

R0239

Chapter and policy number	Comment	Do you consider the Local Plan to be Legally Compliant? (yes/no)	Do you consider the Local Plan to be Sound? (yes/no)	Complies with Duty to Cooperate (yes/no)
Chapter 1 Strategic Priorities	We very much support the economic, social and environmental objectives set out in the Strategic Priorities in the new Plan. We particularly welcome the focus on the retail and cultural sectors and a recognition that office-based businesses and their workers need a wide range of supporting services to create an attractive destination. We also welcome the recognition of the need for new public space and the focus on sustainability.	Yes	Yes	Yes
Chapter 2 Spatial Strategy	<p>"We support the overall spatial strategy, in particular the designation of the Key Areas of Change. In particular;</p> <ul style="list-style-type: none">- Fleet Valley as an area for Tall Buildings, the support for new hotels and the support for student housing as this demographic will support the ambitions for a wider retail and cultural offer;- City Cluster, including reference to the provision of new and improved open spaces at ground floor level, and the provision of complementary ground floor use and offering,;- Smithfield and Barbican, encouraging culture-led development and improvement of pedestrian permeability;- Tower Gateway as an area identified in Aldgate Connect's Public Realm Strategy, including key gateways such as the Crecent and Vine Street specifically"	Yes	Yes	Yes

<p>Chapter 3 Health, Inclusion and Safety, Strategic Policy S1</p>	<p>We support this policy but are concerned it is not effective or sufficiently positive. Para 13 of the policy should be strengthened to require the provision of, for example, outdoor play space, to help meet the overall ambitions of the Policy. If the Corporation wants to support additional childcare and nursery provision (para 11 of policy) facilities for children to play are an associated need that the policy should be clear about how and where they will be met. In addition, whilst the population demographic of residents may be older people, they may well have grandchildren who will require play facilities when they come and visit.</p> <p>Protecting and enhancing existing sport, play space and recreation facilities and requiring the provision of further publicly accessible facilities, within major developments and public realm improvements, in line with the aims of the City Corporation's Sports Strategy.</p>	<p>Yes</p>	<p>No</p>	<p>Yes</p>
<p>Chapter 3 Health, Inclusion and Safety, Policy HL6</p>	<p>We support this policy but would strongly favour the provision of standalone public toilets rather than a reliance on the Community Toilet Scheme or public toilets within private developments – they are difficult to signpost adequately, and the private space adds a psychological barrier to use.</p>	<p>Yes</p>	<p>Yes</p>	<p>Yes</p>
<p>Chapter 3 Health, Inclusion and Safety, Policy HL7</p>	<p>We strongly support the policy and have demonstrated the demand for such facilities using meanwhile activations (Padel Tennis court at The Crescent in the summer of 2023). We particularly support the specific reference to temporarily activating development sites with sports facilities.</p>	<p>Yes</p>	<p>Yes</p>	<p>Yes</p>
<p>Chapter 3 Health, Inclusion and Safety, Policy HL8</p>	<p>This relates to comment on S1: Healthy and Inclusive City. The policy should be strengthened to require the provision of play facilities. The scope of play facilities should also be widened to include facilities that older children and adults can use and enjoy</p>	<p>Yes</p>	<p>No</p>	<p>Yes</p>

<p>Chapter 3 Health, Inclusion and Safety, Strategic Policy S2</p>	<p>"Support this policy but it should include a reference to encouraging the provision of Safe Havens, especially where 24/7 security is likely to be provided in a building and that these should be taken into account in designing the scheme. These might be defined as all office developments over a certain amount of gross floorspace.</p> <p>The policy refers to weather in para 4. This might be expanded to refer to "severe weather events" and an additional paragraph added to the justification on this subject – there being no reference to any of the risks mentioned in para 4 in the justification other than fire"</p> <p>Add to para 6 in the policy: Ensuring that development proposals cater to community safety and security requirements, for example by providing safe havens, particularly those of people more likely to experience crime and fear of safety, including women, girls, children, younger, older and disabled people</p>	<p>Yes</p>	<p>No</p>	<p>Yes</p>
<p>Chapter 3 Health, Inclusion and Safety, Policy SA3</p>	<p>We support this policy but feel it could be strengthened further as vacant premises are a significant blight on the City and can remain so for a significant period of time whilst awaiting new tenants, refurbishment or demolition</p>	<p>Yes</p>	<p>Yes</p>	<p>Yes</p>
<p>Chapter 5 Offices, Policy OF3</p>	<p>Support the policy and approach to incorporating HVM as close, or integral to, the building facade as possible</p> <p>Temporary use of vacant commercial, business and service buildings or sites (â€˜meanwhile' uses) will be mandatory where the proposed use would not result in adverse impacts on the amenity of the surrounding area or the primary business role of the City...Culture and Vibrancy Plans (CVPs) that accompany major developments should explore the feasibility for meanwhile use</p>	<p>Yes</p>	<p>No</p>	<p>Yes</p>

Chapter 6 Retail, Policy RE1	Support the policy and approach and para 6.2.9 and 6.2.10 and the extension of the Principle Shopping Centre to include Ludgate Hill.	Yes	Yes	Yes
Chapter 6 Retail, Policy RE3	Support his para and especially “The south side of Holborn around Chancery Lane tube, which contributes to the wider ‘central London frontage’ that the London Borough of Camden identify in their Local Plan.” but this should be expanded to include the whole south side of Holborn as far as Holborn Circus to match the retail designation of the north side of the street in the Camden Local Plan. The Elizabeth Line at Farringdon Station has created a much increased gateway to the area with people using Hatton Garden or Charterhouse Street to reach Holborn Circus. The new Museum of London will add to this, with increased footflow from Chancery Lane along Holborn and Charterhouse Street. The current planning application for the London Tunnels, if the development proceeds, will attract 2m people a year to its entrance on Furnival Street. There is an opportunity to respond to this demand by requiring active frontages along the street and extending the retail designation to Holborn Circus.	Yes	No	Yes
Chapter 4 Housing, Policy HS6	Support the policy and approach	Yes	Yes	Yes
Chapter 7 Culture & Visitors, Strategic Policy S6	Support this policy, and the importance it places on culture and late-night activities.	Yes	Yes	Yes
Chapter 7 Culture &	Support this policy	Yes	Yes	Yes

Visitors, Policy CV3				
Chapter 9 Design, Strategic Policy S8	<p>"Support this policy but para 8 of the policy should clearly state that the preference for this space should be at ground level to minimise any barriers to entry such as stairs, lifts and escalators. Ground floor accessible space also has a greater visual impact, active frontage and visual interest – it provides an incidental benefit for passers-by, not just the direct users.</p> <p>The Policy should include reference to recreational facilities such as children's play areas."</p> <p>""Delivers publicly accessible space within the development by maximising the amount of accessible, inclusive and free to enter open spaces, roof terraces, cultural offers and other spaces, including in tall buildings and along the river and around City landmarks. Providing this space at ground level will be strongly encouraged.""</p> <p>Supports health and wellbeing within the City's communities for example by providing children's play facilities;</p> <p>"</p>	Yes	No	Yes
Chapter 9 Design, Policy DE1	Support this policy but make clear that para e requires developments and public realm are designed to withstand severe weather events that climate change will generate.	Yes	No	Yes
Chapter 9 Design, Policy DE3	The policy states: "The need to integrate high quality public art as part of the public realm design." Considering the pressure on open space, greening and seating we would suggest that 'need' is too strong a requirement and the integration of public art should not come at the expense of other more pressing public amenities. A significant amount of public art already exists in around the City when compared to the scarcity of green infrastructure	Yes	No	Yes

	<p>“Encourage the integration of high-quality public art as part of the public realm design where it does not detract from the ability to provide ample open space, greening and seating.”</p>			
<p>Chapter 9 Design, Policy DE4</p>	<p>We welcome the broadening of this policy to include “other retail or leisure facilities’ as viewing galleries and terraces should be multi-functional and activated in order to offer a unique visitor experience. Roof gardens and terraces though should not be at the expense of free, accessible, active and visually appealing public space at ground level.</p>	Yes	Yes	Yes
<p>Chapter 9 Design, Policy DE6</p>	<p>We support the policy: “Artificial greening on hoardings should be avoided,” but could this be enhanced with general encouragement that real greening would be welcomed instead? They would support the City’s biodiversity action plan and help mitigate impacts of the development.</p> <p>Additional sentence after “should be avoided” to say “Real plants that provide cosmetic greening improvements, biodiversity value and absorb pollutants will be encouraged.”</p> <p>The display of advertisements on construction site hoardings will be resisted unless directly related to the development site or provide information such as maps or signs for navigation and local interest purposes or other purposes that improve streetscape and visual amenity during the construction period having regard to the prominence of the frontage within PSCs and main streets.”</p>	Yes	No	Yes
<p>Chapter 10 Transport, Figure 7</p>	<p>"We would suggest, to ensure that the Policy is positively prepared and effective, that in the map showing the designation of the road network, consideration is given to designating Fleet Street and Ludgate Hill, and part of St Paul’s Churchyard as a local access rather than City access street.</p> <p>Elsewhere in this chapter, the plan identifies Fleet Street as a key walking and cycling route, with improvements to be made for both forms of transport. Fleet Street is designated as a Principal Shopping Centre. The closure of the road south of St Mary le Strand’s church at Aldwych in Westminster effectively book ends the west end of Fleet</p>	Yes	No	Yes

	<p>Street. The development of Salisbury Square with its new court complex, and the location of the new police station, with the imperative for fast and easy vehicular based access to these locations will be made better by the redesignation of Fleet Street as a local access road. In addition, it would also improve the setting of St Paul's Cathedral and improve bus journey times along Fleet Street. This is all in line with Policy Strategic Policy S22: Fleet Street and Ludgate especially para 1:" Protecting and enhancing the character and appearance of the royal and state processional route including views of St. Paul's Cathedral from the route."</p> <p>"The Plan should redesignate Fleet Street as a local access road.</p> <p>The map showing the proposed Street Hierarchy should include the Processional Route from St Paul's along Ludgate Hill, Ludgate Circus and Fleet Steet to the boundary with City of Westminster"</p>			
Chapter 10 Transport, Strategic Policy S9	Support this policy	Yes	Yes	Yes
Chapter 10 Transport, Policy AT1	Support this policy especially para 10. Better revealing "hidden routes, courts, alleys and other spaces in ways that respect and celebrate their character and heritage."	Yes	Yes	Yes
Chapter 10 Transport, Figure 10	Support these proposed walking improvements	Yes	Yes	Yes
Chapter 10 Transport,	Support this policy	Yes	Yes	Yes

Strategic Policy S10				
Chapter 11 Heritage & Tall buildings, Figure 12	Support this map of heritage assets but consideration should be given to showing the processional route that is shown on the map on p.202 even though it is not a formally designated heritage asset Show the Processional Route	Yes	No	Yes
Chapter 11 Heritage & Tall buildings, Figure 12	Support this policy and the designation of the Fleet Valley as an area for tall buildings.	Yes	Yes	Yes
Chapter 12 Open Spaces & Green Infrastructure, Strategic Policy S14	Support this policy	Yes	Yes	Yes
Chapter 12 Open Spaces & Green Infrastructure, Policy OS1	Support the reference to “opportunities for play, sport, recreation and leisure” in para 5 of this policy	Yes	Yes	Yes
Chapter 13 Climate Resilience,	Support this policy	Yes	Yes	Yes

Strategic Policy S15				
Chapter 14 The Temple, the Thames Policy Area & the Key Areas of Change, Para. 14.7.5	Welcome reference to FSQ BID and commitment of support from the City Corporation	Yes	Yes	Yes
Chapter 14 The Temple, the Thames Policy Area & the Key Areas of Change, Para. 14.8.7	Add to the end of 14.8.7 : "and will work closely with the Culture Mile BID to deliver public realm and cultural activation."	Yes	No	Yes
Chapter 14 The Temple, the Thames Policy Area & the Key Areas of Change, Strategic Policy S14	Support this policy	Yes	Yes	Yes
Chapter 14 The Temple, the Thames Policy	Support this policy	Yes	Yes	Yes

Area & the Key Areas of Change, Strategic Policy S15				
Chapter 14 The Temple, the Thames Policy Area & the Key Areas of Change, Strategic Policy S17	Support this policy especially “ b. improving access to the River Thames by enhancing north-south routes and the widening of the Riverside Walk.”	Yes	Yes	Yes
Chapter 14 The Temple, the Thames Policy Area & the Key Areas of Change, Strategic Policy S18	Welcome and support this policy and all of its elements.	Yes	Yes	Yes
Chapter 14 The Temple, the Thames Policy Area & the Key Areas of Change,	<p>"Strongly support the focus on a broad range of uses for Leadenhall Market and ensuring it becomes a 7 day-a-week destination.</p> <p>We support the requirement for new developments to provide new and improved open spaces at ground level, free to enter publicly accessible spaces such as roof gardens and roof terraces, and cultural and leisure destinations and other facilities. However, we would</p>	Yes	Yes	Yes

<p>Strategic Policy S21</p>	<p>emphasise that the focus must remain on the ground-level experience with the provision of these amenities provided there rather than at height.</p> <p>We support enhancing the streets, spaces and public realm to improve connectivity with new pedestrian routes. The EC BID's public realm strategy is considering exactly this and will identify specific projects to address the issue. We look forward to working in collaboration with the City on delivering this.</p> <p>We support the desire to introduce new approaches to freight, servicing, delivery and construction logistics. The EC BID is currently undertake research on this and hopes to roll out a pilot scheme late in 2024."</p>			
<p>Chapter 14 The Temple, the Thames Policy Area & the Key Areas of Change, Strategic Policy S22</p>	<p>Welcome and support this policy and all of its elements.</p>	<p>Yes</p>	<p>Yes</p>	<p>Yes</p>
<p>Chapter 14 The Temple, the Thames Policy Area & the Key Areas of Change, Strategic Policy S23</p>	<p>Welcome the policy overall but would push for, alongside reference to other Business Improvement Districts elsewhere in the City, the reference to Culture Mile BID and partnership working. Specifically in relation to public realm and cultural activation</p>	<p>Yes</p>	<p>No</p>	<p>Yes</p>

Chapter 15 Implementation, Strategic Policy S26	We support this policy and especially para 2.f. on Highways and public realm enhancements. The intensity of new developments within, for example, the designated Key Areas of Change, will require improved public realm to meet the needs of people working in the new developments.	Yes	Yes	Yes
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