a high quality sustainable environment. More should be done to reduce ambiguity in the City Plan 2040, in the interest of effective policy implementation.
- 1.16 The Forum takes the view that clarity of policy in the City Plan 2040 is needed, particularly regarding key social, environmental and economic outcomes such as making the City a world class place to live, work and play, reducing Whole Life Carbon, protecting heritage and achieving

effective resilience in the face of climate change. Without a world-class environment, the City's status as a centre for international finance will weaken, as firms these days have great choice of locations globally. The Forum's suggested policy changes, in the interests of soundness, consistency, clarity and above all effectiveness of the Plan are summarised in an index later in this submission.

- 1.17 The Forum wishes to participate in Examination Hearing Sessions. As the designated Forum we are in the midst of preparing a Neighbourhood Plan for the Barbican & Golden Lane Neighbourhood Area, and we look forward to presenting our latest draft Plan to Inspectors in due course.
- 1.18 The Forum thanks the City for extending the consultation beyond the statutory minimum six week period, as we were advised against running any consultation events of our own during the pre-election period for the July 2024 election, limiting debate with our membership. We have done our best to examine the complex issues in the draft Plan as comprehensively as possible. As an entirely voluntary organisation this has been particularly challenging, even with the extended deadline, and it may be necessary for the Forum to provide supplementary evidence or analysis in advance of the Examination in Public.
- 1.19 The Forum looks forward to conforming with the City Plan 2040, once made, with a Neighbourhood Plan for the Barbican & Golden Lane Area. We would welcome the opportunity to clarify and discuss our suggestions for the City Plan 2040 with the City of London Corporation once our representations have been considered by them.
- 1.20 We are fortunate in having a membership with extremely high levels of local and specialist expertise. Thanks are due to all the professional planners, lawyers, health experts, architects, cultural specialists, historians, urban designers, teachers, transport planners, landscape and other "subject matter experts" whose input has helped to shape this submission and all the 150 Forum members whose combined forensic knowledge of our Area is invaluable.

2 Barbican & Golden Lane Character Study

2.1 Predominantly Residential Character

The Barbican and Golden Lane Neighbourhood Forum Area is a cohesive, predominantly residential, community clustered within and around the listed Barbican and Golden Lane Estates. It is a closely packed, tightly-defined part of the City of London. The residential communities and most businesses within this area all self-define themselves to be part of the Barbican and Golden Lane Neighbourhood and there is a strong and vibrant community attachment. This existing community network includes groups based in the residential blocks and estates, such as Roman House, the Barbican, Golden Lane, London House, Little Britain, the Heron, Monkwell Square, Bridgewater Square and Tudor Rose Court. In this Area residential, business, heritage and cultural interests come together within a highly populated footprint. Population density will increase with further residential development, reinforcing its status as a predominantly residential area, and with it a need to consider supportive social and community and health facilities, as well as open space and trees.

Although the Area scores above average on many quality-of-life indices, it is worth noting that according to the Living Environment Deprivation Indicators (which measure the quality of the local Environment both ‘indoors’ i.e. quality of housing and ‘outdoors’) Golden Lane is within the 20% most deprived small area zones (LSOAs) in England, while Barbican West and Barbican East are within the 40% most deprived in England³

2.2 The City’s main Residential Area (half the City’s population live here)

The Barbican and Golden Lane Neighbourhood Area is all primarily residential, containing;

- a) The whole of the Golden Lane Estate and neighbouring housing such as Clarendon Court, Tudor Rose Court, the Denizen and Bridgewater House.
- b) The whole of the Barbican Estate, including the original residential blocks as well as the converted Frobisher Crescent (top three floors) and Blake House, various offices and other uses on/in the estate, Barbican Arts Centre, Guildhall School of Music and Drama, City of London School for Girls, St Giles Cripplegate – along with the adjoining, often interlocking,

³ City of London – Indices of Deprivation (2019) - <https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-emp-and-pop-stats-indices-of-deprivation-2019.pdf>

homes and other buildings such as the Museum of London/Bastion House, Ironmongers' Hall, Cripplegate Institute, Monkwell Square, Barber-Surgeon's Hall, and 45 Beech St.

- c) The Silk Street area immediately adjoining the Barbican, including the residential Heron tower, Milton & Shire House, the entire area of the Brewery Conservation Area and Milton Gate which adjoins the Heron within the Coleman St ward boundary.
- d) The Roman House area immediately adjoining the Barbican, including Roman House, Salters' Hall and Garden, part of London Wall Place garden and Bassishaw Highwalk – but excluding the office developments of London Wall Place 1 & 2.
- e) The Little Britain area immediately adjoining the Barbican, including the residential grouping of London House, Little Britain and the church of St. Botolph's-without-Aldersgate, together with Postman's Park.

The Barbican and Golden Lane Neighbourhood Forum's own analysis using the ONS nomis system, is that 4,194 people or 49% of the City's total population live within the Barbican and Golden Lane Neighbourhood Forum Area. The Barbican has 2,140 residential units and Golden Lane 559.

2.3 **The Post-War and Modern Heritage and Character of the Area**

The importance of the Area's modern architectural heritage, its gardens and green infrastructure, as well as its historical significance is key to the area's character. The Forum recognises the significance of nationally-designated heritage assets which all fall within the Barbican and Golden Lane Neighbourhood Forum Area. The entire Neighbourhood Area, devastated by heavy bombing during WWII, was subject to grand post-war planning from the late 1940s onwards. Today the Area consists largely of C20 architecture and is dominated by the Golden Lane and Barbican Estates. Designed by the architectural practice Chamberlin, Powell & Bon the mixed-use housing estates are two distinct, self-contained developments which greatly vary in scale, character and appearance.

GOLDEN LANE ESTATE

The Modernist Golden Lane Estate lies in the north of the Neighbourhood Area. The Estate was conceived in 1951 and completed in 1962. Here the general building height is low-rise and consistent with that of the surviving pre-war built environment surrounding the Estate. The original plan comprised seven four- to six-storey high residential slab blocks, geometrically arranged on an orthogonal grid, and at its centre one high-rise block, Great Arthur House. A further four-storey block, Crescent House, was later added to the west of the site. The volumes and elevations are

formed by distinct components, including slim aluminium and timber window frames, primary-coloured spandrel panels, brick cross walls and piers, concrete floor slabs, concrete balconies and balustrading. While each building type has its individual architectural expression, unit size and unit typology, together they read as a homogeneous whole. The influence of Le Corbusier is clear throughout the Estate, from the ribbon windows, pilotis, expressed structural details, the fine and simple design of the leisure centre to the pick-hammered concrete of Crescent House. The latter is distinct through architectural language and form: its western façade follows the curve of Goswell Road and features a single storey colonnade at ground with a parade of dual aspect shops opening onto the street and into the Estate.

In between the buildings are large rectangular communal courts of hard and soft landscaping, each with its own character, and the community facilities including community centre and swimming pool. While Golden Lane is a private estate, it has open thresholds and publicly accessible thoroughfares. The external spaces are as important to the character and special interest of the estate as the buildings themselves.

Sandwiched between the two Estates lies a small group of historic, post-war and recent buildings, including the Jewin Welsh Presbyterian Chapel, a non-designated heritage asset, and the Grade II listed shell of the former Cripplegate Institute.

BARBICAN ESTATE

The Brutalist Barbican Estate, built between 1962 and 1982, covers the largest and central part of the Neighbourhood Area. The Barbican is arguably the greatest piece of urban architecture of post-war Britain, unique in its kind and of worldwide reputation. It is Britain's largest listed object. The Estate represents a huge jump in scale from the traditional small-scale and low-rise setting of the Barbican area, including the Golden Lane Estate, to the mid-rise environment of the grander and representative buildings and open spaces of the City beyond London Wall and Moorgate, such as Finsbury Circus and Finsbury Square.

The Barbican Estate is a composition of individual slab blocks, three sculptural towers, and cultural and educational buildings expressed as one single monolithic piece of architecture – a city in its own. The residential buildings of the Estate are elevated on pilotis and hover above one- to three-

storey high brickwork podia and at their midst the free-flowing landscape. While the pedestrian podium levels and highwalks are open public realm, they are designed to be reached by only a few access points from street level. All public buildings, as the City of London School of Girls, the Guildhall School of Music and Drama, and the Barbican Arts Centre have direct access from street level.

The Estate is divided into Centre Barbican and North Barbican. The whole of Centre Barbican is set on a perpendicular grid parallel to Moorgate where buildings are placed around the sequence of grand open spaces. North Barbican follows at a 35-degree angle, along the direction of Beech Street. The three triangular shaped towers, strategically placed at centre and either end of Beech Street, mediate between the two diverging grids.

The architectural language of the residential buildings has a consistent and restricted palette of materials: brindled brickwork for podia, low-rise schools and terrace houses; bush hammered concrete for residential slab blocks with plant boxes along the continuous, horizontal band of balconies, timber framed windows, and white barrel-vaulted roofs; and bush hammered concrete, white tiles and metal framed glazed panels and screens for the Barbican Art Centre.

The Barbican Estate is introvert in character. The podia and residential blocks along the Estate's perimeter have created an oasis, a sheltered and secluded internal environment of private and public spaces with sunken gardens, terraces, lakes and water features.

COMMERCIAL SOUTH BARBICAN

To the south the Barbican Estate and within the Neighbourhood Area lie the former Museum of London and Bastion House, which formed part of the commercial South Barbican redevelopment along London Wall with its originally six regularly spaced, parallel and modular point blocks on top of two-storey podia, as governed by the overall masterplan. While four of the towers have since been replaced by clusters of new towers, one tower at eastern end, Beaumont City Tower, and one at western end, Bastion House, have survived.

The tallest tower of the post-war plan was the 35-storey high Britannic House on Ropemaker Street, immediately to the east of the Barbican Estate.

The mid-rise office blocks between Britannic House and London Wall have since been replaced, morphing the previously distinguishable towers into a continuous wall of tall buildings along Moor Lane.

LISTED HERITAGE ASSETS

Listed Buildings - Grade I

Church of St Giles

St Botolph's Church

Listed Buildings - Grade II*

Crescent House

Listed Buildings - Grade II

Barbican Estate

Dorothy Annan Murals, Speed Highwalk

Great Arthur House

Cuthbert Harrowing House

Cullum Welch House

Bowater House

Golden Lane Community Centre

Bayer House

Stanley Cohen House

Basterfield House

Golden Lane Leisure Centre

Hatfield House

Sir Ralph Perrin Centre

Designated Landscapes

Barbican Estate (grade II*)

Golden Lane Estate (grade II)

Scheduled Ancient Monuments

London Wall: section of Roman and medieval wall and bastions, West and North of Monkwell Square.

2.4 **Townscape and building heights**

The Neighbourhood Area includes one group of tall buildings and straddles two merging clusters of high-rise and tall buildings which bleed into the Neighbourhood Area. The definition of building heights in between low-rise and tall buildings is area specific: Mid-rise buildings form the predominant building height within the Neighbourhood Area and the City of London at large. Those buildings that project above the general datum and are perceived as significantly higher than their neighbours but below the tall building threshold are classed as high-rise.

- **LOW-RISE:** up to 18m or 6 storeys (Golden Lane, Litte Britain, Museum of London, Chiswell Street).
- **MID-RISE:** 20-45m or 7-12 storeys (Barbican, Aldersgate Street, St Martin's Le Grand, One London Wall).
- **HIGH-RISE:** 45-75m or 13-21 storeys (Great Arthur House, Blake Tower, 1 Silk Street, Ropemaker Street, More Lane, London Wall, Rotunda Tower, Old and New Bastion House).
- **TALL BUILDINGS:** as defined by the draft City 2040 policy – i.e. those above 75m (Barbican towers, Heron Tower, City Point).

BARBICAN

The three Barbican towers are the tallest buildings within the northwestern fringe of the City of London. By design, the heights all align and in contrast to the two clusters, the residential Barbican towers form a generously spaced composition, with ample breathing space in between and around them. When viewed from within and without the Neighbourhood these form a significant, coherent trinity.

LONDON WALL

The first group of high-rise buildings, which sits between Moorgate and Aldersgate Street, goes back to the post-war commercial element of the Barbican masterplan along London Wall with six parallel 17-storeys high modular towers placed at regular intervals on two-storey podia framing the street. Since the 1990s the central four original towers have been successively replaced by larger ones and others added in between. Hence, the lightness of the original scheme is being lost to a haphazard and dense cluster of towers, some only metres apart. The general building height, however, has broadly been maintained and remained below the tall building threshold.

ROPEMAKER STREET

A group of tall and high-rise buildings has developed around a thirty-five-storey singular tower from 1967 to the east of Moor Lane, just outside the Neighbourhood Area. Britannic House, formerly headquarters of BP, was refurbished and extended in 2000, and renamed Citypoint. Over the past decade several tall buildings were added to the west, north and north-west of Citypoint. Together they form another dense cluster of towers, on streets laid out for a 17th century city. Whilst the buildings vary in height, they do not exceed the crown of the original tower.

MOORFIELDS

The post-war plan for the Barbican area saw a general building height of 8-10 floors with a small number of high-rise and tall buildings strategically placed and projecting above. This compositional clarity has recently been lost as the latest redevelopment of the lower post-war courtyard blocks, between Moorfields and Moor Lane, from Ropemaker Street in the north to London Wall in the south, has resulted in a continuous wall of tall mega-structures – some attached, others only meters apart – which now connect the previously separate clusters on Ropemaker Street and London Wall. The general building height has doubled, from a medium of 10 floors to over 20 – with far reaching impact on townscape, conservation areas and listed buildings, views and residential amenities.

IMPACTS

Due to the adjacency of the Neighbourhood Area, any addition to these clusters will have a significant impact on the Grade II and Grade II* listed Barbican Estate, the Grade II and Grade II* listed Golden Lane Estate, the Barbican and Golden Lane Conservation Area, the Grade II listed Brewery and the Brewery Conservation Area, the Grade I listed churches St Giles' and St Botolph, and the Postman's Park Conservation Area.

The Barbican is also one of four City parks and gardens included on Historic England's Register of Parks and Gardens of special interest. The Barbican and Golden Lane Neighbourhood Planning Area encompasses all these assets in recognition that they are important to the identity of the Neighbourhood. The Forum recognises that conserving and developing these assets requires partnership working with government, Historic England, and other stakeholders – as well as with the City of London through the Mayor's Plan for London 2021, the adopted Local Plan (2015) and the City Plan 2040 once made.

The Area contains significant elements of green infrastructure, providing a focus for the neighbourhood as well as direct economic benefits to the productivity of workers and the well-being of residents and workers alike. As well as the contribution of the nationally-registered Barbican garden, the Area also has Postman’s Park and Barber Surgeons’ Garden (both Sites of Local Importance for Nature Conservation) and the Barbican Wildlife Garden (a Site of Borough Importance for Nature Conservation). There are many local opportunities to expand this green infrastructure further still.

The Neighbourhood Forum Area also contains the (now closed and soon to be relocated) Museum of London, the Guildhall School of Music and Drama and the Barbican Centre – a cultural quarter recognised in the London Plan 2021 as one of the capital’s strategic cultural areas⁴ and integral to the neighbourhood, both by being joined physically and by being a key feature of life in the area for residents and visitors. Community facilities, open to the public, such as Golden Lane Pool and Leisure Centre and the lending Library in the Barbican residential estate all help to cement the ties which bind this neighbourhood together. Places of worship include the listed St Giles Cripplegate, St-Botolph-without-Aldersgate (now used by the Free Church of Scotland), the Jewin Welsh Chapel (developed as part of the Golden Lane Estate in 1960 to replace a chapel in the Barbican, which itself replaced the original chapel established in 1774, the first of 30 Welsh chapels in London). Currently unmarked, yet incredibly important, are both the City’s only pre-expulsion Jewish Cemetery (dating back to before 1177), and the place where John Wesley had his “Aldersgate conversion” in 1738 leading to the founding of the major world faith of Methodism. All are significant features of the Area, acknowledged to bind the neighbourhood together in culture, history and worship.

2.5 **Relationship with existing Planning Policy**

The Forum supports the London Plan in recognising the Barbican neighbourhood as a special area within the Central Activities Zone (CAZ) which is rich in cultural activity and where there is a rich mix of strategic functions and local uses.

⁴ The Mayor of London’s London Plan 2021, https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

As this strategic plan for London says, this is a place where achieving a suitable sustainable balance is important *“The quality and character of the CAZ’s predominantly residential neighbourhoods should be conserved and enhanced. This should ensure a variety of housing suitable to the needs of diverse communities, including affordable housing, whilst ensuring that development does not compromise strategic CAZ functions. Boroughs should also consider social infrastructure demands generated by residents, workers and visitors in the CAZ when undertaking social infrastructure need assessments”* (2.4.19)⁵.

The City of London’s Local Plan (both current and draft) defines the area as one of strategic importance with regard to planning. In the current Local Plan⁶ it is defined as a “Key City Place” (North of the City) and in City Plan 2040 it is defined as a “Key Area of Change” (Barbican and Smithfield). The Barbican and Golden Lane Neighbourhood Forum Area is entirely within both these areas of strategic planning importance, as defined by the local planning authority.

The area has a long-standing status as a recognisable, distinct Residential Area (and now a designated Neighbourhood) – a status that is likely to continue for many years to come. The City’s current Plan expected that approximately 60 - 70% of new residential development in the City would take place in the Area, and the City Plan 2040 implicitly expects further housing development in this Area. As a result, the Barbican and Golden Lane Neighbourhood Area will remain predominantly residential for the foreseeable future.

⁵ The Mayor of London’s London Plan 2021, CAZ policies such as 2.4.19, page 79
https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

⁶ City of London Local Plan 2015 (Adopted) <https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-local-plan-adopted-2015.pdf>

3 Strategic Priorities and Spatial Strategy

- 3.1 The Forum supports the City of London's ambitions to ensure that growth is accommodated sustainably, to protect and enhance heritage, and to improve public health and the public realm. These align with our objectives which were accepted by the City of London when it designated the Forum in June 2023. To make the City Plan more effective and deliver on the promise of a City that delivers "sustainable economic growth" (1.2 Economic objective) and is "environmentally sustainable" (1.4 Environmental objective), the Forum would also like to see a Social Objective (1.3) to improve the health, amenity and quality of life for the City's workers, residents and visitors rather than just "engaging with" them.
- 3.2 In particular we support a 'retrofit first' approach to development which aligns with the latest national and London-wide planning policy goals in an effective way. In the interests of effective policy a more detailed approach is justified by the evidence and we propose an approach in line with Westminster; this is set out in section 9 of this report. NPPF para 157 calls for "radical reductions in greenhouse gases", a test which is not met by the proposed City policy on retrofit. Lowering operational carbon emissions for the future cannot be at the expense of releasing unacceptable levels of embodied carbon now.
- 3.4 We are surprised that the Corporation's ambitions do not include making the City one of the best places, globally, to work, live and play. There is no strategy to explicitly protect and promote uses and places of international importance, like the Barbican. The most prized City firms, which are key to the City (and UK) economy, are all international businesses with world-wide choice over where they locate. Their benchmarks are global, and the *quality* of the City's environment and its green space, heritage, views, culture, places to eat and shop (as well as quality of life) are just as important to the growth and retention of top firms as office floorspace availability.
- 3.5 We support the Spatial Strategy of focussing delivery of office floorspace and tall buildings in the City Cluster KAOC, supplemented by growth in the KAOCs of Fleet Street, Ludgate and Liverpool Street, even though we question the quantum. Given the rise of flexible working, especially in the sort of high-end professional jobs that are common in The City, and where it is crucial to retaining the talent that drives economic growth, we are sceptical that there is need for 1.2million m² net additional office floorspace to achieve the economic output identified. The City may be applying a standard formula of 12m² per job to an aspiration of 100,000 additional

jobs to reach its office target of 1.2million m² of new office floorspace, but it is highly unlikely that City firms will continue to allocate 12m² office space for each full time equivalent (FTE) in future and credible evidence sees the “new normal” as 63 desk spaces per 100 FTE employees⁷. Both the evidence and target on office floorspace should be revisited. We also question the City’s presentation of the pipeline of office consents and the shifting baseline as a basis for calculating progress towards the target.

- 3.6 There should be stronger policy and controls in areas where uncharacteristic height, massing and overbearing are unsuitable. Current policy has resulted in speculation, inappropriate height and mass, and a harmful reduction in diversity of uses in the Barbican & Golden Lane Area. A Tall Building definition of 75m+, when combined with a policy that does not exclude buildings that are under 75m but are tall in relation to their surroundings from predominantly residential areas or Conservation Areas, will have the same effect. As well as affecting amenity, and damaging townscape, evidence shows that this is also damaging the residential/cultural mix of uses that the City now seeks to encourage. A more balanced set of townscape policies in this Neighbourhood would ensure that the predominantly residential character is retained in the Barbican & Golden Lane, in line with the London Plan. Just as some areas of the City are suitable for dense office development, however, other areas are not and these should also be identified spatially.
- 3.7 We support the Spatial Strategy 2.1 (3) of focussing additional housing “in and around the identified residential areas”. GLA monitoring evidence⁸ shows that the CAZ has systematically accommodated many more residents over recent years whilst achieving strong economic growth, proving that these two outcomes are not incompatible.
- 3.7 We also support an overall strategy of good growth, provided this also ensures that those from disadvantaged backgrounds benefit from the opportunities created by that growth – as a *strategic* priority for the Corporation and The City.
- 3.8 Office rents in The City are already substantially below those in the West End, and a further surplus of City floorspace would be extremely damaging to investors and therefore to the viability and deliverability of economic floorspace in particular. The current office space

⁷ <https://volterra.co.uk/blog/the-post-pandemic-workplace-and-office-employment-densities-in-central-london/>

⁸ <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/monitoring-london-plan>

occupancy rate of 35%⁹ represents an extremely inefficient use of land and buildings entirely contrary to the NPPF and London Plan.

- 3.9 Office building in the City now have an extremely short life-span. One in Gresham Street, for example, is now being retrofitted less than 25 years after being built. New offices need to meet the ESG priorities of *neighbourhoods, residents and communities* as well as occupiers and workforces. The strategic priority should be to ensure that offices are high quality. Most importantly they need to be built to last, or at the very least to be deconstructed so that the materials can be reused.
- 3.10 We regret that high quality amenity, quality of life and liveability are not to be found in the Corporation's strategic priorities for The City, nor meeting the health needs of communities, nor the provision of new high quality homes. Our view is that supporting the communities that live in the City to flourish by protecting residential amenity and ensuring a liveable environment should be an objective.
- 3.11 Retail is struggling in the City post-pandemic. While the Forum supports the growth and revival of retail in the four principal shopping centres, and active frontages at the foot of office and commercial buildings, the area of independent locally-important retail is a Neighbourhood Shopping Area along Aldersgate Street/Goswell Road (A1) which also needs strong protection and support as a strategic priority; either in the Spatial Strategy or the Smithfield & Barbican KAOC policy set, or both.
- 3.12 In seeking to diversify uses, it seems that the Corporation has misunderstood the nature and importance of culture to the City and by doing so has created a strategy that is highly unlikely to be effective¹⁰. Culture is not just something to be consumed through a series of “attractions”; its value to the economy and life of London is also in its production, which is why the contribution of the Barbican Arts Centre, the Guildhall School of Music and Drama and the surrounding culture/arts SME base is so important to the cultural life of London. The significance of the cultural economy and the potential opportunity for this area to grow and develop it are why the London Plan recognises it as a home to a cultural and creative cluster (2.4.14) as well as to the City. As a strategy, the City's cultural offer should be defined more clearly in keeping with the character of the areas where it is to be supported, broadened, and developed to increase

⁹ London office occupancy rates are less than half pre-Covid levels in the UK, at about 35 per cent, according to Remit Consulting. This compares with pre-pandemic levels of 60 per cent to 80 per cent – reported in The National, Feb 2024

¹⁰ During the Reg 19 consultation the City's anticipated evidence in the form of the Cultural Strategy was not available

skills and employment as well as enjoyment, while managing the impact on existing residential communities. The Plan should therefore clearly define and balance cultural development according to the classifications of the CPF and in reference to the London Plan.

3.13 Finally, the City's evidence shows that space will need to be allocated to uses and developments that are crucial to reducing carbon emissions and improving resilience in the face of a changing climate over the lifetime of the Plan. We find the Plan to be insufficiently forward-looking in light of the robust evidence about climate change, whole life carbon, and Urban Heat Island effect in the City, rendering City Plan 2040 contrary to NPPF paras 157, 158 and 159. The Spatial Strategy needs to ensure that sufficient space is available in the right places to expand ground level open space and plant more trees (in sufficient quantity to achieve measurable results), or to support cooling networks, for example, in order to make sure that the whole Plan Area is sustainable.

4 Smithfield & Barbican KAOC (S23)

- 4.1 The Smithfield and Barbican area contains the largest residential area of the City of London. Since the post-war redevelopment, starting with the Golden Lane Estate and then the Barbican Estate, the eastern half of the KAOC has been and remains a predominantly residential area. It has a rich architectural, archaeological, economic, environmental and cultural heritage which contributes significantly to the diversity and success of the City. The relocation of the Museum of London from its current position as an integral part of the post-war Barbican redevelopment to Smithfield, the renewal of the Barbican Arts Centre after half a century of operation and the potential relocation of the historic Smithfield Market, taken together will result in significant change. This creates a strong rationale for having a strategic policy to guide the Barbican & Golden Lane's future development given that it contains a variety of adjacent uses and that it is predominantly residential with housing covering over two-thirds of the KAOC¹¹ area.
- 4.2 We find that the entirely different and separate characteristics of the "Barbican & Golden Lane" area and the "Smithfield" area are not sufficiently recognised in the Plan to achieve an effective policy nor a successful outcome for the area.
- 4.3 Smithfield is a predominantly commercial area with a long-established pattern of use throughout the day and night; dominated by a wholesale market that has been there for centuries, night clubs and bars, a large teaching hospital serving a broad catchment area and a small quiet residential area beside it. The Cultural Planning Framework focal area of Barbican and Smithfield identifies only 'Clusters of night time activity located around Smithfield Market and Holborn Viaduct.'
- 4.4 The Barbican & Golden Lane Neighbourhood Area, on the other hand, represent a large predominantly residential, tranquil area with a significant and world-class cultural centre at its heart. The Barbican Arts Centre has managed to co-exist peaceably with the neighbouring housing for fifty years mainly due to the excellence of the original design, and because it is not a raucous use, and due to its doors closing at 11pm.
- 4.5 The opportunities and challenges of providing for growth in the Barbican & Golden Lane Neighbourhood are completely different to those in the Smithfield area of the KAOC. The impacts of change in Smithfield on the predominantly residential Barbican & Golden Lane require effective, coherent and clearly separate policy and management.

¹¹ The evidence of the Plan's existing conditions and spatial priorities for Smithfield and Barbican (Figures 31 and 32 on pages 279 and 280) show that "Identified Residential Areas" cover at least two-thirds of the KAOC as a whole and a much higher proportion of the "Barbican and Golden Lane" sub-area

- 4.6 We agree that the proposed Key Area of Change for Smithfield and Barbican boundary describes a zone that will be subject to significant change (S23 and policy maps¹²), however, the Forum does not consider that it is justified or effective to then have a second strategic policy (S24) which only applies to the “Smithfield” sub-section of this KAOC without a balancing strategic policy for the “Barbican and Golden Lane”, particularly as “Smithfield” is not defined spatially.
- 4.7 This policy deficit leaves the Barbican & Golden Lane, which is a significant part of the City Plan as a whole as well as of the KAOC, with policy requirements that are not met by S23. The Forum’s suggestions for adjusting S23 are in the interests of policy effectiveness, clarity and coherence. We therefore propose;
- a) amendments to Strategic Policy S23, particularly with regard to residential amenity, housing, accessibility, servicing, air pollution, retail and demolition/construction; and
 - b) resolving conflicting policies on food uses;
 - c) adding wording to Strategic Policy S23 to encourage improvements to the Long Lane/Beech Street/Aldersgate junction, together with better accessibility for all, and lifts to the Highwalk at that junction; and
 - d) a new Strategic Policy (S23B) for the Barbican & Golden Lane, to provide greater clarity and in so doing create more effective policy; and
 - e) applying Strategic Policy S24 (9) [freight & servicing] to the whole KAOC, and not just to Smithfield by moving it from S24 to S23.

4.8 Strategic Policy S23

- 4.8.1 The Forum supports S23 (1) and S23 (5). On the same basis, S23 (9) is strongly supported; Citigen is essential for the Barbican Arts Centre which is about to renew its heating and cooling systems. The Forum strongly supports S23 (10) especially where this allows for the sensitive retrofit or retention/enhancement of heritage assets for hotel use if they are unsuitable for affordable or specialist housing, or otherwise would be lost or demolished.
- 4.8.2 The Forum supports improving pavements and lifts for pedestrians but, as written, policy S23 (2) would run into significant challenges in providing *additional* routes through the Registered Park and Garden and Grade II listed Barbican Estate without impacting on its overall integrity as a masterplanned landscape (as noted in its listing) – or adversely affecting architectural heritage, open space and residential amenity. The KAOC is a small compact area well-served with streets and walkways. There is scant evidence that “connectivity” or “permeability” is lacking, but there

¹² City Plan 2040 – KAOC Smithfield and Barbican - Figures 31 and 32 on pages 279 and 280

is substantial evidence that improved accessibility for all in this area requires more, and more reliable, lifts, ramps and widened pavements on existing routes in places like Beech Street tunnel. In the interests of clarity and more effective policy, therefore, the Forum proposes the following change to S23 (2);

2. Improving inclusive and pedestrian accessibility ~~Ensuring the retention and improvement of pedestrian permeability and connectivity through the large sites such as Smithfield Market site, and by encouraging better lift and ramp access to Barbican Highwalks whilst seeking to preserve pedestrian permeability, heritage, open space, amenity, privacy, security and noise abatement for residents and businesses;~~

4.8.3 The Forum supports S23 (3) and the matching policy of S24 (3) about the future use of Smithfield always provided that the amenity of existing residential areas in the whole KAOC is protected under the “agent of change” principle. We propose adding the following words to both policies in the interests of clarity, consistency and effective policy;

“...whilst protecting residential amenity for existing homes in the KAOC”

4.8.4 The Forum has considered the Smithfield and Barbican Policy S23 (4) “*Supporting and enabling residential development in appropriate locations*” with the policy for Smithfield S24 (7) “*Resisting residential development adjacent to the current market site or future Museum of London in order to minimise potential adverse impacts on residential amenity*” and the City-wide policy for Housing S3, which says new housing is to be encouraged “*in or near identified residential areas*” but without any identified sites for delivering it. There is robust evidence that the need for affordable rented housing and specialist housing in the Barbican and Golden Lane Neighbourhood is met with substantial difficulty in finding suitable, available and achievable sites on which to deliver housing. Densification of existing residential sites may require sacrificing existing open space; an unacceptable alternative given the robust evidence of OS deficit in the City and this area. By ruling out Smithfield for housing without providing for it elsewhere in the KAOC, the City Plan risks reducing the scope for housing supply in the KAOC and thereby in the City as a whole.

4.8.5 Our proposal is that;

- a) Housing site allocations are necessary; City Plan 2040 needs to be more specific about how it will ensure that local needs for housing are met either within the City and within the Smithfield and Barbican KAOC (Strategic Policies S3 and S23)
- b) Strategic Policy 23B be developed for the Barbican and Golden Lane part of the KAOC (see paragraph 4.9 below)

4.8.6 The Forum has considered policy S23 (6) and S23 (11) together. Beech Street tunnel is relevant to both. It is busy, polluted and unpleasant, with narrow pavements. It is directly under and vents up to a dense residential part of the Barbican Estate. Residents' car parks, deliveries and emergency services all need direct access to/from Beech Street tunnel. This relationship is significant as the access points in the tunnel represent the "front door" to residences above it for anyone arriving by vehicle, including emergency vehicles. Air quality needs to be improved and traffic reduced, but not if this simply relocates vehicles to another part of the Neighbourhood or hinders access. Some uses are completely unsuitable for this location. The City Plan provides no credible evidence for the inclusion of "vitality" in this tunnel, a phrase which is sufficiently vague to cover unsuitable uses which may cause nuisance for those living above and around the tunnel, and for the nearby schools. The Forum supports S23 (6) only provided the policy is reworded in the interests of clarity and effectiveness to say;

"6. Making improvements to Beech Street to reduce the volume of vehicle traffic, improve air quality and increase amenity, widen pavements and improve accessibility for all without worsening neighbourhood traffic, air quality or access ~~and vitality~~;"

S23 (11) also needs to be reworded. "Routes between the London Museum and the Barbican" is too loose, covering both Beech Street tunnel and the Highwalk above Beech Street when both are unsuitable as locations for "encouraging leisure, retail or food & beverage uses". Streets in Smithfield, such as Long Lane and Carthusian Street, are very suitable for these uses yet S23 (11) is inconsistent with the Smithfield-only policy S24 (8) which promotes "a retail and leisure economy", without food & beverage uses, even though Smithfield is seen as a "late evening, 7 day a week" place to a degree that new housing will be resisted by the Plan. Taken together as they stand these policies would mean that the only place that food & drink uses would be encouraged would be inside the Beech St tunnel or above it – the most unsuitable places possible – which cannot be the intended outcome or justified by evidence. In the interests of effective, clear and coherent policy, the Forum proposes rewording so that either;

- S23 (11) applies only to "Long Lane and Carthusian Street" (and delete "Routes between the London Museum and the Barbican"), or
- Add "food & beverage uses" to the Smithfield policy S24 (8), define the Smithfield area to which it applies and delete S23 (11).

The Forum also considers that there is insufficient acknowledgement of the retail, food and drink offering on Long Lane, Carthusian Street, Aldersgate and Goswell Road in the policy as it

stands. This retail corridor straddles both the London Borough of Islington and City of London, so perhaps it is understandable that it has not received similar attention as, for example, the Primary Shopping Area designated in Moorgate, but it is a significant Neighbourhood Shopping Area and it could benefit from the anticipated increase in footfall in Smithfield when the new Museum opens. The Forum considers that the policy S23 (11) could contain an additional amendment to say:

'This includes encouraging the retention of the existing leisure, retail, food and beverage uses along Long Lane, Carthusian Street, Aldersgate Street/Goswell Road (A1) (and the Barbican launderette), as these businesses play an important role in supporting the residential community and local economy.'

Including these local retail corridors would assist the City Plan to reflect the aims of NPPF para 97 (d) and 110 (a) to retain shops, facilities and services for the community and reduce the length of journeys required for shopping, particularly in light of the City's own Retail Needs Assessment which identifies 'Shops and other retail around the edges of the Golden Lane, Mansell Street and Barbican estates, which play a role in serving the residential communities'¹³.

4.8.7 The Forum supports the principle of S23 (7) as pollution is at unacceptable levels throughout the KAOC. Given the substantial evidence on this, however, the proposed policy is ineffective and ignores some of the most harmful pollution¹⁴ and nuisance altogether. The City is currently consulting on a new Air Quality Strategy 2025 – 2030; we expect therefore to expect to receive, and have the opportunity to respond to, further information before, and at, the Examination In Public. Demolition/construction is a significant source of noise and air pollution and should be limited to Monday-Fridays in the interests of residents' health. Office and commercial terraces are unacceptably noisy, as can be seen from City environmental health officers' comments on planning applications. Traffic generates air pollution and particulates at street level; needing green mitigation at the same level, because that is where it is breathed in at the highest concentrations. In the interest of making policy more effective, the Forum suggests rewording policy S23 (7) to say;

Seeking to minimise pollution levels by resisting demolition/construction at weekends, restricting access at all times to new non-residential terraces, reducing and curtailing nighttime light pollution, managing traffic and increasing green infrastructure at street level.

¹³ City of London, Retail Needs Assessment, p. 35

¹⁴ As identified by the WHO – see our supporting evidence

4.8.8 The Forum supports the principle of S 23 (8) but it ignores evidence and assessments that point to the need to make accessibility (and lifts) a priority for visitors, workers and residents alike in this area. To make policy more effective the Forum suggests rewording policy S23 (8) to say;

Seeking improvements to accessibility for all including wider pavements, safer crossings, more reliable lifts and ramps (such as at Barbican tube) and better cycle routes.

4.8.9 The Forum strongly supports S 23 (12) and proposes additional wording to support the development of a cultural hub around the Barbican;

- *Affordable spaces for start-ups etc*
- *Artist/maker spaces*

4.8.10 The Forum supports the principle of S 23 (13) provided that the “special character” of the Barbican and Golden Lane is recognised as “*predominantly residential and tranquil with a world-class cultural centre*” (i.e. not the same as the “special character” of Smithfield as a “*late evening 7 day a week*” place).

4.8.11 New policy S23 (14) – this Smithfield Policy S24 (9) should apply to the KAOC as a whole “9. *Ensuring new activities and developments contribute to a reduction in freight and vehicular movements, whilst not adversely impacting the operation of businesses and amenity of residents;*”

4.8.12 New policy S23 (14)
“Encourage improvements to the Long Lane/Beech Street/Aldersgate junction and its public realm, together with better accessibility for all, public toilets and lifts to the Highwalk”.

4.9 Proposed Strategic Policy S23 B – Barbican and Golden Lane

The Forum questions the City of London’s evidence for excluding a strategic policy for Barbican and Golden Lane. We agree that both parts of the KAOC will experience change from the same root causes; the relocation of the Museum of London from the Barbican to Smithfield in the early years of the Plan, the anticipated move of Smithfield market later, and the opportunity to “develop a world-class cultural destination centred around the Barbican Centre and Smithfield”¹⁵. We have not seen any credible evidence from the City, however, to show that it is feasible to successfully shape a place with nighttime economy uses at one end of a 200m street¹⁶ and tranquil predominantly residential uses at the other, without having separate, focussed strategic policies for each distinct area.

¹⁵ City of London – City Plan 2040 - Sustainability Appraisal p. 13

¹⁶ Long Lane from Smithfield Market to Aldersgate Street junction/start of the Barbican Estate

The City of London's own evidence base proves that Barbican and Golden Lane is a unique area which demands special treatment¹⁷. This is further evidenced by the Barbican and Golden Lane Conservation Area SPD¹⁸. It is also underlined by the two sets of Listed Building Management Guidelines SPD and the Barbican and Golden Lane Area Strategy (2015).¹⁹ A separate policy is necessary, particularly as legitimate concerns, raised previously and noted in the Consultation Statement have not all been remedied²⁰, such as this; 'the Barbican Association highlighted a spatial clash between the Northwest of the City being its biggest residential area, with more housing planned, and the site of the City's major cultural offer, with more 24-hour activity planned. This is a fundamental contradiction and there are no policies in the Plan to resolve that clash'.

The Forum's suggested policy for the Barbican and Golden Lane (to be defined as the part of the KAOC to the west of Aldersgate Street) is;

New Strategic Policy S23B: Barbican and Golden Lane

The City Corporation will protect and enhance the predominantly residential, cultural and historic character of Barbican and Golden Lane by:

- 1. Support residential development that meets specific local needs for specialist elderly accommodation and affordable rented accommodation in the [corrected]²¹ "identified residential areas".*
- 2. Enhancing, maintaining and encouraging sensitive refurbishment of the Barbican Arts Centre and Guildhall School of Music and Drama as a focus for the strategic cultural area recognised in the London Plan, and supporting the reuse of the Barbican Exhibition Halls for start-ups, digital and creative industries, cultural organisations and artists/makers;*
- 3. Resisting development adjacent to the Barbican Estate and Golden Lane Estate and the residential blocks and streets of the area that has an adverse effect on residential amenity in this predominantly residential part of the KAOC which does not have a late evening, 7 day a week character;*

¹⁷ See the City of London Tall Buildings Topic Paper, for example;

<https://www.cityoflondon.gov.uk/services/planning/planning-policy/evidence-draft-city-plan-2040>

¹⁸ <https://www.cityoflondon.gov.uk/assets/Services-Environment/barbican-golden-lane-ca-spd.pdf>

¹⁹ <https://www.cityoflondon.gov.uk/assets/Services-Environment/public-realm-barbican-golden-lane-area-strategy.pdf>

²⁰ City of London – City Plan 2040 – Consultation Statement

²¹ See boundary change to include missed residential areas

4. *Enhancing the distinctive character of the area by retaining residential and listed buildings and encouraging new development which respects;*
 - a. *the predominant low-rise and mid-rise character²² of the Brewery Conservation Area and the Barbican and Golden Lane Conservation Area*
 - b. *the heritage, design and fabric of the Registered Landscapes, Parks and Gardens and also of the Grade II and Grade II* Listed Buildings [to be identified in full in final policy wording]*
 - c. *the reference heights and grain of the neighbourhood*
 - d. *the Barbican Estate Listed Building Management Guidelines SPD²³ and Golden Lane Estate Listed Building Management Guidelines SPD²⁴*
 - e. *and keeps an appropriate distance from the trinity of Barbican towers to protect their composition, and does the same for Great Arthur House.*
5. *Protecting the heritage and plan of both the listed Barbican and Golden Lane estates – the way squares are formed and the way that Highwalks – whether high level or ground level - intersect with them. Developments that cut across these original plans will be resisted.*
6. *Resist loss of Highwalks and Highwalk ramps, and encourage new Highwalks that sensitively integrate with the existing ones and do not damage residential amenity. Encourage the provision of lift access to the Highwalk from Aldersgate St (w) near Barbican tube through developer contributions or directly.*
7. *Supporting the relocation of the Museum of London to Smithfield, and encourage meanwhile cultural and community use of the original Museum of London building and Bastion House during the relocation;*
8. *Protect amenity by requiring developments to restrict access to new office and commercial roof terraces, install automated blinds, increase green infrastructure with emphasis on tree cover to mitigate urban heat island effects and refrain from noisy deconstruction and construction works at weekends and bank holidays. Developments should also demonstrate how they will avoid generating additional light pollution with an emphasis on any residential neighbour impacts and fully reference the City of London’s Lighting Supplementary Planning Document;*
9. *Urban Greening*

²² As defined in the Barbican & Golden Lane Conservation Area SPD

²³ [Barbican Estate Listed Building Management Guidelines - City of London](#)

²⁴ Golden Lane Estate Listed Building Management Guidelines - City of London

- a) *Development must achieve a minimum UGF score of 0.4, and 0.6 for major development in the area*
- b) *Any Biodiversity Net Gain should be required to be delivered within the Barbican & Golden Lane Area so that it benefits the local community and environment.*

10. *Development adversely affecting health and sport facilities will be resisted.*

11. *Air Quality*

- a) *Development should not damage the health of the air by increasing emissions of harmful pollutants to it. Such pollutants include: greenhouse gases; those considered by the United Nations to cause adverse impacts to the natural environment; and particles and gases considered by the World Health Organisation (WHO) to be harmful to human health. Barbican & Golden Lane, being predominantly residential, is a sensitive receptor zone and any proposal that results in an increase in air pollution will only be justified in exceptional circumstances.*
- b) *Development should comply at least with all minimum UK environmental requirements in relation to air pollutants whichever is the more stringent.*
- c) *All development must be at least 'air quality neutral' and not cause or contribute to worsening air quality. On major development this should be demonstrated through an Air Quality Impact Assessment which must additionally demonstrate how local air quality can be improved across the proposed development as part of an air quality positive approach.*
- d) *Major development must demonstrate that it is designed to ensure that indoor air quality complies with the latest WHO guidelines for short and long term air quality including particulate matter (PM_{2.5} and PM₁₀), nitrogen dioxide (NO₂), carbon monoxide (CO), formaldehyde and volatile organic compounds (VOCs). Carbon dioxide (CO₂) concentrations in indoor air should also be considered. Compliance with such standards is also encouraged on medium development and substantial refurbishment schemes.*
- e) *Air intake points servicing internal air handling systems (including air filtration systems and heating and cooling systems) should be located away from Beech Street, Aldersgate Street, London Wall, Silk Street and Moor Lane.*
- f) *Flues should be directed away from residential dwellings.)*

12. *Encourage the retention of ground floor retail units at Crescent House on Aldersgate Street, in the Golden Lane Estate, as these provide an important local shopping, food and drink offering for local residents in an area that otherwise lacks nearby retail uses.*

4.10 Policy maps for the Smithfield and Barbican KAOC

As well as the boundary and residential area changes relating to Plan policy and proposed earlier in this report, the Forum questions the following issues with the Spatial Priorities map;

- a) There is substantial, robust evidence that the junction of Long Lane/Beech Street and Aldersgate Street needs to be safer, and more accessible, with a reinstated public toilet, a lift up to the Highwalk and, if possible, a lift down to Barbican Tube platforms (extending accessible access to the adjoining Elizabeth Line platforms of Farringdon). We question why this is not identified, and why it is not the top priority for public realm improvement in City Plan 2040.
- b) The green space shown on Moor Lane does not exist at that location – a green space on the corner of Moor Lane and Silk Street is not shown, nor is the substantial greening with mature trees on Fore Street (S) – all need to be mapped, enhanced and extended.
- c) We question why City Point Plaza is not clearly identified as key open space to be retained, extended and subject to high quality public realm improvement, including trees offering broad cover and substantial greening.
- d) We question the evidence for the location of the pedestrian routes at the eastern end of the KAOC. The whole of Moor Lane, from Fore Street to Chiswell Street is a key north-south route, which already takes heavy footfall from people diagonally crossing City Point Plaza (SE:NW) from Moorgate Tube, as well as from people walking the length of the street. The stretch of Moor Lane north of Ropemaker Street (and the adjacent crossing points) is inadequate in terms of accessibility and a priority. Chiswell Street also needs improvement, particularly along the stretch from Moor Lane west to Brewery, Montcalm Hotel (with its bars and restaurants); it is a significant route leading to the Barbican and Whitecross Street market and shops. All of these would help the viability of this area and offer a useful adjunct to the Barbican Arts Centre, allowing for intensification of use in a location infinitely more suitable and deserving than the residential Silk Street, bordered by Cromwell Tower and Speed House with its single-glazed bedrooms all facing the street.
- e) The proposed N-S pedestrian route outside the KAOC joins London Wall at the junction with Wood Street/Fore Street; an exceptionally busy and unattractive junction which is not a destination in its own right. The route therefore relies on the Highwalk and lifts/escalator

improvements at that junction for pedestrians to go up and down to ground level. The route also needs to continue within the KAOC along Fore Street to join with Moor Lane.

- f) There is substantial evidence of need for public realm improvements along Golden Lane, Aldersgate Street (along its whole length)/Goswell Road (by the shops), Little Britain, Carthusian Street and Fann Street – none of which are mapped. The colonnade of shops under Crescent House on Aldersgate Street/Goswell Road should also be identified as a Neighbourhood Shopping Area and the routes to it from Smithfield and Barbican tube should be identified to improve footfall and viability.
- g) The historic alleyway of Braidwood Passage from Aldersgate St through to Smithfield is currently stopped up temporarily but will be reinstated as part of the 150 Aldersgate Street scheme. It is on a key walking route through to the GP surgery and Barts Hospital which needs to be mapped and prioritised to make sure that very high quality public realm is maintained and full accessibility secured. It must not sink back into being a nighttime urination spot for the drinkers of Smithfield, and it must be level, wide, green and pleasant. This is outside our Neighbourhood boundary but crucial to our Neighbours and we therefore will be relying on the City Plan 2040 to recognise its importance as a key pedestrian route.

5 Housing

- 5.1 The supply of affordable housing in the Barbican & Golden Lane Neighbourhood, and housing for older people and those with support needs, is a concern for the Forum.
- 5.2 We have commissioned our own professional Housing Needs Assessment (see separate supporting evidence) which concludes that the housing priorities for the Area are both affordable private rented dwellings, and specialist accommodation for older people and those with support needs.

Table 5-6: Age structure of Barbican and Golden Lane, 2011 and 2021

Age group	2011 (Census)		2021 (Census)		Change
0-14	344	8.1%	301	6.7%	-12.5%
15-24	299	7.0%	363	8.1%	21.4%
25-44	1,510	35.6%	1,632	36.5%	8.1%
45-64	1,303	30.7%	1,242	27.8%	-4.7%
65-84	693	16.3%	834	18.7%	20.3%
85 and over	98	2.3%	98	2.2%	0.0%
Total	4,247	100.0%	4,470	100.0%	5.3%

Source: ONS 2011, ONS 2021, AECOM Calculations

Table 4-1: Tenure (households) in Barbican and Golden Lane, 2021

Tenure	NA	City of London	London	England
Owned	48.2%	36.5%	45.2%	61.3%
Shared ownership	0.2%	0.2%	1.5%	1.0%
Social rented	13.1%	14.9%	23.1%	17.1%
Private rented	38.4%	48.4%	30.1%	20.6%

Sources: Census 2021, AECOM Calculations

- 5.3 We support the policy intention [HS1] for new housing to be provided in or next to existing residential areas, particularly where it would allow people to stay in their own neighbourhoods as their support needs increase. We find it hard to understand where this new housing will be located, however, without site allocations. Our evidence shows that the residential area boundaries in our Neighbourhood Area have been drawn too tightly, missing residencies which evidence shows as being within our predominantly residential, cohesive Neighbourhood when the Forum was designated. It would therefore be more appropriate, accurate and straightforward to use the Barbican & Golden Lane Neighbourhood Forum boundary. Without such a change it is not entirely clear how housing delivery is to be achieved in this Area, given that the three main sites have

already been built on, both of our large residential estates are Listed and short of space, and the presumption against conversion of office sites to residential use.

- 5.4 The City's assertion that housing targets can be met by windfall provision has not been underpinned by adequate evidence, especially with regard to the Barbican & Golden Lane Neighbourhood Area and by extension the Barbican & Smithfield KAOC, which is the largest residential area of the City. Nor is there sufficient evidence to justify a lower target for specialist older housing than the London Plan. Our evidence (provided separately), therefore provides justification for amendments to the City Plan 2040 to;
- a) Extend the "residential area" (Figure 32) to include the whole of the Forum Area boundary, as this has already been accepted by the City of London as a cohesive residential neighbourhood on designation;
 - b) Designate sites for housing which meet the Plan target, in the main, with housing for which there is local need;
 - 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.
- 5.5 Co-living and shared living schemes (whether purpose-built or a conversion) may have a place in the Smithfield & Barbican KAOC, particularly if this means the reuse or retrofit of a building rather than demolition, and if it can be shown that such provision is likely to relieve pressure on the availability of affordable private rented homes elsewhere in the Neighbourhood. However, such schemes will have been designed to meet a specific demand, meaning that, without significant adaptation, changing the development to meet an alternative residential use will result in a failure to meet the minimum space standards. In the interest of effective policy on the quality and standards of housing, Policy (S3) should be re-worded to say

Policy S3 [1b] Within identified residential areas, the delivery of affordable housing, build to rent, sheltered and extra-care housing is a priority. Co-living and hostel accommodation may also be allowed, if it can be shown that this relieves pressure on the availability of affordable housing nearby, does not cause excessive concentration or cause adverse impact on / loss of permanent residential accommodation. Housing is encouraged in residential areas particularly if this means the reuse or retrofit of a building rather than its demolition. To protect housing standards and residential amenity, shared living

developments are prevented from converting to other housing types through legal agreements and conditions.

5.6 Student housing

The Barbican & Golden Lane Neighbourhood Forum would prefer to see real affordable rented and specialist residential development to meet evidenced local need. However, we acknowledge that, under the current City Plan 2040 and the London Plan, our Area is in theory a viable location for student housing. Given this, clarification is needed as to whether the City Plan, and the City Corporation, intends to include student housing in its definition of 'residential development' for the Barbican & Smithfield KAOC (page 48 - para 4.1.5 says it does not, para 4.1.6 says it partly meets housing need though a formula of 2.5 student rooms to 1 residential unit). Since the City of London 2022 Housing Monitoring Report shows 797 additional student units completed in recent years and the 2023 SHMA acknowledges a large pipeline of further supply amounting to 1,413 units in total, the Forum believes there is no justification for locating additional student units in the Area unless there is robust evidence to show that providing specialist student rooms would relieve competition and price pressure in the wider private rented sector to the benefit of other groups, and particularly those in need of affordable accommodation.

5.7 Local housing in the Barbican & Golden Lane Neighbourhood

The City's strategy of using developer contributions to fund new homes outside the City means that local people have to move away from their current homes and social networks to benefit directly. It is worth emphasising that the Barbican & Golden Lane Neighbourhood's Housing Needs Assessment (HNA, provided separately) is robust evidence of need for Affordable Housing in the Area and every effort should be made to maximise delivery locally where viable.

5.8 The City is the landlord of the Barbican Estate and Golden Lane Estate and, as local authority and also through its separate (private) investment portfolio, is a substantial landowner in the Neighbourhood Area. It therefore has options to deliver housing, either on public sector land or on investment land, beyond those available to most local authorities through the Local Plan. The Forum regrets that the City has not, as yet, brought forward any of its own land for new housing in the Neighbourhood, and we remain hopeful that this position will change.

5.9 Using public sector land, or private developer-led schemes, would be preferable in this Neighbourhood to the regeneration and intensification of the existing estates, which would not be possible nor advisable given their heritage status. We request that such redevelopment of listed

housing is ruled out in the lifetime of the Plan, with a focus on maintaining, repairing and upholding the fabric of the housing and buildings as heritage significant assets to the Neighbourhood. NPPF 129a) says that increasing the density of housing in city centres should be the norm, but it does allow for this not to apply if “*it can be shown that there are strong reasons why this would be inappropriate*”. The heritage status of the Barbican and Golden Lane Estates, in which the masterplanned grid with its communal garden squares is a significant element, together with the existing density, and the significant deficit of open space and green space, taken together, provide the “strong reasons” for not seeking further intensification in this Neighbourhood.

- 5.10 Finally, and we appreciate this is outside the scope of the current Plan, we note that a great deal of specialist housing need could be met by the City by the selective “buy back” of under-used leasehold residences and that this would be both a cost-effective and land-efficient way of addressing the evidenced housing and social care needs locally.

6 Heritage

- 6.1 The Barbican & Golden Lane Neighbourhood Area is one of very high heritage significance, including parts which meets the global benchmark of world-class.
- 6.2 In 2023, the government's Independent Panel on UNESCO World Heritage status, convened by the Department of Culture, Media and Sports said *"As a masterpiece of brutalist architecture and town planning reflecting the standards of its time and arguably, one of the best examples of municipal urbanism, the Barbican is one of the best examples of municipal urbanism in the Brutalist style in the world that has maintained its authenticity and integrity despite periods of adaptation and change"*²⁵.
- 6.3 Most of the area lies within designated conservation areas, and it contains a large number of statutorily listed buildings together with Registered Parks and Gardens and Scheduled Ancient Monuments.
- 6.4 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. The Forum proposes that the wording of current policy CS12 is reinstated in City Plan 2040.
- 6.5 The Barbican and Golden Lane Neighbourhood Forum considers that despite the policies set out in S11 of the Draft Plan for Managing Change to the Historic Environment, the necessary and vital protection of heritage assets will be seriously reduced by the emphasis placed elsewhere in the Plan on achieving a very large increase in new office floorspace and the encouragement of tall buildings.
- 6.6 The 'public benefits' that may be perceived from large-scale office development seem likely to be used to justify harm to the historic environment which would normally be considered unacceptable. Such an approach should not be allowed to mitigate against harm to the historic environment.
- 6.7 Policy HE1(6) should be strengthened to require that opportunities to enhance conservation areas be positively sought and pursued, not merely 'considered'. As proposed the wording does not comply with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 which stipulates a duty to pay special attention to the desirability or preserving or enhancing the

²⁵ Note to Barbican Cultural Alliance, from the government's advisory committee on the UNESCO Tentative List, provided by DCMS, August 2023

character or appearance of conservation areas, nor is it in accordance with the requirements of Section 16 of the National Planning Policy Framework.

- 6.8 The Barbican and Golden Lane Neighbourhood Forum notes with concern the proposed reference to the ‘immediate setting’ of the Bevis Marks Synagogue in policy HE1[8]. Such a concept does not comply with national policy: NPPF defines setting as ‘the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve’. NPPF makes no distinction between immediate or wider setting. Were such a distinction to be deemed acceptable within the City Plan the implications for heritage protection in the BGLNF area could be severely damaging. The Forum proposes that the word “immediate” is deleted from Policy HE1[8].
- 6.9 The Forum is also concerned that the City of London Corporation has no register of non-designated heritage assets and, in decision-making on planning applications, its committees tend to take the view that if an asset is not listed or registered it has no heritage value at all. This is contrary to NPPF (209) particularly with regard to non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, such as the Jewish Cemetery dating back to 1177. The lack of listing status also disadvantages the City’s twentieth-century buildings, where listing is slowly advancing but whose value as heritage assets is bound to increase in the future.
- 6.10 The Forum takes the view that non-designated heritage assets can make a positive contribution to the City’s environment and distinctiveness as a prime location for business. We regret that the only reference to non-designated heritage assets is in S11[d] which refers to retrofitting them. Our proposal is for a procedure to identify and record non-designated heritage assets in the City in a public list, using agreed criteria for identification, combined with a specific policy to protect them;

“To ensure that development is sympathetic to the local character and history and aims to maintain and enhance a strong sense of place, new development should be fully integrated with existing designated and undesignated heritage assets without causing undue harm and without loss of local distinctiveness.”

- 6.11 Finally, the Forum also notes a reference in the City Plan 2040 (p302) to the CAAC - Conservation Area Advisory Committee as “A consultative group set up to advise on planning applications and other proposals in the City’s conservation areas”. According to a Committee Report in 2023 “The City of London Conservation Area Advisory Committee (CAAC) was set up by the

Corporation of London in 1973 and a constitution was approved in 1982. Membership of the Committee is open to representatives of Ward Clubs, amenity bodies and City institutions and organisations by invitation of the Committee. Eleven of the City's twenty-two Ward Clubs are represented on the Committee. National conservation organisations represented include the Ancient Monuments Society, The Twentieth Century Society and the Georgian Group. Local amenity groups represented include the City of London Historical Society and the London Society. Representatives from professional bodies include Royal Town Planning Institute (RTPI), Royal Institute of British Architects (RIBA), the Royal Institute of Chartered Surveyors (RICS and The Urban Design Group. A quorum consists of seven members of the Committee.²⁶ However, there is no list of members, or means of contacting the committee, and no minutes are published.

- 6.12 The 2023 committee report also said that “Although some members of the Committee have relevant professional qualifications, the main criterion is to take an active interest in the buildings and environment of the City”. This oddly-constituted advisory body hardly provides reassurance that the governance, independent monitoring and standard-setting for heritage in the City is receiving the attention it deserves and needs, nor that heritage planning decision-making is getting suitably qualified advice, given the worldwide status of much of that heritage, nor that the interests of users, residents and stakeholders are represented. We recall that, in the case of the Tulip; “The Secretary of State notes that there is little evidence of how internal design reviews had shaped the outcome, that there was no independent review until after the application was reported to committee”²⁷. We urge the City to undertake an independent review of the constitution, terms of reference, transparency, accountability and effectiveness of CAAG.
- 6.13 Without strong and independent design reviews, planning decision-makers and committees would benefit from strengthened and clear Heritage policy to actually achieve its aims.
- 6.14 The Forum is also concerned that the City Plan treats heritage primarily in terms of visitor facilities. There is nothing about safeguarding the City’s portable heritage assets i.e. collections of rich historical value held in City buildings. We propose inserting a third point into Policy CV1. ‘Proposals resulting in the removal of portable heritage assets (items or collections of historic importance) from the City will normally be resisted.’

²⁶ The 25 Wards of the City of London each have a Ward Club (some Wards share a club). The Ward Clubs are primarily clubs aimed at residents and those who work in the City particularly the business voters. They organise the Wardmote (Ward Moot). A Ward Beadle opens & closes the Wardmote and in the past would fine Freemen who failed to attend.

²⁷ TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 78 APPEAL MADE BY BURY STREET PROPERTIES (LUXEMBOURG) S.A.R.L. - LAND ADJACENT TO 20 BURY STREET, LONDON EC3A 5AX. APPLICATION REF: 18/01213/FULEIA

7 Tall Buildings

- 7.1 As our supporting evidence (provided separately) outlines in more detail, we agree with the 'City Plan 2024 – Tall Buildings and Heritage Report' that the Barbican and Golden Lane area is 'very sensitive' to tall buildings.
- 7.2 We also support the principle that *“Outside the designated areas, policy will be amended to specify that these areas have been identified as being very sensitive to tall buildings and that new tall buildings would be inappropriate in these areas”*²⁸. In accordance with this, the Barbican & Golden Lane Neighbourhood Forum considers that the whole of the Neighbourhood Area, and by extension the Smithfield & Barbican KAOC, is inappropriate for new tall buildings. In the interests of conformity, clarity and effectiveness Policy S23 should be extended to say that *“buildings that are significantly taller than their surrounding will be resisted”*.
- 7.3 The Forum notes that between the existing 2015 plan and City Plan 2040 the City's definition of a tall building has changed from "those which significantly exceed the height of their general surroundings" to *“buildings over 75m AOD”*. This represents a radical (and uncommented on) departure from the definition in the previous plan
- 7.4 Furthermore we consider the 75m+ definition of a tall building to be arbitrary and inappropriate to the context of conservation areas in the City, and specifically to the conservation areas within the Barbican & Golden Lane Neighbourhood Area. The BGLNF strongly objects to the amendment of the wording of Policy S12 to remove the statement in the existing Local Plan that tall buildings are inappropriate in conservation areas. It is considered that this change would radically weaken the level of protection of the historic environment, and fundamentally threaten the character and appearance of the BGLNF area. The wording in the currently adopted local plan (CS14) should therefore be reinstated to say that tall buildings (defined in this case as those that significantly exceed the height of their general surroundings) are inappropriate in conservation areas. It is essential that the existing presumption against tall buildings in conservation areas be retained.
- 7.5 The Barbican and Golden Lane Conservation Area SPD, specifically describes the immediate setting of the conservation area is low- to mid-rise²⁹. The tall buildings that do exist within the conservation area, notably Golden Lane's Great Arthur House and the trinity of Barbican towers were all built as part of meticulous post-war masterplan, carefully positioned and proportioned

²⁸ City Plan 2024 – Tall Buildings and Heritage Report – City of London Corporation

²⁹ Barbican and Golden Lane Conservation Area SPD, adopted in February 2022, Section 4

among ranges of lower buildings and extensive public realm. The spaces and distances between the taller elements are essential to their setting as individual heritage assets and are also intrinsic to the character and appearance of the conservation area. New tall buildings would be completely inappropriate for the area, and extremely damaging to its character and appearance. The SPD specifically describes the southernmost end of the estate as the ‘foothills’³⁰ of the Barbican where the scale is lowest and closest to that of more traditional forms of building. The southern part of the BGLNF area which includes Little Britain, the north side of Gresham Street, Ironmongers’ Hall and the former site of the Museum of London is conspicuously low scale.

7.6 Outside the conservation area but within the BGLNF area, Bastion House and the original Museum of London complex are also an important part of the post-war masterplan, complying with the grid layout and integrated into the elevated pedestrian walkway system. Evidence of the significance of the orthogonal layout of Bastion House has been clearly set out by C20 Society and Historic England. These buildings are also critical to the setting of the conservation area and nearby listed buildings. It is considered that these sites are inappropriate for new tall buildings (defined as those that are significantly taller than the height of their surroundings).

7.7 We have a concern that the consequence of defining tall buildings as 75m+ is that it incentivises high-rise developments that are just under the 75m threshold, across the whole City, and specifically in and adjacent to the Barbican & Golden Lane’s predominantly residential and heritage-rich neighbourhood where the reference height is low to mid rise and buildings much taller than the reference heights cause substantial harm.

7.8 Just as not all locations are suitable for Tall Buildings, not all locations are suitable for slightly lower but still inappropriately high buildings either.

7.9 Within the Barbican & Golden Lane Neighbourhood the only buildings above 75m are the listed trinity of Barbican towers, Heron Tower, and City Point. Buildings of up to 18m or 6 storeys form the main character of Golden Lane (the Barbican & Golden Lane Conservation Area), Little Britain, Museum of London and Chiswell Street (the Brewery Conservation Area). The bulk of the listed Barbican Estate (in the Barbican & Golden Lane Conservation Area) is 20-45m or 7-12 storeys, together with Aldersgate Street, St Martin’s Le Grand, and One London Wall. Pencil towers of 45-75m or 13-21 storeys in height, such as Great Arthur House, Blake Tower, or Bastion House, as with the trinity of Barbican towers, are typically part of a well-designed composition, with ample breathing space in between and around them.

³⁰ Ibid, Page 28

7.10 New development just under the 75m Tall Building threshold, in locations adjacent to the Barbican and Golden Lane Neighbourhood Area, will have a significant impact on the Barbican and Golden Lane Conservation Area, the Brewery Conservation Area, the Postman's Park Conservation Area, and their Grade II* and Grade II listed buildings, scheduled monuments, gardens and landscapes. The Barbican & Golden Lane Area is generally not suitable for buildings out of scale with their neighbours and surrounding area, particularly where closeness of developments to one another would also cause the type of harm that City Plan 2040 policy (S12 [10.f]) only seeks to prevent with tall buildings by maintaining "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 the street level;*".

8 Open Space and Green Infrastructure (S14)



Open Space

8.1 Open space, and particularly green open space is extremely thin on the ground in the City. The purpose of the City Plan 2040 is not simply to expand office provision: it must deliver sustainable patterns of development. A failure to plan for adequate green and open space contravenes London and national planning policy. Evidence shows that the City’s current proposals are ineffective at ensuring adequate access to green and outdoor space, adversely affecting health, productivity and happiness for workers, visitors and residents.

8.1.1.1 Without clear evidence of need nor evidence of how the proposed policy will release specific sites for creating new ground level green and open space to meet a reasonable standard³¹, our view is that it is not possible to see the City Plan 2040 as sound as it will be contradicting national and London policy by not delivering sustainable patterns of development and by not

being based on robust and objective need assessment (NPPF 11, 15, 35 etc)

8.2 The NPPF (11[b]) says that strategic policies should, as a minimum, provide for “objectively assessed needs for housing and other uses” (our emphasis). There is no objective assessment of need for Open Space for residents in City Plan 2040, and we question the City’s evidence for setting standards of Open Space for the workday population so low, for failing to respond the deficit in Open Space, and consequently for failing to plan in sufficient detail for an increase of Open Space to a sufficient target level to meet the combined needs of residents, workers and visitors.

- 8.3 The City's Open Space policy does not conform with the London Plan Policy G4 Open space which requires (G4[1]) a "needs assessment of all open space to inform policy" nor does it conform to G4[3] with regard to "ensuring that future open space needs are planned for, especially in areas with the potential for substantial change", in particular as this relates to the Smithfield & Barbican KAOC. It does little to meet the Mayor of London's target of making more than 50 per cent of London green by 2050.
- 8.4 The City has provided no evidence to support the notion that "the most appropriate standard" is a ratio of public open space per 1,000 week day day-time population at 0.06 hectares of "amenity space" (i.e. counting space you look at but can't access). This is 1/10th of the part of the Fields in Trust benchmark for "amenity space", which itself is only part of the normal Open Space benchmark of 1.6ha or more per 1,000 population. Unlike commuters who may have access to Open Space in their home areas, for residents the City is home and their need for Open Space is no less than anyone else's.
- 8.5 Even by the City's inadequate, tiny and unevidenced measure, however, City Plan 2040 fails to secure anything like a suitable amount of Open Space. Applied to a current workday population of 615,000³² and the additional workforce of 100,000³³ anticipated, City Plan 2040 would be required to deliver a total public open space of 42.9ha against current provision of 34.5ha. This deficit of 8.4ha of Open Space takes no account of the Open Space lost and due to be lost by development consents since 2022; and we know that this pipeline of planning permissions allows building over existing open squares and plazas in the City. The 8.4ha deficit also does not account for the number and needs of residents, which barely figure in the equation used to calculate need (by excluding working residents, for example).
- 8.6 The Forum considers that the City needs to improve its evidence base by providing a more reasonable, accurate and up to date analysis of the needs for Open Space, including the needs of residents; by mapping areas of deficit related to the relevant categories of Open Space (such as public Open Space, outdoor sports, play etc); and then by putting forward a target and more detailed spatial strategy for how deficits will be addressed with provision of new Open Space of the right type in the right locations.
- 8.7 Expanding Open Space provision must be part of Policy OS1, including identifying in policy those areas where new Open Space is deficient and/or needs to be created. Examples already in the

³² City of London Statistics Briefing, May 2024

³³ From the City Plan 2040's own office space forecasts

- supporting text include; along the river, the City Cluster, Aldgate and Smithfield (para 12.2.1), the City Cluster (para 12.2.1), west of Farringdon Street and east of Bishopsgate (para 12.4.1)
- 8.8 Next to a picture of the beautiful ground level green lawn by St Paul's Cathedral, the City Plan 2040 says "there is a need for additional open space in the City to provide facilities for the growing daytime population, to help reduce the effects of pollution and climate change, to provide facilities for relaxation, tranquility, leisure and sport, and to increase biodiversity" (para 12.2.0), and yet instead of expanding provision it favours "improving access to open space". This is too weak.
- 8.9 Taking people's gardens is not the answer (Policy OS1[3]). Existing housing estates and blocks in the City typically rely on communal private gardens and open spaces for residents, all of whom are living in areas of deficit against the accepted standards of Open Space for residents. The intention of the policy to "increase public access" to "existing and new open spaces" may not have been to take residents' gardens, but it would be allowable and even encouraged under it. Where existing open space is actually private communal garden space for residents who have no other gardens, public access is not appropriate. Seeking to secure private residential garden spaces as "publicly accessible open space" will damage residential amenity by simply robbing Peter to pay Paul. Taken together with the policies to regenerate estates (S3, KAOCs etc) this policy is too broad and imprecise to protect the loss of open space for residents and, with it, amenity. OS1[3] should be amended to exclude private residential garden space which is already in significant deficit in the City.
- 8.10 Underwhelming pocket parks on the highway are not the answer, either (Policy OS1[3]). During Covid times a number of "pop-up" seating areas appeared in the City. A couple of benches, on a pallet base with a bit of planting, would be located in the street usually next to a Pret to allow workers to eat lunch safely outside. These were described as "pocket parks". A policy, as OS1[3] does, which seeks to create "open space from underused highways" should at the very least create spaces of a reasonable size and a very high quality to ensure they make a positive contribution to the environment.
- 8.11 Ground level Open Space is crucial – the City knows this; there is robust evidence to support this; the statement (para 12.2.1) that "New spaces at ground level should be created where possible" and (9.4.5) that "the provision of outdoor public space at ground level will be prioritised" should be put into policy to make the Plan effective. There is an overall and area-specific deficit of ground-level easily accessible open space and greening that, if corrected, is

capable of having a real impact on shading City streets, bringing down UHI, and improving the health of visitors, workers and residents – all of which are necessary to a material degree according to the City’s own evidence of need and deficiency.

- 8.12 The Forum is of the view that the intention of Strategic Policy (S14) to “promote a greener City” is too limited, imprecise and unrelated to the function of a plan to shape development. The evidence shows that the City needs more open space as well as more greening, and the strategy should be to increase both to a significant degree. 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. A target for ground level open space is also necessary.
- 8.13 We agree that the new and upgraded SINC^s identified in para 12.4.2 are sound and we support this proposal fully. The Barber Surgeons’ SINC, however, was upgraded and is missing from the text although it is on the list.
- 8.14 The Forum questions the City’s evidence about Open Space and standards of access to it. Deficiencies are greater than presented, in our view, and the policy response therefore is ineffective in creating the volume of Open Space and Green Infrastructure necessary to reach acceptable standards in the City and for it to be in conformity with the London Plan and NPPF.
- 8.15 The Forum notes that the City’s Open Space SPD (para 3.8.5) agreed that “*The Mayor of London’s SPG All London Green Grid Framework (2012) identifies the whole of the City as being in the indicative deficiency areas in relation to District Parks, Local Parks and access to nature.*” Eleven years later, the City is still deficient in Open Space to a significant degree. Positive policy is needed to extend this much-needed land use.
- 8.16 Design policies that need to be strengthened to extend ground level open space provision include;
- 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*
 - S14[2] – *add [“at ground level where possible]*

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 (e.g. 21 Moorfields. Late changes in design have led to hostile vehicle mitigation needing to be placed on the public realm, which has in turn undermined a greening project for Moor Lane and a loss of “public benefit”)

8.17 Open space which is not at ground level and which is not routinely and easily accessible to all has proved problematic in the City (see supporting evidence provided separately). Viewing terraces that are supposed to compensate for the loss of ground level open space, and greening, which are then closed for safety reasons, for example, deliver a significant public *disbenefit*. Once a public square is built on it is gone, probably forever, and the risks to “public benefit” of the alternative provision (which is now on private land) then failing or being withdrawn in future are underestimated and un-mitigated in this Plan. This counts heavily against the policy of replacing ground level open space with controlled access upper terraces.

8.18 It is worth recalling the Secretary of State’s decision³⁴ to uphold the refusal of consent for “The Tulip”, a 305.3m AOD mixed use visitor attraction located between the Gherkin (St Mary Axe) and Bevis Marks Synagogue. The Planning Inspector’s Report repeats the London Review Panel finding that the roof terrace was “not equivalent to fully public open space at street level”. His further comments, also repeated by the Secretary of State, concluded that the City’s growing number of viewing galleries reduced their weight as “benefits from tourism” and that, even from such a great height “the probability is that the quality of the views out would to some extent be compromised by the erection of the latest permissions even if the sight of other towers was an opportunity to view them up close at a height”³⁵. Neither open upper terraces, which may not last and can be unsafe, nor closed and safer viewing galleries of diminishing interest, therefore, are an entirely equivalent replacement for ground level, green open space.

³⁴ TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 78 APPEAL MADE BY BURY STREET PROPERTIES (LUXEMBOURG) S.A.R.L. - LAND ADJACENT TO 20 BURY STREET, LONDON EC3A 5AX. APPLICATION REF: 18/01213/FULEIA

³⁵ IR 14.111

Green Infrastructure

8.19 The City Plan 2040 emphasises green corridors biodiversity corridors. The Forum supports what we understand to be the policy intention here; to join up green spaces for the measurable benefit of people and wildlife, in keeping with NPPF para 185 which says plans should: *“identify, map and safeguard”* habitats and ecological networks, including *“wildlife corridors and stepping stones that connect them”*. We find, however, that this intention is unlikely to be met even by the cumulative effect of the proposed policy, spatial strategy, KAOC designations and spatial priorities in the City Plan 2040.

8.20 The City has;

- a) Not allocated any locations in the Spatial Strategy for “green corridors” (the thin lines on Figure 18: Green Corridors, page 218 are labelled as “green links”). These supposed “links” do not identify “habitats and ecological networks”. Instead they cut through densely-developed urban areas with no indication of what is expected to be “linked” nor how a “corridor” of green could be achieved
- b) Produced insufficient evidence for the location of those “green links”, many of which run alongside the City’s most polluted and congested main roads and junctions. An anticipated multi-million spend on a “biodiversity corridor” project at the junction of London Wall and Moorgate, just by the plaza at the exit of Moorgate tube, illustrates the point. This replaces a small lawn outside the Keats at The Globe Pub with some planting and seating. It creates no additional open space, very little additional greenery, and although it will doubtless be very popular with the drinkers who pack the lawn after work, it is hard to see how the target species in most need of habitats according to City Plan³⁶ will benefit at all.
- c) Not provided evidence to show how its proposed “stepping stones” of small isolated pockets of green at ground level and open to the public actually link up, for the species in question, with small private terraces at roof level 10+ storeys up. A biodiversity corridor is only effective if the bees, bats and birds can navigate from one pocket of green to another.
- d) Not provided any evidence of the options assessed in order to reach this policy, nor of exactly how it will create benefit for people, key species or the environment, and to what amount.

³⁶ House sparrows, peregrine falcons, swifts, black redstarts, bats, bumblebees and stag beetles - City Plan 2040 para 12.4.2

e) Not resolved potentially conflicting planning guidance and therefore uses for roof space (for Biodiversity Net Gain, PV panels, roof-top plant such as ventilation, green amenity space etc) anticipated by many policies in the Plan.

8.21 Green corridors have been shown to improve biodiversity, air quality, urban cooling and mental health and Gross Value Added to name just a few benefits. In the main, the “multiplier effect” of creating green corridors comes from physically linking ground-level open space. Evidence shows that the City has “*a high proportion of sites with a zero (or close to zero) baseline for biodiversity*”³⁷ at the moment, and evidence also shows that, without effective policy, developers do little to improve this (see also the City’s UGF study discussed below and further in supporting evidence). The Forum therefore proposes;

- a) *a map showing a distinct corridor for biodiversity based on evidence of how target species are likely to get from one puddle of green to another and the priorities for linking up such spaces*
- b) *a change to s14[8] to require developers to demonstrate how, as a minimum, the site will attract and/or protect the City’s target species, and for major schemes to secure monitoring and management of the BNG spaces to ensure that they remain effective at securing BNG for the lifetime of the building.*

Urban Greening Factor

8.22 The London Plan sets a minimum Urban Greening Factor (0.3) London-wide until a local plan identifies the appropriate level of urban greening required. In the case of the City of London, with its evidenced and significant deficit of green open space and biodiversity, coupled with being a high risk UHI area with significant overheating risks, it beggars belief that the UGF target can possibly also be 0.3.

8.23 Evidence (provided separately) all points to a need for a high level of urban greening and trees with broad cover, as well as for a need for no net loss of greening. We question the evidence that a minimum score of 0.3 reflects an assessment of “*the appropriate amount of urban greening*”³⁸ (our emphasis) and as a result the City’s policy is unsound and will be ineffective.

³⁷ City Plan 2040 – para 12.5.0, page 222

³⁸ As required by the London Plan

- 8.24 Instead, the Forum’s proposal for Policy OS2 is that there should be no net loss of greening through development on any site, that UGF should be raised to 0.6 minimum on major developments in the City, require the inclusion of “trees which are large at maturity and provide biomass, shade and amenity” and (in line with the London Plan minimum) a UGF target of at least 0.4 in the predominantly residential Barbican & Golden Lane part of the Smithfield and Barbican KAOC.
- 8.25 This would benefit City workers, as the City’s UGF Study also found that *“In the City of London, green infrastructure provides direct economic benefits and benefits to the productivity of workers. Green infrastructure is important in ensuring that the City is a more desirable place to work, thereby attracting and retaining companies”*.

9 Carbon, Climate, Cooling (S8, S14, S15)

Carbon

- 9.1 The density of The City and the unsuitable nature of some existing developments make it a big contributor to London's net whole life-cycle carbon, a potential generator of large amounts of embodied carbon and a root cause of urban heat in London putting it firmly in the government's High Risk zone for overheating.
- 9.2 The Forum supports the aims of Strategic Policy S8: Design in its 'retrofit first' approach which concerns itself with reducing the harmful and carbon-emitting effects of new development.
- 9.3 Given the strength of the evidence that greater retrofitting is essential and that UHI causes severe health problems, especially for older people, children and those with underlying health conditions, our view, however, is that these policies risk being ineffective in bringing carbon or UHI down. Nor are they robust enough to meet benchmarks that can reasonably be expected to become the accepted standard over the lifetime of the plan.
- 9.4 The Forum finds that, according to robust evidence the City Plan Policy on retrofit first S8[1] is insufficiently forward-looking and far too loose for the specific circumstances outlined in the City's evidence base and our own evidence that shows the depth of the problem in the City, the urgent need for change to bring carbon emissions and heat levels down, and the requirement for policy consistency within the CAZ across adjoining London boroughs. For these reasons, the Forum proposes an equivalent approach to that in Westminster's latest policy, namely:

PRIORITISING RETROFITTING OVER DEMOLITION

A. Development should adopt a retrofit-first approach, where options for retrofitting and retention of existing buildings are considered before demolition. Where substantial or total demolition is proposed, this should be fully justified through an appraisal of the construction options, assessing the carbon cost and public benefits of refurbishment, retrofit, deep retrofit or newbuild options. Development involving total demolition of a building which has more than a single storey will generally be resisted, unless demonstrated through the appraisal that:

- 1. The proposed development will deliver public benefits which could not be delivered through a suitably comparable retrofit option; and*
- 2. The whole-lifetime carbon of a new building would be less or similar to a suitably comparable retrofit option; or*

3. *The proposed development has bespoke operational requirements which could not be provided through the repurposing, adaptation and/or extension of the existing building(s); or*
4. *It is demonstrated that a retrofitting option is not possible or achievable due to structural constraints, demonstrated through an independently verified structural engineers report.*

REDUCING EMBODIED CARBON EMISSIONS

B. All development involving total or substantial demolition of a building which has more than a single storey, and all major developments are required to:

1. Submit a Whole Life-Cycle Carbon assessment, which demonstrates how the development will achieve:

a. For new non-residential buildings a target upfront embodied carbon

equivalent of London Energy Transformation Initiative (LETI) band “A”, with an absolute minimum rating of “B”.

b. For new residential buildings, including mixed-use over 18 metres in height, a target upfront embodied carbon equivalent of LETI band “C”, with an absolute minimum rating of “D”. Where development is proposing the delivery of policy compliant levels of affordable housing (35% for private sector land, and 50% for public sector land), applicants should demonstrate the maximum embodied carbon reductions deliverable without affecting the viability of affordable housing delivery.

c. For new residential buildings, including mixed-use below 18 metres in height, a target upfront embodied carbon equivalent of LETI band “B”, with an absolute minimum rating of “C”. Where development is proposing the delivery of policy compliant levels of affordable housing (35% for private sector land, and 50% for public sector land), applicants should demonstrate the maximum embodied carbon reductions deliverable without affecting the viability of affordable housing delivery.

d. For developments involving the construction of bespoke buildings which do not have a recognised LETI benchmark, or self-build or custom-build homes, applicants should achieve the maximum reductions in upfront embodied carbon deliverable, and these should be fully justified.

e. In exceptional circumstances where there are site specific constraints which make the benchmarks undeliverable, any shortfall against the minimum embodied carbon targets will be offset through a financial contribution towards the council’s carbon offset fund.

2. Where substantial or total demolition is proposed, applicants must:

- a. *Submit a Circular Economy Statement including a pre-redevelopment, and pre-demolition and reclamation audit which demonstrates how materials will be reused and repurposed; and*
- b. *Design any new structures to ensure the longevity of the building, easy adaptation, and with easily re-usable materials.*

UNLOCKING AND PROMOTING RETROFITTING

C. Proposals involving responsible retrofitting, which result in energy, performance, and climate adaptation upgrades, will be supported in principle.

D. When considering the townscape, heritage or design impacts of extensions or alterations, which are demonstrated through the appraisal of the construction options as necessary to viably achieve a wider retrofit of a building, regard will be had to the desirability of securing the retention and retrofit of the building, including improvements to its environmental performance, building longevity and climate change adaptation.

Applicants should demonstrate in a Sustainable Design Statement or Retrofit Plan how technical risks have been addressed and how harm to heritage assets has been avoided or minimised.

Climate and Cooling

- 9.5 As the National Centre for Earth Observation³⁹ says “In cities, urban heat islands occur where the land surface is densely covered with roads, pavement, buildings, and other surfaces that absorb and retain heat. This effect increases energy costs, air pollution levels, and heat-related illnesses and fatalities.” It is a significant environmental problem in the City of London.
- 9.6 The City is already in the most severe overheating “High Risk” zone⁴⁰ according to the government, in which current residential overheating and/or the risk of residential overheating is the highest in the country. The evidence for this is sufficiently compelling that building regulations now must ensure that any new homes built in this zone warrant special measures in their design to improve ventilation and cooling to a higher standard than anywhere else in the country, and yet City Plan 2040 makes no attempt to bring UHI down over the lifetime of the plan.
- 9.7 Overheating has a disproportionate effect on elderly people, children and those with underlying health conditions (see evidence provided separately). The City has evidence of populations of

³⁹ <https://www.nceo.ac.uk/article/britain-is-heating-up-how-heat-mapping-can-help-the-uk-adapt-to-climate-change/>

⁴⁰ <https://www.gov.uk/government/publications/overheating-approved-document-o>

sensitive residents and sensitive sites like Barts Hospital where the risk to health from overheating is severe.

- 9.8 Strategic Policy (S15) mainly seeks to ensure that buildings withstand severe climate conditions, without sufficiently mitigating the climate and overheating impact of the development itself. On this basis we consider S15 to be unsound. The wording of S15[1] implicitly accepts that new development will cause further UHI over the current position in which the City is already in a “high risk” UHI zone. Instead of seeking to slow the rate at which UHI rises further, all the evidence indicates that development should seek to positively reduce environmental overheating. We propose that (S15 [1]) be reworded to say; “Development must contribute to a reduction in the City’s urban heat island effect as well as minimising overheating within buildings;”.
- 9.9 Policy (CR1) Overheating and the urban heat island effect is similarly designed to have no impact on UHI reduction, and does not reflect the robust evidence that the City has significant environmental problems with environmental heat that, without effective policy, are likely to worsen further during the lifetime of the Plan (see evidence provided separately). As the City of London LAEP evidence shows, waste heat from buildings is already a problem and one that is unlikely to be solved by sharing waste heat through point-to-point connections with neighbouring developments – as they are all generating significant amounts of waste heat themselves. In developments next to residential areas the waste heat is, more often than not, simply vented into the atmosphere; workers inside offices, therefore, are cooled while neighbouring homes roast. The LAEP suggests that a network is required to distribute the City’s waste heat to areas beyond its boundary where it can be used effectively and efficiently (by the way, rather than spending CIL money on bollards, such a network would be a good infrastructure investment). City Plan 2040 (S15) is insufficiently forward-looking in our view and CR1 should be revised to require developers to demonstrate that developments have been designed to a) reduce the urban heat island effect; b) reduce overheating throughout the development; c) prepare for connection to a waste heat network exporting heat to those that need it; d) no waste heat is vented to the atmosphere.
- 9.10 In view of the evidence from the City’s LAEP⁴¹ it is surprising that policy is not stronger on Citigen (or equivalent) for cooling as well as heating. This is especially important for the Barbican Arts Centre and Guildhall School of Music & Drama, the Barbican Exhibition Halls, cooling the

⁴¹ Local Area Energy Plan

listed fabric of Golden Lane and the Barbican residential estates, supporting low carbon growth in offices, retail, housing, community and cultural uses in The City.

9.11 Currently there are underlaps in City Plan 2040 policy and the Forum notes an additional requirement to strengthen the following design policies with regard to overheating;

(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”;

(DE1[4]) – says”....wider sustainability improvements in the area” add “including reducing urban heat island effect”

(DE1[8 e]) – says”Demonstrate climate resilience” add “(including measures to reduce the urban heat island effect)”

(DE1[8]) – ~~Prioritise the objectives of the City of London Local Area Energy Plan [LAEP]~~ should instead say “demonstrate how the development will transfer heat and cooling to/from nearby developments, and provide for future links into local energy, waste heat, heat and cooling networks in line with the City of London LAEP (provision of sufficient space and financial contributions for future connections will be secured by conditions and planning obligations)”.

10 Health and Inclusion (S1)

- 10.1 The City's stated Social objective includes "creating a more inclusive, healthier and safer City for everyone". According to the NPPF (8) a Plan's "social objective – to support strong, vibrant and healthy communities.....with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;" must be met with "mutually supportive" economic and environmental objectives, reflected in the underlying policies and with the presumption in favour of sustainable development in mind.
- 10.2 It is, therefore, a matter for the whole of City Plan 2040 that development should directly contribute to making the City healthier for everyone or provide effective mitigation to achieve the same effect. In an area where the bulk of development is high-end office development, that should not be too difficult to achieve. We applaud the City Plan's aims to promote healthy buildings for workers; this needs to be met by a healthier environment for residents and visitors. Given the strength of evidence of the need to improve health, inclusion and safety in the City, the Plan's ambition (S1) to "enable all communities to access" various facilities will be ineffective at meeting the objective to create healthier communities over the lifetime of the Plan. The only improvement the City Plan 2040 seeks to make is air quality – and then only with regard to NO₂, PM₁₀ and PM_{2.5} – which is the minimum statutory requirement and ignores the WHO's list of pollutants which damage health.
- 10.3 Strategic Policy S1 – in the interest of effective policy resulting in a healthier City;
- a) (S1[3]) should make it clear that "Health Impact Assessments (HIAs) show how the development will help to protect and improve the health of all the City's Communities".....
 - b) (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";
 - c) (S1 [6 c]) – should reduce levels of all air pollutants to comply with the latest WHO guidelines for short and long term air quality including particulate matter (PM_{2.5} and PM₁₀), nitrogen dioxide (NO₂), carbon monoxide (CO), formaldehyde and volatile organic compounds (VOCs). Carbon dioxide (CO₂) concentrations in indoor air should also be considered.
 - d) (S1 [6 e]) – add – install automated blinds on windows to drop at 7pm facing existing homes
- 10.4 The evidence (below and provided separately) shows that to actually improve health and wellbeing in the City Strategic Policy S1 also needs ensure that development;
- a) Increases ground level open space;

- b) Helps bring environmental noise levels within WHO guidelines of 53 dB Lden (adjusted 24 hour average) and 45 dB Lnight (night-time average), starting with residential areas;
- c) Reduce the UHI effect especially in residential areas and near sensitive sites like Barts Hospital and locations where people vulnerable to heat are.

- 10.5 The first point of the City Plan 2040 Strategic Policy S1: Healthy and Inclusive City says the Plan will be “implementing the principles of the City of London Corporation Joint Health and Wellbeing Strategy”. The Forum notes that City Health & Wellbeing Strategy is out of date. A new one (2024-2028) discussed by the City of London’s Health and Wellbeing Board on 3rd May 2024 but not published as an evidence document, has no “principles” to implement, and appears to have dropped children as a priority (which would be discriminatory as a basis for planning policy). Our comments in this section are provisional, therefore, pending development, consultation and publication of official City Health & Wellbeing “principles” covering the Plan period and we expect to receive and have the opportunity to respond to such further information before, and at, the Examination In Public.
- 10.6 HL1: Inclusive buildings and space – this policy is strong on paper, and we welcome its aims. The Forum urges the City to do all it can to ensure that is not trumped by other demands, like HVM or constraints, considered too late in the design process.
- 10.7 HL2: Air Quality – Policy (HL2[2]) needs to be extended to comply with the latest WHO guidelines for short and long term air quality including particulate matter (PM2.5 and PM10), nitrogen dioxide (NO₂), carbon monoxide (CO), formaldehyde and volatile organic compounds (VOCs). Carbon dioxide (CO₂) concentrations in indoor air should also be considered.
- 10.8 HL3: Noise is at unhealthy levels and needs to be reduced throughout the City. Because of the extended hours of exposure experienced by residents, as well as the vulnerability to noise of some groups, noise levels need to be reduced and particularly in residential areas. The City’s evidence on this is out of date; the Forum has supplied its own separately. 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 of 53 dB Lden (adjusted 24 hour average) and 45 dB Lnight (night-time average), starting with residential areas; banning demolition and all types of construction from sites in and adjacent to residential areas on Saturdays as well as Sundays; and minimising and mitigating noise pollution to be less than the current baseline for neighbouring uses under the “agent of change” principle.

- 10.9 HL5: Social and Community facilities – we support the principle of protecting existing facilities in situ, however current policy similar to (HL5[1b]) has led to completely unsuitable space and facilities for effective replacement provision, in our experience. To be effective at making the City healthier; (HL5) needs to protect **and improve** existing social and community facilities in situ. However, new and expanded provision is also needed and (HL5[2]) not all identified community and social need can be met by “flexible multi-use space”. The Forum’s evidence (provided separately) demonstrates where provision of, say, a “bookable meeting room” available during office hours in an office block is utterly useless at meeting any of the identified social and community needs in our Neighbourhood or the City as a whole. (HL5[2]) should have an “or” instead of “and” between b. and c.
- 10.10 HL6: Public toilets - under-provision of public toilets is a direct health problem in the City leading to further indirect health and safety problems caused by street urination in our open spaces and public realm especially but not exclusively at night. Accessible public toilets open 24/7 are in particularly short supply, especially in the Community Toilet Scheme (HL6 [3]), membership of which should be a requirement for any development next to public open space. We support the provision of more public toilets in the City; with workday numbers due to rise to 715,000 at least in the lifetime of the Plan, we urge the City to secure sufficient contributions to ensure that provision meets the identified need.
- 10.11 HL7: Sport and recreation – The Forum recognises the deficiency in space for sport but (HL7 [1]) we question the City’s evidence for a “network” of “free outdoor sporting facilities” created by re-assigning widely used public open space. The evidence of un-met need for sport and recreation in the City is heavily weighted in favour of teens and elderly residents on the City’s housing estates, rather than commuting office workers who can afford to make use of the City’s many gyms (some even within the office) and who have access to sports facilities where they live (as do visitors). This policy risks using land to create a narrower benefit to a much smaller group of people than the current land usage and as such, in this location, would be contrary to the NPPF. New outdoor sporting facilities should be in addition to current open space.
- 10.12 HL9: Health Impact Assessments – “Health Impact Assessments (HIAs) must show how the development will help to protect and improve the health of all the City’s Communities”.....
- 10.13 S2: Safe and Secure – (S2 [6]) we question the City’s evidence for the list of people “more likely to experience crime” given the data on the victims of crime and race, sexual orientation, religion etc.

10.14 SA3: Designing in Security – we welcome (SA3[3])

Health problems and policy not addressed in the City Plan 2040

- 10.15 Homelessness - Levels of rough sleeping are high in the City and a priority for health as well as housing provision, and yet this gets no attention at all in City Plan policies despite, rightly, being one of the reasons for policy S1 (para 3.1.10). The Forum also notes that rough sleeping is only one manifestation of the City's homelessness problem, which also results in couch-surfing and staying in inadequate, unsuitable or unsafe accommodation. The City's looked after children, for example, are routinely placed elsewhere and the housing needs of children leaving care may not have been assessed at all.
- 10.16 Aging - Our own evidence (provided separately) shows that the 75+ population of the Neighbourhood is projected to increase by 482 individuals to reach a total of around 877 in 2040. This is a 122% increase, doubling the share of the population in this age group. The housing, care and social/community needs of this changing population do not seem to have been planned for in the City Plan 2040. The Forum takes the view that out-of-borough provision should not be the default way to meet these needs, especially as much of the housing stock in the Barbican & Golden Lane Neighbourhood is very suitable for home-based care based on hyper-local service hubs, to assist those who would like to stay in their own homes as long as possible. We encourage the City of London Corporation to work with the residential community to explore the possibility of a "Caring Neighbourhood" model, and to adopt policies that retain space and extend facilities to deliver health and social care locally in an efficient and effective manner. Planning obligations should also be used towards this end. To do so would help to 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".
- 10.17 Out of borough provision, returning to the City - We have not seen evidence to support the view that "it is often not economic to deliver effective services for City residents from locations within the City" (para 3.1.3), nor any assessment of the additional burden that out-of-borough provision places on the City's service users themselves. The demographic shift over the lifetime of the Plan suggests that service needs will grow, and with that the need for facilities within the City that are being outsourced now. The Plan is not sufficiently forward-looking and makes no provision for this, either spatially or in terms of existing community, social and health provision.

- 10.18 Deprivation - We agree that there are pockets of deprivation (para 3.1.7) and not just in the locations mentioned; we have not seen any evidence, however, that “securing skills and training programmes” (para 3.1.7) has had any measurable impact on deprivation in the City.
- 10.19 Extreme heat and health - City Plan 2040 fails to analyse or prepare for the impact of City UHI concentration and extreme heat events on Barts Hospital nor on other key health providers in the Smithfield and Barbican KAOC.
- 10.20 Cool Spaces – the City Plan 2040 makes no plans for developing cooling centres, providing shelter, drinking water and medical care. According to the Greater London Authority website mapping (London Cool Spaces Summer 2024) the City of London has no Tier 1 Cool Spaces, and only one Tier 2 Cool Space (at Aldgate, outside the Barbican & Golden Lane Neighbourhood, a facility which serves residents in the east of the City but provides no help to those in the west). We note that Tier 2 spaces are not targeted at vulnerable populations and do not provide medical support, and so are inadequate to cater for the specific problems of vulnerable people and overheating detailed in our evidence.
- 10.21 Defibrillators – 24/7 public access - The Corporation’s draft City Plan 2036 encouraged developers to provide facilities to improve the community’s health – such as drinking water fountains, publicly accessible toilets and defibrillators – but defibrillators have been taken out of City Plan 2040. The Neighbourhood Forum questions the evidence for removing this policy, given the rate of heart disease and the high number and concentration of workers, residents and visitors in the City. For our evidence on this please see the supporting documentation. We propose that 24/7 public access defibrillators (plus maintenance) are reinstated to City Plan 2040 in a new Policy designed to extend health and wellbeing provision.

11 Design (S8) and Residential Amenity (new DE9, HS3)

11.1 S8 Design – in addition to our comments on carbon, cooling and climate (above) the Forum’s evidence also supports the following changes to policy on the grounds of making the City Plan 2040 more effective:

(DE1 [8]) add “h. ensure that the building does not emit heat to the surrounding area.

(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) 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)

(DE3) Public realm – add “Neighbourhood Forums” to first sentence

(DE3 [5]) – add “increased open space at ground level”

(DE 4[1]) – substitute “considered” for “encouraged”

(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.

(DE 4[2]) – add “space for queuing indoors” (for reasons of safety and security)

(DE 4[new]) – add public “changing places” toilets

(DE 7) – 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.

(DE8) - 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

(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, in line with policy DE8;

In order to give effect to the plan’s intention to protect daylight in residences, a full assessment is necessary to ensure that the resulting absolute level of daylight is not unacceptably low, even if the relative change falls with the BRE guidelines of acceptability. This also gives force to item 3 of the policy on cumulative development.” (We suggest additional paragraphs of explanation, in particular to ask developers to refer to BRE’s updated best practice guidance [BR 209 2022 Site Layout for daylight and sunlight: a guide to good practice] when preparing proposals, as it is the exemplar best industry guidance on how to avoid causing loss of daylight to neighbouring properties, and how to avoid impacts on amenity and privacy to neighbours). This would also conform with the City’s approach to public open space (para 9.8.1) which says “Given the importance of the City’s open spaces in a high-density urban environment, the impact of any changes to sunlight on the public realm will need to be carefully evaluated even if proposals comply with BRE guidelines. The City Corporation may require independent verification of these assessments at the developer’s expense”.

- 11.2 The Neighbourhood notes that the City of London does not make use of independent design review panels (a Planning Inspector having also found in one case that that pre-application discussions were no substitute, being “neither transparent nor rigorous”⁴²). This is contrary to advice on the use of design review panels in NPPF 138. Strong design policy, therefore, is necessary.

Residential Amenity

⁴² Appeal Report APP/K5030/W/20/3244984

11.3 The explanation of residential amenity in the City Plan 2040 is in the glossary, which sees it as “The elements of a location or neighbourhood that contribute to its overall character and the enjoyment of residents.” Since residential amenity is referred to in policy throughout the Plan, and to make City Plan 2040 policy effective, the Forum proposes the following new policy to meet the evidenced needs, in line with the NPPF;

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.

11.4 Also in the glossary is the City’s definition of the agent of change principle. In the interests of effective policy, the Forum proposes that this should be in Strategic Policy S3 Housing:

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]

12 **Culture**

- 12.1 The City Plan 2040 Strategic Policy S6: Culture & Visitors - This suite of policies rests on a Cultural Planning Framework, which itself rests on a Cultural Strategy. The Cultural Planning Framework is yet to be consulted on and the City has no current Cultural Strategy. The Forum notes, therefore, that key information is missing. We are not sure how a Planning Framework can be considered finalised when the thing it is delivering has not been adequately specified. Culture differs from place to place, and objectives need to be defined before any policy to deliver can be judged effective or not. Our comments in this section are provisional, therefore, pending publication of the official City Cultural Strategy (CCS) and Cultural Planning Framework (CPF) covering the Plan period and we expect to receive, and have the opportunity to respond to, such further information before, and at, the Examination In Public.
- 12.2 We believe the policies lean heavily toward cultural ‘consumption’ and ‘visitor experience’ rather than supporting greater ‘production’ and community categories. The CPF evidence review of cultural development plans states ‘We established a detailed picture of provided cultural offer across 20 plans. This shows a variety of proposals but also a lack of provisions within the cultural production and community categories.’ Policies should be aiming to rebalance this.
- 12.3 The policy also refers twice (S6[1.and 5.]) to ‘cultural placemaking’ but this is undefined and no mention is made of this in the CPF.
- 12.4 Policy S6[8] refers to enabling ‘night-time activity and around cultural and tourist attractions where public transport..are available’ but makes no reference to the agent of change principle and we note that the CPF focal area of Barbican and Smithfield identifies only ‘Clusters of night time activity located around Smithfield Market and Holborn Viaduct.’ The Forum has reflected this in its analysis of the KAOC S23 and S24 policies.
- 12.5 Supporting the development of creative industries (S6[6]) is to be welcomed but there seem to be a lack of policies to underpin this aspiration. The London Plan Policy HC5 makes clear commitments, especially ‘2) identify and promote new, or enhance existing, locally-distinct clusters of cultural facilities, venues and related uses defined as Cultural Quarters’. These commitments are not reflected in the City Plan but the CPF states ‘Home to the City’s major cultural institutions, the Barbican and Smithfield area has a strong, culturally-driven identity that supports a robust cluster of creative businesses...But this development activity may threaten to displace the smaller-scale cultural clusters. It will be important to maintain the unique cultural and architectural character, especially at its smaller grain, by ensuring plentiful affordable

workspace' and 'Lack of commitment towards affordability of spaces will preclude growth of cultural production spaces'. The City's evidence, therefore, already points to a policy about creation of affordable creative space that overcomes some of the constraints identified.

12.6 The Cultural Planning Framework document Part A states clearly that "The CPF is not a cultural strategy for the City of London but contains elements that might usefully contribute to the development of a cultural strategy in the future. It has not been designed to suggest a City-wide cultural vision or objectives, nor does it propose a timeline for recommended cultural actions." (Cultural Planning Framework, Part 1-A, January 2024). Meanwhile the City's Culture Libraries and Heritage Committee has been tasked with overseeing the development of a Cultural Strategy but this is still in the pipeline pending action on the Martin Review of Destination City. We would like to see a coherent and coordinated set of policies once the Cultural Strategy has been thoroughly consulted on with the community and considered and adopted, including but not limited to the creation of affordable creative space.

12.7 Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities - We welcome the intention to protect arts, cultural and visitor facilities but have concerns about the lack of definition of 'visitor facilities'. The London Assembly Culture Infrastructure Plan notes that top visitor attractions include heritage buildings, theatre, music, galleries and museums. The CPF defines a Cultural Ecosystem encompassing "Cultural Infrastructure" with sub-groups: Cultural Consumption, Cultural Production, Heritage, and Community; and "Cultural Contributors" with sub-groups: Tourism, Development, Night-time and Leisure, Other. We believe Policy CV1 is too loose to be meaningfully applied without a clearer definition of 'visitor facilities' and how these relate or map to the "cultural contributors" identified in the CPF. The CPF also suggests formula for calculating developer contributions but goes on to ask the question: 'Do we only count cultural infrastructure uses in the formula? Do we weight infrastructure and contributors differently?' The issues of definitions and weighting needs to be resolved following consultation.

12.8 Policy CV2: Provision of Arts, Culture and Leisure Facilities - Policy CV2.2 requires the provision of onsite facilities for developments of 10,000sqm whereas the CPF states that 'Planners should encourage developments between 10,000 - 60,000sqm to meet the target with either financial or spatial contributions' and 'should encourage developments over 60,000sqm to meet the target with spatial contributions, except in extraordinary circumstances (e.g. a cultural space in the development location would not meaningfully contribute to the cultural fabric of the City; a financial contribution toward the given focal area would be of greater value than a spatial

contribution)’. We suggest that if cultural development plans are to be ‘informed by the City Corporation’s Cultural Planning Framework’ (CV2.1) then the recommendations of the CPF should be clearly echoed in the policy and it be amended to reflect the evidence and advice of the CPF.

12.9 CV2[3] also does not reflect the evidence in the CPF: ‘Our studies and conversations with both planners and developers...favours financial contributions for small schemes. Firstly, financial contributions for schemes of this size are much more feasible from the developer’s perspective; lettable space on the ground floor is already constrained in most of these schemes, and any spatial provision would necessarily be small and potentially poorly located. Secondly, many small, fragmented, and low-quality cultural spaces would not have the same positive impact as one larger cultural space or a pool of financial resources to support programming, events, or existing institutions. Foregrounding spatial contributions for projects under 10,000sqm misses critical opportunity to maximise the potential impact of developer contributions and threatens to create a fragmented landscape of underused spaces that do not meaningfully contribute to the cultural fabric of the City.’ We suggest this policy also be amended to reflect the evidence of the CPF to encourage pooling of financial resources to support cultural provision.

12.10 Policy CV3: Provision of Visitor Facilities – we question the City’s evidence base for this policy, particularly pending action on the Martin Review of Destination City. Public toilets are in very short supply in the City, particularly ones to “changing places” standards, which are open and accessible at the right times, in the right locations, and in sufficient numbers to meet peak anticipated demand over the lifetime of the plan. Developer provision of facilities has not always been an unqualified success (see evidence provided separately) and City Plan 2040 needs to be far more ambitious in securing funds for offsite provision as well as onsite. We have seen no evidence of need for permanent tables “in nearby open spaces and the public realm”; these significantly limit the use of open space and public realm especially for anyone with limited mobility or sight. Temporary tables in open space or the public realm need to be managed, cleaned, stored away in the winter and so forth; it is not clear how this can be secured to the high standard necessary through planning obligations (except in a few limited sites next to one of the City’s diminishing ground level open spaces, in which case why have a policy?). “Key routes” are not defined, nor what “animation” means. Traditional playgrounds only serve a small age range and are unsuitable for many locations in the City due to the high levels of air pollution, noise and traffic. The City certainly does not have the open space to accommodate traditional

single-use outdoor play areas for current or projected visitor numbers over the lifetime of the plan. Taken together with the play policy, City Plan 2040 encourages private, indoor play facilities for visitors which, in practice, may be very similar to the sui generis “experience” uses that could be in conflict with primary shopping centres. High quality outdoor landscapes, for example, designed to a high standard and planned to allow for children to run about safely, climb and explore the same space that adults are also enjoying, would be far more suitable.

12.11 Policy CV4: Hotels We support this policy but would like to see it enhanced from ‘permitted’ to ‘enabled’ (as with policy CV5) where potentially stranded assets, such as lower grade office space could be converted to serviced accommodation use. The report Future of Office Use (June 2023) commissioned by the City by Arup and Frank Knight states ‘We suggest that intervention is needed to allow for fewer obstacles for older stock to be updated to meet office market needs, or to convert to other uses’ and ‘The City could explore the implications of amending policy that requires ‘viability assessment’ when considering change of use, where this would incentivise the retention and improved environmental performance of existing buildings’.

12.12 Policy CV5: Evening and Night-Time Economy - We note that the agent of change principle is only specified in relation to new residential development and not in evening and nighttime use. We believe the policy should be strengthened in line with the NPPF and London Plan to specifically include the agent of change principle across all development.

13 Retail

- 13.1 Retail, for the most part, is struggling in the City of London post-pandemic. Even in the four principal shopping centres (PSCs) of Moorgate & Liverpool St, Leadenhall Market, Cheapside and Fleet Street, which have always been popular with mid and high-end retailers, units are still empty and planning applications are coming in to convert prime space to, for example, temporary library use (for four or five years) and sui generis “experience” uses such as visitor game/entertainment venues, which do not meet the vision or strategy for clustering and sustaining shopping which is compatible with the overall Plan.
- 13.2 Whilst it is sensible for retail growth in the Primary Shopping Centres over the lifetime of the Plan, there is currently a need to support and protect local independent neighbourhood shops as well. The City’s Retail Needs Assessment on p. 35 refers to ‘Shops and other retail around the edges of the Golden Lane, Mansell Street and Barbican estates, which play a role in serving the residential communities’. Aldersgate Street/Goswell Road in the Forum’s Area and the KAOC for Smithfield & Barbican is an important hub for the community. There is evidence that these neighbourhood shops could benefit from the change and growth in Smithfield, for example, an opportunity that is not yet reflected in the City Plan 2040 and should be, in our view.
- 13.3 If established corporate retailers are not returning to the City in droves, neighbourhood shops and cafes are struggling even more and recovery is still extremely fragile. Independent shops, and Aldersgate Street/Goswell Road (A1) is a good example of this, are also small businesses (SMEs), which typically vary in the amount of support they seek or get, and which are the last point in supply chains (and therefore vulnerable to their weaknesses). This is evident in Aldersgate Street/Goswell Road (A1) where the shops got differing levels of grants and support during the pandemic and after it, and one, a long-standing DIY and building supplies merchant, was brought down in part by the collapse and non-payment of debts by a much bigger firm and its sub-contractors.
- 13.4 In order to protect and support much-needed independent retail and neighbourhood shops we propose;

(S5) Retail and active frontages – add “encouraging the provision of “neighbourhood” shops in residential areas and resisting other uses

(RE3 and RE2) – Move (RE2 3] to RE3 “The loss of convenience retail units located close to, or that meet, a local residential need will be resisted, unless it is demonstrated that they are no longer required”.

14. Infrastructure

14.1 Evidence of need and provision of infrastructure in the City points to a significant requirement for infrastructure over the lifetime of the plan in order to;

- reduce the City's UHI effect;
- successfully decarbonise electricity supply;
- distribute excess waste heat;
- distribute zero carbon cooling;
- improve air quality by reducing reliance on diesel generators;
- build the most robust and secure communications networks possible to withstand risks to the critical digital infrastructure supporting the City's financial services (many of which are themselves critical national infrastructure);
- increase resilience to heat and floods caused by climate change;
- build green infrastructure for health and BNG;
- build health and community infrastructure; and
- create a network of cultural infrastructure.

Development contributions will be required to fund, develop and extend this infrastructure to meet the City's future needs over the lifetime of the plan and beyond, where infrastructure provision has to anticipate longer-term needs. We question the City's evidence for seeking appropriate levels of developer contributions to this infrastructure and we find the City Plan 2040 to be insufficiently forward-looking in planning for future needs (contrary to NPPF).

14.2 To be more effective we propose the following, based on our supporting evidence;

Policy (IN1) Infrastructure provision and connection add "Developments should connect to a second substation for back up power, rather than relying on diesel back up generators".

The City is relatively well-served with electricity sub-stations supplying decarbonised power, and this is likely to further improve over the lifetime of the plan. It is also an area of very poor air quality. This policy change would make the policy of energy efficient buildings more effective and also make policies of not worsening air quality more effective

14.3 The City's own Local Area Energy Plan (LAEP) correctly notes that the high level of production of waste heat is a major issue in the City⁴³ and one which is expected to grow over the lifetime of City Plan 2040. If this waste heat is vented to the atmosphere it will also be a contributing factor to the City's UHI problem. In the appendix to the LAEP Arup's report (p67) recommends that the City Plan 2040 should require major developments to prepare for connection to a heat offtake network in future. This would allow excess heat to be redistributed to buildings and places that could use it, would mitigate UHI to some degree, and would contribute to the City and London's net zero aspirations. The Forum requests, therefore, that this forward-looking recommendation is adopted. In the City Plan 2040 as it stands, Policy IN1 (1b.) only seeks connections to existing decentralised energy networks, and Policy IN2 (2) only seeks "provision of space" if "potential capacity problems are identified", both do too little to respond to the evidence that future-proofing new buildings and their surroundings is a necessity.

Policy proposal - major developments should be required to prepare for connection to a heat offtake network in future.

[ENDS]

⁴³ City of London LAEP, 2023, Appendix commissioned from Arup

Appendix A: Schedule of Proposed Amendments to Policy and Maps

City Plan 2040 Policy		Proposed amendment
General		The Barbican and Golden Lane Neighbourhood Plan is in preparation; the Forum considers it appropriate that this should be explicitly acknowledged and accommodated within City Plan 2040
Figure 1		the Barbican & Golden Lane Neighbourhood Area should be mapped in Figure 1: Key Diagram, as it is material to planning decision-making;
		The role and status of Neighbourhood Plans and Forums to be set out, at least, in the Glossary of the Plan
		the “Barbican” part of the KAOC was extended to be co-terminus with the designated boundary of the Barbican & Golden Lane Neighbourhood Area at its south-west corner
Strategic Priorities	UNSOUND	a) <u>Climate</u> - We find the Plan to be insufficiently forward-looking in light of the robust evidence about climate change, whole life carbon, and UHI in the City, rendering City Plan 2040 contrary to NPPF paras 157, 158 and 159
	UNSOUND	b) <u>Heritage</u> - 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. The Forum proposes that the wording of current policy CS12 is reinstated in City Plan 2040.
	UNSOUND	c) <u>Housing</u> – It is unclear how housing targets are to be met without site allocations, nor why the supply of specialist housing seems lower than the Mayor of London target
		d) <u>Culture</u> - the City’s cultural offer should be defined more clearly in keeping with the

		<p>character of the areas where it is to be supported, broadened, and developed to increase skills and employment as well as enjoyment, while managing the impact on existing residential communities. The Plan should therefore clearly define and balance cultural development according to the classifications of the CPF and in reference to the London Plan.</p>
1.2 Economic objective		<p>No evidence for policies based on the idea that office uses are “compromised” by other uses in the specific circumstances of the City.</p>
1.3 Social objective		<p>add a Social Objective (1.3) to “improve the quality of life for the City’s workers, residents and visitors” rather than just “engaging with” them.</p>
1.4 Environmental objective		
Spatial Strategy	UN SOUND	<p>add a sub-paragraph 2.1 (12) to say “a detailed Neighbourhood Plan for the Barbican & Golden Lane Neighbourhood Area will be brought forward in conformity with City Plan 2040.”</p> <p>Housing sites not allocated, lack of clarity over where student housing to be used to meet housing targets, residential areas insufficiently defined nor where residential amenity is to be protected.</p> <p>Spatial Strategy does not identify “green corridors” referred to in policy (the thin lines on Figure 18: Green Corridors, page 218 are labelled as “green links”). These supposed “links” do not identify “habitats and ecological networks”.</p> <p>No spatial strategy for extending open space to the degree necessary to meet acceptable standards</p>
Health, Inclusion & Safety	UN SOUND	<p>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”.</p>

<p>Strategic Policy S1: Healthy and Inclusive City</p>		<p>S1’s extremely limited aim to “enable all communities to access” facilities should be “to create healthier communities for everyone”</p> <p><i>(S1[3]) should make it clear that “Health Impact Assessments (HIAs) show how the development will help to protect and improve the health of all the City’s Communities”.....</i></p> <p><i>(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”;</i></p> <p><i>(S1 [6 c]) – should reduce levels of all air pollutants to comply with the latest WHO guidelines for short and long term air quality including particulate matter (PM2.5 and PM10), nitrogen dioxide (NO2), carbon monoxide (CO), formaldehyde and volatile organic compounds (VOCs). Carbon dioxide (CO2) concentrations in indoor air should also be considered.</i></p> <p><i>(S1 [6 e]) – add – install automated blinds on windows to drop at 7pm facing existing homes</i></p> <p>Strategic Policy S1 also needs ensure that development; Increases ground level open space; Helps bring environmental noise levels within WHO guidelines of 53 dB Lden (adjusted 24 hour average) and 45 dB Lnight (night-time average), starting with residential areas; Reduce the UHI effect especially in residential areas and near sensitive sites like Barts Hospital and locations where people vulnerable to heat are.</p>
<p>Policy HL1: Inclusive buildings and spaces</p>		
<p>Policy HL2: Air quality</p>		<p>Policy (HL2[2]) needs to be extended to comply with the latest WHO guidelines for short and long term air quality including particulate matter (PM2.5 and PM10), nitrogen dioxide (NO2),</p>

		carbon monoxide (CO), formaldehyde and volatile organic compounds (VOCs). Carbon dioxide (CO ₂) concentrations in indoor air should also be considered.
Policy HL3: Noise		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 of 53 dB Lden (adjusted 24 hour average) and 45 dB Lnight (night-time average), starting with residential areas; noise from completed developments to be less than the current baseline for neighbouring uses under the “agent of change” principle; and banning demolition and all types of construction from sites in and adjacent to residential areas on Saturdays as well as Sundays & Bank Holidays
Policy HL4: Contaminated land and water quality		
Policy HL5: Location and protection of social and community facilities		(HL5) needs to protect and improve existing social and community facilities in situ. However, new and expanded provision is also needed and (HL5[2]) not all identified community and social need can be met by “flexible multi-use space”. (HL5[2]) should have an “or” instead of “and” between b. and c.
Policy HL6: Public toilets		Community Toilet Scheme (HL6 [3]), membership of which should be a requirement for any development next to public open space.
Policy HL7: Sport and recreation		
Policy HL8: Play areas and facilities		
Policy HL9: Health Impact Assessment (HIA)		“Health Impact Assessments (HIAs) must show how the development will help to protect and improve the health of all the City’s Communities”.....
Strategic Policy S2: Safe and Secure City		(S2 [6]) we question the City’s evidence for the list of people “more likely to experience crime” given the data on the victims of crime and race, sexual orientation, religion etc.
Policy SA1: Publicly accessible locations		
Policy SA2: Dispersal Routes		

Policy SA3: Designing in Security		
Housing		
4.1 Housing Context		
Strategic Policy S3: Housing	UNSOUND	<p>Housing site allocations are necessary; City Plan 2040 needs to be more specific about how it will ensure that local needs for housing are met either within the City and within the Smithfield and Barbican KAOC (Strategic Policies S3 and S23)</p> <p>Policy (S3) should be re-worded to say</p> <p>Policy S3 [1b] Within identified residential areas, the delivery of affordable housing, build to rent, sheltered and extra-care housing is a priority. Co-living and hostel accommodation may also be allowed, if it can be shown that this relieves pressure on the availability of affordable housing nearby, does not cause excessive concentration or cause adverse impact on / loss of permanent residential accommodation. Housing is encouraged in residential areas particularly if this means the reuse or retrofit of a building rather than its demolition. To protect housing standards and residential amenity, shared living developments are prevented from converting to other housing types through legal agreements and conditions.</p> <p>addition to item 4</p> <p>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]</p>
Policy HS1: Location of New Housing		<p>a) Extend the “residential area” (Figure 32) to include the whole of the Forum Area boundary, as this has already been accepted by the City of</p>

		<p>London as a cohesive residential neighbourhood on designation;</p> <p>b) Designate sites for housing which meet the Plan target, in the main, with housing for which there is local need;</p> <p>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.</p> <p>HS1[3] 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 to the Neighbourhood.</p>
Policy HS2: Loss of housing		
Policy HS3: Residential environment		<p>(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, in line with policy DE8;</p> <p>In order to give effect to the plan’s intention to protect daylight in residences, a full assessment is necessary to ensure that the resulting absolute level of daylight is not unacceptably low, even if the relative change falls with the BRE guidelines of acceptability. This also gives force to item 3 of the policy on cumulative development.” (We suggest additional paragraphs of explanation, in particular to ask developers to refer to BRE’s updated best practice guidance [BR 209 2022 Site Layout for daylight and sunlight: a guide to good practice])</p>
Policy HS4: Housing quality standards		
Policy HS5: Short term residential letting		
Policy HS6: Student accommodation and hostels		Add 1f. They would not involve the loss of permanent residential accommodation or

		prejudice the development of permanent residential accommodation in residential areas, particularly, affordable rented accommodation for older people or those with special needs
Policy HS7: Older persons housing to		
Policy HS8: Self and custom housebuilding		
Offices		
Strategic Policy S4: Offices	UNSOUND	Floorspace target not supported by robust evidence
Policy OF1: Office Development		
Policy OF2: Protection of Existing Office Floorspace		
Policy OF3: Temporary 'Meanwhile' Uses		
Retail		
Strategic Policy S5: Retail and active frontages		(S5) Retail and active frontages – add “encouraging the provision of “neighbourhood” shops in residential areas and resisting other uses
Policy RE1: Principal Shopping Centres		
Policy RE2: Active frontages		(RE3 and RE2) – Move (RE2 3]) to RE3 “The loss of convenience retail units located close to, or that meet, a local residential need will be resisted, unless it is demonstrated that they are no longer required”.
Policy RE3: Specialist retail uses and clusters		RE3 “The loss of convenience retail units located close to, or that meet, a local residential need will be resisted, unless it is demonstrated that they are no longer required”.
Policy RE4: Markets		
Culture & Visitors		
Strategic Policy S6: Culture and Visitors		<p>Without a Cultural Strategy it is hard to comment but we note the evidence of a lack of provisions within the cultural production and community categories.’ Policies should be aiming to rebalance this.</p> <p>(S6[1.and 5.]) refer to ‘cultural placemaking’ but this is undefined and no mention is made of this in the CPF.</p> <p>We would like to see a coherent and coordinated set of policies once the Cultural Strategy has been thoroughly consulted on with the community and</p>

		considered and adopted, including but not limited to the creation of affordable creative space.
Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities		To be effective needs a clearer definition of 'visitor facilities' and how these relate or map to the "cultural contributors" identified in the CPF. Also add: Proposals resulting in the removal of portable heritage assets (items or collections of historic importance) from the City will normally be resisted.
Policy CV2: Provision of Arts, Culture and Leisure Facilities		We suggest this policy also be amended to reflect the evidence of the CPF to encourage pooling of financial resources to support cultural provision.
Policy CV3: Provision of Visitor Facilities		we question the City's evidence base for this policy
Policy CV4: Hotels		We support this policy but would like to see it enhanced from 'permitted' to 'enabled' (as with policy CV5) where potentially stranded assets, such as lower grade office space could be converted to serviced accommodation use.
Policy CV5: Evening and Night-Time Economy		We note that the agent of change principle is only specified in relation to new residential development and not in evening and nighttime use. We believe the policy should be strengthened in line with the NPPF and London Plan to specifically include the agent of change principle across all development
Policy CV6: Public Art		
Infrastructure		
Strategic Policy S7: Infrastructure and Utilities		
Policy IN1: Infrastructure provision and connection		Policy (IN1) Infrastructure provision and connection add "Developments should connect to a second substation for back up power, rather than relying on diesel back up generators".
Policy IN2: Infrastructure Capacity		Policy proposal - major developments should be required to prepare for connection to a heat offtake network in future.
Policy IN3: Pipe Subways		
Design		
S8[1] retrofit		<i>PRIORITISING RETROFITTING OVER DEMOLITION</i> <i>A. Development should adopt a retrofit-first approach, where options for retrofitting and retention of existing buildings are considered before demolition. Where substantial or total demolition is proposed, this</i>

should be fully justified through an appraisal of the construction options, assessing the carbon cost and public benefits of refurbishment, retrofit, deep retrofit or newbuild options. Development involving total demolition of a building which has more than a single storey will generally be resisted, unless demonstrated through the appraisal that:

1. The proposed development will deliver public benefits which could not be delivered through a suitably comparable retrofit option; and
2. The whole-lifetime carbon of a new building would be less or similar to a suitably comparable retrofit option; or
3. The proposed development has bespoke operational requirements which could not be provided through the repurposing, adaptation and/or extension of the existing building(s); or
4. It is demonstrated that a retrofitting option is not possible or achievable due to structural constraints, demonstrated through an independently verified structural engineers report.

REDUCING EMBODIED CARBON EMISSIONS

B. All development involving total or substantial demolition of a building which has more than a single storey, and all major developments are required to:

1. Submit a Whole Life-Cycle Carbon assessment, which demonstrates how the development will achieve:
 - a. For new non-residential buildings a target upfront embodied carbon equivalent of London Energy Transformation Initiative (LETI) band “A”, with an absolute minimum rating of “B”.
 - b. For new residential buildings, including mixed-use over 18 metres in height, a target upfront embodied carbon equivalent of LETI band “C”, with an absolute minimum rating of “D”. Where development is proposing the delivery of policy compliant levels of affordable housing (35% for private sector land, and 50% for public sector land), applicants should demonstrate the maximum embodied carbon reductions deliverable without affecting the viability of affordable housing delivery.

c. For new residential buildings, including mixed-use below 18 metres in height, a target upfront embodied carbon equivalent of LETI band “B”, with an absolute minimum rating of “C”. Where development is proposing the delivery of policy compliant levels of affordable housing (35% for private sector land, and 50% for public sector land), applicants should demonstrate the maximum embodied carbon reductions deliverable without affecting the viability of affordable housing delivery.

d. For developments involving the construction of bespoke buildings which do not have a recognised LETI benchmark, or self-build or custom-build homes, applicants should achieve the maximum reductions in upfront embodied carbon deliverable, and these should be fully justified.

e. In exceptional circumstances where there are site specific constraints which make the benchmarks undeliverable, any shortfall against the minimum embodied carbon targets will be offset through a financial contribution towards the council’s carbon offset fund.

2. Where substantial or total demolition is proposed, applicants must:

a. Submit a Circular Economy Statement including a pre-redevelopment, and pre-demolition and reclamation audit which demonstrates how materials will be reused and repurposed; and

b. Design any new structures to ensure the longevity of the building, easy adaptation, and with easily reusable materials.

UNLOCKING AND PROMOTING RETROFITTING

C. Proposals involving responsible retrofitting, which result in energy, performance, and climate adaptation upgrades, will be supported in principle.

D. When considering the townscape, heritage or design impacts of extensions or alterations, which are demonstrated through the appraisal of the construction options as necessary to viably achieve a wider retrofit of a building, regard will be had to the desirability of securing the retention and retrofit of the building, including improvements to its environmental performance, building longevity and climate change adaptation.

		<p>Applicants should demonstrate in a Sustainable Design Statement or Retrofit Plan how technical risks have been addressed and how harm to heritage assets has been avoided or minimised.</p>
Strategic Policy S8: Design		<p>(S8) – Sustainable design – add a new point “contribute to reducing urban heat island effect”</p> <p>(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”;</p> <ul style="list-style-type: none"> - replace “open space” with “the quantity of ground level open space” - add “at ground level where possible” - change to [“delivers a net increase of publicly available open space, at ground level, and overall....] and add [“green space”] to the list
Policy DE1: Sustainable Design		<p>(DE1[4]) – says”....wider sustainability improvements in the area” add “including reducing urban heat island effect”</p> <p>(DE1[8 e]) – says”Demonstrate climate resilience” add “(including measures to reduce the urban heat island effect)”</p> <p>(DE1[8]) – Prioritise the objectives of the City of London Local Area Energy Plan [LAEP] should instead say “demonstrate how the development will transfer heat and cooling to/from nearby developments, and provide for future links into local energy, waste heat, heat and cooling networks in line with the City of London LAEP (provision of sufficient space and financial contributions for future connections will be secured by conditions and planning obligations)”. (DE1 [8]) add “h. ensure that the building does not emit heat to the surrounding area.</p>
Policy DE2: Design Quality		<p>(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..</p> <p>DE2[2f] – add [“Such greening biodiversity and public realm improvements should be at ground</p>

		<p>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”].</p> <p>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</p> <p>(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)</p>
Policy DE3: Public Realm		<p>(DE3) Public realm – add “Neighbourhood Forums” to first sentence</p> <p>(DE3 [5]) – add “increased open space at ground level”</p>
Policy DE4: Terraces and Elevated Public Spaces		<p>(DE 4[1]) – substitute “considered” for “encouraged”</p> <p>(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.</p> <p>(DE 4[2]) – add “space for queuing indoors” (for reasons of safety and security)</p> <p>(DE 4[new]) – add public “changing places” toilets</p>
Policy DE5: Shopfronts		
Policy DE6: Advertisements		
Policy DE7: Daylight and sunlight		<p>(DE 7) – 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.</p>
Policy DE8: Lighting		<p>(DE8) - amended to say “Automated blackout blinds should be fitted to office windows next to residences, to drop at 7pm”.</p>

		(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		<p>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.</p> <p>2. Impact on residential amenity will be assessed to:</p> <ul style="list-style-type: none"> 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.
Transport		
Strategic Policy S9: Transport and Servicing		
Policy VT1: The impacts of development on transport		
Policy VT2: Freight and Servicing		<p>Add new text:</p> <p>2. Major commercial development must provide for;</p> <ul style="list-style-type: none"> 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. <p>7. Streets that are:</p> <ul style="list-style-type: none"> a) Next to residences, or

		<p>b) Designated cycle routes, or</p> <p>c) Designated as pedestrian corridors or “healthy streets” or equivalent</p> <p>will not normally be permitted to be used as access routes to or from service bays.</p>
Policy VT3: Vehicle Parking		
Policy VT4: River Transport		
Policy VT5: Aviation Landing Facilities		
Strategic Policy S10: Active Travel and Healthy Streets		
Policy AT1: Pedestrian Movement, Permeability and Wayfinding		
Policy AT2: Active Travel including Cycling		
Policy AT3: Cycle Parking		
Heritage & Tall buildings		
Strategic Policy S11: Historic Environment		<p>The Forum proposes a procedure to identify and record non-designated heritage assets in the City in a public list, using agreed criteria for identification, combined with a specific policy to protect them;</p> <p>“To ensure that development is sympathetic to the local character and history and aims to maintain and enhance a strong sense of place, new development should be fully integrated with existing designated and undesignated heritage assets without causing undue harm and without loss of local distinctiveness.”</p> <p>We also urge the City to undertake an independent review of the constitution, terms of reference, transparency, accountability and effectiveness of CAAG.</p>
Policy HE1: Managing Change to the Historic Environment	UNSOUND	<p>Policy HE1(6) should be strengthened to require that opportunities to enhance conservation areas be positively sought and pursued, not merely ‘considered’.</p> <p>The Forum proposes that the word “immediate” is deleted from Policy HE1[8].</p>
Policy HE2: Ancient Monuments and Archaeology		

Policy HE3: Setting of the Tower of London World Heritage Site		
Strategic Policy S12: Tall Buildings		<p>The BGLNF strongly objects to the amendment of the wording of Policy S12</p> <p>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.</p> <p>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 the street level;”.</p>
Strategic Policy S13: Protected Views		
Open Spaces & Green Infrastructure		
Strategic Policy S14: Open Spaces and Green Infrastructure	UN SOUND	<p>Strategic Policy (S14) aim to “promote a greener City” is too limited, imprecise and unrelated to the function of a plan to shape development.</p> <p>The evidence shows that the City needs more open space as well as more greening, and the strategy should be to increase both to a significant degree.</p> <p>We support the “protection” of “existing open and green spaces”; instead of “promoting” greening, (S14) needs to create new <i>ground level</i> open space publicly accessible to all and to resist loss of such space in absolute terms.</p> <p><i>- add [“at ground level where possible]</i></p> <p>S14[8] to require developers to demonstrate how, as a minimum, the site will attract and/or protect the City’s target species, and for major schemes to secure monitoring and management of the BNG spaces to ensure that they remain effective at securing BNG for the lifetime of the building.</p>

		<p>Policy addition: text (para 12.2.1) that “New spaces at ground level should be created where possible” and (9.4.5) that “the provision of outdoor public space at ground level will be prioritised” should be put into policy to make the Plan effective.</p>
Policy OS1: Protection and provision of open spaces		<p>OS1[3] should be amended to exclude private residential garden space which is already in significant deficit in the City.</p> <p>A policy, as OS1[3] does, which seeks to create “open space from underused highways” should at the very least create spaces of a reasonable size and a very high quality to ensure they make a positive contribution to the environment.</p>
Policy OS2: Urban Greening	UN SOUND	<p>There should be no net loss of greening through development on any site, and UGF should be raised to 0.6 minimum on major developments in the City, requiring the inclusion of “trees which are large at maturity and provide biomass, shade and amenity” and (in line with the London Plan minimum) and a UGF target of at least 0.4 in the predominantly residential Barbican & Golden Lane part of the Smithfield and Barbican KAOC [see also suggested policy S23B below]</p>
Policy OS3: Biodiversity		
Policy OS4: Biodiversity Net Gain		
Policy OS5: Trees		<p>Reword to say:</p> <p>3. Other than in exceptional circumstances, only permitting the removal of existing trees which are dead, dying or dangerous. Where trees are removed, requiring their replacement with large mature trees of an equivalent value capable of surviving in that location, with funding for maintenance and further replacement if necessary.</p>

		<i>We note that specialist tree suppliers can now successfully relocate mature trees.</i>
Climate Resilience		
Strategic Policy S15: Climate Resilience and Flood Risk	UNSOUND	S15 [1]) be reworded to say; “Development must contribute to a reduction in the City’s urban heat island effect as well as minimising overheating within buildings;”.
Policy CR1: Overheating and Urban Heat Island Effect		CR1 should be revised to require developers to demonstrate that developments have been designed to a) reduce the urban heat island effect; b) reduce overheating throughout the development; c) prepare for connection to a waste heat network exporting heat to those that need it; and d) no waste heat is vented to the atmosphere.
Policy CR2: Flood Risk		
Policy CR3: Sustainable drainage systems (SuDS)		
Policy CR4: Flood protection and flood defences		
Strategic Policy S16: Circular Economy and Waste		
Policy CE1: Sustainable Waste Facilities and Transport		
Policy CE2: New waste management sites		
S23		<p>POLICY CLARIFICATION</p> <p>Clarification is needed as to whether the City Plan, and the City Corporation, intends to include student housing in its definition of ‘residential development’ for the Barbican & Smithfield KAOC (page 48 - para 4.1.5 says it does not, para 4.1.6 says it partly meets housing need though a formula of 2.5 student rooms to 1 residential unit).</p>
S23		<p>POLICY AMENDMENTS</p> <p>S23 (new point);</p> <p>Policy S23 should be extended to say that “buildings that are significantly taller than their surrounding will be resisted will be resisted”.</p> <p>S23 (2);</p> <p><i>2. Improving inclusive and pedestrian accessibility</i> <i>Ensuring the retention and improvement of pedestrian permeability and connectivity through the</i></p>

~~large sites such as Smithfield Market site, and by encouraging better lift and ramp access to Barbican Highwalks whilst seeking to preserve pedestrian permeability, heritage, open space, amenity, privacy, security and noise abatement for residents and businesses;~~

S23 (3) add;

“...whilst protecting residential amenity for existing homes in the KAOC”

S23 (6) reword to say;

“6. Making improvements to Beech Street to reduce the volume of vehicle traffic, improve air quality and increase amenity, widen pavements and improve accessibility for all without worsening neighbourhood traffic, air quality or access ~~and vitality;~~”

S23 (7) to say;

Seeking to minimise pollution levels by resisting demolition/construction at weekends, restricting access at all times to new non-residential terraces, reducing and curtailing nighttime light pollution, managing traffic and increasing green infrastructure at street level.

1 S23 (8) to say;

Seeking improvements to accessibility for all including wider pavements, safer crossings, more reliable lifts and ramps (such as at Barbican tube) and better cycle routes.

S23 (11)

a) either;

S23 (11) applies only to “Long Lane and Carthusian Street” (and delete “Routes between the London Museum and the Barbican”), or

Add “food & beverage uses” to the Smithfield policy S24 (8), define the Smithfield area to which it applies and delete S23 (11).

b) S23 (11) additional amendment to say:

		<p><i>‘This includes encouraging the retention of the existing leisure, retail, food and beverage uses along Long Lane, Carthusian Street, Aldersgate Street/Goswell Road (A1), and the Barbican launderette, as these businesses play an important role in supporting the residential community and local economy.’</i></p> <p>S 23 (12) additional wording to support the development of a cultural hub around the Barbican; <i>Affordable spaces for start-ups etc Artist/maker spaces</i></p> <p>S 23 (13) needs to recognise the “special character” of the Barbican and Golden Lane as “<i>predominantly residential and tranquil with a world-class cultural centre</i>” (i.e. not the same as the “special character” of Smithfield as a “<i>late evening 7 day a week</i>” place).</p> <p><u>New policy S23 (14)</u> – this Smithfield Policy S24 (9) should apply to the KAOC as a whole “9. <i>Ensuring new activities and developments contribute to a reduction in freight and vehicular movements, whilst not adversely impacting the operation of businesses and amenity of residents;</i>”</p> <p><u>New policy S23 (14)</u> <i>“Encourage improvements to the Long Lane/Beech Street/Aldersgate junction and its public realm, together with better accessibility for all, public toilets and lifts to the Highwalk”.</i></p>
NEW 23B		Strategic Policy 23B be developed for the Barbican and Golden Lane part of the KAOC
NEW 23B Strategic Policy S23B: Barbican and Golden Lane		<p>The City Corporation will protect and enhance the predominantly residential, cultural and historic character of Barbican and Golden Lane by:</p> <ol style="list-style-type: none"> 1. Support residential development that meets specific local needs for specialist elderly accommodation and affordable rented accommodation in the [corrected boundary]⁴⁴ “identified residential areas”. 2. Enhancing, maintaining and encouraging sensitive refurbishment of the Barbican Arts

⁴⁴ See boundary change to include missed residential areas

Centre and Guildhall School of Music and Drama as a focus for the strategic cultural area recognised in the London Plan, and supporting the reuse of the Barbican Exhibition Halls for start-ups, digital and creative industries, cultural organisations and artists/makers;

3. Resisting development adjacent to the Barbican Estate and Golden Lane Estate and the residential blocks and streets of the area that has an adverse effect on residential amenity in this predominantly residential part of the KAO which does not have a late evening, 7 day a week character;

4. Enhancing the distinctive character of the area by retaining residential and listed buildings and encouraging new development which respects;

a. the predominant low-rise and mid-rise character⁴⁵ of the Brewery Conservation Area and the Barbican and Golden Lane Conservation Area

b. the heritage, design and fabric of the Registered Landscapes, Parks and Gardens and also of the Grade II and Grade II* Listed Buildings [to be identified in full in final policy wording]

c. the reference heights and grain of the neighbourhood

d. the Barbican Estate Listed Building Management Guidelines SPD⁴⁶ and Golden Lane Estate Listed Building Management Guidelines SPD⁴⁷

e. and keeps an appropriate distance from the trinity of Barbican towers to protect their composition, and does the same for Great Arthur House.

5. Protecting the heritage and plan of both the listed Barbican and Golden Lane estates – the way squares are formed and the way that Highwalks – whether high level or ground level - intersect with them. Developments that cut across these original plans will be resisted.

6. Resist loss of Highwalks and Highwalk ramps, and encourage new Highwalks that sensitively integrate with the existing ones and do not damage residential amenity. Encourage the

⁴⁵ As defined in the Barbican & Golden Lane Conservation Area SPD

⁴⁶ [Barbican Estate Listed Building Management Guidelines - City of London](#)

⁴⁷ [Golden Lane Estate Listed Building Management Guidelines - City of London](#)

provision of lift access to the Highwalk from Aldersgate St (w) near Barbican tube through developer contributions or directly.

7. Supporting the relocation of the Museum of London to Smithfield, and encourage meanwhile cultural and community use of the original Museum of London building and Bastion House during the relocation;

8. Protect amenity by requiring developments to restrict access to new office and commercial roof terraces, install automated blinds, increase green infrastructure with emphasis on tree cover to mitigate urban heat island effects and refrain from noisy deconstruction and construction works at weekends and bank holidays. Developments should also demonstrate how they will avoid generating additional light pollution with an emphasis on any residential neighbour impacts and fully reference the City of London's Lighting Supplementary Planning Document;

9. Urban Greening

c) Development must achieve a minimum UGF score of 0.4, and 0.6 for major development in the area

d) Any Biodiversity Net Gain should be required to be delivered within the Barbican & Golden Lane Area so that it benefits the local community and environment.

10. Development adversely affecting health and sport facilities will be resisted.

11. Air Quality

a) Development should not damage the health of the air by increasing emissions of harmful pollutants to it. Such pollutants include: greenhouse gases; those considered by the United Nations to cause adverse impacts to the natural environment; and particles and gases considered by the World Health Organisation (WHO) to be harmful to human health. Barbican & Golden Lane, being predominantly residential, is a sensitive receptor zone and any proposal that results in an increase in air pollution will only be justified in exceptional circumstances.

b) Development should comply at least with all minimum UK environmental requirements in relation to air pollutants whichever is the more stringent.

		<p>c) All development must be at least ‘air quality neutral’ and not cause or contribute to worsening air quality. On major development this should be demonstrated through an Air Quality Impact Assessment which must additionally demonstrate how local air quality can be improved across the proposed development as part of an air quality positive approach.</p> <p>d) Major development must demonstrate that it is designed to ensure that indoor air quality complies with the latest WHO guidelines for short and long term air quality including particulate matter (PM2.5 and PM 10), nitrogen dioxide (NO 2), carbon monoxide (CO), formaldehyde and volatile organic compounds (VOCs). Carbon dioxide (CO 2) concentrations in indoor air should also be considered. Compliance with such standards is also encouraged on medium development and substantial refurbishment schemes.</p> <p>e) Air intake points servicing internal air handling systems (including air filtration systems and heating and cooling systems) should be located away from Beech Street, Aldersgate Street, London Wall, Silk Street and Moor Lane.</p> <p>f) Flues should be directed away from residential dwellings.)</p> <p>12. Encourage the retention of ground floor retail units at Crescent House on Aldersgate Street/Goswell Road (A1), in the Golden Lane Estate, as these provide an important local shopping, food and drink offering for local residents in an area that otherwise lacks nearby retail uses.</p>
S24		<p>Within the Smithfield and Barbican KAOC, “Smithfield” needs to be defined. We propose that Aldersgate Street/Goswell Road (A1) is the obvious boundary dividing the two distinct parts of the KAOC.</p>
S24		<p>S24 (3) add “...whilst protecting residential amenity for existing homes in the KAOC” either;</p>

		<i>S23 (11) applies only to “Long Lane and Carthusian Street” (and delete “Routes between the London Museum and the Barbican”), or Add “food & beverage uses” to the Smithfield policy S24 (8), define the Smithfield area to which it applies and delete S23 (11).</i>
OTHER		
Glossary of the Plan, to include reference to an explanation of; a) Neighbourhood Plan b) BGLNF – Barbican and Golden Lane Neighbourhood Forum		the Barbican & Golden Lane Neighbourhood Forum is the first to be designated in the City and the addition of a Neighbourhood Plan to the existing planning hierarchy is relatively novel to applicants and decision-makers alike here.
POLICIES MAPS		
Figure 1: Key Diagram	Page 14	a) the Barbican & Golden Lane Neighbourhood Area should be mapped.
Figure 12		does not show the buildings of the Barbican – the residential blocks, Arts Centre, and Girls’ School as the grade II listed building that they are. It only shows the grade II* listed landscape.
Figure 17		Should clearly show using distinct colours; private open space, public open space, green space
Figure 18: Green Corridors	page 218)	a new map showing a distinct corridor for biodiversity based on evidence of how target species are likely to get from one puddle of green to another and the priority sites for further greening which would link up such spaces
Figure 31 Smithfield and Barbican existing conditions and Figure 32 Smithfield and Barbican Spatial Priorities	P 278 & P280	a) the KAOC should be co-terminus with the Barbican & Golden Lane Neighbourhood Area at the south-west corner b) the Barbican and Golden Lane Neighbourhood Area boundary should be mapped c) We propose that the boundary between the “Smithfield” area and the “Barbican & Golden Lane” Area should be Aldersgate Street/Goswell Road (A1) d) We propose that the whole of the Barbican & Golden Lane Neighbourhood Area should be defined as a “Residential Area” e) The “Barbican Junction” where Aldersgate Street, Beech Street and Long Lane

meet at Barbican tube station should be a Spatial Priority

f) Locations for improving lifts and accessibility for all should be mapped as a Spatial Priority (such as at Barbican tube)

g) Locations for improving provision of accessible 24/7 public toilets should be mapped as a Spatial Priority (such as by Barbican and Moorgate tube stations)

a) The Neighbourhood Shopping Area in the Colonnade on Aldersgate Steet should be a spatial priority and the routes to it from Smithfield and Barbican tube should be identified to improve footfall and viability.

h) Highwalks should be mapped

i) Private, communal garden and open space on the Golden Lane Estate should not be classed as “Other Public Realm”

j) There is no “Green Space” on Moor Lane within the 21 Moorfields site as shown. A green space on the corner of Moor Lane and Silk Street is not shown, nor is the substantial greening with mature trees on Fore Street (S) – all need to be mapped, enhanced and extended

b) City Point Plaza needs to be clearly identified as key open space to be retained, extended and subject to high quality public realm improvement.

c) The following are key pedestrian routes:

- whole of Moor Lane, from Fore Street to Chiswell Street,
- Moor Lane north of Ropemaker Street (and the adjacent crossing points)
- Chiswell Street also needs improvement, particularly along the stretch from Moor Lane westwards

d) Silk Street, being residential street, is less suitable for heavy pedestrian and traffic use

e) The proposed N-S pedestrian route, joining the KAOC at London Wall’s junction with Wood Street/Fore Street requires lift and elevator improvement. It also needs to continue within the KAOC along Fore Street to join with Moor Lane.

k) public realm improvements along Golden Lane, Aldersgate Street (along its whole length)/Goswell Road (by the shops), Little Britain, Carthusian Street and Fann Street – none of which are mapped

		<p>l) Braidwood Passage from Aldersgate St through to Smithfield is a key walking route through to the GP surgery and Barts Hospital which needs to be mapped and prioritised.</p> <p>m) Strategic Cycleways should be shown</p>
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BGLNF

Supporting Evidence on behalf of
Barbican and Golden Lane Neighbourhood
Forum to the City of London Corporation
Regulation 19 Consultation on the
City Plan 2040

June 2024

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Appendix A:

CITY OF LONDON LOCAL PLAN 2024

REGULATION 19 CONSULTATION

SUBMISSION OF EVIDENCE

BARBICAN GOLDEN LANE NEIGHBOURHOOD FORUM

JUNE 2024

Background

1. The Barbican Golden Lane Neighbourhood Area and Neighbourhood Forum were designated by the City Corporation on 18th July 2023. The BGLNF welcomes the opportunity to comment on the pre-submission Draft of the City of London Local Plan 2024 under the Local Plan Regulation 19 Consultation. The evidence set out below has been commissioned by the BGLNF as part of its submission.

Summary

2. There is evidence 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 BGLNF area including its historic environment and amenities. There is evidence that the apparent overlapping boundaries of two of the proposed Key Areas of Change is confusing and conflicting, and that this matter requires reconsideration.

Heritage Protection

3. The BGLNF area is one of very high heritage significance. Most of the area lies within designated conservation areas, and it contains a large number of statutorily listed buildings together with Registered Parks and Gardens and Scheduled Ancient Monuments.

4. 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 adaptation 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.

5. The BGLNF considers that despite the policies set out in S11 of the Draft Plan for Managing Change to the Historic Environment, the necessary and vital protection of heritage assets will be seriously reduced by the emphasis placed elsewhere in the Plan on achieving a very large increase in new office floorspace and the encouragement of tall buildings. The 'public benefits' that may be perceived from large-scale office development seem likely to be used to justify harm to the historic environment which would normally be considered unacceptable. Such an approach should not be allowed to mitigate against harm to the historic environment.

6. Policy HE1(6) should be strengthened to require that opportunities to enhance conservation areas be positively sought and pursued, not merely 'considered'. As proposed the wording does not comply with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 which stipulates a duty to pay special attention to the desirability or preserving or enhancing the character or appearance of conservation areas, nor is it in accordance with the requirements of Section 16 of the National Planning Policy Framework.

7. The BGLNF notes with concern the proposed reference to the 'immediate setting' of the Bevis Marks Synagogue in policy HE1(8). Such a concept does not comply with national policy: NPPF defines setting as 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve'. NPPF makes no distinction between immediate or wider setting. Were such a distinction to be deemed acceptable within the City Plan the implications for heritage protection in the BGLNF area could be severely damaging.

Tall Buildings

8. The City Planning Officer's report of 20th June 2023 entitled 'City Plan 2024 – Tall Buildings and Heritage' divided the City into nine character areas 'that have characteristics which make them distinct from each other'. One of these is the Barbican and Golden Lane area which included the London Wall West site of Bastion House and the former Museum of London (see Fig.1). Paragraph 19 of the report concluded that seven of the nine areas, including Barbican and Golden Lane, were 'very sensitive' to tall buildings and were 'sieved out' of the exercise of identifying areas within the City where tall buildings might be appropriate. Paragraphs 23 and 24 of the report stated that the updated policy will designate areas within the City where tall building development is considered appropriate. 'Outside the designated areas, policy will be amended to specify that these areas have been identified as being very sensitive to tall buildings and that new tall buildings would be inappropriate in these areas'. In accordance with this, the BGLNF considers that the whole of the Neighbourhood Area, including London Wall West, is inappropriate for new tall buildings.

9. The Barbican and Golden Lane Conservation Area SPD, adopted in February 2022, notes in Section 4 that the immediate setting of the conservation area is low- to mid-rise. The tall buildings that do exist within the conservation area, notably Golden Lane's Great Arthur House and the Barbican towers were all built as part of meticulous post-war masterplan, carefully positioned and proportioned among ranges of lower buildings and extensive public realm. The spaces and distances between the taller elements are essential to their setting as individual heritage assets and are also intrinsic to the character and appearance of the conservation area. New tall buildings would be completely inappropriate for the area, and extremely damaging to its character and appearance. Page 28 of the SPD specifically describes the southernmost end of the estate as the 'foothills' of the Barbican where the scale is lowest and closest to that of more traditional forms of building. The southern part of the BGLNF area which includes Little Britain, the north side of Gresham Street, Ironmongers' Hall and the former site of the Museum of London is conspicuously low scale.

10. The BGLNF strongly objects to the amendment of the wording of Policy S12 to remove the statement in the existing Local Plan that tall buildings are inappropriate in conservation areas. It is considered that this change would radically weaken the level of protection of the historic environment, and fundamentally threaten the character and appearance of the BGLNF area. The wording in the currently adopted local plan (CS14) should therefore be reinstated. It is essential that the existing presumption against tall buildings in conservation areas be retained.

11. Outside the conservation area but within the BGLNF area, Bastion House and the original Museum of London complex are also an important part of the post-war masterplan, complying with the grid layout and integrated into the elevated pedestrian walkway system. Evidence of the significance of the orthogonal layout of Bastion House has been clearly set out by C20 Society and Historic England. These buildings are also critical to the setting of the conservation area and nearby listed buildings. It is considered that these sites are inappropriate for new tall buildings.

12. The definition of ‘tall buildings’ as 75 metres or more creates opportunities for proposals for buildings of less than 75 metres which might nevertheless have an adverse impact in their context, including the BGLNF area. In any event, 75 metres is an arbitrary definition of a ‘tall’ building, not one that is referred to in national or London-wide policy, or neighbouring boroughs. In some boroughs anything over 30 metres high is defined as a tall building. A new building of 74 metres, for example, might comprise 20 commercial storeys or 25 residential storeys, whose scale might be completely inappropriate in its context.

Key Areas of Change

13. The BGLNF considers that there is a lack of clarity and potential confusion in the proposed overlap of Key Areas of Change S23 (Smithfield and Barbican) and S24 (Smithfield). These either need to be divided into separate KAOCs, one for Smithfield and another KAOC for the BGLNF area or be amalgamated into one KAOC for the whole area where the differences in character between different parts of the large area are properly set out and appropriate policies identified.

14. It is evident that the characters of Smithfield and the BGLNF area are radically different. The BGLNF area is predominantly residential in character but with important cultural and educational elements that coexist happily alongside housing owing to the nature of the activities and because of good management practice.

15. By contrast the Smithfield area has historically been, and remains so, predominantly commercial, including a large hospital with a wide catchment area, together with the surviving nighttime meat market and the new site for a much expanded Museum of London. There is a thriving 24/7 economy including night clubs and late licensed premises bordering Islington.

16. The west side of Aldersgate Street from Long Lane to Little Britain presents a 'wall' of office development which effectively separates the Barbican from the southern part of Smithfield. This physical barrier is recognised in the boundaries of the BGLNF area (Fig.2). There is a clear difference in character between the BGLNF area and Smithfield. Policies that promote ambitions for change and cultural enhancement need to be balanced against policies to protect and enhance the amenities of residents and businesses in the BGLNF area whether these are set out in one large KAOC or two separate one. Such policies will need to comply with those set out in the London Plan and NPPF to protect residential amenity.

17. Whilst acknowledging the existing and potential cultural connections between the BGLNF area and Smithfield, there is evidence that these two areas require their own bespoke policies. For the BGLNF these will need to include policies to protect and enhance housing amenities, to guide the renewal of the Barbican Arts Centre, to secure improvements to Beech Street and other areas of public realm, and to control retail and food/drink premises. Such policies will need to dovetail with those in preparation for the BGLNF area.

Reusing existing buildings

18. The BGLNF welcomes policies OF1(1a) and S8(1) & (2) to prioritise the retention and retrofitting of existing buildings, informed by an appraisal of development options. These policies are long overdue and

must be resolutely adhered to, particularly given the spate of recent demolition and redevelopment approvals within the City. It is desirable that new policies prioritising the reuse of existing buildings are compatible and consistent with those being introduced by neighbouring boroughs such as Westminster, Camden, Islington and Tower Hamlets.

June 2024

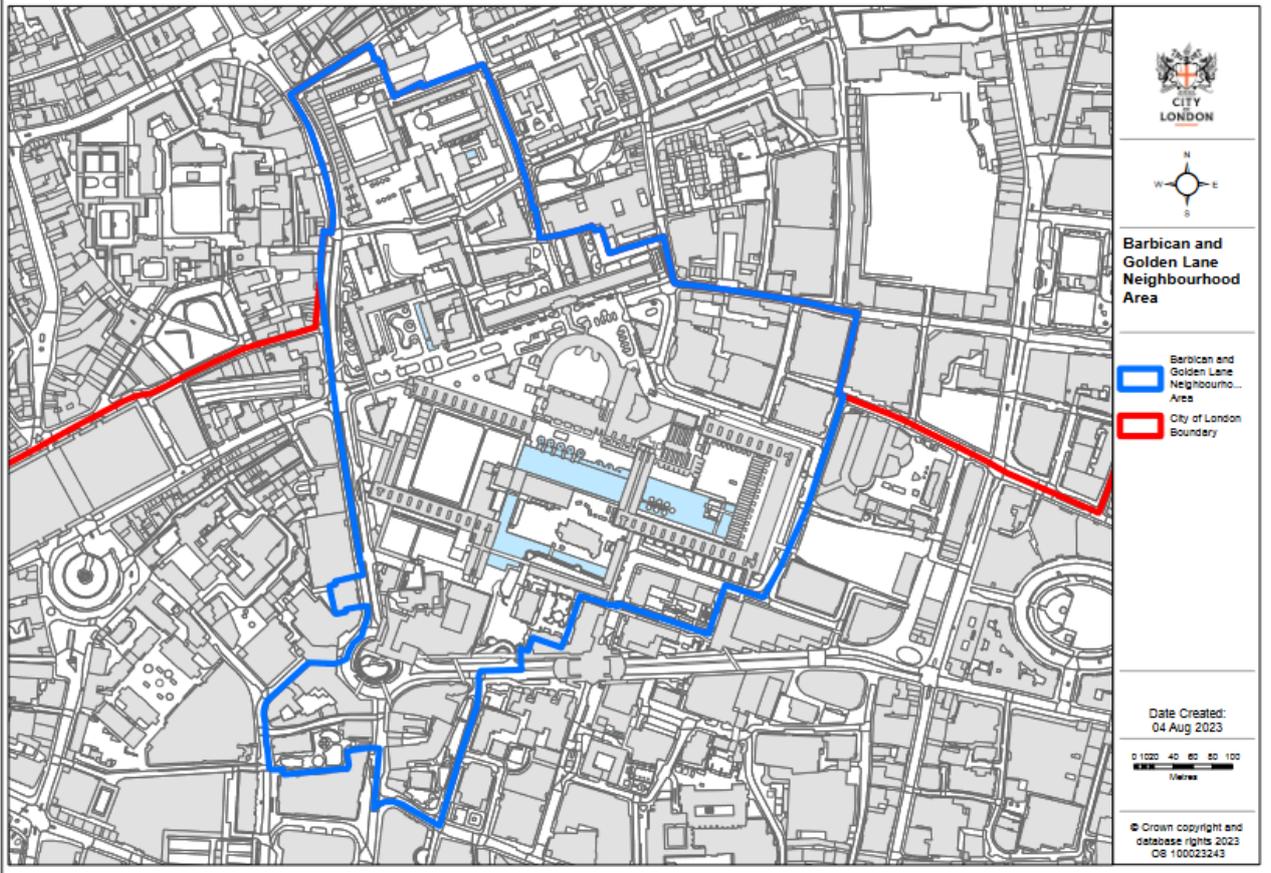
Author of this report

Alec Forshaw worked for 35 years as a conservation and urban design officer in local government. As a specialist heritage and planning consultant he has presented evidence at major Public Inquiries including Smithfield (2014), Liverpool Welsh Streets (2014), New River Head (2017), Norwich Anglia Square (2020), Custom House (2021), and M&S Oxford Street (2022). He contributed to the designation of the Barbican and Golden Lane Conservation Area and has been heavily involved in the very recent designation of the Creechurch/Bevis Marks Conservation Area. He is the co-author of *The Barbican: Architecture and Light* (2015) and *New City: Contemporary Architecture in the City of London* (2013).



FIG 1 CHARACTER AREAS COMMITTEE REP. JUNE 2023

FIG 2 BARBICAN AND GOLDEN LANE NEIGHBOURHOOD AREA



Appendix B: Barbican & Golden Lane Neighbourhood Housing Needs

Analysis (AECOM) – 2024

The full report is available on the Forum's website¹. The Executive Summary is here:

Executive Summary

1. This Executive Summary details the conclusions of each chapter of this Housing Needs Assessment (HNA), addressing each of the themes agreed with the Neighbourhood Forum at the outset of the research.
2. Barbican and Golden Lane is a densely developed urban Neighbourhood Area (NA), located in the City of London. The Barbican and Golden Lane Neighbourhood Forum, designated by the City of London Corporation in 2023, leads the preparation of the Barbican and Golden Lane Neighbourhood Plan, which this Housing Needs Assessment supports as evidence.
3. The 2021 Census recorded 4,470 individuals, 2,678 households, and 3,536 dwellings in the Barbican and Golden Lane NA, indicating an increase of 223 people since the 2011 Census. Note that a degree of caution is advised when interpreting data from the 2021 Census because of its timing during a national COVID-19 lockdown, which is likely to have impacted the location and composition of households at that time, and therefore undercounted the actual current NA population. The movements of local households during this time, and the impact of this on Census statistics, may present an area for further primary research.
4. Most of the City of London's resident population lives in the Barbican and Golden Lane area, at the centre of which are two postwar estates. The NA's residential character stands in stark contrast to the rest of the City, where office uses predominate. There has been significant development in the Barbican and Golden Lane area in recent years, equating to a 23% increase (663 additional dwellings) between 2011 and 2021. During this time, the amount of Affordable Housing in the NA has actually declined by 39 units, most likely due to the continuation of the Right to Buy scheme alongside an absence of additional onsite Affordable Housing in new mainstream development (equivalent financial contributions are instead used to fund provision outside of the City boundary, where land values are lower).

Conclusions- Tenure and Affordability

Current tenure profile

5. In Barbican and Golden Lane, around half of households are homeowners, 38% rent privately and 13% live in social rented accommodation, according to the 2021 Census. This is not dissimilar to the picture across London as a whole but diverges from the rest of the City – where the tenure mix is weighted in favour of renting over ownership. There are also significant

¹ <https://www.bglmf.london/>

differences within the NA, with 86% of the area's social rented housing being concentrated in the Golden Lane estate.

6. Over the past decade, the number of households renting privately in the NA has grown by 56% while all other categories have contracted slightly. This suggests that most of the new housing delivered in recent years is rented rather than owned, and that purchases through the Right to Buy and similar schemes (as well as wholesale redevelopments of key worker housing) are continuing to erode the stock of affordable rented housing. Subsidised housing lost in this way tends not to be replaced within the NA itself. Instead, the Corporation collects financial contributions that it spends on delivery in other boroughs where land values are lower. This increases the amount of Affordable Housing able to meet the City's needs but comes at the cost of relocating the people concerned and potentially leaving a community that is less mixed in terms of incomes, occupations and other characteristics.
7. Another key change that has taken place over the past decade is a substantial increase in the number of dwellings that have no permanent or usual occupant. This includes vacant homes, second homes and short-term rentals such as serviced apartments. The number of such homes (based on the difference between the number of dwellings and households counted in the Census) stood at 858 in 2021, compared to 350 in 2011 – a sharp increase that is likely to have been driven in part by the timing of the 2021 Census during the Covid-19 pandemic. This is again linked to observed trends of largescale but temporary outmigration from large cities during this period.²
8. Local agents note that many homes in the NA serve as pied-à-terre accommodation for City workers and others with their primary residence outside of London. Though hybrid working trends may be expected to reduce demand for such forms of (non-)occupancy, owners are generally understood to lack financial urgency to sell. It may also be the case that the timing of the 2021 Census during Covid-19 restrictions artificially inflated the number of vacant homes as those with multiple properties elected to respond from more spacious non-urban dwellings.

Housing costs

9. Home values in Barbican and Golden Lane have followed an uneven trajectory over the past decade, rising to a peak in 2016 before falling to a low point in 2018/19 and then stabilising again from 2020, though remaining below their level in 2016. In 2023, the median dwelling price stands at £800,000, having experienced 7.4% price growth over the decade. The lower quartile, which is usually a good representation of entry-level housing, stands at £665,000, following growth of 11.9% over the period.
10. These averages are similar or slightly lower than the equivalent measures for the City of London as a whole, but significantly higher than Greater London averages. This indicates that those who struggle to access suitably affordable housing within the NA do have potential options within the wider London market as their needs and financial capacity changes.
11. Trend data for rental prices is less readily available than for purchase prices, but local agents note that rents dropped by around 15-20% during the Covid-19 pandemic, in part because overseas renters represent a large segment of the market and both travel and work patterns

² Rowe, F. et al., Urban Exodus? Understanding Human Mobility in Britain During the COVID-19 Pandemic Using Meta-Facebook Data. *Population, Space and Place*, 2022.

were restricted. Since then, rents are observed to have risen close to their pre-2019 peak, with further anecdotal reports suggesting steeper recent price growth exceeding previous peaks.

Tenure options

12. AECOM has estimated the annual income required to afford various tenures of housing in Barbican and Golden Lane – each of which is explained in detail in Appendix C. These thresholds are compared to incomes to determine which options are the most appropriate for local people going forward.
13. The average household income the City of London was £65,400 in 2020, and lower quartile earnings (per person) for individuals living in Inner London was £23,002 in 2022. The earnings of individuals working in the City of London is significantly higher owing to the high-value employment that predominates in its commercial areas. The earnings levels of key local occupation categories have also been reviewed: the median individual earnings for carers and associated professions in London is £18,549; for cultural workers it is £34,323. Though it is not possible to determine if these figures are reflective of NA-based workers, they give a sense of the scale of the affordability challenge among key occupational groups on whom the cultural identity and ageing population of Barbican and Golden Lane may increasingly depend.
14. The costs of market housing in Barbican and Golden Lane far exceed the purchasing power of local households, at least in terms of the income benchmarks available for analysis. Average earning households are not close to being able to afford even entry-level rented housing, and would need an income three times greater to access a mortgage on the median home for sale locally. The implication here is that it is primarily existing wealth (in the form of savings or existing housing equity) rather than income that determines the ability of many households to access market housing in the NA. Mobility between tenure categories (other than between private renting and ownership) is therefore likely to be limited.
15. In this context, housing products offering a subsidised route to home ownership for those who can afford to rent but not to buy unfortunately appear to offer limited additional value. A key concern is that they primarily serve those on incomes far above the average or with significant savings. More fundamentally, however, First Homes and shared ownership may not be deliverable within the price and income eligibility caps set for London without the potential for adverse consequences on development viability, size or quality. Given such products are supported in the London and City of London Plans and required as a proportion of all Affordable Housing to some extent, the Corporation should be able to advise how to overcome the affordability and eligibility challenges posed.
16. In contrast, affordable rented housing is generally affordable to households with two lower earners depending on their household size. However, households with a single lower earner appear unable to afford any of the tenures considered including the average socially rented unit. Such individuals will, if unable to secure a smaller social rented dwelling (with the attendant risk of affordability-driven overcrowding in the large number of studio units), require additional subsidy through Housing Benefit to access housing. The comparisons discussed here suggest that the affordable rented sector performs a vital function in Barbican and Golden Lane as the only option for a large segment of those in the greatest need.

Quantity of Affordable Housing needed

17. The 2023 City of London SHMA identifies a need for 103 net additional affordable homes each year in the City. On the basis that the share of this need attributable to the NA is in proportion to its share of the City population (54.5%), this suggests that Barbican and Golden Lane will need around 56 affordable homes per year.
18. The HNA includes estimates that are more specific to Barbican and Golden Lane and that consider the need for affordable rented homes and subsidised routes to ownership separately. The results of these calculations are an annual need for 22 affordable rented homes and potential demand for 34 units of affordable home ownership accommodation. Note that the latter are generally adequately housed in rented accommodation and have less severe needs than the former. The HNA estimates happen to precisely match the pro-rated SHMA estimates at a total of 56 units required annually.
19. However, these results require an important caveat. It is not possible to accurately pro-rate City-level needs to the NA because the City waiting list includes needs arising from a large number of households living in estates outside of the Square Mile. As such, using Barbican and Golden Lane's proportion of the current City of London population almost certainly overstates the need. This issue affects the first HNA estimate (for affordable rented housing) as well as the overall estimate derived from the SHMA. The NA's needs are likely to be smaller in practice, and these estimates should be interpreted as the upper bound of a range.
20. Looking at the needs expressed on the City of London waiting list in terms of dwelling size suggests that the available stock is broadly aligned with the distribution of need, with the exception that 1 bedroom homes represent a larger share of supply than need and 4+ bedroom properties represent a larger share of need than supply. Demand and supply in the other categories are generally well-balanced, with more turnover and more need at the lower end of the size spectrum (including studio accommodation). The waiting list figures also demonstrate a significant degree of housing hardship, including a number of homeless and overcrowded households. This appears to justify urgent provision (and protection) of additional Affordable Homes.

Affordable Housing tenure mix

21. Affordable Housing is required to be delivered at set minimum proportion of all housing on mainstream sites above specific size thresholds through policies set at City and London scale. The key benchmark in this case, if the emerging Local Plan proceeds as currently drafted, is a requirement that a minimum of 35% of new homes should be affordable. However, as noted above, the Affordable Housing contribution of new development is most likely to take the form of financial contributions to delivery outside of the City boundary. Leaving aside the relative merits of this approach, this context potentially limits the ability of the Neighbourhood Plan to influence the form that Affordable Housing should take.
22. Nevertheless, it is worth thinking through the available options. Based on AECOM's professional judgement of the factors listed in Appendix D, it is recommended that at least 70% of future Affordable Housing should take the form of affordable rented housing to accommodate the urgent backlog of need on the waiting list, and to ensure that those on lower-than-average incomes have some way of remaining or moving to Barbican and Golden Lane. This group may include paid carers and culture sector workers, who can be seen to represent key strategic segments of the local employment base, as well as unpaid carers and key workers

vital to the functioning of the area (and reflecting the original purpose of the two main estates). Furthermore, our analysis of housing affordability suggests it may be challenging to deliver affordable routes to home ownership, and that they would tend to benefit wealthier households. To ignore this tenure category altogether would risk falling out of conformity with the Local Plan and London Plan, but the focus should be on meeting the more urgent and acute need for affordable rented housing.

23. There is no obligation to follow this recommendation or to depart from the emerging Local Plan default mix if that is more in line with the community's objectives. The City of London Corporation should be able to advise about the options available as well as the implications of issues beyond the scope of this report, such as development viability.

Conclusions- Type and Size

The current housing mix

24. The current dwelling mix in Barbican and Golden Lane is dominated by flats, which make up 98% of all homes, according to the 2021 Census. This mirrors the mix of the wider City (of which the NA represents a significant part – around 55% of households). London as a whole features a more diverse housing mix, although it remains heavily weighted in favour of flats compared to the national average.
25. In terms of dwelling size, a combined 85% of homes in the NA have 2 bedrooms or fewer – a finding that aligns with the dominance of flats discussed above. Although a reasonable share of 3 bedroom homes exists (11%), properties with 4 or more bedrooms are rare (4%). This again echoes the City of London mix and offers less diversity than is available across London as a whole. Recent development has broadly embedded existing patterns, with a focus on smaller homes.
26. The 2011 Census (which, unlike the 2021 release, disaggregates studios and 1 bedroom properties) counts just 49 studios in the NA at that time. Data from the Barbican Living website, supplemented with other sources provided by the Forum indicates there are around 504 studio units in the NA currently, indicating that the Census figure is a significant underestimate.
27. The availability of larger and less dense dwelling options across London as a whole supports a view of the housing market in which households can relocate in and out of the NA as their needs and preferences change. In terms of the functioning of the wider market, Barbican and Golden Lane's seemingly imbalanced dwelling mix in terms of type and size is not necessarily a problem. For individual households, however, this may threaten to disrupt social networks and other links as people with evolving needs (particularly older and less mobile people but also growing families) leave the area due to limitations in the local housing stock.

Demographics

28. The age structure of the population is a key indicator of the future need for housing. Despite relatively small overall population growth since 2011 (amounting to 223 additional people), the NA has seen fairly large proportional changes in certain demographic groups. Most notably, the population aged 65-84 has expanded by 20% and is likely to produce a sharp increase in the 85+ population in future years, which in turn could have significant implications for the evolving

housing (and other) needs of the population. This could necessitate adaptations, home moves, or new caring arrangements if moves out of the NA are to be avoided.

29. Other key demographic changes include a 24% decrease in the number of young children (0-4 years) and a 36% increase in those aged 25-29. This suggests that the NA is seeing higher numbers of young people either delaying the choice to have children, electing not to have them at all, or still living with their own parents. Depending on the balance between these possibilities, recent demographic changes could translate into a near-term baby boom as this group reaches their 30s or a longer-term towards fewer children living in the NA.
30. Barbican and Golden Lane has a generally older population than the wider City and London as a whole. The NA is home to a large working-age population and growing cohort of older residents. Children are few in number compared to the rest of London, which is not surprising given the more urban character of the area. These comparisons, alongside the experience of local estate agents, suggest that the housing options available elsewhere in the City are more attractive to young working professionals, while Barbican and Golden Lane holds greater appeal for later life stages.
31. Applying ONS household projections for City of London to the Barbican and Golden Lane population in 2011 (due to the lack of 2021 Census data on this metric) suggests that population growth can be expected to be driven by the oldest households, with the 65+ age group expanding by 125% to become the largest single group while all other age cohorts grow much more slowly or even decline. Such projections may not reflect the market on the ground, notably the capacity of the housing stock to attract a replacement population of younger people to compensate for the ageing of existing residents, shifts in the availability of employment opportunities, or the impact of future development.

Occupancy patterns

32. Barbican and Golden Lane, like the wider City, has a far higher proportion of single person households (both 51%) than wider London and England (both 30%). This is a function of the high proportion of studios and 1 bedroom dwellings. However, despite their similar dwelling mixes, the NA diverges from the City in its larger share of single person households aged over 66 – a group that has expanded by 242% over the past decade due primarily to natural ageing. The NA also has a distinctly high proportion of couples aged over 66, and younger families without children far outnumber those with children.
33. The 2021 Census suggests that overcrowding is fairly uncommon in the NA, with less than 4% of households having fewer bedrooms than they would be expected to need – though this still suggests at least 100 households (primarily those containing children) are living in overcrowded conditions. This finding is corroborated in City of London Affordable Housing waiting list data. A combined 34% of households have more space than they theoretically need, which is extremely low by national standards. Although housing appears to be occupied fairly efficiently in the NA, this data relates only to dwellings that are usually occupied by a household: there remains a large number of properties that are not occupied on a permanent basis.

The future housing mix

34. It is possible to estimate the size mix for future development that might best accommodate demographic trends and address imbalances in the existing housing stock. The result of this process suggests that the broad goal should be a mix featuring 40% 1 beds, 34% 2 beds, 18% 3

beds and 8% 4 beds. However, when comparing this outcome to the current dwelling size mix, the HNA model suggests that correcting for current imbalances would require a size mix with a much lower focus on 1 beds and greater emphasis on delivering 3-4 bed properties, which are rare at present.

35. Thinking through these results alongside existing evidence at City of London scale, the NA's relationship with the wider London market, local affordability considerations, and the limitations posed by the availability and cost of land in the NA, an adjusted recommendation is proposed as follows: 45% 0-1 beds, 30% 2 beds, 15% 3 beds and 10% 4+ beds.
36. When it comes to devising a policy approach to the mix of housing in the Neighbourhood Plan, it is for the Neighbourhood Forum and wider community to decide on the appropriate balance between meeting specific elements of local need, seeking to diversify the range of choices in the NA, accepting or enhancing the particular role it currently plays in the wider market, and making the most efficient use of land.
37. This recommendation, which is a starting point for further consideration, applies across all tenures. However, to the extent that the mix can be influenced within specific tenure categories and sites at neighbourhood level, Affordable Housing should generally be smaller and market homes larger, with the exception of a small quantity of unmet need for affordable rented housing for larger families. There may also be a potential option for the City of London to expand Affordable Housing provision within the Square Mile through the acquisition of market housing in key size categories if new construction is not considered feasible.
38. Any guidance on the dwelling mix proposed in the Neighbourhood Plan also represents an opportunity to reflect more nuanced understandings of local needs and alternative models of housing delivery. For example, the goals of reducing social isolation and the improving the affordability of renting could be addressed through co-housing or co-living approaches that may not neatly fit the standard dwelling size categories proposed here. The need for certain sub-categories of housing could also be addressed through the acquisition of existing market homes for use as supported specialist housing or Affordable Housing if this avenue is available to the community with support from the City of London. The modelling provided here represents only a starting point for further consideration.

Conclusions- Specialist Housing for Older and Disabled People

Existing supply of specialist housing

39. There is a total of 35 units of specialist accommodation in the NA at present, all in the Tudor Rose Court scheme on Fann Street. This scheme offers sheltered housing without additional onsite care, and both leasehold (open market) and socially rented homes are available. Beyond the confines of the designated NA, there are a further 4 schemes containing 140 units within a roughly 1km radius. The tenure balance of these schemes is strongly in favour of social renting, and the care level favours sheltered housing rather than extra care, though a limited number of other types exist.

Characteristics of the current older population

40. There are currently estimated to be around 395 individuals aged 75 or over in Barbican and Golden Lane, representing 9% of the population. For the City of London as a whole, the population aged 75+ is in the region of 495 people – or 6% of the City total. Therefore around 80% of older people in the Square Mile live in the NA.
41. A slight majority of households aged 55-75 in 2011 (and therefore likely to reach the 75+ bracket by 2040) are renters. Nearly two thirds of this group rent from a private landlord (the reverse of the pattern among renters of other ages in the NA). Unlike homeowners, current renters are more likely to need specialist accommodation because they are unlikely to be able to make adaptations. Note that rates of disability are also higher among social tenants than owner-occupiers.
42. It is assumed that most renters needing specialist accommodation will need to rely on subsidised Affordable Housing, although some of those renting privately at present may not be immediately eligible based on their wealth or income. Current homeowners form a fairly large market for specialist housing for purchase on the open market. However, 'house rich, cash poor' owners, who may be forced to move if unable to afford adaptations or domiciliary care, represent another potentially at-risk group.
43. Rates of disability and mobility limitation are also correlated with tenure, with those in socially rented housing tending to have greater support needs. They are also strongly correlated with age: in the NA 84% of people with a severe disability and 77% with a moderate disability are aged over 50.
44. Barbican and Golden Lane has very similar overall levels of disability to wider averages, but it is apparent that the NA's older population are notably healthier (only 16% have a severe disability) than the London average (26%). It is, however, unclear whether the more able older population of the NA is a consequence of the lack of specialist provision or easily adaptable dwelling types that would allow relatively fewer mobile people to live there, or an effect of other factors (such as leisure and community amenities) that attract active older people to this location.
45. Research at City of London level (conducted by the Corporation in 2019 and Goldsmiths University (date unknown)) has revealed high levels of loneliness and social isolation among older people as well as a number of other at-risk groups within the City of London. This is relevant to housing needs for two reasons: first, housing solutions that allow residents with evolving needs to remain among their existing social networks (i.e. within the NA) could reduce the future potential for such impacts; and second, there may be ways of designing new housing that respond to feedback on this issue by prioritising communal spaces, enabling neighbourly contact or even imagining new housing products that directly facilitate socialisation. A key example of the latter would be a co-housing development for older people, or the incorporation of such groups into mainstream co-housing schemes by offering tenancy arrangements more suitable for long-term occupation, accessible floors, intentional social mixing throughout, or arrangements that allow for the cohabitation of providers and receivers of care.

Projected demographic change and need for specialist housing

46. The 75+ population of the NA is projected to increase by 482 individuals to reach a total of around 877 in 2040. This is a 122% increase and would double the share of the population in this age group. This demographic shift, continuing recent ageing trends discussed in the previous chapter, presents both challenges and opportunities for how the NA's housing stock might respond, as well as how the needs of this specific group might be balanced alongside those of other groups (such as those in need of subsidised Affordable Housing).
47. The growth in the older population, which, rather than the total, is the focus of the estimates of need here, is converted into households because some older people will be cohabiting in old age. The projected household (as opposed to population) growth is 395 households (based on an average household size in this age group of 1.22).
48. The potential need for specialist housing with some form of additional care for older people can be estimated by bringing together data on population projections, rates of disability, and what tenure of housing the current 55-75 cohort occupy in the NA. This can be sense-checked using a toolkit based on national research and assumptions. These two methods of estimating the future need in Barbican and Golden Lane produce a range of 121 to 134 specialist accommodation units that might be required during the Plan period, plus around 31 care home bedspaces. These estimates (based on the growth in the older population) may understate the need due to an assumption that current households are adequately accommodated. The extent to which they are not could be explored through further primary survey or consultation research. This is particularly relevant in Golden Lane, where a disproportionate share of such needs is likely to arise given the population's higher rates of disability.
49. Breaking this overall range down into its component parts, there is slightly higher need for affordable than market specialist housing, and significantly higher need for accommodation with low-level care or adaptations, compared with more intensive extra-care specialist housing (which overlaps to some degree with care home accommodation). However, much of the latter group's need could be met through adaptations, leaving new specialist housing supply to focus on those with more severe needs.

Accessibility and adaptability

50. Given the potential difficulties involved with delivering a large volume of additional specialist housing supply during the Neighbourhood Plan period, another avenue for meeting a share of the need identified here is to promote high standards of accessibility and adaptability in all mainstream residential development. The London Plan already requires all new homes to meet building regulation standards for accessibility and for 10% of new homes to meet standards for wheelchair users. In this context, there may be little more that the Neighbourhood Plan can achieve.
51. However, new development is likely to represent only a small proportion of the NA's housing stock and may not be able to cater to the needs of all those requiring higher levels of accessibility in future years. The Neighbourhood Plan has less control over existing housing, but there may

be scope for non-policy actions to prepare for anticipated demographic shifts. For example, the City of London may be able to consider ways of streamlining or simplifying the planning application process for accessibility adaptations in its Conservation Areas, or to research and propose options for adapting the existing housing stock that falls under its purview as social landlord, acquiring more of it through the purchase of market housing and ongoing management.

52. In terms of the challenge of meeting the need for specialist housing delivery on the scale required, it is worth noting that the residential parts of the NA are encircled by commercial uses and busy traffic intersections that potentially form a barrier for people moving out of the City to meet their housing needs remaining in close contact and physical proximity to their existing social networks – a problem that research into loneliness and social isolation (including within the NA itself) makes clear. This context, combined with clear need for additional specialist accommodation, adds up to a strong case to be made for delivery of solutions within Barbican and Golden Lane where possible. The acquisition of existing market housing to be managed by City of London or relevant partners using specialist housing models could offer a beneficial alternative.
53. Delivery options are beyond the scope of this assessment but taking into account the limitations of land supply and values, more imaginative options such as co-housing and co-living may represent an appealing option for some, while mixed developments with a protected proportion of age-restricted, adaptable or accessible units may be beneficial. Care should be taken to consider the views of the range of groups representing older people and others in formulating housing policy and responding to planning applications.

Conclusions- Other Groups

Self, custom and community led approaches

54. The 2023 City of London SHMA reports 17 individuals on the self-build register as of March 2023. It is not known how many of these households live within the NA (or even within the City of London), but assuming that most live in the City and using population statistics, it can be roughly estimated that around 8 households in the NA have taken active steps to express their demand for this form of housing. It is probable that if a group self-build or community-led scheme meeting a specific sub-set of local people's needs was publicised, higher levels of demand and interest would be noted. These might not be the same individuals currently registering their interest.
55. The 2022 City of London Housing Monitoring Report notes that there are no large areas of unused land that would provide an opportunity to create serviced plots in the City and that the low-density development typical of custom and self-build would conflict with Local Plan policies seeking to maximise housing supply. As such, the Corporation advises that the best prospect for this form of housing delivery would be partnerships with developers of large housing schemes in which a number of units could be built to shell and core, then subsequently fitted out to individual specifications. Community-led approaches that define the goal and form of new development but do not necessarily manage the construction process may be an appealing

alternative but require the exploration of funding options and site availability with the City of London and others.

Student housing

56. The 2017 London SHMA identifies a net need for 3,500 additional purpose-built student accommodation bedspaces per year to 2041. In turn, the London Plan expresses support for the development of such accommodation in well-connected areas where relationships with specific institutions exist. On these criteria, Barbican and Golden Lane would appear to be a theoretically viable location.
57. City of London scale evidence is focused more on the existing supply of student accommodation than levels of need. The 2016 SHMA notes the range of private halls close to but beyond the Square Mile, while the 2022 Housing Monitoring Report counts a total of 797 additional units completed in recent years (including a large scheme at Emperor House delivered in 2021/22). The 2023 SHMA states that there is no justification for specific targets for the City of London but acknowledges a large pipeline of further supply amounting to 1,413 units in total.
58. Although the HNA is also unable to add clarity on the potential need for student accommodation, anecdotal evidence supplied by local agents suggests that (predominantly international) students currently make up a large proportion of demand in the private rented sector in Barbican and Golden Lane. Given the robust levels of demand for rented accommodation also highlighted by local agents, it is reasonable to suppose that the provision of purpose-built student accommodation could both serve student demand directly and potentially relieve competition and price pressure in the wider private rented sector to the benefit of other groups.

Appendix C: Open Space in the Barbican & Golden Lane

Neighbourhood Area

1. Open Space Definition

The City of London Open Space Strategy SPD para 1.9.1 Definition of Open Space., says that *“a consistent definition for the term ‘open space’ has been used since the City of London Open Spaces Audit 2002 defined the term “open space” as: “Land which is not built on and which has some amenity value or potential for amenity value. Amenity value is derived from the visual or other enjoyment which the open space can provide, such as historic and cultural interest and value.”*

This is an inappropriate definition for the collection and analysis of data for a local plan or neighbourhood plan evidence base as it significantly over-estimates the amount of open space and public open space in the City of London.

The more usual definitions used in almost every other local planning authority in the land, including comparable inner London boroughs, distinguish between amenity value from looking at open space, and direct access to open space that has clear public access.

2. Standards

The City of London Open Space strategy SPD sets a standard for open space of 0.06ha per 1,000 weekday, daytime population, without reference to how this was justified by evidence other than it was the level of actual open space provision in the City and the working population when the SPD was adopted in 2015. This is an inappropriate standard to use for a local plan evidence base. It is exactly one-tenth of the Fields in Trust benchmark of 0.6ha per 1,000 for “amenity space”, which itself is only one component of a mix of different types of space that should be measured - totting up, typically, to between 2.75 ha per 1,000 residents to 5.35ha per 1,000, excluding private gardens.

According to the SPD, the City discriminates against residents in employment as they are excluded from the baseline population data estimates used to calculate the overall open space target for the City, and were they to be added to the baseline, it sets a significantly lower level

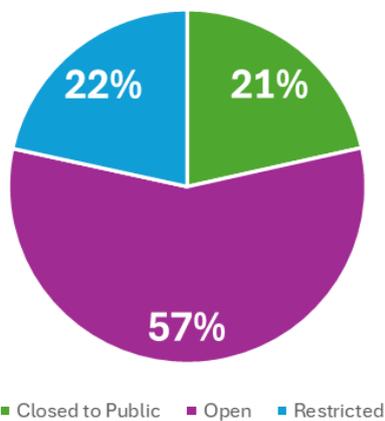
of open space for them (and the non-working residents) than would apply under other widely used reasonable benchmarks.

Part of the City’s rationale for such a low benchmark is that workers who commute in will also have access to open space where they live.

That is not true for the people who live here the whole time. There is no evidence to justify the discrimination between these communities in the City.

3. Barbican & Golden Lane Neighbourhood Area

Public access to open space

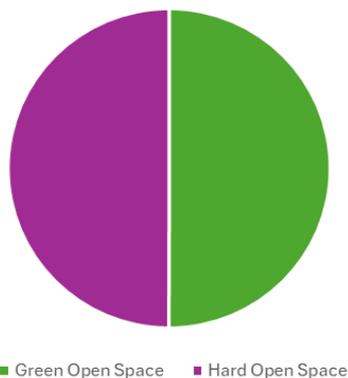


Most of the green space in the Barbican & Golden Lane Neighbourhood is made up of private communal gardens for the residents of Golden Lane and the Barbican estates, or space for the schools and sports centre. Preliminary exploration of the City’s open space audit data for the Barbican & Golden Lane Neighbourhood puts the amount of true open space as 0.62ha (ie excluding private space), for a population of 4,470, or around 0.14ha per 1,000 resident population

alone (ie not counting visitors or workers).

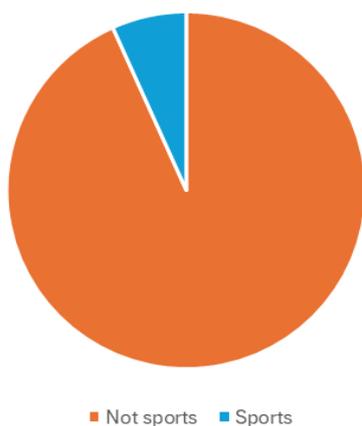
It also shows that if you take the City’s definition of “Land which is not built on and which has some amenity value or potential for amenity value” almost exactly half of it is hard surfaced.

Ratio of hard space to green space



This is not exactly surprising, given the design of the Barbican and Golden Lane Estates, with their Highwalks and urban plazas, all of which contribute to the amenity and character of the place. The elevated space above Beech Street, for example, is a perfect space for children to explore safely and its hard surfaces contribute to that. The lakeside terrace of the Barbican Arts Centre is a civic space as well as a

Sports and recreation sites



cultural one; whether it's a sunny day when it becomes a gathering place or graduation time when gowned students flock for pictures, its hard surface is essential to accommodate high numbers of people successfully. These shared public spaces are incredibly important, but the point is that when looking at the City's evidence on provision (and particularly with UHI and climate change in mind) it would be misleading if the data on "open space"

supporting City Plan 2040 were to be taken as a proxy for "accessible green space".

4. Sports – 0.6ha of outdoor space is set aside for sports in the Barbican & Golden Lane, for a neighbourhood totalling 4,470 (0.14ha per 1,000) compared with a benchmark of 1.6ha per 1,000 residents. The impact on health and wellbeing, together with the effects of such under-provision on children, teenagers and young adults is significant and can only be partially mitigated by indoor sports provision, not least because affordable public-access sports facilities are also in very short supply in the Neighbourhood and in the City more generally.

5. Significant deficiency in Open Space

The deficiency in open space in the City was significant at the time the SPD was produced³, and has worsened leading to increasing levels of overheating and risks to health and wellbeing. The City has robust evidence pointing to this and yet neither their strategic policy (S14) nor the rationale for that policy points to the quantum of that deficit. S14 does not seek to establish a target for new open space provision. In the context of an office growth target that expects to see at least 100,000 additional workers in the City together with a growth in visitor numbers, this represents a failure to plan effectively and to meet predictable levels of future need. This sacrifice of environmental and social objectives for an economic one is the very opposite of the NPPF (and UN) definition of sustainable development "as meeting the needs of the present without compromising the ability of future generations to meet their own needs".

6. Open Space Standards in the City

³ 0.06ha per 1,000 weekday, daytime population (SPD, 2015). This is one-tenth of the Fields in Trust benchmark of 0.6ha per 1,000 for "amenity space", which itself is only one component of standard of 2.75 ha to 5.35ha per 1,000 population, excluding private gardens.

The City says that it is “inappropriate to seek to apply nationally recognised residential standards such as the National Playing Fields Association standard of 1.6 hectares per thousand people in the City context” without providing any evidence for this extraordinary assertion, particularly as applied to the resident population of the City. It does concede “*However, there are benefits in setting an overall standard for public open space in terms of (a) providing a quantitative standard for open space provision for new development, (b) providing a target for overall provision across the City, and (c) monitoring progress in meeting the target.*”

There is nothing in the Plan evidence base to show that it has done any of these things.

We dispute the notion that “the most appropriate standard” is a ratio of public open space per 1,000 workday day-time population at 0.06 hectares⁴, but even this measure applied to a current workday population of 615,000⁵ and the additional workforce of 100,000 anticipated by the City Plan 2040 would require a total public open space of 42.9ha against provision of 34.5ha⁶- a deficit of 8.4ha, which takes no account of the open space lost and due to be lost by redevelopment permissions since 2022 which we know will build on existing open squares and plazas counted as open space in the City’s evidence base, nor does it account for the number and needs of residents.

7. Without a robust assessment of open space needs, and a suitable standard leading to a target for open space provision in the City, almost all the City Plan policies about the quality and amount of open space are ineffective. Open space is being whittled down, development by development, lost in the balance, to the overall detriment both of the environment and the economy. A City that is largely paved over, except for a few high-level terraces for clients and executives, is a City nobody will want to work in or visit.

8. Noise in Open Spaces and other Amenity considerations

The World Health Organisation (WHO) recommends that noise levels in gardens and recreation areas, which would include the City’s open spaces, should be less than 55 dBLAeq (sound level measurement) during daytime. The City’s evidence is out of date (it is from 2009) and we question whether the Barbican falls under this limit anymore (see our Noise evidence in a separate Appendix) and we note that the private communal gardens of the Golden Lane

⁴ City of London, Open Space SPD

⁵ City Statistics Briefing, May 2024

⁶ March 2022. City of London open space audit data

Estate were always noisier than the WHO limit. Air quality in these open spaces is also below acceptable and, in some cases, legal limits (also see separate evidence). The amenity of the Neighbourhood’s open space is compromised on this evidence and cannot therefore be weighed as equivalent to the amenity enjoyed in less polluted places. We see no evidence that this has been taken into account in the City Plan. Achieving good air and proper tranquillity in these gardens is crucial to health, wellbeing and amenity.

9. Fields in Trust guidelines

Fields in Trust’s benchmark standards, or local guidance derived from them, are used by 75% of local authorities as well as other bodies, including Sport England who used to refer to them for benchmarking purposes. In 2015 the guidance was updated – keeping the same headline rates of provision, but drawing out new recommendations for accessibility, the application of standards and the minimum dimensions of formal outdoor space. The standards also no longer differentiate between urban and rural areas. They are not intended to be maximum standards and come with detailed guidance that explains how assessments are to be done, and what quality standards apply. They also explain what is out of scope, for example, like strategic facilities such as swimming pools or golf courses that have broader catchments.

Table 1: Fields in Trust recommended benchmark guidelines – formal outdoor space

Open space typology	QUANTITY GUIDELINE ² (hectares per 1,000 population)	WALKING GUIDELINE (walking distance: metres from dwellings)	QUALITY GUIDELINE
Playing pitches	1.20	1,200m	<ul style="list-style-type: none"> * Quality appropriate to the intended level of performance, designed to appropriate technical standards. * Located where they are of most value to the community to be served. * Sufficiently diverse recreational use for the whole community. * Appropriately landscaped. * Maintained safely and to the highest possible condition with available finance. * Positively managed taking account of the need for repair and replacement over time as necessary. * Provision of appropriate ancillary facilities and equipment. * Provision of footpaths. * Designed so as to be free of the fear of harm or crime. * Local authorities can set their own quality benchmark standards for playing pitches, taking into account the level of play, topography, necessary safety margins and optimal orientation³. * Local authorities can set their own quality benchmark standards for play areas using the Play England Quality Tool.
All outdoor sports ¹	1.60	1,200m	
Equipped/designated play areas	0.25 See table 4 for recommended minimum sizes	LAPs - 100m LEAPs - 400m NEAPs - 1,000m	
Other outdoor provision (MUGAs and skateboard parks)	0.30	700m	

Table 2: Recommended Application of Quantity Benchmark Guidelines – Equipped/Designated Play Space

Scale of Development	Local Area for Play (LAP)	Locally Equipped Area for Play (LEAP)	Neighbourhood Equipped Area for Play (NEAP)	Multi-Use Games Area (MUGA)
5-10 dwellings	✓			
1-200 dwellings	✓	✓		Contribution
201-500 dwellings	✓	✓	Contribution	✓
501+ dwellings	✓	✓	✓	✓

Table 3: Fields in Trust Recommended Benchmark Guidelines – Informal Outdoor Space

Open Space Typology	QUANTITY GUIDELINE ² (hectares per 1,000 population)	WALKING GUIDELINE (walking distance: metres from dwellings)	QUALITY GUIDELINE
Parks and Gardens	0.80	710m	<ul style="list-style-type: none"> * Parks to be of Green Flag status. * Appropriately landscaped. * Positive management. * Provision of footpaths. * Fields in Trust protection * Designed so as to be free of the fear of harm or crime.
Amenity Green Space	0.60	480m	
Natural and Semi-Natural	1.80	720m	

Appendix D – Urban Greening Factor (UGF) Evidence

1. The London Plan says that an Urban Greening Factor is required in Local Plans in order to



assist developers and planners to determine the appropriate level of urban greening required to address particular local issues such as surface water flooding, lack of local green space or biodiversity conservation – at a minimum of 0.3 for non-residential schemes. In the case of the City of London, the deficit of green open

space, UHI and overheating risks and biodiversity all point to a need for a higher level of urban greening than the average, especially given the policy objective of the London Plan to accelerate greening of the built environment – making sure London is greener as it grows.

2. UGF started with Berlin's Biotop Flächenfaktor (BAF) in 1994. This was applied, in combination with Landscape Plans, in several of Berlin's inner-city neighbourhoods where target scores for greening are adjusted according to land use. Minimum scores for sites within neighbourhoods covered by the scheme varied between 0.3 and 0.6.
3. Helsinki trialled something similar, setting minimum scores for residential (0.5), office (0.4), commercial (0.3), and industrial/logistics (0.2), with an expectation that higher targets would be met. Singapore, which has promoted the 'City in a Garden' vision, is looking instead at a Green Plot Ratio (GnPR) to help evaluate green infrastructure on tall buildings.
4. In 2018 the City studied the baseline provision of "greening" in developments without benefit of a specific policy on UGF. This evidence showed that developers of major schemes in the City of London were not including even the minimum levels of greening recognised by the London Plan, (and now proposed in City Plan 2040); this under-provision in existing developments is directly responsible for the City becoming a more grey and less green place. The City's Urban Greening Factor Study⁷ looked at nine large

⁷ <https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-draft-local-plan-evidence-urban-greening-factor-study-2018.pdf>

schemes where UGF was not required when planning consent was granted. Only one development scored over the 0.3 minimum score now anticipated by the Plan, and five scored under 0.1. With remarkable understatement, the study says, “Some of the schemes have very low UGF scores and there is therefore a suggestion that the quantity of GI is inadequate in some of these cases”. The Forum accepts the City’s evidence of need for a policy on UGF, as even minimum acceptable standards of greening were not achieved voluntarily in developments without it. The question is whether policy setting a minimum score of 0.3 will be effective in the City, given such robust evidence of the current deficit of greening and biodiversity overall. We question this as a reasonable conclusion from the combined evidence of the deficit of greening, the relatively low cost of providing it, and the past unwillingness of developers to provide it.

Table 2. Development schemes assessed

Planning Ref. No.	Development Name	Address	Brief description	Commenced (Decision)	Landscape	UGF Score
10/00569/FULMAJ	St Dunstan's Court	133 - 137 Fetter Lane, EC4Y	Refurbishment for residential use. Not listed but in CA	2012	Retained and enhanced gardens	0.31
11/00228/FULL	Carmelite House	50 Victoria Embankment EC4Y	Refurbishment of listed building in CA	2011	3 extensive green roofs	0.27
16/00215/FULMAJ	24-30 West Smithfield	24-30 West Smithfield, EC1	Conversion and part-demolition to create hotel. In CA but not listed	(2016)	Extensive green roofs	0.19
14/00780/FULMAJ	4 Cannon Street	2 - 6 Cannon Street, EC4M	New 7-storey office building not listed and not in CA	(2015)	Extensive green roof, courtyard garden	0.18
11/00049/FULEIA	1 & 2 New Ludgate	30 Old Bailey & 60 Ludgate Hill, EC4	2 new office and retail buildings not in CA	2011	Trees, extensive green roofs intensive green roofs	0.08
11/00317/FULMAJ	Ten Trinity Square	10, Trinity Square, EC3N	Listed building in CA converted to hotel	2013	Ground-level garden extended	0.07
16/00075/FULEIA	1 Undershaft	1 Undershaft, EC3P	73-storey office tower	(2016)	Street level trees and planted beds	0.07
12/00811/FULMAJ	8 Finsbury Circus	7 - 11 Finsbury Circus, EC2M	9-storey office building behind retained facade	2013	2 extensive green roofs	0.04
11/00935/FULEIA	Bloomberg Place	Land Bounded by Cannon St, Queen St, Queen Victoria St, Bucklersbury & Walbrook, EC4	2 new office and retail buildings in CA	2012	3 small extensive green roofs	0.03

5. Elsewhere, such as Malmö's trial of a minimum score of 0.5 in a development in the Western Harbour area, UGF has not necessarily proved effective. The study found that this scheme *"was subsequently revised after the quality of some developments did not match the planning authority's expectations"* with a concern about sealed surfaces, which the study also found was an issue in the City of London. In particular, the evidence supports the study's recommendation that greater weight should be given to tree planting, and particularly to *"trees which are large at maturity and provide more biomass, shade and amenity"* noting that *"the City would like to encourage"* this and showing how large mature trees would help in meeting City objectives. An increase in the minimum UGF score, together with no net loss of UGF, in the City of London is therefore justified and would be a more effective policy.
6. In 2015, for example, Southampton introduced UGF; its City Centre Action Plan (AP 12), *"required all developments (and especially key sites) to assess the potential of the site for appropriate green infrastructure improvements by using the Council's Green Space Factor, and to improve the score for the site."*[our emphasis].
7. London Plan Policy G5 requires all major developments to include urban greening (with a minimum interim *target score of 0.4 for residential, and 0.3 for commercial development*) as a fundamental element of site and building design. However, *"Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments.... based on the factors set out in Table 8.2 but tailored to local circumstances."*
8. There is insufficient evidence that the City has identified *"the appropriate amount of urban greening"* (our emphasis) nor therefore that it has tailored its policy to local circumstances, particularly with regard to deficits in mature tree cover and public open space at ground level; instead the City Plan seeks to require the minimum possible UGF without justification for setting the bar so low and without regard to the past propensity of City developers to under-provide urban greening.
9. Viability cannot be an issue here as the cost of raising the minimum UGF score and introducing a no net loss of greening policy has been shown to be affordable for developers, even at levels higher than 0.3. The City study looked at the costs of increasing greening to various UGF levels. For example, with the consent of a 73-storey tower at 1

Undershaft (16/00075/FULEIA), against a construction cost expected to be significantly more than £435m the costs of adding greening were estimated to be as follows:

- a. UGF Score 0.07 costs £ 29,650
- b. UGF Score of 0.4 costs £ 629,650
- c. UGF Score of 0.6 costs £ 929,650
- d. UGF Score of 1 costs £ 1.75m

10. During policy development it appears that the findings of the City’s evidential study have been reported incorrectly, both by Natural England⁸ and the City of London in its Committee Report;

- a. both reported the study as saying the 0.3 UGF target would be “challenging” – it does not, nor did it feature any evidence to support this;
- b. Natural England reported the study as saying a target of 0.3 would lead to ‘*an increase in improved levels of urban greening*’ – the study did not say this, nor is there any evidence to support this.
- c. At no point does the study find that meeting the GLA UGF target of 0.3/0.4 would be “challenging”, rather it provides evidence that the City of London should be going beyond it (e.g. on trees, and with tall buildings⁹) to meet its objectives, and that doing so would be unlikely to damage scheme viability. The City of London’s Committee Report notes that any increase in greening from a 0.3 target is only “compared with recent developments” (ie higher than the score of 0.1 achieved by 50% of schemes studied) and is silent on whether a target of 0.3 would actually lead to a net increase in greening.

11. The City of London Study did not, in fact, consider the loss of greening on any of the sites studied. A score of 0.3, depending on the site, may well result in a loss of greening as planning applications in the City recently have proved. This is of particular concern in this location. The data and evidence on climate change, air pollution, UHI and other such factors in the City of London clearly show that a net loss of greening will have detrimental environment, societal and economic effects which are highly specific to this place.

12. Loss of much-needed mature tree cover, for example, is not considered in the UGF formula, which also counts small new trees as if they have been in place for years. The way

⁸ Urban Greening Factor for England – Summary Report NERR131, Natural England, 2023

⁹ Using the Plan 2015 definition

UGF is calculated¹⁰ is based on measuring the “current total spread” if existing trees are retained, but the “area of spread of the tree canopy at maturity” for new trees planted in pits large enough to allow them to mature. This theoretical spread is supposed to come from planting trees listed in the Tree Species Selection for Green Infrastructure Guide (TDAG, 2019) or as “published by nursery supplier”. TDAG 2019 does not in fact list the spread of trees, so the calculation of tree spread depends entirely on suppliers’ estimates rather than objective data.

13. There is already evidence that developers in the City are planting trees in such unsuitable locations, such as near to Fenchurch Street (also see other examples in our evidence), that they die almost immediately and so do their replacements. Even before this policy is enacted there is evidence that it would not be effective at actually securing broad tree cover and greening that lasts long enough to meet the City Plan’s goals.
14. Despite existing and proposed tree protection policies¹¹ in City Plans, even Tree Preservation Orders (TPO) have failed to protect mature trees with broad canopies of the type the City is in deficit of, and which are therefore of high amenity value. With Thavies House (21/00885/FULMAJ) the City’s Planning and Transportation Committee issued TPOs for two London plane trees on the site on 22 February 2022 and then voted on 01 July 2022 to destroy them; on the questionable grounds that the TPOs would ensure the destroyed trees got replaced.
15. In such a heavily developed part of London, with such a deficit in greening already, the evidence shows that any net loss of greening will worsen the City’s environment and not improve it. For this reason, the Forum’s proposal is that there should be no net loss of greening and UGF through development on any site, that UGF should be raised to 0.6 minimum on major developments in the City and (in line with the London Plan minimum) at least 0.4 in the predominantly residential areas of the City such as the Barbican & Golden Lane part of the Smithfield and Barbican KAOC. Even at these levels, however, we doubt whether this would be enough.

¹⁰ NERR132 Edition 1 Urban Greening Factor for England - Development and Technical Analysis

¹¹ eg City Plan 2040 Policy OS5: Trees, which says “The City Corporation will seek to increase the number of trees and their overall canopy cover

Appendix E: Overheating and Climate Resilience

1. Climate Resilience and Flood Risk – Strategic Policy S15 (and CR1 Overheating and the urban heat island effect). As the National Centre for Earth Observation¹² says *“In cities, urban heat islands occur where the land surface is densely covered with roads, pavement, buildings, and other surfaces that absorb and retain heat. This effect increases energy costs, air pollution levels, and heat-related illnesses and fatalities.”* It is a significant environmental problem in the City of London.
2. According to the most recent UK Parliament POSTnote¹³ *“Annual maximum temperatures are rising at a faster pace than mean temperatures. Human-induced climate change makes heatwaves more likely and more extreme. For example, in 2022, the Met Office declared three heatwaves in the UK, and temperatures exceeded 40 °C for the first time. While the chance of UK temperatures currently exceeding 40 °C is low, climate predictions indicate such heat extremes would occur every 15 years by 2100 under the current greenhouse gas emissions trajectory. The Intergovernmental Panel on Climate Change projections indicate that heat extremes are very likely to increase in frequency and intensity”*.
3. The City is already in the most severe overheating “High Risk” zone¹⁴ according to the government, in which current residential overheating and/or the risk of residential overheating is the highest in the country. The evidence for this is sufficiently compelling that Building Regulations now must ensure that any new homes built in this zone warrant special measures in their design to improve ventilation and cooling to a higher standard than anywhere else in the country. It stands to reason, therefore, that any existing housing in this zone – especially housing without the same higher standard of ventilation and cooling – is vulnerable to overheating.

¹² <https://www.nceo.ac.uk/article/britain-is-heating-up-how-heat-mapping-can-help-the-uk-adapt-to-climate-change/>

¹³ Public health impacts of heat, UK Parliament POSTnote, 723 - 23 May 2024

¹⁴ <https://www.gov.uk/government/publications/overheating-approved-document-o>

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Table C1 Overheating risk at postcode area level in the high risk part of London

CR4	E17	EC3R	KT6	N22	SE8	SE27	SW11	TW10	W1F	W12
CR7	E18	EC3V	KT7	NW1	SE9	SE28	SW12	TW11	W1G	W13
E1	E20	EC4A	KT8	NW2	SE10	SW1A	SW13	TW12	W1H	W14
E1W	EC1A	EC4M	IG11	NW3	SE11	SW1E	SW14	TW13	W1J	WC1A
E2	EC1M	EC4N	N1	NW5	SE12	SW1H	SW15	TW14	W1K	WC1B
E3	EC1N	EC4R	N1C	NW6	SE13	SW1P	SW16	TW15	W1S	WC1E
E4	EC1R	EC4V	N2	NW8	SE14	SW1V	SW17	TW19	W1T	WC1H
E5	EC1V	EC4Y	N4	NW10	SE15	SW1W	SW18	UB1	W1U	WC1N
E6	EC1Y	HA0	N5	NW11	SE16	SW1X	SW19	UB2	W1W	WC1R
E7	EC2A	HA9	N6	RM8	SE17	SW1Y	SW20	UB3	W2	WC1V
E8	EC2M	IG1	N7	RM9	SE18	SW2	TW1	UB4	W3	WC1X
E9	EC2N	IG2	N8	RM10	SE19	SW3	TW2	UB5	W4	WC2A
E10	EC2P	IG3	N9	SE1	SE20	SW4	TW3	UB6	W5	WC2B
E11	EC2R	IG4	N13	SE2	SE21	SW5	TW4	UB7	W6	WC2E
E12	EC2V	KT1	N15	SE3	SE22	SW6	TW5	UB8	W7	WC2H
E13	EC2Y	KT2	N16	SE4	SE23	SW7	TW6	UB11	W8	WC2N
E14	EC3A	KT3	N17	SE5	SE24	SW8	TW7	W1B	W9	WC2R
E15	EC3M	KT4	N18	SE6	SE25	SW9	TW8	W1C	W10	
E16	EC3N	KT5	N19	SE7	SE26	SW10	TW9	W1D	W11	

4. The problem of residential overheating is compounded if other environmental factors affecting the City of London are also considered. As the GLA’s consultant from Arup, Dimple Rana, says “If you’ve got a flat in a neighbourhood with high noise pollution rates and air pollution rates, people are not going to want to open their windows”.¹⁵ The government recognises this in its requirements for new homes in the High Risk zone. It says “windows are likely to be closed during sleeping hours if noise within bedrooms exceeds the following limits:

- a. 40dB LAeq,T, averaged over 8 hours (between 11pm and 7am)
- b. 55dB LAFmax, more than 10 times a night (between 11pm and 7am)”.

City of London noise levels are routinely higher than this, and the Barbican nighttime average (on the City’s out-of-date 2009 evidence) was only 5dB lower than the “peak” fifteen years ago, and routinely exceeds it now. Please note that this “official” City evidence from 2009 all pre-dates the current demolition and construction activity (see our separate evidence on this) that has significantly elevated noise and noise nuisance in the Barbican & Golden Lane Area.

5. There is substantial evidence that people living in the Barbican & Golden Lane Neighbourhood are already at a high risk of overheating, compounded by high noise and pollution levels which restricts us from opening our windows. Given this context, the City of London’s proposed policy response is ineffective by focussing on the resilience of new,

¹⁵ Properties Vulnerable to Heat Impacts in London: a report by Arup for the GLA, 2024
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largely office, buildings for the workforce inside them and not on reducing UHI for everyone in the City. Not addressing the impact on residents who, unlike office workers, are in the City all the time with little escape from the heat is discriminatory and ineffective.

6. The character of Barbican buildings and the effects of heat – as the Barbican Association points out, Barbican flats are particularly vulnerable to the effects of heat because of their thick concrete construction and large areas of glass.

On the one hand concrete is known to have a high thermal mass, and the structures in the Barbican are particularly thick. So, the concrete retains heat (it's one reason why the underfloor heating system, though designed to provide simply background heating to a level of about 15 degrees centigrade, provides the majority of flats with adequate heating levels throughout the winter). On the other hand, the large windows allow bright sunlight to flood into rooms, heating them quickly when the outside temperatures are high.

This overall problem is exacerbated in flats that are single aspect, particularly those facing east or west. Because the rooms all face the same way, there is no possibility for residents of “retreating to the cooler side” or getting an airflow from one side the flat to another. Many of these single aspect flats are studio flats, with basically one room and a bathroom.

7. The result is that on hot days the temperature inside the flats quickly rises to match the outside temperature and can remain above the outside temperature at night. One Barbican resident told us that, in the summer of 2022 when City of London temperatures reached 40 degrees, she was unable to stay in her flat and had to move to the underground car park. Such days are much more likely to occur in the lifetime of the Plan.
8. Golden Lane - the same applies on the Golden Lane Estate. Although the concrete may be less thick, many of the flats have large, glazed areas, and the flats have been poorly maintained. There is no air conditioning in flats on either estate, and air conditioning units would not be allowed because of the listing of these buildings – and nor would they be energy efficient.
9. Overheating in existing buildings - in an independent assessment, the Climate Change Committee (CCC)¹⁶ criticised the lack of policy commitments on overheating in existing

¹⁶ Progress in adapting to climate change - 2023 Report to Parliament. Climate Change Committee; Environmental Improvement
Supporting Evidence to City Plan 2040 Reg 19 Consultation © Barbican & Golden Lane Neighbourhood Forum Ltd, 2024

buildings, and the House of Commons Environmental Audit Committee has considered the importance of considering overheating risks when retrofitting and accounting for regional weather and climate differences and projected future changes, as well as the importance of evaluating impacts of policy on actually reducing overheating.

10. Heat impacts on health and health services – the City Plan 2040 insufficiently addresses the wider health and healthcare impacts of a warming climate over the lifetime of the Plan. As the UK Parliament POSTnote¹⁷ details;

“Heat impacts the body and can lead to illness and death. The summer 2022 heat periods were associated with 2,985 deaths in England. The number of heat-related deaths is projected to increase with climate change, and as the population grows and ages. The impact of heat on health varies across the population. Vulnerability factors include: advanced age; physical and mental health conditions; pregnancy; environmental factors such as living in urban areas; housing conditions; occupational setting; homelessness; poverty; low educational attainment and being an immigrant”.

11. Extreme heat also impacts healthcare provision, *“due to increased admissions, impact on facilities and equipment, and thermal discomfort.... cancellations of surgeries due to extreme heat.... primarily resulted from staff and bed shortages, and overheating in surgical theatres. Extreme heat in 2022 resulted in the failure of IT systems of London’s largest NHS hospital trust with impacts on healthcare in three hospitals”*¹⁸.

12. City Plan 2040 fails to analyse or prepare for the impact of City UHI concentration and extreme heat events on Barts Hospital nor on other key health providers in the Smithfield and Barbican KAOC

- 13.** Local cooling centres – the City Plan 2040 makes no plans for developing cooling centres, providing shelter, drinking water and medical care. According to the Greater London Authority website mapping (London Cool Spaces Summer 2024) the City of London has no Tier 1 Cool Spaces, and only one Tier 2 Cools Space at Aldgate, outside the Neighbourhood Area. Tier 2 spaces are not targeted at vulnerable populations and do not provide medical support.

Plan 2023. Department for Environment, Food & Rural Affairs; Urban Tree Challenge Fund. Forestry Commission. 2019

¹⁷ Public impacts of heat, ibid

¹⁸ Public impacts of heat, ibid

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Appendix F: Demolition, Deconstruction and Construction Case Study

1. In the Barbican & Golden Lane Neighbourhood Area, the size of developments means that residential exposure to multiple sources of noise and nuisance from demolition and construction is common, and each overlapping project can easily take three or four years or more to complete.
2. In recent years, and since the City's noise monitoring survey of 2009 for their current Strategy, construction projects in and adjacent to the Barbican and Golden Lane Neighbourhood (almost all of which involved demolition) have included;
 - a. Moor Place – c2010 – 2014 – (4 years)
 - b. Moor House – 2000 – 2005 (5 years)
 - c. The Heron – Planning permission early 2008- 2013 (4-5 years)
 - d. London Wall Place – 2013 – 2018 (5 years)
 - e. 21 Moorfields – 2014/15 – 2024 (10 years)
 - f. Denizen – 2017-2020 (4 years)
 - g. 160 Aldersgate Street – 2015 – 2018 (3 years)
 - h. 150 Aldersgate Street – 2020 – ongoing may finish 2024 (4 years)
 - i. 1 Golden Lane – current phase started 2023 (ongoing, 3 years, possibly)
 - j. Tenter House – demolition started 2023 (ongoing, 4 years, possibly)
 - k. At least five more major schemes have been consented, or are at pre-application stage, with approval expected and major demolition in most.
3. Residents in the City expect construction, but the combined and cumulative effects of such big projects, one after another after another, has a significant detrimental impact on residential amenity and the reasonable ability to enjoy living in the City. Residents at the east end of the Barbican estate have been exposed to continuous construction work (Moor Place, The Heron, London Wall Place, 21 Moorfields) for well over 10 years
4. There is no routine noise reporting to any City committee, giving the impression that City leadership has no interest in evidence of the true levels of noise in the area they are responsible for governing.

5. Whilst the City of London Corporation has responsibility for managing construction and prides itself on its “considerate constructors” scheme, the Code for Deconstruction and Construction (the Code) has not been revised despite many calls to do so.
6. The separation of Environmental Health, Transport and Planning functions, a lack of resources and the sheer volume of construction projects in the City had led to gaps in enforcement and compliance leading to a slip in standards on construction sites, as this evidence shows.
7. Planning consents, which always used to include conditions requiring full compliance with the Code, now sometimes do not. Conditions requiring Logistics Plans for construction are discharged without being compliant with policy, such as lorries avoiding schools. Pit lanes are allowed on strategic cycle routes, sometimes for years, and are also allowed to clog up major routes for pedestrians, deliveries and taxis. Even conditions which do require the Code are frequently discharged in full at the first stage of a project, a mistake which weakens compliance on all the later stages. These are a matter of record, and even formal complaints, to the City. An unequivocal policy in the City Plan 2040 requiring full compliance with the Code until completion, on all developments, would make it more effective. Saturday working on construction sites should also be restricted next to residential areas by condition.
8. Saturday working on construction sites causes significant harm to residential amenity (see also our Environmental Noise Case Study). Noise pollution is frequently the same on Saturdays as weekdays, and in some cases even higher than the preceding Friday. It may even be that the scheduling of breaks in construction work on weekdays, but no breaks on Saturdays, incentivises more intensive working at weekends where tasks can be done with a “clear run” even though the finish time is earlier.
9. The City of London Corporation relies on unreasonably extended LAeqT10hour monitoring, which presents noise levels averaged out over 10hours. The most intrusive and disturbing noises - shouts, bangs, bleeps, yelps, crashes, etc - are generally short and sharp. The shortness of their duration (for instance, a gun blast lasts 3-5 milliseconds) means that they have virtually no effect on an average taken over 10 hours¹⁹.

¹⁹ British Standard BS5228-1:2009 Code of Practice for Noise and Vibration Control on Construction and Open Sites - Part 1: Noise recognises (in, for example, 8.2.1 and 6.3f) that many sources of noise annoyance are not detectable on 1hr and 10hr sampling regimes, but that short-duration problems are causes of genuine and justifiable complaint, and suggests best practice ways to resolve such issues. “Environmental Noise and Health in the UK” [Health Protection Agency 2010] 2.14 also outlines this issue)

10. As one resident says *“Extended working hours, and occasional pre-8am deliveries or attempts to start work early have been the main issues with these sites. Bleepers, crane alarms, and (in the case of 2 Aldermanbury) an absence of acoustic shielding have also presented themselves. The noise of construction is extremely wearing, particularly living as I do in a listed building with full-height, full-width single glazing facing onto a building site. Extended hours should not be granted so liberally, and it is time - for the sake of residents’ health and well-being - to stop the practice of Saturday working”*.
11. Saturday working may not be an issue in office-only districts of the City, but in or adjacent to residential areas it creates noise and nuisance for six days out of seven, which damages health and amenity to a significant degree. Other inner London Boroughs, such as Westminster, have banned Saturday construction work with no noticeable adverse impact on cost, viability or even project length.
12. There is strong evidence that City construction projects often stop and start for a wide range of reasons, such as losing funding or not being able to secure a tenant or a buyer for the finished scheme. 21 Moorfields in the Barbican & Golden Lane Area took ten years to construct because it was interrupted so much. The Pinnacle at 22 Bishopsgate is another example; its concrete core reached seven storeys before construction stopped forever. More London, next to the old City Hall south of the Thames, was a great site, but was left as a hole in the ground for years, resulting in a 15-year construction period.
13. The argument that Saturday working is important to shorten project lengths ignores all the evidence that this is insignificant compared to other factors affecting the length of construction timescales in the City. A more restrictive regime has not proved to be a problem in Westminster or Kensington & Chelsea, both of which ban Saturday working on construction sites.
14. Enabling residents to truly have quiet enjoyment of their homes at weekends (and to sit out on balconies or open windows without noise, light or air pollution) is necessary for amenity and health in the City. Background noise and pollution levels are already too high, and a weekend break would enable these to drop to more reasonable levels for everyone.
15. One reason for requiring a weekend break on sites next to people’s homes is that the disturbance can start well before the official hours and continue well beyond them at the end of the day, too.

16. Compliance with the Code, secured by planning conditions, would also do a great deal to ensure better management of construction in the City.
17. Below is first-hand testimony from residents in the Barbican & Golden Lane Neighbourhood who have direct experience of over twenty years of construction in the area:
18. *“The first big construction site that affected me was London Wall Place, constructed by Brookfield Multiplex. Problems with this site occurred daily and it was an exceptionally badly run site (I am involved in construction, so I know what I’m talking about). The main issues were:*
- a) Excessive extended working hours: CofL granted innumerable Site Hours Variation Request Sheets on the grounds of “exceptional circumstances”.*
 - b) Abuse of extended working hours: in one month residents suffered weeks of what were in effect 12 hour days.*
 - c) Bleeping from on-site machinery (cherry pickers, MEWPs, etc) and delivery vehicles: This is an unnecessary disturbance for people who don’t need to hear alarms all day. Contractors even now sometimes try to get away with shrieking beepers on and off-site.*
 - d) Bad on-site discipline - shouting, play-fighting, revving engines for fun:*
 - e) Badly placed concrete pumps with inadequate acoustic shielding (which I later found out was not in accordance with the contractor’s Scheme of Protective Works):*
 - f) Poorly maintained equipment: Cranes which clanked, wheezed, and made gunfire-like pops throughout the day. Sometimes their alarms went off at night.*
 - g) Bad working practices: Dropping, rather than placing, hard and heavy items. Failure to put up adequate or even any shielding around noisy activities such as angle-grinding, hammering, sawing metal.”*

Appendix G – Environmental Noise Evidence – Case Study

1. Excessive environmental and construction noise and nuisance has damaged amenity and health in the Barbican & Golden Lane Neighbourhood for the past 10 years or more. Construction continues for 6 days a week in the City, leaving only Sunday for residents to enjoy their homes in relative tranquillity. The conclusion of our evidence is that;
 - a. Noise in the City needs to be more tightly controlled through policy and secured by conditions; and
 - b. There should be no Saturday working for construction sites in or adjacent to residential areas.
2. Demolition and construction projects in the Neighbourhood are, typically, large schemes taking years to complete.
3. World Health Organization (WHO) recommendations for environmental noise exposure, broadly speaking, are;
 - a. 53 dB Lden*, (24 hour average)
 - b. 45 dB Lnight*, (at night)

*For a more technical explanation please see the footnote to this section.
4. Averages only tell part of the story, though, and the WHO Guidelines for Community Noise are pertinent in that they reflect the point at which the level of steady, continuous noise is acknowledged to affect health:

“In Dwellings. ... To protect the majority of people from being seriously annoyed during the daytime, the outdoor sound level from steady, continuous noise should not exceed 55dB LAeq on balconies, terraces and in outdoor living areas. To protect the majority of people from being moderately annoyed during the daytime, the outdoor sound level should not exceed 50 dB LAeq. Where it is practical and feasible, the lower outdoor sound level should be considered the maximum desirable sound level for new development”²⁰.
4. City of London noise evidence for this Plan does not take account of the wave of construction. It is based on its own Noise Strategy²¹ which was itself based on noise monitoring data collected in 2009 which we consider to be out of date. Even so, it found;

²⁰ WHO Guidelines for Community Noise p xiv: ...

²¹ City of London Noise Strategy 2016 - 2026

“In the 2009 noise monitoring survey, average noise levels in the City during the weekday were found to be between 53dB LAeq,T at the center of Barbican to 74dB LAeq,T at Bank Junction”

5. Because we consider that the City is using out of date evidence, here we present more up to date evidence specifically from the Barbican & Golden Lane Neighbourhood from 2021 up to now.
6. The case study of Willoughby House, below, shows that average daily noise levels including on Saturdays are over 60dBA on most days, and levels up to and over 75dBA are not unknown. For this to continue year after year, as it has done, is a risk to health and amenity that deserves stronger policy in the City Plan.
7. Data from Saturdays shows that this is largely equivalent to weekday noise and in some cases is louder than the preceding Friday.
8. Persistent, high levels of noise have triggered and worsened health and mental health episodes for residents neighbouring construction sites.
9. Willoughby House is a residential block at the eastern end of the Barbican estate. It houses 150 flats, mostly single-glazed. Windows need to be opened in the summer in order to ventilate flats. The block is home to a mixed population of single occupants, couples, families with young children and/or teenagers, older residents and people with health and other specific needs.
10. An unattended noise sensor has been operating on the roof of Willoughby House for many years, and weekly data has been shared between construction contractors, the City of London and residents since the trigger alert for intervention was adjusted to 79dB on 1st April 2019.
11. From the 1st of April 2019 trigger levels for the noise monitors on the roof of Willoughby House were adjusted as follows:
 - a. Hourly LAeq reported based on a 10h day between 08:00 and 18:00. Trigger alert level at 75dBA LAeq, 10hr, at each location.
 - b. Also monitor the 75dBA LAeq trigger level on an additional 1hour LAeq average. If this trigger level is reached three times during a given day, then a review will be made to working practices.

In lay terms this means that the noise threshold applies as follows;

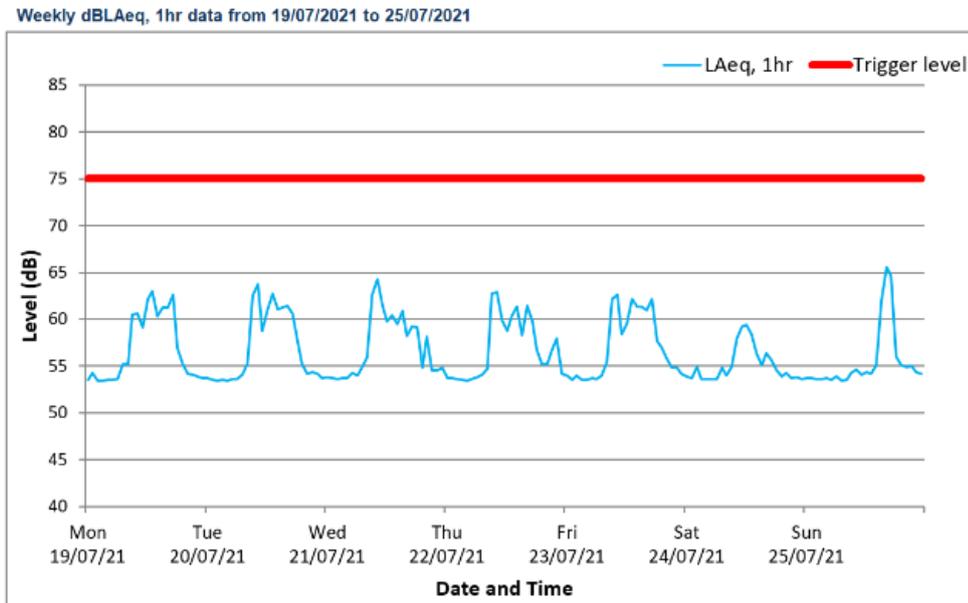
- noise is averaged over 10 hours, daytime (core hours), and
- noise is averaged over an hour

- an alert is triggered if “hourly” noise goes up to or over of 75 dBA three or more times in a day, or if the 10-hour average goes over 75 dBA

Roughly speaking, 75 dBA is about the same as the level of a TV, music or radio inside a living room, and a little bit louder than a vacuum cleaner; but of course environmental noise has peaks and troughs and what is reported is the average over a period (in this case of 10 hours, and 1 hour).

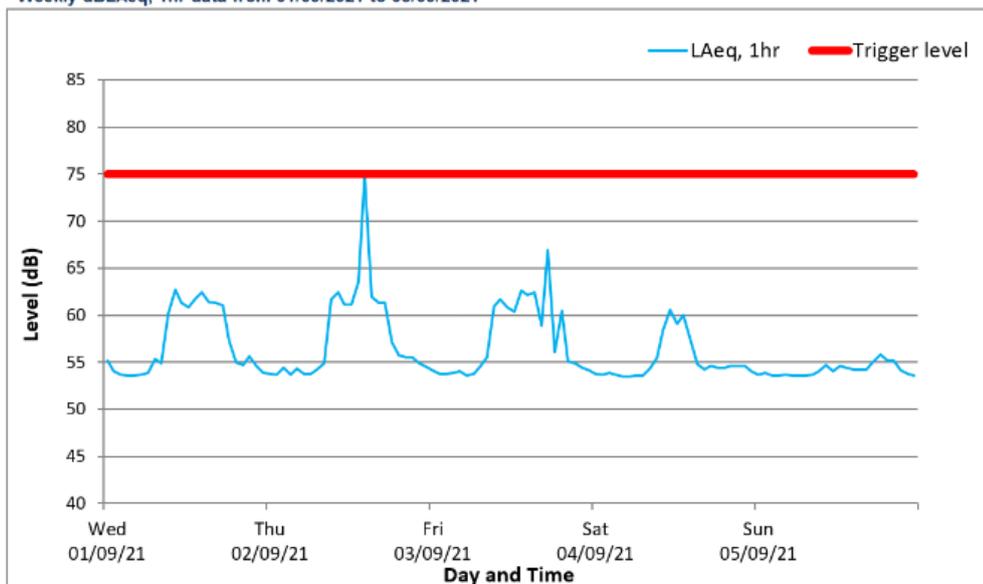
12. All of the above (and the data below) we take as evidence that demolition, deconstruction and construction should be limited to Monday – Friday within the Barbican & Golden Lane Neighbourhood Forum Area and the Barbican & Smithfield KAOC in City Plan 2040.

Data sample examples, taken at random from the full evidence base for Willoughby House:



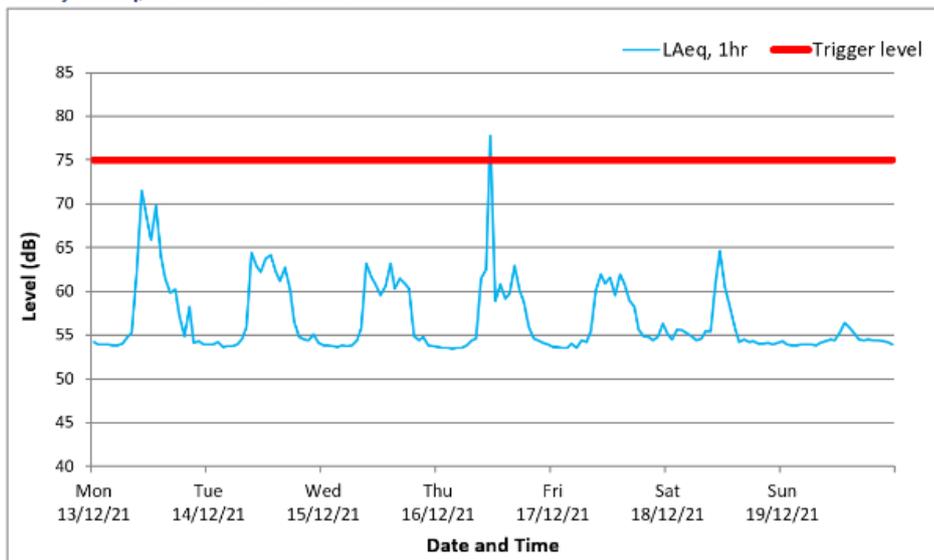
Date of Measurement		dB $L_{Aeq, T}$ Over Core Hours
Thursday	01/07/2021	61.9
Friday	02/07/2021	60.1
Saturday	03/07/2021	59.0
Sunday	04/07/2021	#N/A
Monday	05/07/2021	60.7
Tuesday	06/07/2021	60.2
Wednesday	07/07/2021	60.5
Thursday	08/07/2021	60.2
Friday	09/07/2021	59.9
Saturday	10/07/2021	57.8
Sunday	11/07/2021	#N/A
Monday	12/07/2021	59.6
Tuesday	13/07/2021	61.7
Wednesday	14/07/2021	62.1
Thursday	15/07/2021	61.5
Friday	16/07/2021	61.5
Saturday	17/07/2021	63.1
Sunday	18/07/2021	#N/A
Monday	19/07/2021	61.1
Tuesday	20/07/2021	61.4
Wednesday	21/07/2021	60.9
Thursday	22/07/2021	60.6
Friday	23/07/2021	61.1
Saturday	24/07/2021	58.2
Sunday	25/07/2021	#N/A
Monday	26/07/2021	59.7
Tuesday	27/07/2021	60.5
Wednesday	28/07/2021	61.0
Thursday	29/07/2021	60.7
Friday	30/07/2021	60.2
Saturday	31/07/2021	59.5

Weekly dBLAeq, 1hr data from 01/09/2021 to 05/09/2021



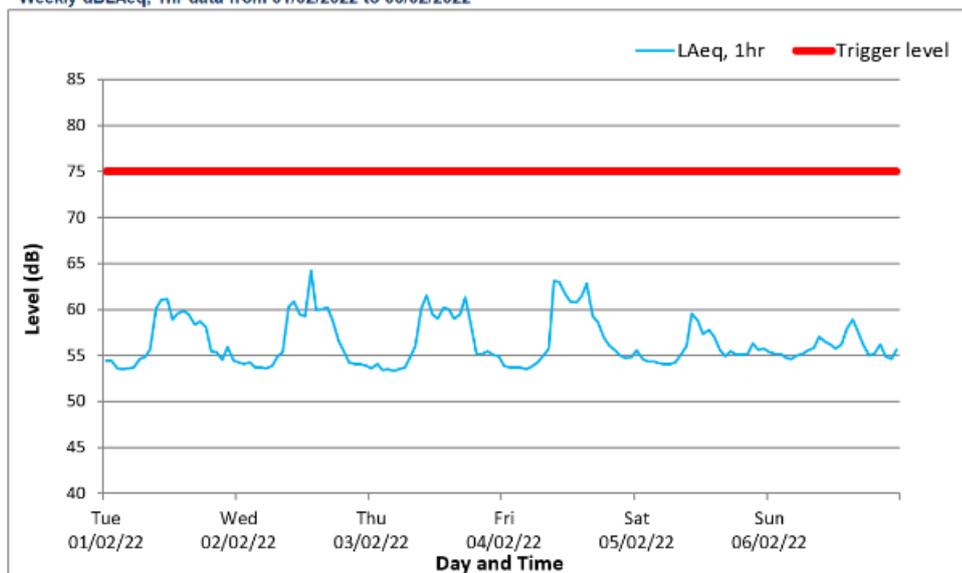
Date of Measurement	dB $L_{Aeq, T}$ Over Core Hours
Wednesday 01/09/2021	61.2
Thursday 02/09/2021	66.4
Friday 03/09/2021	62.1
Saturday 04/09/2021	59.0
Sunday 05/09/2021	#N/A
Monday 06/09/2021	59.9
Tuesday 07/09/2021	59.4
Wednesday 08/09/2021	61.1
Thursday 09/09/2021	59.9
Friday 10/09/2021	60.3
Saturday 11/09/2021	58.8
Sunday 12/09/2021	#N/A
Monday 13/09/2021	60.9
Tuesday 14/09/2021	62.0
Wednesday 15/09/2021	61.8
Thursday 16/09/2021	62.2
Friday 17/09/2021	62.2
Saturday 18/09/2021	62.2
Sunday 19/09/2021	#N/A
Monday 20/09/2021	62.5
Tuesday 21/09/2021	61.9
Wednesday 22/09/2021	62.8
Thursday 23/09/2021	62.4
Friday 24/09/2021	63.3
Saturday 25/09/2021	63.1
Sunday 26/09/2021	#N/A
Monday 27/09/2021	65.8
Tuesday 28/09/2021	61.9
Wednesday 29/09/2021	63.5
Thursday 30/09/2021	62.9

Weekly dBLAeq, 1hr data from 13/12/2021 to 19/12/2021



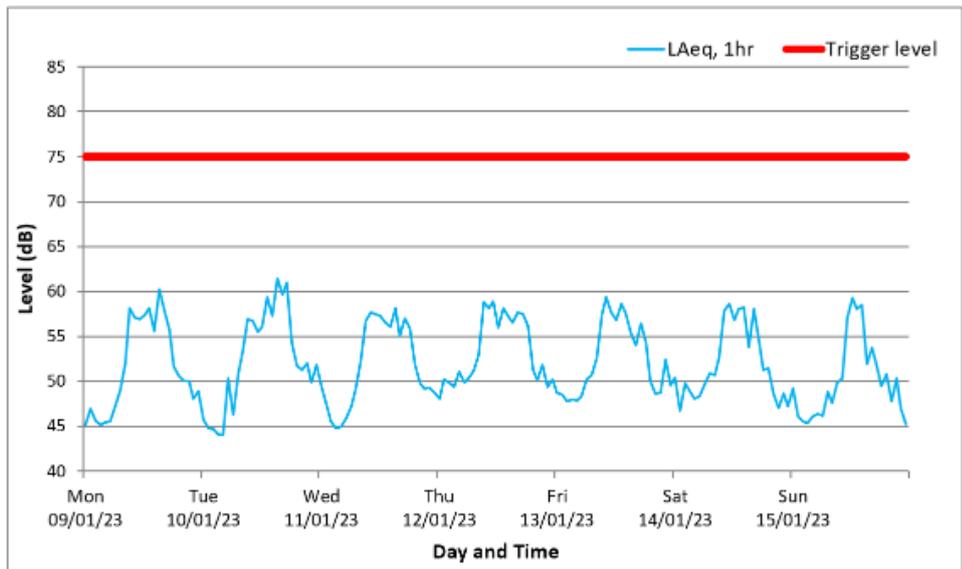
Date of Measurement	dB $L_{Aeq, T}$ Over Core Hours
Wednesday 01/12/2021	62.1
Thursday 02/12/2021	60.3
Friday 03/12/2021	60.8
Saturday 04/12/2021	58.7
Sunday 05/12/2021	#N/A
Monday 06/12/2021	60.0
Tuesday 07/12/2021	60.2
Wednesday 08/12/2021	62.4
Thursday 09/12/2021	66.3
Friday 10/12/2021	65.7
Saturday 11/12/2021	58.8
Sunday 12/12/2021	#N/A
Monday 13/12/2021	66.3
Tuesday 14/12/2021	62.5
Wednesday 15/12/2021	61.3
Thursday 16/12/2021	68.5
Friday 17/12/2021	60.3
Saturday 18/12/2021	61.0
Sunday 19/12/2021	#N/A
Monday 20/12/2021	59.7
Tuesday 21/12/2021	62.7
Wednesday 22/12/2021	63.4
Thursday 23/12/2021	57.1
Friday 24/12/2021	54.8
Saturday 25/12/2021	56.7
Sunday 26/12/2021	#N/A
Monday 27/12/2021	55.0
Tuesday 28/12/2021	55.7
Wednesday 29/12/2021	55.6
Thursday 30/12/2021	55.0
Friday 31/12/2021	54.9

Weekly dBLAeq, 1hr data from 01/02/2022 to 06/02/2022



Date of Measurement	dB $L_{Aeq, T}$ Over Core Hours
Tuesday 01/02/2022	59.6
Wednesday 02/02/2022	60.4
Thursday 03/02/2022	59.9
Friday 04/02/2022	61.2
Saturday 05/02/2022	58.0
Sunday 06/02/2022	#N/A
Monday 07/02/2022	59.6
Tuesday 08/02/2022	59.6
Wednesday 09/02/2022	60.8
Thursday 10/02/2022	60.0
Friday 11/02/2022	60.0
Saturday 12/02/2022	57.8
Sunday 13/02/2022	#N/A
Monday 14/02/2022	59.7
Tuesday 15/02/2022	59.9
Wednesday 16/02/2022	60.2
Thursday 17/02/2022	60.5
Friday 18/02/2022	64.2
Saturday 19/02/2022	57.5
Sunday 20/02/2022	#N/A
Monday 21/02/2022	60.8
Tuesday 22/02/2022	60.1
Wednesday 23/02/2022	61.5
Thursday 24/02/2022	59.8
Friday 25/02/2022	60.0
Saturday 26/02/2022	59.1
Sunday 27/02/2022	#N/A
Monday 28/02/2022	59.9

Weekly dBLAeq, 1hr data from 09/01/2023 to 15/01/2023



Date of Measurement	dB $L_{Aeq, T}$ Over Core Hours
Sunday 01/01/2023	#N/A
Monday 02/01/2023	54.8
Tuesday 03/01/2023	55.9
Wednesday 04/01/2023	57.4
Thursday 05/01/2023	65.7
Friday 06/01/2023	57.2
Saturday 07/01/2023	56.9
Sunday 08/01/2023	#N/A
Monday 09/01/2023	57.3
Tuesday 10/01/2023	58.0
Wednesday 11/01/2023	57.4
Thursday 12/01/2023	57.7
Friday 13/01/2023	57.7
Saturday 14/01/2023	57.6
Sunday 15/01/2023	#N/A
Monday 16/01/2023	58.0
Tuesday 17/01/2023	57.5
Wednesday 18/01/2023	57.4
Thursday 19/01/2023	57.3
Friday 20/01/2023	58.3
Saturday 21/01/2023	57.8
Sunday 22/01/2023	#N/A
Monday 23/01/2023	57.9
Tuesday 24/01/2023	58.6
Wednesday 25/01/2023	57.6
Thursday 26/01/2023	58.5
Friday 27/01/2023	58.4
Saturday 28/01/2023	58.3
Sunday 29/01/2023	#N/A
Monday 30/01/2023	60.2
Tuesday 31/01/2023	57.4

Definitions and concepts:

Decibel (dB) Measures sound pressure level. It is the logarithmic ratio of the noise being assessed to a standard reference level.

dB(A) A weighted scale to reflect the susceptibility of the human ear to mid-frequency noise than the high and low frequencies, and to correspond roughly to the overall level of noise heard by the average human.

Noise levels in dB(A) are on a logarithmic scale; an increase in noise level of 10dB(A) represents a doubling of subjective loudness. A change of 3dB(A) is just perceptible.

Leq stands for equivalent continuous sound level. This is as a notional steady sound level which contains the same amount of acoustical energy as the actual, fluctuating sound measured over a period (e.g. 1 hour). Digital technology in sound level meters is used to calculate Leq.

Lmax is the maximum sound pressure level recorded over a period. Sometimes used to assess occasional loud noises, which may have little effect.

Appendix H; Environmental Noise and Health – WHO and UKHSA evidence

1. Environmental Noise and its effect on health

Data and analysis from WHO Europe Region and UK Health Security Agency

Two reports more recent than the City's noise strategy split noise into types in order to make findings about the effect of noise on health and recommendations on noise levels that would avoid the adverse health effects. Both the WHO Recommendations for the Europe Region 2018 and a systematic review sponsored by the UK Health Security Agency in 2023 assess the effects of road traffic noise, railway noise, and aircraft noise.

2. WHO report

The WHO *Environmental Noise Guidelines for the Europe Region* state:

- a) *“Exposure to noise can lead to auditory and nonauditory effects on health. Through direct injury to the auditory system, noise leads to auditory effects such as hearing loss and tinnitus. Noise is also a nonspecific stressor that has been shown to have an adverse effect on human health, especially following long-term exposure. These effects are the result of psychological and physiological distress, as well as a disturbance of the organism’s homeostasis and increasing allostatic load (Basner et al., 2014).”*
- b) *“Available assessments place the burden of disease from environmental noise as the second highest after air pollution (WHO Regional Office for Europe & JRC, 2011; Hänninen et al., 2014; WHO 2014b)*
- c) *“Critical health outcomes affected by noise are: Cardiovascular disease, Effects on sleep, Annoyance; Metabolic outcomes, Cognitive impairment, Hearing impairment and tinnitus*
- d) *“Important health outcomes are: Adverse birth outcomes; Quality of life, well-being and mental health;*
- e) *“The importance of considering both annoyance and self-reported sleep disturbance as health outcomes is further supported by evidence indicating that they may be part of the causal pathway of noise-induced cardiovascular and metabolic diseases.*

3. The Guideline Development Group (GDG) agreed to set guideline exposure levels based on the definition: *“noise exposure levels above which the GDG is confident that there is an increased risk of adverse health effects”*. Both the WHO and the UKHSA report look at road, rail, and

aircraft noise. Taking the data for road traffic noise as being the closest to the experience of City residents, we quote here the WHO recommendations on road traffic noise.

4. WHO Recommendations²²

For average noise exposure, the GDG strongly recommends reducing noise levels produced by road traffic below 53 dB Lden*, as road traffic noise above this level is associated with adverse health effects. For night noise exposure, the GDG strongly recommends reducing noise levels produced by road traffic during nighttime below 45 dB Lnight*, as road traffic noise above this level is associated with adverse effects on sleep.

NB:

The WHO distinguishes daytime noise from both evening and nighttime noise, considering the extra sensitivity to noise of both evenings and night times.

**The Lden (also referred to as “DENL”) indicator can be calculated as the A-weighted average sound pressure level, measured over a 24-hour period, with a 10 dB penalty added to the average level in the night (23:00–07:00 or 22:00–06:00), a 5 dB penalty added to the evening (19:00–23:00 or 18:00–22:00) and no penalty added to the daytime period (07:00–19:00 or 06:00–18:00). The penalties are introduced to indicate people’s extra sensitivity to noise during the evening and night.*

**The Lnight indicator is the A-weighted average sound pressure level, measured over an eight-hour period during nighttime, usually between 23:00 and 07:00 (EC, 2002a).”*

This guideline was incorporated into a 2022 Update to Chapter 11 (Environmental Noise) of the *Compendium of WHO and Other UN guidance on Health and Environment*. It summarises the overall findings and recommendations of the WHO European Region report as follows:

“In 2011, an estimated one million healthy life years were lost from traffic-related noise in the western part of Europe only (1). Important sources for environmental noise exposure are road, railway and air traffic, or building sites.... Excessive noise can cause annoyance; in addition, research shows it increases the risk for ischaemic heart disease and hypertension, sleep disturbance, hearing impairment, tinnitus and cognitive impairment, with increasing evidence for other health impacts such as adverse birth outcomes and mental health problems (2).

²² Environmental Noise Guidelines for the European Region 2018.

1. Burden of disease from environmental noise: Quantification of healthy life years lost in Europe. Copenhagen: WHO Regional Office for Europe; 2011 (<https://apps.who.int/iris/handle/10665/326424>).

2. Environmental noise guidelines for the European Region. Copenhagen: WHO Regional Office for Europe; 2018

5. UKHSA systematic review²³

The UKHSA study estimated the burden of annoyance (highly annoyed), sleep disturbance (highly sleep disturbed), ischemic heart disease (IHD), stroke, and diabetes attributable to long-term transportation noise exposures in England for the adult population in 2018 down to local authority level.

Road traffic noise (Lden) (% of the population exposed above 50 dB)

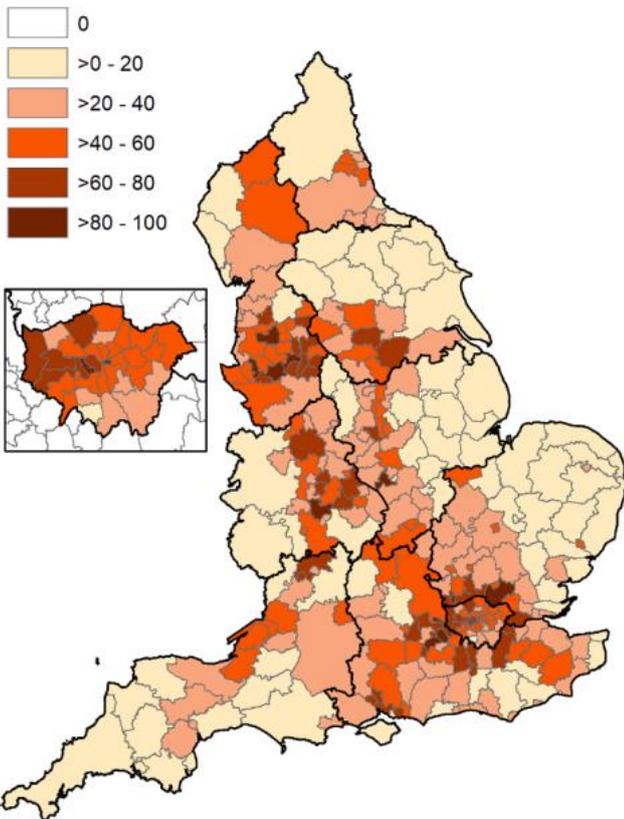
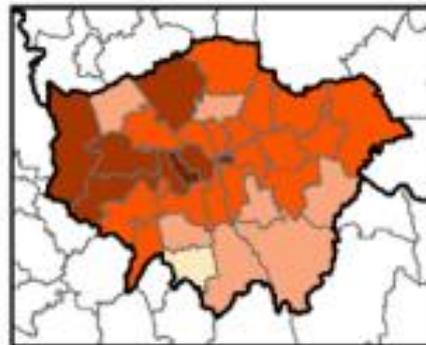


Fig. 2. Spatial variation in the percentage (%) of the population exposed to road-traffic, railway, and aircraft noise from major sources above 50 dB (Lden) across local Authority Districts (LADs) in England, based on strategic noise mapping carried out in 2012.



London enlarged

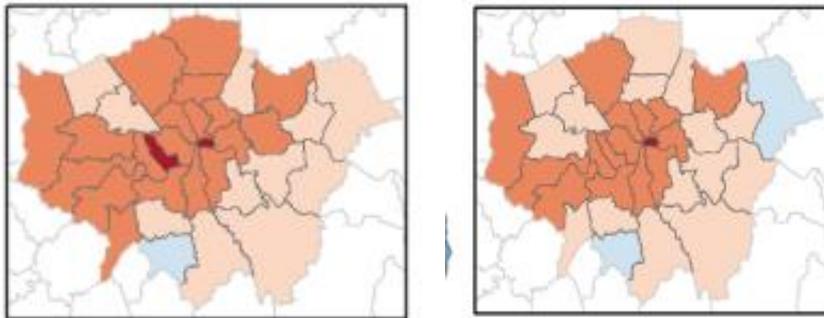
Note that the City of London has over 80% of the population exposed to >50dB Lden

²³<https://www.sciencedirect.com/science/article/pii/S0160412023002398#:~:text=Results,%E2%88%BC17%2C000%20from%20aircraft%20noise.>

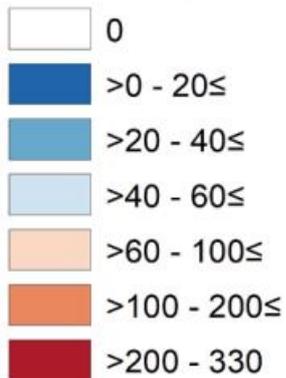
Fig. 4. Attributable Disability Adjusted Life Years (DALY) lost per 100,000 people/yr due to road-traffic noise exposures above 50 dB within Local Authority Districts (LAD) in England. Estimates are for the adult population (20 +) in 2018. Inset map is Greater London. [Only London shown]

Effect: Highly annoyed.

Highly sleep disturbed



DALY rate per 100,000 people



The City of London is in the highest category of DALY rate per 100,000 people

Appendix I: Lighting Impact Analysis and Case Studies

1. Background and impact

Light pollution from new developments facing residential areas in the Barbican & Golden Lane Neighbourhood has a detrimental impact on children and vulnerable adults.

2. Impact on Residential Amenity

Recently approved large office developments, immediately facing residential blocks, have internal lighting so bright that it is possible to read a book on a neighbouring balcony after midnight. Our analysis, below, is based on over ten years' experience of negotiating with developers, constructors and occupiers of new buildings in the Barbican & Golden Lane Neighbourhood.

i) Curfews are seldom effective in the City – in-built automated blinds are crucial

New City of London offices tend to be large footplate blocks with floor-to-ceiling windows. All are fitted with PIR systems designed to turn lights off and on when movement is detected. Many City firms work on global projects outside normal office hours, and cleaning and maintenance is usually at night. A lighting curfew has very little effect when even one worker can trigger the lights to come on. Due to big floorplates and large windows this lights up a large area, which is very intrusive to neighbours.

The only solution for developments directly facing people's homes is for automated window blinds – allowing office users to carry on inside without intruding on neighbours directly outside.

There is direct evidence within the Neighbourhood Forum Area that developers are, as yet, not seeking to install automated blinds as standard, even though this would also have significant benefits for the firms inside in controlling the working climate for their staff. In some cases, this has left City firms to fund the retrofitting of blinds, at a much higher cost and in a less effective manner than designing them in from the start and installing them during the build. The following cases illustrate the point;

- **London Wall Place** – Brookfield development. This high quality headquarters building, now occupied by Schrodgers, was originally designed by MAKE to include blinds for the floor-to-ceiling windows. The north-facing elevation is directly opposite residential bedrooms, and the office block is several storeys taller than the housing, so the impact of light at night is significant. Blinds were taken out of the spec, presumably to save costs, leaving the occupier to pick up the cost of retrofitting at a later date.

- **Golden Lane Community Centre** – City of London. In the middle of a residential estate and surrounded closely by people’s homes. It has very bright ceiling lights, not capable of being dimmed, which come on automatically for cleaners etc and no blinds to protect residential amenity.
- **Moorfield** – Land Securities development. This new scheme is currently being fitted out for Deutsche Bank. Its western elevation is directly opposite residential bedrooms, and the office block is several storeys taller than the housing, so the impact of light at night is significant and detrimental to health. It was designed and approved by the City’s Planning Committee in full knowledge of that impact, and numerous requests of the developer to fit blinds were all refused. Deutsche Bank, at its own expense, is now fitting blinds that drop automatically at night.
- The **Bloomberg HQ** (on Queen Victoria Street), famously, is owned by Bloomberg and was built to their specification rather than being developer-led and let later. This includes automated blinds that drop early in the evening, even though it is not directly facing any residential properties.

Occupiers in the City see the point of automated blinds – either for their own comfort, and/or (as is the case with Schroders and Deutsche Bank) from a wish to be a good neighbour, particularly next to people’s homes. It is developers that do not, and yet the cost for building blinds in is so tiny; it cannot possibly affect development viability. There is no excuse to do otherwise.



Bloomberg's HQ at 6.30pm on 8th February 2023, with some blinds dropped. It shows the difference that blinds make (even to a building with a sensitive lighting design). It proves that City firms, even running global 24/7 operations, can operate perfectly well with blinds dropped automatically at 7pm – and may prefer to do so.

ii) Computer-controlled lighting systems are not failsafe – automated blinds are a necessary back-up – and a more robust approach to compliance is needed

Another problem is that computer-controlled lighting systems within new City office blocks are extremely complicated. The specialists who program them are expensive contractors in short supply. If automated controls don't work as they should on building completion, our experience is that they seldom get changed afterwards.

Since lighting systems are commissioned and programmed late in the project, the City finds it difficult to enforce curfew or lighting controls, that are required by planning conditions. This has already happened on developments such as London Wall Place which still, many years after completion, does not have automated lighting systems operating as envisaged and promised.

This practical problem strengthens the argument for automated window blinds, which also provide a back-up should automated lighting systems fail. It also raises the issue of compliance. We note that Westminster has a much more robust approach in which the lighting strategy and design must be done by a suitably qualified (to ILP or similar) lighting expert and that lighting conditions are not discharged until a suitably qualified lighting expert has confirmed that everything has been installed and commissioned *as specified*. We propose that the City adopts a similarly robust approach.

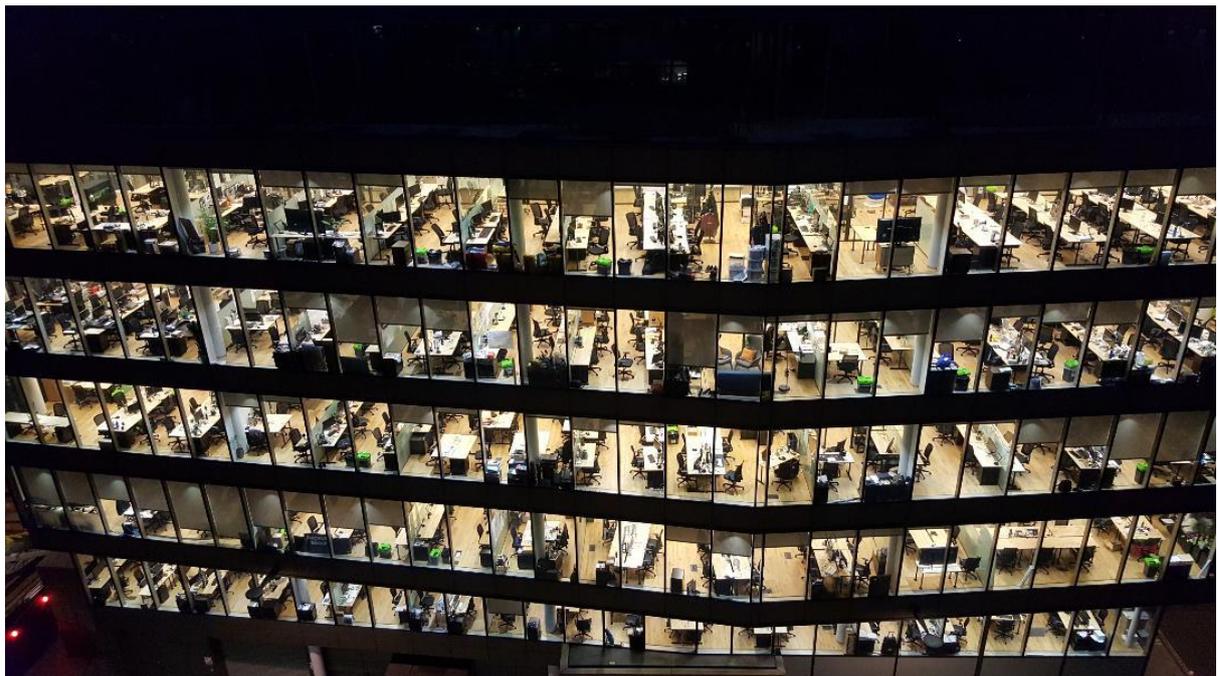
ii) Refurbishments and refits next to people's homes can be just as intrusive as new build

Lighting design and overspill from refurbishments and refits can be every bit as problematic when they are next to people's homes. Even small projects facing bedrooms, for example, can have a significant detrimental impact. An improvement would be for lighting proposals to be built in at the start for any development facing people's homes. Curfews and automated blinds should apply to all such projects, not just "major developments".

iii) A curfew of 22.00 to sunrise is too late to prevent nuisance to children's bedrooms.

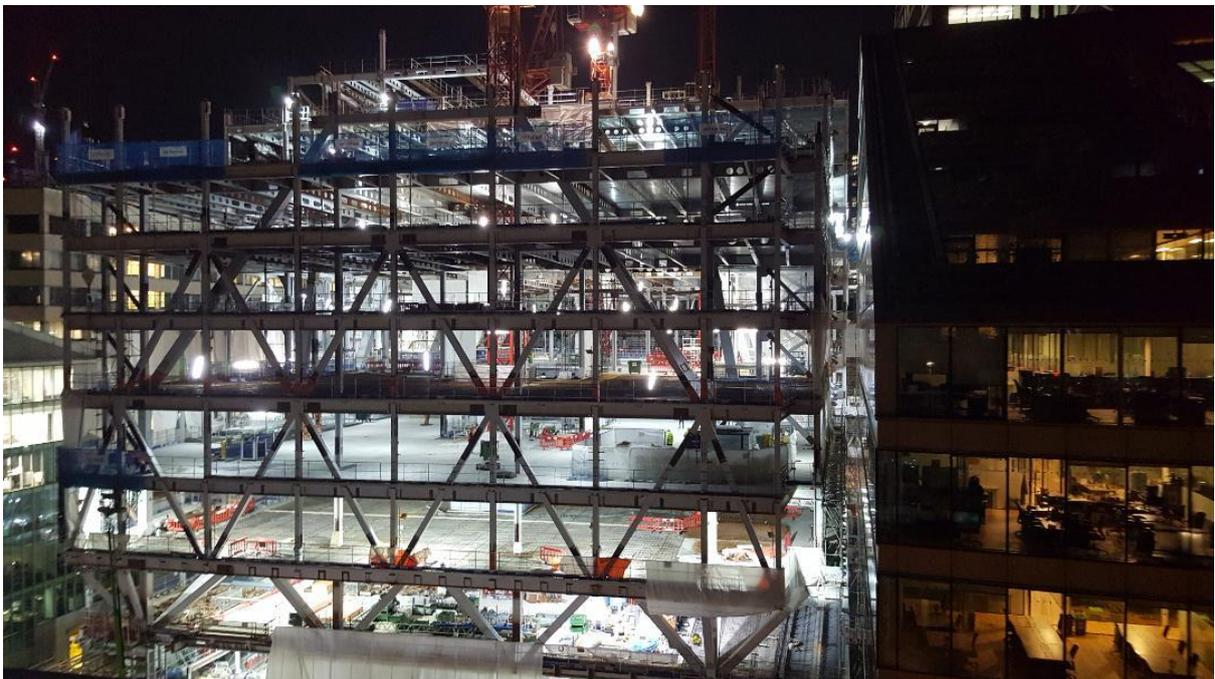
Automated blinds are essential

A curfew at 10pm is too late for families trying to get children to sleep at the right time, and therefore for their mental health and wellbeing. Since intrusive lighting before this time is a nuisance, which the City has a statutory duty to mitigate. A very simple solution is available – blinds. These should be mandated for development next to people's homes and automated to drop at 7pm in time to allow children to have a reasonable bedtime.



This City office block at Moor Place faces directly into residents' bedrooms. A curfew of 10pm is too late for developments facing people's homes. If blinds are not automated, they are not used (as here), and if the PIR systems are not commissioned properly (as here) the resulting light can be on right through the night.

- iv) Construction lighting requirements should not fall short of the City of London's Code of Deconstruction and Construction (CDC) – including blacking out windows during fit-out
Light spillage during construction is a significant problem in the City, and the City Plan could do a great deal to improve the resulting nuisance by requiring compliance with the City's Code of Deconstruction and Construction (CDC) through planning conditions.



The experience of construction sites like 21 Moorfields (pictured) directly opposite over 100 people's homes and bedrooms is that the City should be requiring and enforcing planning conditions to ensure a Scheme of Protective Works is in place. This should include obligations to keep site lighting under control and fully black out windows once they are glazed and right through fit-out. Better compliance monitoring is also crucial.

- v) Effective policy – light nuisance from construction sites and new schemes is mostly felt by the residential population – a more targeted policy to require conditions on schemes adjoining residential areas, or in the residential KAOCs, like Barbican & Golden Lane would make the City Plan 2040 more effective.

Appendix J: Provision of open space and facilities for public benefit within new major development through negotiation, conditions and developer obligations and contributions – case studies in the City of London

1. Development managers and the City's Planning Committees routinely seek to meet policy objectives providing public benefit, open space, culture and greening by requiring developers to provide these facilities.

2. Open space and roof terraces

Experience of developer-provided open space in the City of London has been decidedly mixed. Examples of successful provision of newly designed public gardens above a railway, such as Exchange Square, at roof level such as 120 Fenchurch Street, or at ground level, such as St. Alphage Garden in the London Wall Place development by Brookfield/MAKE, are contrasted by other schemes where provision has been problematic for a range of reasons. St Alphage Garden replaced a hard-surfaced Highwalk plaza with a ground-level lush garden scheme, complemented by a new Corten steel high walkway and small garden at Highwalk and tree canopy level. It managed to increase urban greening, open space and pedestrian permeability significantly in a high quality design, which is now maturing nicely.

- a. I New Change – rooftop terrace, hard surfaced 'public' viewing terrace without greening, now closed for security reasons. Some inaccessible green roof areas.
- b. 81 Newgate Street – a rooftop terrace, promised at planning stage to meet OS and greening policies, later removed from the scheme at the request of new tenants (HSBC) on the grounds of security (as a delegated decision/amendment), and not replaced by any further OS and greening.
- c. 21 Moorfields (Land Securities) – replaced a publicly-accessible hard surfaced Highwalk plaza with predominantly private terraces, and a very small and dark open sitting-out space at Highwalk level with three multi-stemmed trees. It also took much of the public realm along Moor Lane for HVM bollards (contrary to City policy) thus blocking and limiting planned greening and tree planting on the street, so the net effect on public open space is negative. Within the scheme its BREEAM Excellent threshold for greening is only just met, with heavy reliance on green walls etc, and next to no margin for error. So, if

any greening is lost as occupiers move in and start to use the building, what looks like a BREEAM Excellent scheme risks quickly becoming one that is not, in practice.



d. 20 Fenchurch Street - the Walkie Talkie building (Land Securities) – a 38 storey building on the edge of a conservation area, oversailing the footprint of the site. It contains a 'sky garden' at the top of the building. On consent it was claimed by the developer to be London's highest public park, however being internal it is not open space and offers no biodiversity or cooling from the greenery. Access restrictions and pre-booking also preclude it from being truly 'public'. The balance between gardens and restaurants calls into question its description as a garden.

e. No 1 Poultry – rooftop lawn with some greening– known suicide risk spot, so carefully managed by the adjoining bar/restaurant and effectively private in operation.

f. “The Lookout” - 8 Bishopsgate - 50th floor viewing gallery, entirely internal, no greening. Very near to Horizon 22 – 22 Bishopsgate – 58th floor viewing gallery, entirely internal, no greening.



g. 22 Bishopsgate – the trees alongside the scheme which are adjacent to St Ethelburga’s Centre for Peace and Reconciliation have not thrived and have recently been replaced, suggesting poor location or poor planting. Also, the trees at the front (to mitigate wind along Bishopsgate) died within 6 months of planting and TfL requested that the trees were felled for safety reasons.”

The developers of 22 Bishopsgate, AXA, have kept the existing stumps (at bollard height to avoid them being less of a trip hazard) to enable a specialist assessment of the trees in situ to ascertain why they failed. Once they fully understand the reasons for the failure of the trees, they will select the new, more appropriate, wind resistant, trees as

replacements. The planning team are working with Axa to ensure that the planting takes place within this year's tree planting window. Sadly, the stumps have been used by smokers as a place to put out cigarettes and drop the remnants around the base.."24 according to Benjamin Murphy, one of the local councillors.

- h. Black Raven Court is a City of London development of 66 flats on the fringe of the City, Golden Lane Estate and the Neighbourhood Forum boundary. Currently unoccupied due to issues with cladding, it has no external open space as this is expected to be available by using the playground of the neighbouring CoLPAI school on a shared basis – a multi-use games area (MUGA). It is unclear how this will operate effectively in practice

3. Community Space

Current City policy is proving ineffective in securing provision of useful “community space”, which is frequently included in scheme proposals in order to demonstrate policy compliance, but which does not generate any community benefit in practice. A “community bookable meeting room” in an office development only available during office hours Monday to Friday, for example, is of limited benefit to the business community in the City which has its own meeting rooms, and is of almost no benefit to the resident and cultural communities which require evening and weekend access and flexible, dedicated space with a kitchen and storage to enable multi-functional use such as sports/dance classes, maker workshops, parties, classes, youth activities, films, clubs, and worship, typically. The dangers of isolation leading to poor mental and physical health in the City are well-documented in the evidence; experience of developer provision of community space is that it does not address this issue, as a result of ineffective policy;

- a. 1 Golden Lane is providing a ground floor community room on the dark ground floor, but not the free/affordable workshop/studio/artist/maker space required and requested by the local community
- b. Tenter House is offering an unwanted part-time daytime bookable meeting space, with no guarantee of affordability
- c. CoLPAI straddles the Barbican and Golden Lane Neighbourhood Forum Area and Islington, in which it is mostly situated, with only a small amount of its land in the City. However, it serves the Neighbourhood and was funded by the City. The school hall cannot be let out for community use as it was designed with only one toilet.

²⁴ <https://www.benjaminmurphy.uk/?p=1142>

4. Lifts, escalators and the retention of existing ramps

The specific multi-level nature of the Listed Barbican and Golden Lane Estates and the integral Highwalks, Barbican Arts Centre and Golden Lane Leisure Centre means that functioning, high-traffic lifts are necessary to ensure accessibility for all in the Neighbourhood. The City's monitoring evidence shows that current (and proposed) policy is ineffective in securing the standard of lift installation and ongoing repair and maintenance that is necessary to achieve the goal of accessibility for all;

- a. 21 Moorfields (Land Securities) – this is an interesting attempt to correct the deficiencies of policy and practice on previous schemes and was only achieved after considerable effort by Robert Barker, the Barbican Association's late-lamented disability champion. Two lifts are included to replace a ramp which allowed step-free access from Moorgate tube up to the Barbican Highwalk; and both are covered by a bond secured by planning obligation which provides both an incentive to maintain the lifts in good working order and an insurance if they are not. This arrangement has not been in place long enough to prove conclusively that it achieved the objective of providing access that is no less reliable than the concrete ramp; however, it reflects both the outcome that meets the evidenced need of the community and the best attempt so far in meeting it.
- b. Moor House – a discrete lift from a busy pavement near the junction of London Wall and Moorgate, which does operate most days.
- c. London Wall Place (Brookfield) – a public lift was a condition of this scheme but there seems to be no contingency to replace the c17-year old lift that routinely breaks down for weeks at a time, denying access from the Highwalk to the public open space below for those that cannot use the stairs.
- d. Alban Gate – has four escalators from the Highwalk, under a consent from the 1990's two of which reach ground level, and two of which finish a few steps above ground level. All are broken more often than they are working. The building is currently subject to a refurbishment scheme under which City development managers refused to ask for all the escalators to reach ground level, on the grounds that this would be "unreasonable" thus frustrating the policy of access for all.
- e. 1 London Wall – two escalators and a lift on a major junction; these are frequently not working.

f. The City's lift monitoring reports show that the performance of the City's network of lifts routinely drops below 95%. Reports are provided for variable periods (from 6 weeks to 18 weeks) depending on the Committee reporting cycle. A selection of reports from 2022, 2023, and 2024 taken at random shows:

From 25 September 2022 to 14 October 2022 "publicly accessible lifts and escalators were available for 88.13% of time. The aggregated 12-month availability across all publicly accessible lifts/escalators is 89.65%."

From 19 September 2023 to 3 November 2023 "publicly accessible lifts and escalators were available for 92% of the time."

From 24 November 2022 to 16 February 2024 "publicly accessible lifts and escalators were available for 88% of the time."

5. Toilets

The Barbican & Golden Lane Neighbourhood Area, in common with the City generally, hosts a high number of visitors to the area. During the daytime, toilet facilities are required to meet the broadest possible mix of workers, residents, shoppers, families with children, tourists and other visitors. The nighttime requirement is also driven by the number of bars, pubs and restaurants which are very heavily used especially post-work in the middle of the week, when the deficit of accessible public toilets contributes to the growing²⁵ issue of urination in streets and doorways especially where groups of drinkers congregate outside and on the routes to Tube and rail stations as drinkers head home. Provision therefore needs to accommodate peak demand and all types of potential users.

If you are a stranger in the City - a visitor say - you might think to Google toilets in the City. You then get to the City's interactive map. For the Smithfield area – a magnet for visitors and late night economy - you get offered 7 places to choose from. One is Barts Hospital - which people might or might not think of - but it is open 24 hrs a day. Of the remaining 6 - 1 may not exist but if it does it's a male urinal (a Urilift only open in the evenings), and 4 of the rest are closed at weekends and bank holidays. The other one is the Red Cow pub in Long Lane.

Those in the NA all depend on the place being open:

²⁵ See Port Health and Environmental Health Committee reports Supporting Evidence to City Plan 2040 Reg 19 Consultation © Barbican & Golden Lane Neighbourhood Forum Ltd, 2024

- Lamb and Trotter pub - Little Britain
- St Botolph's Church
- St Giles Church
- Lord Raglan pub
- Museum of London (the map still shows it as being open)
- London Wall carpark – much used by taxi drivers and the police
- Wood Street Bar
- Barbican Arts Centre
- Shakespeare pub

Public toilets which are accessible for all, with long opening hours and high quality facilities are necessary - in relatively high numbers and the right locations to meet demand from the high footfall. The new Elizabeth Line is a popular train service, but it has no toilets on board the trains, and is bringing large numbers of passengers, so there is increased demand for toilets in proximity to stations as well as in them.

One example of developer provision that has been mainly successful is 1 New Change shopping centre (Land Securities). In other schemes, developer-led provision has been problematic. 140 Aldersgate Street is an example: it sits on the corner with Long Lane, an extremely busy junction immediately adjoining Barbican tube. The corner is the long-standing site of a public toilet; a planning consent in 2002 (0401/1U) allowed for the resiting of the public toilet within the building envelope, but it is boarded up and there has been no functioning public toilet on the site for several years.

6. Public defibrillators available 24/7

The Barbican & Golden Lane Neighbourhood Area of the City of London attracts high numbers of visitors, as well as being home to a vibrant group of local residents. More than half a million commuters come into the City to work– many of them doing high pressured jobs in the financial sector. Good health is a shared concern of everyone in this community, and wellbeing came out top in Culture Mile BID's survey of businesses locally.

Heart health is a priority because, as the medical director of the NHS, Professor Stephen Powis, says: "Sadly, cardiovascular disease causes a quarter of all deaths across the country ... this is the single biggest area where we can save lives over the next decade". Evidence shows that a network of 24/7 public-access community defibrillators in the area, coupled with healthy

heart training delivered through events designed to build community networks as well as healthy heart skills, would improve health and save lives.

Ten defibrillators are registered and mapped on the National Defibrillator Network, which allows anyone to see where the equipment is. Most are near to Moorgate, outside the Neighbourhood and most are also private and only available in the day, disadvantaging visitors, residents, families with children, and anyone here after work.

Training is not always necessary in using a defibrillator, but it does make people more confident. The benefits of this approach are that it raises awareness of good practice, such as when to call an ambulance, as well as showing what to do before the ambulance arrives. Polling by the NHS in 2022 found that under 50% of Londoners would dial 999 if they or a loved one experienced lesser known symptoms of heart attacks, and according to the London Ambulance Service report, the overall rate of people who survive heart attacks in the City of London is 11%.

If public access 24/7 defibrillator provision only saves one life, it will be worth it. However, there is plenty of evidence that public defibrillators are more effective than that. In 2019, six people treated with defibrillators had a successful return of spontaneous circulation and were taken to hospital for further treatment. “This shows the importance of having defibrillators in public places within the City of London,” according to Dr Andy Liggins, a public health consultant. The Corporation’s draft City Plan 2036 encouraged developers to provide facilities to improve the community’s health – such as drinking water fountains, publicly accessible toilets and defibrillators – but that has been taken out of City Plan 2040. The Neighbourhood Forum questions the evidence for removing this policy, given the rate of heart disease and the high number and concentration of workers, residents and visitors in the City and the patchy nature of provision in the City.

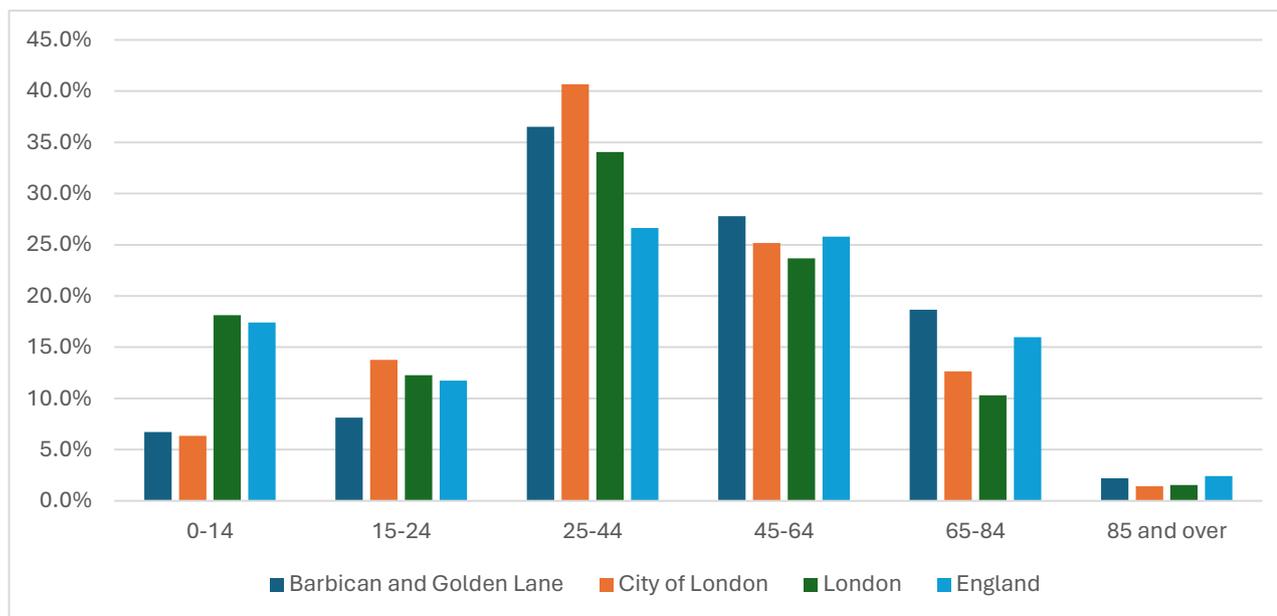
Appendix K: Evidence of Health, Social Need and Vulnerability to Environmental and Climate Change

Barbican & Golden Lane Population and Demographics

According to the 2021 Census, the Barbican and Golden Lane Neighbourhood Area contains 4,470 residents, living in 2,678 households; an increase of 223 people since the 2011 Census.

Of the 3,536 dwellings (mostly flats) half of households are homeowners, 38% rent privately and 13% live in social rented homes. 86% of the area's social rented housing is concentrated in the Golden Lane Estate, which has a total of 793 homes. The Forum's own count of housing types shows that a high proportion of flats are studios - around 504 units. We therefore challenge the 2011 Census data which counted just 49 studios (2021 data lumps studios and 1 bedroom flats).

Age structure in Barbican and Golden Lane, 2021



Source: ONS 2021, AECOM Calculations

The Area has a higher proportion of older people and a lower proportion of children than London or the UK. About 80% of the City’s population of older people live in Barbican and Golden Lane. Our 75+ population is projected to increase by 482 people to reach a total of around 877 in 2040. This is over a 120% increase and would double the share of the population in this age group.

Household composition, various geographies, 2021

Household composition		Barbican and Golden Lane	City of London	London	England
One person household	Total	50.9%	51.0%	29.3%	30.1%
	Aged 66 and over	14.5%	10.0%	9.1%	12.8%
	Other	36.3%	40.9%	20.1%	17.3%
One family only	Total	43.4%	40.3%	58.0%	63.1%
	All aged 66 and over	14.5%	4.1%	9.1%	9.2%
	With no children	23.0%	22.8%	14.2%	16.8%
	With dependent children	8.9%	8.1%	26.6%	25.8%
	With non-dependent children ²⁶	3.3%	3.4%	11.2%	10.5%
Other household types	Total	5.7%	8.7%	12.7%	6.9%

Source: ONS 2021, AECOM Calculations

A slight majority of households in the 55-75 bracket in 2011 (and therefore likely to be 75+ by 2040) are renters. Two thirds of these tenants rent privately; they will need specialist accommodation if they can’t make adaptations, and rates of disability are higher among social tenants than owner-occupiers. Rates of disability and mobility limitation are also correlated with tenure, with those in socially rented housing tending to have greater support needs. They are also strongly correlated with age: in the NA 84% of people with a severe disability and 77% with a moderate disability are aged over 50.

²⁶ Refers to households containing children who are older than 18 e.g. students or young working people living at home.

Projected age of households, Barbican and Golden Lane, 2011 - 2040

Year	24 and under	25 to 34	35 to 54	55 to 64	65 and over
2011	68	416	971	452	616
2040	45	228	799	610	1,385
% change 2011-2040	-33%	-45%	-18%	35%	125%

Source: AECOM Calculations

Barbican and Golden Lane has very similar overall levels of disability to wider averages. Older people here are notably healthier (only 16% have a severe disability) than the London average (26%). But it isn't clear whether lack of provision is forcing people to move out, or whether it is just a place that attracts active older people. Research at City of London level (conducted by the Corporation in 2019 and Goldsmiths University²⁷ has revealed high levels of loneliness and social isolation among older people as well as a number of other at-risk groups within the City of London.

City of London health and social care data²⁸

Evidence and data for the City and Hackney JSNA and underpinning the City's Health and Wellbeing Strategy also identifies health, wellbeing and social care needs amongst the following groups which illustrate some of the needs which are under-represented in the City Plan 2040;

- a) Care leavers and looked after children, largely housed outside the City,
- b) the hidden workforce keeping offices and workspaces clean, safe and secure and providing essential services to businesses. Many people in these roles are more likely than other workers to be experiencing poor physical health, living with long term conditions, diagnosed with serious illnesses later than others, facing poor health outcomes and experiencing stress, anxiety and poor mental health.
- c) 482 people sleeping on the streets in the City in 2022/23, as identified by outreach services– the sixth highest level among London's local authorities. It is well known that people experiencing homelessness face significant health inequalities and poorer health outcomes.

²⁷ Green, Roger and Tim Stacey (2015), 'The Voices of Older People: Exploring Social Isolation and Loneliness in the City of London

²⁸ References in square brackets [e.g.] are to items in the JSNA evidence base

Supporting Evidence to City Plan 2040 Reg 19 Consultation © Barbican & Golden Lane Neighbourhood Forum Ltd, 2024

d) 496 self-identified carers (6% of the population) in the City of London (Census 2021). Nearly a third of these (32%), provide 20 or more hours of unpaid care a week and 298 of total carers are aged over 50. 34 unpaid carers are supported through formal Adult Social Care Support Plans and around 100 are supported through commissioned services for carers and a peer support group.

e) City of London research in 2019 found approximately 31% of social housing residents estates experienced forms of loneliness and social isolation.

f) UK policy is to promote exclusive breastfeeding for the first six months of an infant's life. The City & Hackney has no universal sustainable infant feeding service for women on discharge from maternity services in Hackney or the City²⁹

Quality of the local environment and health – evidence from the JSNA evidence base, prepared by the London Borough of Hackney and the City of London 2019³⁰

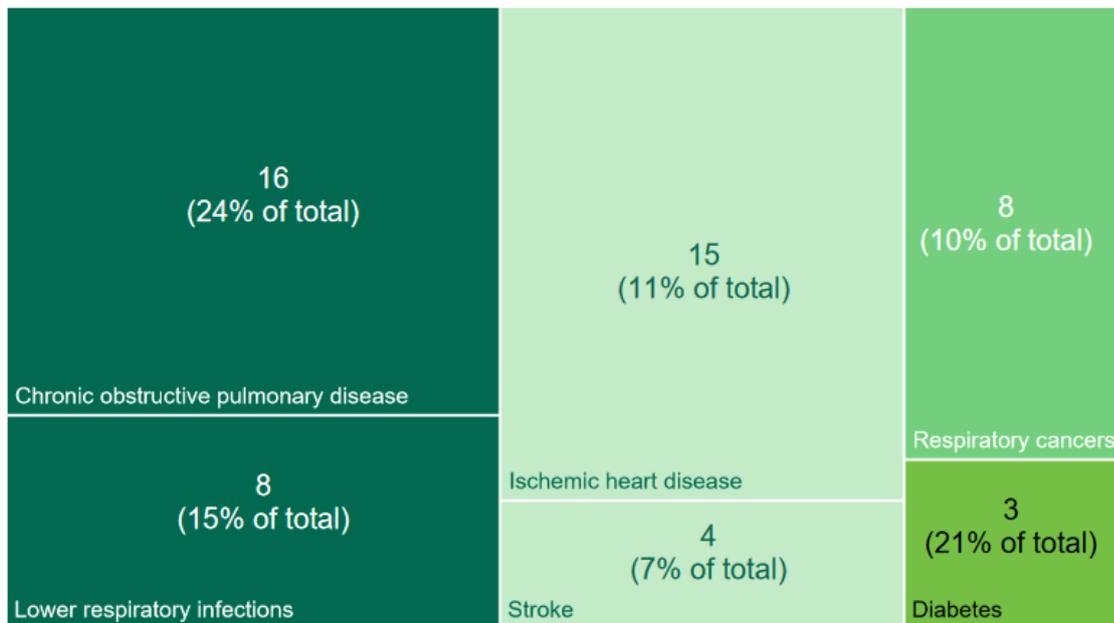
Outdoor air quality

The evidence base notes that for the City and Hackney Joint Health area “Air pollution in the outdoor environment is a high profile public health concern” [our emphasis], further noting sources of damaging air pollution beyond those currently addressed by the City Plan 2040: “The main source of outdoor air pollution in the area is road transport – associated pollutants include oxides of nitrogen, fine particles (PM10 and PM2.5), ozone, sulphur dioxide, carbon monoxide, benzene and polycyclic aromatic hydrocarbons” and “There are numerous other substances which are air pollutants – including ozone, benzene, lead and other heavy metals, all of which have been found to be harmful to Health”. Illnesses and causes of death most commonly associated with air pollution include chronic obstructive pulmonary disease (COPD) and lower respiratory tract infections, cardiovascular disease (CVD) (including coronary heart disease and stroke), diabetes, and cancers of the respiratory system³¹.

²⁹ https://cityhackneyhealth.org.uk/wp-content/uploads/2022/03/FINAL_-A-health-needs-assessment-for-the-population-aged-0-to-25-for-the-City-of-London-and-Hackney-Google-Docs.pdf

³⁰ https://cityhackneyhealth.org.uk/wp-content/uploads/2023/05/Quality_of_Environment_JSNA_2019.pdf

³¹ ‘Adult health and illness’ chapter of the JSNA



Source: Institute for Health Metrics and Evaluation [4]

Figure 1: Estimated annual attribution of outdoor particulate air pollution to deaths in Hackney and the City of London (all ages, 2017)³²

Concentration of particulate pollution in Hackney and the City is high compared to other parts of England and London. In 2017, the adjusted annual concentration of fine particulate matter in Hackney was 12.2 µg/m³ and in the City of London it was 12.6 µg/m³. [50] Estimates for Hackney suggest that as many as 7.0% of all deaths in those aged 30+ may be attributed to particulate air pollution, and 7.1% in the City of London. [50] In London as a whole, 6.6% of deaths in this age range can be attributed to particular pollution, compared to a national average of 5.2%. Additional local deaths associated with NO₂ in particular are difficult to estimate. According to the Global Burden of Disease (GBD) Study, an estimated 54 deaths in residents of Hackney and the City were attributable to air pollution in 2017. [4]

Air pollution contributes to land contamination across wide areas in the longer term. This effect has been observed in parks such as Hampstead Heath which have higher levels of lead than similar areas outside London. [25] As well as impacting local air pollution, burning hydrocarbons is a major source of carbon dioxide gas – the major cause of climate change.

³² Quality of the local environment p10

Table 1: Estimated costs to local health and care services of PM2.5 and NO₂ pollution in £ millions (2019; age 18+ only)

	Hackney		City of London	
	PM2.5	NO ₂	PM2.5	NO ₂
Primary care	£4.6m	£3.8m	£0.2m	£0.2m

Beyond the direct impact on health and wellbeing, environmental factors (in particular air pollution) have a significant, but difficult to quantify, economic impact – this includes the cost of additional GP visits and working days lost to illness.

Secondary care	£12.0m	£5.5m	£0.6m	£0.2m
Medication	£8.6m	£5.1m	£0.4m	£0.2m
Social care	£5.1m	£5.3m	£0.3m	£0.2m
Combined costs	£30.3m	£19.9m	£1.6m	£0.8m

Source: Public Health England [22] and GLA SHLAA 2016-based population estimates
Note that figures may not add up due to rounding

Table 1: Estimated costs to local health and care services of PM2.5 and NO₂ pollution

in £ millions (2019; age 18+ only) Hackney City of London

Climate change

The JSNA evidence notes that “Climate change is a major global threat, though in the short term less so in wealthy countries with a temperate climate such as the UK. Residents of Hackney and the City of London are thought to be particularly vulnerable to heatwaves³³ (due to the urban heat island effect). These are becoming increasingly common as global temperatures continue to rise”. And “the heatwave in 2003 led to 2,000 deaths nationally, while estimates suggest that the heatwaves in 2018 and 2019 may each have been responsible for around 1,000 deaths nationally [36] [37]. Older people, people with existing medical conditions, and outdoor workers would be particularly affected”,

Climate Just, a network of organisations including the Environment Agency and the Joseph Rowntree Foundation, have produced a model estimating the vulnerability of small areas (MSOAs, see Box 1) across England to flood and heat hazards associated with climate change.

³³ Heatwave – the UK Met Office uses the World Meteorological Organisation definition is "when the daily maximum temperature of more than five consecutive days exceeds the average maximum temperature by 5°C" (with the comparison being the period 1961-1990)

This is based on population vulnerability, ability to respond, ability to recover and likelihood of the hazard occurring. The model suggests that two out of 28 (7%) MSOAs in Hackney have a high vulnerability to flooding, and 13 out of 28 (46%) MSOAs have a high vulnerability to heat. The one MSOA in the City of London is categorised as having a high vulnerability to flooding and heat. [52] Across London, a total of 468 deaths have been estimated to have resulted from the summer heatwaves of 2018, the highest rate of death in England. [53] Estimates are not available for Hackney and the City specifically. The JSNA evidence also notes that “the City has not declared a climate emergency unlike the majority of English local authorities over the past year”.

The City’s and the government’s own evidence on climate change and its impacts includes:

City Plan 2040 evidence (including the Carbon Options Guidance Planning Advice Note, the Sustainable Design and Construction SPG, the Guidance on Preparing Energy Assessments, the Local Area Energy Plan, and the Climate Action Strategy³⁴).

London-wide evidence (including London Heat Map and its accompanying reports, data and resource page; Heat Network Manual etc³⁵);

National legislation, e.g. the various Environment/Climate Change Acts ³⁶).

Noise

The most common negative effect of noise is annoyance, but there are a number of other effects, including: sleep disturbance; hearing impairment; heightened cortisol in the blood (a marker of stress); impairment of cognitive performance in children; and increased risk of developing CVD in those exposed long-term to noise pollution. [46] A large study in 2015 found that across London there are significant excess deaths associated with traffic noise, however it’s not clear that this is causal. [47] WHO estimate that one million healthy years of life are lost every year in Western Europe because of traffic noise, particularly due to the contribution of raised cortisol levels to CVD. [48]

³⁴ Available here: [Sustainable development planning requirements - City of London](#)

³⁵ Available here: [London Heat Map | London City Hall](#)

³⁶ [Climate change adaptation: policy information - GOV.UK \(www.gov.uk\)](#)

Impairment of early childhood development and education caused by noise may have lifelong effects on academic achievement and future health. [49] High levels of traffic noise are also associated with higher levels of air pollution, which can make it difficult to attribute specific underlying causes of related health impacts. Some recent research suggests that air pollution, rather than noise pollution, is associated with higher levels of low birth weight babies. [12]

The City of London received 1,093 complaints about noise in 2014/15 from residents and businesses. These concerned a range of sources, but were predominantly related to demolition/construction sites, street works and entertainment venues. The Public Health Outcomes Framework estimates that 28% of the resident population are exposed to transport noise of 65dB(A) or more in the daytime, and a similar proportion at night.

Inequalities

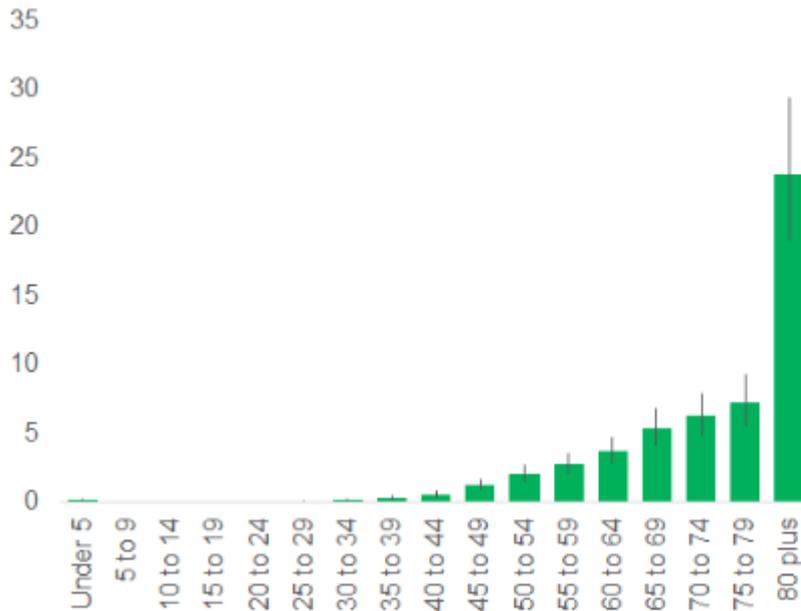
As well as affecting a significant number of individuals in total, environmental influences are a source of health inequalities.

Age

Air pollution disproportionately affects the elderly and children, as well as those with heart and respiratory disease. Estimates from the GBD study suggest that most related deaths in residents of Hackney and the City occur in people aged 80 or older. Older people are particularly vulnerable to heatwaves associated with climate change. For example, of the 468 deaths in London estimated to have resulted from the summer heatwaves of 2018, 92% were thought to have occurred in people aged 65 or older. [53]

Chronically ill and elderly people are also more sensitive to noise disturbance. [56] Older adults, and people in poor health, are also considered to be more vulnerable to the effects of noise.

Figure 4: Estimated annual attribution of air pollution to deaths in Hackney and the City of London by age (all ages, 2017) [4]



The one MSOA in the City of London is categorised as having a high vulnerability to both flooding and heat. [52]

Children

Other research has shown that concentrations of particulate matter in a sample of classrooms in London are above guideline values. [55] As children require more sleep than adults, they are more likely to be disturbed by nighttime noise pollution. Impairment of early childhood development and education caused by noise may have lifelong effects on academic achievement and health. [49]

Appendix L: Neighbourhood Shopping Centre – Colonnade under Crescent House, Aldersgate Street/Goswell Road (A1)



Case study of Crescent House “Colonnade” in Goswell Road, and Launderette on Aldersgate Street (Neighbourhood Shopping Centre)

The colonnade consists of 17 units that were designed as an integral part of the Golden Lane Estate. Some units have been amalgamed to make larger spaces. They currently hold a variety of businesses all serving the Golden Lane and Barbican communities along with local City and Islington workers.



There is just one unit that can be loosely described as a convenience store, Barbican News.

Alongside this there are units that provide well-being services – chemist, the only independent

chemist in the City, NHS dentist, optician, hairdresser and barber, there are food and drink outlets - a pub and 3 different types of cafés.

There are also service outlets, drycleaner, greengrocer and florist, wineshop and until a few months ago, a hardware and DIY store. The Barbican Launderette nearby (immediately south of Fann Street, on Aldersgate Street) is another valued local service, especially given the high number of studio apartments in the Neighbourhood.

These provide vital services to the residents of the estates and are particularly important to those with mobility issues.

The lack of adherence to listed building guidelines (that shutters should be inside the units rather than exterior) has led to graffiti on the exterior shutters and a general air of disrepair, which left to worsen will damage the viability of this important retail and service cluster.



Retail Policy RE2 and RE3

RE2 (3)

This Policy seeks to promote active street frontages and...

Supporting Evidence to City Plan 2040 Reg 19 Consultation © Barbican & Golden Lane Neighbourhood Forum Ltd, 2024

Retail units outside the PSC provide not just vibrancy but vital services for residents. It is not just convenience stores that are needed, the lack of vital service retail means that residents in the City often have to travel to find what would be expected in a neighbourhood.

RE3 Specialist retail uses and clusters.

This policy seeks to retain specialist retail uses and premises that are culturally and historically significant to the City of London.

- *Retail around the Golden Lane and Barbican Estates*

The retail units in the two estates are vital parts of the community, providing facilities for both local residents and local City workers. Both estates are listed, and it is important that when any retail/small businesses are redeveloped they maintain the qualities and characteristics of the listing and listed building guidelines.

Below is the long-standing hairdressers/barber, with the original fascia



Appendix M: Residential Visual Amenity Assessment Evidence

We suggest that a residential visual amenity assessment should be required for large buildings close to residential living rooms.

An RVAA is, as the Landscape Institute describes them in its Technical Guidance Note 2/19, “a stage beyond LVIA [Landscape and Visual Impact Assessments] and focusses exclusively on private views and private visual amenity.”

“RVAA focuses on private visual amenity at individual properties whilst LVIA focusses on public amenity and views. In relation to private property and residential receptors GLVIA3 states at paragraph 6.36 (page 114)” and recognise that “residents may be particularly susceptible to changes in their visual amenity - residents at home, especially using rooms normally occupied in waking or daylight hours, are likely to experience views for longer than those briefly passing through an area.”[our italics]

A reading of Landscape (or Townscape) and Visual Impact statements from recent applications to the City shows that LVIA indeed do not pay specific attention to the visual amenity of residences close by. They tend to focus on longer and mid term views. Even when views are closer they may not be relevant to residential visual amenity. The Townscape and Visual Impact Assessment for London Wall West (23/1304/FULEIA), for example, includes 28 views, not one of them from any of the residences nearest to the site, though one view in an appendix of supplementary views is from the public Highwalk below one of the nearby blocks of flats. Not one of the views is from flats in the block closest to the development (Mountjoy House), which at some point is only 20 metres from the largest building.

Additional extracts from the technical note:

“Residential Visual Amenity Assessment (RVAA) is a stage beyond LVIA and focusses exclusively on private views and private visual amenity.

“The overall quality, experience and nature of views and outlook available to occupants of residential properties, including views from gardens and domestic curtilage’. Residential Visual Amenity is one component of ‘Residential Amenity’.

“RVAA focuses on private visual amenity at individual properties whilst LVIA focusses on public amenity and views. In relation to private property and residential receptors GLVIA3 states at paragraph 6.36 (page 114):

“Considerations which provide a framework for describing and evaluating the predicted magnitude of visual change and related visual amenity effects which may lead to the property being considered in Step 4 include:

- Distance of property from the proposed development having regard to its size / scale and location relative to the property (e.g. on higher or lower ground);
- Type and nature of the available views (e.g. panoramic, open, framed, enclosed, focused etc.) and how they may be affected, having regard to seasonal and diurnal variations;
- Direction of view / aspect of property affected, having regard to both the main / primary and peripheral / secondary views from the property;
- Extent to which development / landscape changes would be visible from the property (or parts of) having regard to views from principal rooms, the domestic curtilage (i.e. garden) and the private access route, taking into account seasonal and diurnal variations;
- Scale of change in views having regard to such factors as the loss or addition of features and compositional changes including the proportion of view occupied by the development, taking account of seasonal and diurnal variations;
- Degree of contrast or integration of new features or changes in the landscape compared to the existing situation in terms of form, scale and mass, line, height, colour and texture, having regard to seasonal and diurnal variations;
- Duration and nature of the changes, whether temporary or permanent, intermittent or continuous, reversible or irreversible etc.; and
- Mitigation opportunities – consider implications of both embedded and potential further mitigation.

“The purpose of carrying out a Residential Visual Amenity Assessment (RVAA) is to form a judgement, to assist decision makers, on whether a proposed development is likely to change the visual amenity of a residential property to such an extent that it becomes a matter of ‘Residential Amenity’.

At the Burnthouse Windfarm Inquiry the inspector said:

“No individual has the right to a particular view but there comes a point when, by virtue of the proximity, size and scale of a given development, a residential property would be rendered so unattractive a place to live that planning permission should be refused.”

<https://landscapewpstorage01.blob.core.windows.net/www-landscapeinstitute-org/2019/03/tgn-02-2019-rvaa.pdf>

Appendix N: Offices

Offices in the City of London – the role of the City within the CAZ and the future of work, productivity and places

The Forum questions the City of London’s evidence³⁷ as a robust basis for the Office policies in the City Plan 2040. There is significant uncertainty about almost every variable in the office floorspace forecast, and yet the City’s evidence does not reflect this, being based instead on exactly the same methodology used to produce the office floorspace forecasts on which the 2015 local plan is based. The Forum considers this both to be out of date and insufficiently forward-looking or robust for a policy that has such significant implications for the economic health of London, and the quality of the environment in the City.

A great deal of modelling evidence has been produced to show how the proposed 1.2 million m² office floorspace could be accommodated; very little evidence has been made available by the City to justify the target itself, however. The Office topic paper is only 15 pages long and refers to a study with a substantial number of caveatsⁱ; it does not consider alternative scenarios or the potential impact of alternative targets for office floorspace nor any other combination of economic or commercial uses to meet the economic objectives.

It is possible, of course, that the Corporation of London takes the view, in private, that it should be oversupplying planning permissions for office floorspace as the risk of doing so is a “lesser evil” than the risk of undersupply of offices. If so, this is a scenario which should be tested in public with full consultation during the plan preparation phase. The risk to the City and London as a whole of overestimating demand and oversupplying office planning permissions has significant consequences, not least by squeezing out development which could bring greater benefit to London over the lifetime of the plan and make the City a more prosperous place in the medium to long term. We see little evidence that the City, with all its resources, has investigated and compared the range of reasonable alternative development scenarios to optimise the economic, social and environmental benefits of its core commercial places.

³⁷ The Office Topic Paper and the City of London Future of Office Use paper

Previous office policy in the City of London has not focussed on securing medium to long-term benefit through office developments that last. “I always thought of the City as a vegetable patch,” Peter Rees, a previous Chief City Planning Officer said. “You cultivate each specimen, then harvest it and move on”³⁸. This has left a legacy of oversupply, the risk of stranded assets no longer sustainable enough, and a culture of “moving on” rather than creating buildings and places with lasting benefit.

There is already a risk of office oversupply in the City of London, with Bloomberg reporting that both Goldman Sachs and JPMorgan Chase & Co³⁹ have warned investors that “remote working, rising interest rates and worries over a potential recession in the UK have put pressure on the City of London’s office market with JPMorgan Chase & Co. analysts recently predicting that office buildings in the capital’s financial heart will lose 20% of their value this year”. Whilst this may be ironed out over the longer term, the considerable uncertainty in the short to medium term about the rise of home working and the role of the office more generally is echoed by property professionals such as JLL whose figures indicate that 48% of their clients in major markets, including the UK, Germany and France are seeking to decrease their footprints in the next three to five years⁴⁰. According to March 2024 data from workplace research firm Leesman, total space reductions could reach 40% across its global client base of 766 firms. Projected onto central London, if the same proportion of the city's occupiers opt to reduce their footprints, this corporate downsize would be the equivalent to 56.6 million sq ft (5.26 million sq m) of office space⁴¹. With lease lengths in London averaging around 12 years, the potential under-occupancy of City offices is a material consideration. As Stephanie Hyde, JLL’s CEO UK and CEO EMEA Markets told the BBC "Our clients are working out what to do with the space they've got by analysing data from recent years to come up with long-term plans.....many leases are expiring, companies are pressing ahead to meet sustainability agendas and they're focusing on getting hybrid working right."⁴²

³⁸ <https://www.theguardian.com/artanddesign/architecture-design-blog/2015/jan/28/-sp-power-to-the-postwar-architectures-most-scorned-era-finally-gets-some-love-listed>

³⁹ <https://www.bnnbloomberg.ca/goldman-says-city-of-london-office-market-risks-oversupply>

⁴⁰ May 2024 – reported in <https://www.bbc.com/worklife/article/20240509-corporate-real-estate-on-cliff-edge-to-rethink-communal-spaces>

⁴¹ *ibid*

⁴² *ibid*

The Forum suggests that further *independent* research, analysis and forecasting for City Plan 2040 is needed before the policy can be determined to be based on robust evidence.

In the face of evidence that HSBC is rationalising its floorspace by around 50% (by leaving their 1.1 million sq ft space in Canary Wharf to occupy 550,000 sq ft in the City), the City Plan 2040: Offices Topic Paper then seeks to counter this by quoting a blog from Savills that claims space occupied by tenants increased 27%, between January 2021 and March 2023. The Forum does not consider this to be robust independent evidence that City tenants will not be rationalising their office footprint over the plan period. We note that Lloyds bank has recently announced a similar reduction in floorspace to HSBC.

According to the Mayor of London’s latest annual monitoring report⁴³, by Q1 2022 London had around 3.2 million m2 of vacant office space, or just over 8%.

Business vacancy rates

Table 2.2.33 Vacancy rate in Sq.M for 2017/18 to 2021/22

Type	Q1 2018	Q1 2019	Q1 2020	Q1 2021	Q1 2022
Office	1,767,807	1,686,320	1,847,494	2,720,618	3,192,998
Industrial	480,517	414,539	375,909	599,415	604,259
Retail	266,954	256,315	272,486	479,487	519,332
Light Industrial	32,116	27,099	37,049	53,986	86,616

Table 2.2.34 Vacancy rate as a percentage for 2017/18 to 2021/22

Type	Q1 2018	Q1 2019	Q1 2020	Q1 2021	Q1 2022
Office	4.8%	4.6%	4.9%	7.2%	8.3%

⁴³ London Plan Annual Monitoring Report 19 - 2021/22

According to the same report, the current supply of planning permissions for office development is 8.7 times higher than current starts (a factor of 3 is the London target):

KPI 3 Supply of office capacity

Pipeline of planning permissions for office floorspace is at least three times the average office floorspace construction started over the previous three years.

Table 1.2.1 Supply of office capacity

Year	Office floorspace starts (sqm GIA)	Office pipeline (sqm GIA)	Ratio
2019/20	1,131,053	6,135,554	5.4
2020/21	849,667	6,160,613	7.3
2021/22	747,503	6,532,762	8.7

1.2.2 The average area of office floorspace construction starts between 2019/20 and 2021/22 was 747,503 sqm (GIA), while the pipeline of office floorspace (floorspace that has been approved and has not been completed or lapsed due to inactivity) at the end of 2021/22 was 6,532,762 sqm, giving a ratio of 8.7 times the average area of office floorspace starts. This meets the KPI target.

The City’s 2015 Plan was based on GLA projections suggesting “significant growth in the financial and business services sector will return in the medium to longer term”. As a result, Core Strategic Policy CS1: Offices was designed to provide “additional office development of the highest quality to meet demand from long term employment growth”. Not all offices in the City developed as a result of this policy are of the “highest quality”, however, and there is now a growing requirement to upgrade, retrofit and even demolish and redevelop relatively young buildings a great many years before they reach the useful life anticipated at planning stage. This problem is recognised to a degree by the City Plan 2040 policy to “fast track” retrofit, but again the City’s evidence is limited. This will only be effective in achieving the necessary quantum of upgraded offices, and this objective will be severely undermined by setting a target of too many new offices, because the incentive to upgrade existing stock will be reduced. The Arup/Knight Frank study⁴⁴ for the City highlights the risk, recommends policy intervention but

⁴⁴ Arup and Knight Frank were commissioned to undertake an assessment of the City of London’s office market, covering the current and anticipated office-use behaviours, the qualitative and quantitative demand for net additional office floor space and an assessment of the extent of risk of stranded assets Supporting Evidence to City Plan 2040 Reg 19 Consultation © Barbican & Golden Lane Neighbourhood Forum Ltd, 2024

specifically notes that it has not considered the effect of this on the office demand projections.

It says:

“But, a proportion of the City’s existing office stock, will require investment to meet new energy regulation and market demands.

As such, our projections for higher overall demand for office space do not account for the challenges faced by some existing lower grade stock in the City. We suggest that intervention is needed to allow for fewer obstacles for older stock to be updated to meet office market needs, or to convert to other uses”.

As for labour projections overall, we note that this fundamental input to the office demand model is subject to uncertainty. GLA Economics⁴⁵ explain that it is based on assumptions such as; that London’s employment and output return to pre-crisis levels by 2023-24, that commuting patterns and location choices⁴⁶ don’t change, and that key economic uncertainty means they will be revisiting forecasts. GLA Economics says that “The ongoing impacts of the COVID-19 pandemic, alongside Brexit and cost-of-living pressures, mean there is a significant degree of uncertainty around these projections. We expect to revisit our key judgements as further data is made available and can be incorporated into our modelling”. They also explain that “the terms “jobs” and “employment” are used to refer to the number of jobs located in London or another area. The surveys used to compile the workforce estimates of employment are surveys of employers, and so the figures generally reflect the location of the workplace, not the worker’s place of residence”. So anyone working from home for a City firm is counted – but should be excluded for the purpose of calculating office space requirements.

Since, even under these assumptions GLA says that “2051 projection represents a 4% decrease, or 300,000 jobs, from the previous GLA Economics projection of 7.2m jobs in 2050”. The City’s evidence base needs to look beyond the plan period as well as looking more closely at potential shifts in office usage and location within it.

⁴⁵ London labour market projections 2022 Interim update

⁴⁶ about which they say “it is still unclear how strong these effects will be over the long term, and whether in the aggregate they will result in an increase or decrease in the number of jobs”
Supporting Evidence to City Plan 2040 Reg 19 Consultation © Barbican & Golden Lane Neighbourhood Forum Ltd, 2024

As a sense check, GLA Economics compares and benchmarks its forecasts with other external forecasters (up to 2041 as a full comparison to 2051 is not possible). This shows that External 1 forecasts 6.5m jobs in 2036, 4.1% less than GLA Economics; External 2 forecasts 4.8% more jobs than GLA for 2042; and External 3, which forecasts up to 2040.

A forecast employment figure which GLA says contains “significant uncertainty” coupled with a range of -4% to +4.8% in benchmark comparisons is not a robust base for projecting office floorspace. This can also be seen in the difference between the BRES data suggesting there were 614,500 workers registered with businesses in the City of London in 2022 and the most recent GLA employment figures (published in 2022) suggest that there were a total of 667,000 jobs in the City of London in 2021, made up of 575,000 employees (comparable to the 586,000 for 2021 in the BRES data) and 92,000 self-employed workers.

Our main report references the Volterra analysis that the “new normal” is 63 desk spaces per 100 FTE employees⁴⁷. The City of London’s evidence provides no justification for the assumptions used in modelling office floorspace. The BCO “guidance” and the Future of the Office report prepared by ARUP and Knight Frank do not, taken together, provide any robust evidence of the ratio of headcount to desk space, nor of the standard floorspace per desk specifically in the City of London.

Conclusion

The City’s office floorspace estimates are not robust. Many of the input assumptions and variables are subject to a high degree of uncertainty. The significance and impact of the office floorspace target is so high that it demands a more thorough analysis.

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An extract from the disclaimer says “In preparing this report we have relied on information provided by others and we do not accept responsibility for the content, including the accuracy and completeness, of such information. In no circumstances do we accept liability in relation to information used by us which has been provided by others. We emphasise that the forward-looking projections, forecasts, or estimates are illustrative only and scenario-based. They are based upon interpretations or assessments of available information at the time of writing. The realisation of the prospective financial information is dependent upon the continued validity of the assumptions on which it is based. Actual events frequently do not occur as expected, and the differences may be material. For this reason, we accept no responsibility for the realisation of any projection, forecast, opinion or estimate. Findings are time-sensitive and relevant only to current conditions at the time of writing. We will not be under any obligation to update the report to address changes in facts or circumstances that occur after the data of our report that might materially affect the contents of the report of any of the conclusions set forth therein.....”

⁴⁷ <https://volterra.co.uk/blog/the-post-pandemic-workplace-and-office-employment-densities-in-central-london/>
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Appendix O - Beech Street

Beech Street is not entirely covered by a roof. At each end it opens up, and residences (Lauderdale Tower, Defoe House, Seddon House at the west end and Cromwell Tower and Ben Jonson House at the east end) are exposed to noise emitted from the “tunnel” part of Beech Street. Examples include:

- Noisy motor bikes and noisy car races in the early hours of the morning.
- When the cinemas and Cote restaurant were formed out of part of the Exhibition Halls in 2013 residents suffered months of noise and smells from faulty plant.

When the Arts Centre devised a sound and light experience in the tunnel in March 2018 (Tunnel Visions: Array) <https://www.barbican.org.uk/whats-on/2018/event/tunnel-visions-array> it did plan very carefully with resident input to remove all sources of sound leakage that might disturb residents living above or alongside the tunnel. That exercise proved that the resident input was invaluable because the arts centre project managers and engineers were not aware of the extent of the means and routes by which noise travels around the estate. Even with that input, residents in some parts of the estate, notably Shakespeare Tower and Cromwell Tower, were subject to noise nuisance because of sound routes that no one was aware of, and because of the difficulty of screening the opening of the tunnel enough to prevent sound being heard outside.

Appendix P: Urban Heat Island Effect

Urban Heat Island

Several sources of recent information, including some of the City's own reports, make clear that overheating from hotter climatic conditions is as much if not more of a threat to human health and well being than being too cold (in a climate such as Britain's). This is particularly so in Cities, where temperatures are consistently higher than in the surrounding land, and where areas with less green open space are significantly hotter than areas with more green open space. The City is already densely packed with building and paved surfaces and has little open space.

1. The City's Adaptive Pathways study of 2020 (Burro Happold) says of the risks to health, well being and productivity of high temperatures “

“Rising temperatures and heatwave intensity across the region could have severe health implications, increase heat-related mortality, put strain on health services and infrastructure functionality, as well as have negative consequences for wellbeing associated with recreational use open spaces, disease and pathogen transmission and air pollution levels.”

The proposed pathway:

“Measures with regard to managing overheating will need to deliver inclusive action and protect the health of vulnerable populations who may be disproportionately affected by the impacts of overheating. Many measures to tackle overheating should be implemented in line with temperature rises experienced and projected in the coming decades. Based on the defined thresholds, it is recommended that action to retrofit properties starts immediately, a cool streets programme may be triggered in the next five years, while action to diversify energy sources due to heat-related disruption may not be required until around 2060.”

<https://www.cityoflondon.gov.uk/assets/Services-Environment/city-of-london-adaptive-pathways-study.pdf>

On this analysis, cool streets programmes should be starting now, and buildings being developed now will still exist in 2060, so measures to eliminate heat waste should be taken now

2. The City's Local Area Energy Plan also mentions the amount of waste heat emitted into the environment and the need to find ways of reusing the waste heat that comes from cooling offices in summer and data centres to provide heat for complementary uses

<https://democracy.cityoflondon.gov.uk/documents/s190766/Appendix%203%20-%20City%20of%20London%20Local%20Area%20Energy%20Plan.pdf>

Waste heat

“Capturing and utilising heat which is produced as a by-product from other processes is an effective and efficient method of providing low carbon heating to buildings directly or via heat networks. This can be via building scale energy centres or larger network scale energy centres as a source for heat pumps. ...Even compared to air source heat pumps, which are commonly proposed to replace gas boilers, waste heat sources can offer a reduction on electricity demand as the heat they produce is normally at a higher initial temperature and therefore requires less energy to be ‘boosted’.

In dense, urban areas such as the City, waste heat is often readily available from a range of sources such as building cooling plant and London Underground ventilation shafts. ...Waste heat from cooling in particular is of interest to the City which has a large proportion of non-domestic buildings such as offices and businesses with servers which require constant cooling.

It is recommended that the Local Plan is updated to mandate new developments with a waste heat source to be enabled for heat offtake. This could also be encouraged through development of a waste heat pilot study to present the financial and carbon benefits to the asset owner.

3. Arups' Urban Heat Snapshot document of heat maps in several major world cities illustrates well the problem of urban heating:

“London's urban centre has the joint-fourth most extreme urban heat island (UHI) “hot spot” of six major cities around the world, with temperatures 4.5°C hotter than rural surroundings,” “In the majority of cities, the hottest spots had less than 6% vegetation cover, while the coolest spots had over 70%.”

“To a large extent, we have designed our cities to be hotter. We’ve pushed out nature, concreted our streets and built high in steel and glass. That makes the built environment a huge contributor to the build-up of heat in cities, compared to their rural surroundings.”

“30% increase in tree cover in European cities could have prevented over 2,500 excess deaths”

The Urban Heat Snapshot recommends measures such as:

*Increasing tree canopy cover

*Creating more permeable surfaces

Using every space possible to build resilience. Arup has been working with local authorities in London to assess the potential for a mass roof retrofit using reflective and solar PV, to cool the buildings themselves and reduce the need for air conditioning, as well as capturing energy to help decarbonise its energy use. This will have a significant impact on the urban heat island effect – with less heat being released by buildings at night.

<https://www.arup.com/perspectives/publications/research/section/urban-heat-snapshot>
