



**City of London Corporation**  
**City Plan 2040 — Examination in Public**  
**Matters Statement**

**Main Matter 1: Legal Requirements and Overarching Issues**

## **Duty to Cooperate**

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

- **Have all the relevant strategic matters in relation to this duty been clearly identified?**

Yes, the CP has been prepared in the context of Section 33A of the Planning and Compulsory Purchase Act 2004, which places a legal duty on local planning authorities in England to engage “*constructively, actively and on an ongoing basis*” to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters.

All the relevant strategic matters in relation to the Duty to Cooperate (DtC) have been identified. Table 2 of the DtC Statement (LD13) clearly sets out the cross-boundary issues raised in consultation from the DtC bodies, and how these have influenced the key strategic issues to be carried forward in the DtC process in the section underneath table 2. These ‘Key Strategic Matters’ formed the focus of discussion at the DtC meetings throughout the plan-preparation process, and are specifically identified in each SoCG with the neighbouring boroughs (see SoCG 1 to 8).

The CP is prepared in the context of the London Plan, the overarching Spatial Development Strategy for London. The London Plan covers several strategic matters which would otherwise be dealt with in local plans (eg housing targets) therefore the extent of conversations on housing with the relevant DtC bodies have focussed on location and delivery. The City Corporation regularly engages with the Greater London Authority in respect of the preparation and implementation of the London Plan, and has prepared a Statement of Common Ground with the Greater London Authority (SoCG13).

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

The Corporation has maximised the effectiveness of plan-making activities by engaging constructively, actively and on an on-going basis with the prescribed bodies. The Duty to Cooperate Statement (LD13) and the 2024 Supplement (LD14) both set out how the DtC has been complied with at each stage of the plan-preparation process. The DtC prescribed bodies were clearly identified at the outset (and are included within Appendix A to the Statement of Community Involvement (LD10)). The City Corporation ensured that each prescribed body was included on the consultation database, and open dialogue established. In accordance with data protection requirements the consultation database is regularly reviewed and the DtC body list kept up to date (see section 4 of the 2024 update (LD14)).

As well as regular meetings, the City Corporation has made every effort to share key information, promote shared outcomes and joint working, invite representations and schedule meetings with neighbouring boroughs at each stage of plan-preparation. The details of the meetings and topics discussed are set out in Appendix 1 to the DtC Statement (LD13, LD14).

The City Corporation also acknowledges the role of effective cooperation in delivering sustainable growth. In the context of paragraphs 24 to 28 of the NPPF the City Corporation has also engaged with the local communities and relevant bodies (see Consultation Statement LD3-8). It has also reviewed the relevant plans and strategies and engaged with infrastructure providers in preparation of the Infrastructure Delivery Plan (IDP) (ED-INF1).

### **London Plan**

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

Yes, the CP is in ‘general conformity’ with the London Plan (2021). Together the London Plan and the CP will form the Development Plan for the Square Mile on adoption. The CP has been prepared to be in general conformity with the LP, seeking to add local context to, and minimise repetition of, the LP policies.

The Mayor of London has been consulted, and provided comment at each stage of the preparation of the CP (See Consultation Statement Appendix 5, LD4; Appendix 6, LD5; Appendix 9, LD8). A first round of Regulation 19/20 consultation took place in 2021, and the Mayor’s response highlighted an issue of non-conformity between Policy S12 and LP Policy D9 (Tall Buildings). Since this date, additional evidence on tall buildings has been gathered (ED-HTB1-15), heritage (ED-HTB15-31) and the 3D model of the tall buildings clusters has also been made publicly available (ED-HTB32). This evidence informed the new approach to tall buildings to address the previous non-conformity issues.

The City Corporation has worked in collaboration with officers from the GLA with the shared ambition of producing a local plan which is in general conformity with the London Plan. A series of meetings have taken place throughout this process, as detailed in Appendix 1 of the DtC Statements (LD13, LD14).

A further Regulation 19/20 took place in Spring 2024 and the Mayor’s response is listed as (R0292, LD19). This included comments from Transport for London (TfL) (registered as R0118). This representation included some comments and raised some concerns about the approach or impacts of particular policies, but did not raise issues of non-conformity. The City Corporation provided a response in Appendix 9 of the Consultation Statement (LD8).

Following the submission of the above representation the City Corporation has met with the GLA on several occasions and has prepared a Statement of Common Ground with the GLA (SoCG13). As set out in Table 1 of the SoCG several of the matters raised by the Mayor in

relation to housing have now been agreed, and a series of minor proposed changes suggested at Table 2 to the Statement (and within LD26 Proposed Changes Document). The remaining points of contention are comments in relation to heritage and tall buildings. A further note on the Outstanding Universal Value of the Tower of London World Heritage Site has now been produced to provide further explanation of how this informed the preparation of the evidence, and approach to the tall buildings cluster contours for the City cluster (submitted to the examination as Appendix 1 to Matter 7). As a result all concerns relevant to general conformity have been addressed.

**Does the CP meet all other legal requirements, specifically:**

- **Does the content and timescale for preparation of CP accord with the latest version of the Local Development Scheme?**

Yes. The Local Development Scheme (LDS) has been produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The CP has been prepared in accordance with the latest version of the LDS (July 2024) (LD12). Table 1 reproduces table 1 from the 2024 LDS but includes the precise dates each stage was met up to submission. This confirms that the submitted CP has been consistent with the programme outlined in the current LDS on submission.

Table 1

Stage of Plan	2024 LDS dates	Actual dates
Issues and Options (Regulation 18)	Sept - Dec 2016	As previous
Draft Local Plan: Public consultation	Nov 2018 – Feb 2019	As previous
Proposed Submission Draft (Regulation 19)	March – May 2021	As previous
Proposed Revised Submission Draft (Regulation 19)	18 April to 17 June 2024	As previous
Submission	August 2024	29 August 2024
Examination	Autumn/Winter 2024	Spring/Summer 2025/6
Adoption	June / July 2025	TBC

The examination commences on submission of the plan, but post submission dates are out of the control of the City Corporation. The latter stages of the timetable will depend on the progress of the examination.

On the request of the Deputy Prime Minister, all local planning authorities have been asked to prepare a new LDS by 6 March 2025. In accordance with Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended) Table 1 within the 2025 version of the LDS specifically highlights progress against the 2024 version. For completeness the new LDS has now been submitted to the examination as LD28.

- **Has the CP consultation complied with the Statement of Community Involvement and public consultation requirements in the Town and Country Planning (Local Plan) (England) Regulations 2012?**

Yes, the CP has complied with the Statement of Community Involvement (SCI) (LD10) and public consultation requirements of the Town and Country Planning (Local Plan) (England) Regulations 2012 at each stage of plan preparation.

The SCI was last reviewed and updated in July 2024 (LD10). It sets out how communities will be involved in the plan-making processes, consultation techniques and clearly lists the general, specific and DtC consultation bodies in Appendices A and B. Table 2 sets out the minimum consultation requirements at each stage. The Consultation Statement (LD3) sets out how these have been met and exceeded, as below:

- Regulation 18 consultation (Section 2)
- Regulation 20 (2021) (Section 3)
- Informal engagement (2023) (Section 4)
- Regulation 20 (2024) (Section 6), Appendix 8 (LD7) evidence of publicity

Additionally, the City Corporation met the requirements of the Regulations at submission stage through making the submission material ‘publicly available’ (Regulation 35) (see Notice of Submission, LD21) and the Hearings Notice (LD27).

The Consultation Statement also sets out how the consultation has shaped the development of the CP (see Sections 2 to 6) and the full responses included at Appendix 5 (LD4), Appendix 6 (LD5) and Appendix 9 (LD8) the main issues raised by representors and the City Corporation’s response. Furthermore, in Summer 2024 a ‘You Said, We Did’ document was produced to highlight in a clear and accessible manner how the CP evolved from comments received at the previous Reg19/20 stage in 2021 and as submitted (see ED-CON1).

- **Has the CP been subject to a Sustainability Appraisal (SA) and have the requirements for Strategic Environmental Assessment been met? Is it clear how the SA influenced the final plan and dealt with mitigation measures?**

Yes. The CP has been subject to a Sustainability Appraisal (SA) and the requirements for Strategic Environmental Assessment (SEA) have been met. The requirements of SA and SEA have been incorporated together into one document which is the final 2024 Sustainability Appraisal Report (ED-SUS1) and Appendices 1 to 5 (ED-SUS2-6). The SA has been prepared iteratively alongside the development of the CP, however due to the many stages and the fact that the Corporation carried out two Regulation 19/20 stages for further clarity the process has been set out below, and for completeness all documents have been added to the examination library.

#### 2016 Scoping Stage

As set out in Section 3.3 of the SA Report (ED-SUS1), the SA Scoping stage was originally carried out in 2016. This combined the SA/SEA requirements into an Integrated Impact Assessment also incorporating the requirement for Equality Impact Assessment (EqIA) and Health Impact Assessment (HIA). This included an assessment of the baseline, relevant plans and programmes, sustainability issues, defined the scope of the SA process and introduced the sustainability objectives. This was consulted upon between 11 January and 22 February 2016, and consultation responses were received from three stakeholders. Appendix 3 of the Final SA Report (ED-SUS4) highlights the comments received and where amendments to the SA were made. For completeness the January 2016 Scoping Report has now been uploaded to the examination library (ED-SUS7).

#### Issues and Options Stage

An updated IIA Scoping Report was produced for the Issues and Options stage, which was consulted upon alongside the plan between 19 September and 31 October 2016. Comments were received from two stakeholders which resulted in changes to the baseline, compatibility matrix and the SA objectives (see Appendix 3, ED-SUS4). The IIA Scoping Report (September 2016) has been added to the examination library at ED-SUS8.

#### Draft Plan Stage

A draft SA was produced at Draft Plan stage. This was consulted upon in November 2018. This first draft SA Report has been added to the examination library at ED-SUS9.

#### Proposed Submission (2021)

A second draft SA was produced at Draft Plan stage. This was consulted upon in March to May 2021 but no comments were received. The second SA Report has been added to the examination library at ED-SUS10.

#### Second Scoping Stage (2023)

An updated Scoping Report was produced to accompany the informal engagement in 2023. As noted in section 3.3.3 of the Final Sustainability Appraisal this Scoping Report relates to the requirements of SA/SEA only as the EqIA and HIA requirements have been completed separately (see ED-HIS2, and ED-HIS1). The statutory consultees were consulted on the updated Scoping Report between 21 August and 22 September 2023. Comments were received from two stakeholders, with some amendments made to the report as a result. The 2023 Scoping Report has been added to the examination library at ED-SUS11.

#### Proposed Submission (2024)

The final SA Report (ED-SUS1-6) was produced to accompany the City Plan 2040 proposed submission document, and was consulted upon between 18 April and 17 June 2024.

#### SEA Requirements

The requirements to carry out SA and SEA are distinct and covered by separate pieces of legislation. However, as advocated by Planning Practice Guidance (Paragraph: 001 Reference ID: 11-001-20190722) it is possible to satisfy both using a single appraisal process. The initial stages of the appraisal process were conducted within the framework of an Integrated Impact Assessment (IIA) including SA, SEA, HIA and EqIA. The latter stages involved SA/SEA only.

Table 1 of ED-SUS1 sets out how the requirements of the SEA Regulations have been met, including the dates of consultation on the SA at scoping, issues and option, draft and proposed submission stages.

#### How SA process has influenced the CP

The SA process has been iterative. The SA process including the consultation responses have influenced the content and outcomes of both the final Sustainability Appraisal Report and the CP.

Appendix 3 of the Sustainability Appraisal Report (ED-SUS4) sets out the SA consultation responses for each stage and sets out where the SA Report has been amended as a result of the SA process. No comments were made at draft (2018) and Proposed submission (2021).

In terms of how the SA process has influenced the CP itself Table 4 of ED-SUS1 demonstrates how City Plan Objectives were influenced by the SA process. Section 5.3 sets out the reasonable alternatives, and Table 9 sets out the reasons for the preferred approach. Section 5.6 sets out the changes made between the 2021 and 2024 Proposed Submission stages, and assesses the impacts of these changes against the sustainability objectives, with some positive impacts against, for example, Policy HL6: Public Toilets, Policy SA3: Designing in security, Strategic Policy S3: Housing. Section 6 sets out how the Sustainability Appraisal Report was taken into account in decision-making, which took place between 2021 and 2024 Proposed Submission stages, and highlights three changes which can directly be attributed to the SA process at paragraph 6.1.3.

#### Mitigation Measures

Section 7 of ED-SUS1 set out the detail of mitigation measures introduced to deal with any potential negative effects of the plan or policies. Appendix 5 (ED-SUS6) makes some recommendation for mitigation measures to address any negative effects of the policies. A series of amendments were made to the plan as a result, including:

- DE6 Shopfronts- additional reference made to role in climate mitigation and resilience though the addition of “Consider the potential to use awnings and canopies to provide shade and mitigate against adverse climate impacts” within bullet 7
- CR3 Sustainable Drainage Systems- additional reference to taking account of other historic assets, not just archaeology

- Policy CR1 Overheating and Urban Heat Island Effect- More detail regarding how building design will help minimise contribution to the heat island effect
- Policy CR2: Flood risk - additional specific reference to Sustainable Drainage Systems.
- Strategic Policy S19: Pool of London – additional reference to measures to minimise flood risk

Although other recommendations were not taken forward, this was because it was felt that these matters were already covered by over-arching policies, for example additional reference to BREEAM within specific policies was not required given the requirements of Policy DE1: Sustainable Design.

- **Have the requirements for appropriate assessment under the Habitats Regulations been met? Have the results of the Habitats Regulations Assessment been carried forward in the CP?**

Yes, the requirements of the Habitats Regulations have been met through the Habitat Regulations Assessment (ED-OGI3). This included a Screening and then an Appropriate Assessment. The purpose was to determine whether any of the CP policies, in combination with other plans and projects, were likely to have adverse effects on the integrity of any Special Area of Conservation (SAC), Special Protection Area (SPA) or Ramsar site.

The Screening exercise concluded that there were potential likely significant effects on air pollution with commuting traffic passing Epping Forest SAC, Lee Valley SPA and Ramsar site, Richmond Park SAC and Wimbledon Common SAC; direct pollution into the Thames affecting the Thames Estuary and Marshes SPA / Ramsar and the Outer Thames Estuary SPA; Wastewater treatment into the Thames, affecting Thames Estuary and Marshes SPA / Ramsar and the Outer Thames Estuary SPA; and water abstraction from the Lee Valley SPA/Ramsar.

Appropriate Assessment was then carried out to consider whether the likely significant effects will, in light of mitigation and avoidance measures, result in adverse effects on integrity of the European sites. This concluded that the mitigation measures included within the CP policies, along with regulatory safeguards, will be sufficient to avoid adverse effects of pollution and water quality and quantity on the integrity of European sites.

Chapter 5 of the Habitats Regulations Assessment sets out the mitigation measures required to avoid the adverse effects. This chapter also shows how they have been carried forward in the CP, as below:

- Policy VT3: Vehicle Parking Policy – requirement for car free development, resisting new car parks and electric vehicle charging
- VT2: Freight and Servicing Policy - electric vehicle charging requirements
- CV4: Hotels – accessible locations



- Strategic Policy S10 Active Travel and Healthy Streets- putting needs of walking and wheeling first
- Strategic Policy S19: Pool of London – removal of car parking
- Policy AT1 Pedestrian Movement, Permeability and Wayfinding- improving routes for pedestrians
- Policy HL5: Contaminated land and water quality- site specific requirements to avoid impacts
- Policy IN1: Infrastructure provision and connection
- Policy CR3: Sustainable drainage systems (SuDS) – all development to include SuDS
- Strategic Policy S17: Thames Policy Area- no adverse effects on the habitats

Natural England did not have any comments to make on the CP (R0003). The Environment Agency (R0112) also responded with no comments in relation to the HRA.

- **Has the preparation of the CP complied with the Town and Country Planning (Local Plan) (England) Regulations 2012?**

Yes, the CP has been prepared in accordance with the Town and Country Planning (Local Plan) (England) Regulations 2012. The main requirements of the regulations at Part 6 Local Plans and how they have been complied with are set out in Table 2 below.

Table 2

Regulation	How the requirement met
<b>Regulation 4</b>	The SCI at Appendix A and B list the general, specific and the Duty to Cooperate bodies
<b>Regulation 5 and 6</b>	The City Plan is considered a local development document
<b>Regulation 7</b>	No request been made by the Mayor of London.
<b>Regulation 9</b>	The policies map is included at LD2 and LD11.
<b>Regulation 8</b>	City Plan 2040 states that it is the City of London local plan. The plan contains reasoned justification of the policies contained in it.
<b>Regulation 10A</b>	The Local Plan 2015 is in the process of being reviewed through the CP preparation process.  The Local Development Scheme (LDS) and the Statement of Community Involvement (SCI) have been reviewed and kept up to date throughout the plan-preparation process, the latest being LD12 and LD10.
<b>Regulation 17</b>	The Proposed Submission Documents are: a) the City Plan 2040 (LD1) b) Policies Map and amendments to the Policies Map (LD2, LD11) c) Sustainability Appraisal report (ED-SUS1-6) d) Consultation statement (LD3- 8)

	<p>e) Supporting documents (including Statement of Community Involvement (LD10; Local Development Scheme, LD12; Duty to Cooperate Statement, LD14) and other documents (LD4 to 25, ED-CON1)</p> <p>The Statement of Representations Procedure reproduced in Figure 2 of the Consultation statement (LD3)</p>
<b>Regulation 18 (1)</b>	<p>The Consultation Statement (LD3) (sections 2 and 4) provide details of the consultations under Regulation 18. It sets out the methods used, which included notifications to general and specific consultation bodies and those registered on the Corporation’s consultation database.</p>
<b>Regulation 18 (2)</b>	<p>The SCI has been kept up to date from the start of the plan-preparation process, the latest version being July 2024 (LD10). This lists at Appendix A and B lists the general, specific and the Duty to Cooperate bodies.</p> <p>The City Corporation maintains a consultation database which include bodies under (a) and (b) and those registered under part (c).</p> <p>At each stage of the plan-making process this database is used to inform parties of the preparation of the plan, where the information can be found (website, other locations) and subsequent consultations. Alerts were also made via the Corporation’s consultation portal. This ensured conformity with Regulation 35 in terms of making the information publicly available at each stage of the plan-making process.</p>
<b>Regulation 18 (3)</b>	<p>The Consultation Statement at Sections 2 to 6 set out how the representations received at each stagewere taken into account.</p>
<b>Regulation 19</b>	<p>The proposed submission documents included the SA report (ED-SUS1), Policies Map (LD2, LD11), Consultation Statement (LD3-8), representations (LD9) and other documents (see Regulation 17 above). These documents and the Statement of Representations Procedure (Figure 2 of LD3) were all made available in accordance with Regulation 35. This made clear that this met the requirement of Regulation 19 and the consultation was under Regulation 20, and also included the list of the documents, places and times of inspection (as required by Regulation 35).</p> <p>The Statement of Representations Procedure reproduced at Figure 2 (p146) within the Consultation Statement (LD3) was sent by email to all the general and specific consultation bodies, and others registered on the consultation database.</p> <p>The Consultation Statement (LD3) provides further detail of the approach at section 6.</p>

<b>Regulation 20 (1)</b>	Appendix 8 of the Consultation statement (LD7) includes all the representations received under Regulation 20.
<b>Regulation 21</b>	The City Corporation requested an opinion from the Mayor of London under section 24(4)(a) of the Act.
<b>Regulation 22 (1)</b>	The Notice of Submission (LD21) sets out the list of Submission Documents. This included (a) SA report (ED-SUS1), (b) Policies Map (LD2, LD11), (c) Consultation Statement (LD3-8), (d) representations (LD9) and (e) other documents.
<b>Regulation 22 (3)</b>	The Submission documents (as above) and the Notice of Submission (LD21) were all made publicly available in accordance with Regulation 35. This included placing in principal locations, on the Corporation’s website and via emails to the general and specific bodies, and others registered on the Corporation’s local plan consultation database. Alerts were also made via the Corporation’s consultation portal.
<b>Regulation 23</b>	Currently underway
<b>Regulation 24</b>	On 30 January 2025 the City Corporation published the Notice of Hearings (LD27). This made clear the date, times and place where the hearings were to be held and the names of the persons appointed to carry out the examination. This information was made publicly available in same way as other material in accordance with Regulation 35. This meant putting the notice, the Inspector’s Matters and Questions and the Guidance Note on the Corporation’s website, and informing all those registered on the Consultation database of this fact.
<b>Regulation 35</b>	At each stage the relevant documents have been made ‘available’ for the specified period (as per the regulations) by being made available for inspection at the Guildhall and other locations across the Square Mile, and on the Corporation’s website.

- **Does the ‘policies map’ correctly illustrate geographically the application of policies of the CP?**

Yes, the policies map (PM) correctly illustrates geographically the application of policies on an Ordnance Survey map, through PDF file and on the Corporation’s City maps. The PM is split into three parts, the third part dedicated entirely to the tall buildings contour lines. LD2 sets out the Policies Map as would be adopted, and, in accordance with the Regulation 5 (b) and PPG (Paragraph: 002 Reference ID: 61-002-20190315) LD11 shows the proposed changes to the 2015 Adopted Policies Map. Both these documents were ‘made available’ for consultation at Regulation 19/20 stage.

**Consistent with National Policy**

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

- **Does the CP contribute to the achievement of the three dimensions of sustainable development – economic, social, and environmental?**

The CP has been prepared to be consistent with the NPPF. Paragraph 1.1.2 of the CP clearly sets out how the CP objectives in paragraphs 1.2 to 1.4 have been developed to reflect paragraph 8 of the NPPF, and are considered ‘strategic priorities’ in the context of Section 19(1B) - (1E) of the Planning and Compulsory Purchase Act 2004. The CP objectives are intended to demonstrate local context to the national sustainable development objectives.

Paragraph 9 of the NPPF sets out how these objectives should be delivered through the preparation and implementation of plans. A Proposed Change has also been put forward to the examination to include a diagram showing the relationship between the Vision, the Strategic Priorities, the Spatial Strategy and the policies of the CP (see PC4 of LD26).

In relation to the preparation of plans, paragraph 11 and Chapter 3 (Plan-making) are of relevance. Paragraph 11 introduces the presumption in favour of sustainable development, and the CP has been prepared in the context of 11 a) and b). The CP promotes a sustainable pattern of development (see Chapter 2, Spatial Strategy), which has been tested within the Sustainability Appraisal (paragraph 5.5.4). The strategy follows the approach of the London Plan, which focusses growth within the Central Activities Zone, which is a highly sustainable location (see also Matter 2). It also focusses growth in the least sensitive locations in the City (see also Matter 7). It also meets the identified development needs for housing, offices, retail and leisure, and hotels and meets the needs within the area (Chapters 4 to 8); aligns growth and infrastructure (see Chapter 8); improves the environment (Chapters 9, 11 and 12); mitigates climate change and adapts to its effects (Chapter 13).

The CP clearly sets out which policies are considered ‘strategic’ in the context of paragraphs 11 (b), 17, 20 to 22, which are all policies with a ‘S’ prefix and which are all labelled in the policy title as strategic, and ‘non-strategic’ in the context of paragraphs 29 to 30. The strategic policies provide for the objectively assessed needs for housing and other uses. In the context of paragraph 11 (b) the CP seeks to meet all its needs within the Square Mile, and there are not considered to be any reasons under i) or ii) why this would be inappropriate to do so.

Table 3 shows how the ‘Strategic Policies’ of the CP reflects the requirements of paragraph 20 (a) to (d).

Table 3

(a) homes (including affordable housing), employment, retail, leisure and other commercial development	S3: Housing S4: Offices S5: Retail and active frontages S6: Culture and Visitors
(b) infrastructure for transport, telecommunications, security, waste	S7: Infrastructure and Utilities S9: Transport and Servicing

management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)	S15: Climate Resilience and Flood Risk
(c) community facilities (such as health, education and cultural infrastructure)	S1: Healthy and Inclusive City
(d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation	S14: Open Spaces and Green Infrastructure S11: Historic Environment S8: Design S15: Climate Resilience and Flood Risk

Paragraph 23 of the NPPF states that the broad locations for development should be identified on a key diagram and land use designations and allocations on the Policies Map. The Key Diagram is shown within Figure 1 of the CP and land use designations within the Policies Map (LD2). The NPPF goes on to say that strategic policies should address the objectively assessed needs and include planning for or allocating sufficient sites to do so. The CP strategy plans for meeting the needs, but does not include allocations. Due to the compact and highly urbanised nature of the Square Mile, development is generally considered appropriate in all locations bar some identified exceptions (e.g. open spaces). The policies of the CP already provide sufficient context and parameters for re/development and the Key Areas of Change (KAOC) identify where significant change or regeneration is to take place. The tall buildings areas identify the locations where the needs can be met through tall building developments, and the residential areas identify the locations where residential is appropriate. Therefore site allocations are unnecessary. This issue is also addressed under Matter 3 in relation to housing.

As set out above, effective cooperation (paragraphs 24 to 28) has underpinned the preparation of the CP. This is demonstrated in the SoCG and the Duty to Cooperate Statements (see question above).

The CP is underpinned by relevant and up-to-date evidence (paragraphs 32 to 34). Further detail will be provided in each topic-based Matter, but all evidence is included on the Corporation’s ‘evidence base’ website. The CP has been informed by the preparation of the sustainability appraisal (ED-SUS1), which includes sustainability objectives, identification of adverse impacts, reasonable alternatives and mitigation measures. The CP also sets out what contributions are expected from development (NPPF paragraph 35 (paragraph 34, 2023 version) as set out in Chapter 15 of the CP and other policies where required.

In accordance with paragraph 36 the City Corporation considers the CP as submitted to be sound.

With particular reference to the ‘implementation’ of plans as per paragraph 9, the below sets out how each chapter of the CP reflects the chapters of the NPPF. Further detail is provided in each topic related Matter.

- 5. Delivering a sufficient supply of homes – Chapter 4 Housing (Matter 3 Statement)
- 6. Building a strong, competitive economy – Chapter 5 Offices (Matter 4 Statement)
- 7. Ensuring the vitality of town centres – Chapters 6 and 7 (Matters 5 and 6 Statements)
- 8. Promoting healthy and safe communities- Chapter 3 (Matter 10 and 11 Statements)
- 9. Promoting sustainable transport- Chapter 10 (Matter 15 and 16 Statements)
- 10. Supporting high quality communications- Chapter 8 (Matter 17 Statement)
- 11. Making effective use of land- Chapter 3 (All)
- 12. Achieving well-designed places- Chapter 9 (Matter 8 Statement)
- 14. Meeting the challenge of climate change, flooding and coastal change- Chapter 13 (Matter 13 Statement)
- 15. Conserving and enhancing the natural environment- Chapter 12 (Matter 12 Statement)
- 16. Conserving and enhancing the historic environment- Chapter 11 (Matter 7 Statement)
  
- **Has it been positively prepared ‘in a way that is aspirational but deliverable’? (Paragraph 16 of the NPPF)**

The policies of the CP are aspirational but deliverable. The CP is aspirational by acknowledging the City’s pivotal role in fulfilling London’s strategic development needs for office spaces (Chapter 5) while seeking to diversify the uses through provision of supporting retail and leisure (Chapter 6), and cultural spaces (Chapter 7), while championing sustainability through encouraging retrofit approaches and climate resilience (see Chapters 12 and 13).

The CP is shaped by early, proportionate and effective engagement as set out in the Consultation Statement (LD3-8), and has been designed to avoid repetition of national policy and the London Plan. The CP seeks to meet the objectively assessed needs in full as required by paragraph 36 of the NPPF (paragraph 35, 2023 version) (see ED-HOU1, ED-HOU3, ED-OFF1, ED-CAV1, ED-RET1 and ED-INF1) but also uses analysis of past and projected delivery trends, development capacity and detailed testing to ensure that the policy requirements are deliverable (see windfall assumptions within the Housing

Explanatory Note LD22, Section 5); office capacity (see LD23, section 1.6) and the BNG Study (ED-OGI1).

The Viability Study (EBA1) tested the ability of developments in the Square Mile to accommodate emerging policies in the CP alongside prevailing rates in the CIL Charging Schedule and Mayoral CIL (subject to indexation). Table 8.1 reviews the cost impacts of the policies of the CP. The key findings at paragraph 1.7 set out that generally and individually the policy requirements tend to have marginal effects on scheme viability. The study also identified that the cumulative impact of policies did not render schemes unviable, but the viability of each commercial scheme will be substantially influenced by the value of the existing building and the extent of the uplift in floorspace.

- **Is the CP consistent with the NPPF in all other respects? Or if not, what is the justification for any inconsistency?**

Yes, the CP is consistent with the NPPF and PPG in all respects. Where the CP goes above minimum requirements this is clearly stated and backed up by evidence. For example, Policy OS3 goes above the 10% biodiversity net gain requirement but in accordance with the PPG (Paragraph: 006 Reference ID: 74-006-20240214) this is evidenced by the BNG Study (ED-OGI1). This highlights that the 10% requirement would not deliver meaningful BNG given the low baseline, concluding that it is both “*feasible and reasonable to expect all development proposals in the Square Mile to deliver 3 BU/ha on site*” (page 1). This has also been tested in the Viability Study (EBA1), concluding that the impact on land values is marginal (page 56).

- **Do the policies in the CP provide a clear indication of how a decision maker should react to a development proposal?**

There is a clear structure to the CP. The Strategic Objectives and the Vision (Chapter 1) set the scope of the CP, in the context of the NPPF and sustainable development aspirations. The Spatial Strategy (Chapter 2) sets out the spatial development patterns as carried through within the plan policies. The topic and area-based chapters (3 to 14) each clearly identify Strategic Policies and other (non-strategic) development management policies. Chapter 15 sets out the planning contribution and viability assessment requirements.

Like all plans, the City Plan must be read as a whole; care has been taken to avoid repetition and unnecessary cross-referencing.

Each policy is also clearly structured, with ‘policy text’ forming the policy itself, with the supporting text divided into the explanation of the ‘reason for the policy’ and ‘how the policy works’. This makes clear how a decision-maker should respond to each part of the policy in assessing the proposal.

The policies are clearly worded with criteria-based approaches. They are also generally positively worded, supporting development unless specific criteria are met. The exceptions to this approach where policies set out circumstances where proposals will be refused relate to impacts on heritage assets (HE1), or where residential or infrastructure requires protection. Policies make clear the thresholds which apply, for example VT1 (4) sets out thresholds for Transport Assessment and Travel Plans. Where required, policy triggers are clearly set out in the policy, such as S12 and the definitions of a Tall Building being above 75m (AOD).

The Glossary also assists in setting out clear definitions. This explains key terms and definitions, including making clear the definition of major development, which is used as a trigger for several policies, e.g. HL1 and requirement for Equality Impact Assessment. Some minor amendments for the purposes of clarity have also been proposed for discussion at the examination in the Proposed Changes document (LD26), including PC106 to add a definition of wider environmental sustainability benefits to the glossary.

Further details on specific policies are included in the subsequent Matter statements.