City of London Corporation

City Plan 2040 — Examination in Public

Matters Statement

Main Matter 17: Infrastructure

Are the polices relating to Infrastructure requirements justified by appropriate available evidence, having regard to national guidance, and local context, and are they in 'general conformity' with the London Plan?

The policies on Infrastructure are justified by appropriate evidence, having regard to national guidance and local context and they are in general conformity with the London Plan.

The IDP (ED-INF1) on page 49 identified seven priority intervention areas of the Local Area Energy Plan: maximising the energy efficiency of buildings, maximising rooftop PV, decarbonising transport, heat decarbonisation, waste heat capture, reinforcement of electricity distribution network and rollout energy system flexibility. This includes the expansion and decarbonisation of existing heat networks in the area, waste heat offtake opportunities, and enabling existing and new developments to connect to future networks. LP policy SI3 (C2) requires the identification of existing and proposed locations for future heating and cooling networks and opportunities for expansion and inter-connection identified. The City of London is listed in London Plan Figure 9.3 as a Heat Network Priority Areas. This is reflected within CP policy IN1(1)(b), the policy responds to the NPPF and LP stating: "*Utility infrastructure and connections must be designed into and integrated with the development. The following infrastructure requirements should be planned for heating and cooling demand and viability of provision. Designs should incorporate connections to existing decentralised energy networks where feasible*".

The Utility Infrastructure Strategy (ED-OFF3) sets out the steps that will be taken, including through partnership working, to ensure the City's utilities infrastructure remains fit for purpose and future proofed. For example, page 17 of the UIS outlines the challenges requiring future proofing, including changes in telecommunications infrastructure which will enable Openreach to focus on maintaining and enhancing its fibre network in the Square Mile. In paragraph 118 of the NPPF it states: "Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution)". CP policy IN1 (1)(c) directly responds to the NPPF requiring that digital and telecommunications network demand, including full fibre wired and wireless infrastructure, is planned for, and Policy IN1 (2) encourages the pre-instalment of communal chambers or other innovative solutions. Policies in the infrastructure chapter of the CP ensure that high quality communications infrastructure is present to support economic growth and social well-being.

Paragraph 7 of the NPPF (2023 version) states the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner. Paragraph 8A of the NPPF states to build a strong, responsive and competitive economy, growth must be supported by the provision of infrastructure. Paragraph 11 (A) states, for plan making this means that all plans should promote a sustainable pattern of development that seeks to align growth and infrastructure. CP strategic policy S7 (2) builds on this by ensuring that developers engage with infrastructure providers

at an early stage of design to ensure that the infrastructure needs arising from the construction and operation of new development are addressed and required utility networks and connections are in place in time to serve the development.

London Plan Policy SI6 (A and B) aims to ensure London's global competitiveness by requiring development proposals to meet the expected demand for mobility connectivity and take appropriate measures to avoid reducing mobile connectivity, promoting development plans to support the delivery of full-fibre or equivalent digital infrastructure. CP policy IN1 (3) therefore confirms this stating: "*Developers should conduct mobile signal tests within the development and consider the need for provider neutral in-building mobile solutions where coverage is poor".* Paragraph 8.2.6 states mobile connectivity within and around buildings is critical to the City of London. Paragraph 8.2.6 of the CP states that developers will need to ensure that their buildings do not worsen existing signal strength in the area and consider the provision of in-building solutions where signal strength is poor.

Are the policies relating to Infrastructure positively prepared 'in a way that is aspirational but deliverable'?

The policies in the CP relating to Infrastructure are positively prepared in a way that is aspirational but deliverable. A clear 'golden thread' runs through the plan from the Vision and Objectives to the Spatial Strategy, strategic and non-strategic policies through to the Infrastructure chapter. The policies have aspirations for high quality, energy efficient, low carbon infrastructure that can enable the City to grow. The policies in the City Plan are aspirational because they are planning infrastructure in advance and anticipating future requirements to be delivered alongside and by new development. The aspirations of the other policies in the City Plan are made possible by ensuring that the electricity, gas, water supply, heat, telecommunications, digital and other infrastructures are functioning. Paragraph 1.1 of the IDP (ED-INF1) states that infrastructure is vital to ensure that the City can continue to maintain its economic role and provide services to its workers, residents, visitors, and students. It is an essential part of sustainable development supporting growth, mitigating against climate change, delivering climate resilience and continuing to support a high quality of life for residents, businesses and visitors. The policies are deliverable as they will ensure that the City's role as an employment centre is maintained and improved.

The Infrastructure policies are directly connected to the aspirations of the Strategic Priorities. One of the Economic Objectives is "helping to facilitate the infrastructure requirements of the City". The infrastructure policies support the Strategic Priorities of the City Plan. The policies of the CP are anticipating the future infrastructure needs and ensuring that they are in place for occupiers. For example, CP policy IN1 (3) states: "Developers should conduct mobile signal tests within the development and consider the need for provider neutral in-building mobile solutions where coverage is poor". The policy language provides the specific deliverable actions, such as providing neutral in-building mobile solutions, in order to facilitate the infrastructure requirements of the City to ensure that the professional services which rely on digital communications are able to function effectively – an approach that is already being implemented in some developments, for example at 8 Bishopsgate.

Paragraph 8.2.0 of the CP states that the dense concentration of businesses means that high demand is focused in a restricted geographical area. Electricity, telecommunications, water, gas and district heating and cooling networks are of particular importance. The aspirations of the Infrastructure policies are to provide high quality infrastructure in alignment with the growth of the Square Mile. CP policy S7 (1D) states that to coordinate and facilitate infrastructure planning and delivery and the transition towards a zero carbon and climate resilient City, all development should seek to provide the latest and best quality utility infrastructure and connections to serve the development. Paragraph 8.1.0 states that maintaining high quality and sustainable utilities provision in the Square Mile is crucial for the City to remain competitive and address climate challenges. The aspirations of the policies are for infrastructure to support the transition towards a zero carbon and climate resilient City. The aspirations of the Infrastructure policies are connected to the aspirations of the City's Climate Action Strategy which, detailed in the IDP (ED-INF1), has set out the ambition of a net-zero Square Mile by 2040 with a set of 5-year milestones for decarbonising key areas such as commercial buildings and transport. The City has developed a Local Area Energy Plan and is participating in the Government's Advance Zoning Programme in advance of the implementation of the heat zoning regulations, demonstrating wider efforts to help implement the growth of heat networks in the Square Mile. Schemes are currently preparing for connection to heat networks. For example, at London Wall West, the development would contribute to the expansion of the Citigen heat network by hosting a local energy centre within the development. The Infrastructure policies are deliverable because developments in the Square Mile are already incorporating sustainable infrastructure aspirations as aligned with the policy.

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

The policies in the CP provide clear direction as to how decision maker should react to development proposals. The policies in the CP are aligned with the NPPF which requires plans to contain policies that are clearly written and unambiguous (paragraph 16). As well as the policies being clearly structured and worded, they have been drafted such that they are clearly linked with the relevant environmental, social and economic objectives of the CP and overarching strategic policies, for example 1.2 Economic Objective seeks to help facilitate the infrastructure requirements of the Square Mile.

Policies S7, IN1, IN2 and IN3 are positively worded. The policies are split into the policy text, 'reason for the policy' and 'how the policy works'. These three distinct sections for policies provide background and clarity to decision makers and stakeholders on how to interpret the policies.

CP policy S7 is a strategic policy which sets out the approach to infrastructure, including the direction to the non-strategic policies in the chapter of IN1, IN2 and IN3. CP strategic policy S7 (2) states that developers must engage with infrastructure providers at an early stage of design to ensure that infrastructure needs arising from the construction and operation of new development are addressed and required utility networks and connections are in place in time to serve the development. In paragraph 8.1.1 of 'Reason for the policy', it states that there are specific challenges to providing the infrastructure needed to support existing activity in the City and the development set out in this Plan, such as the dense concentration of business activity resulting high demand for infrastructure concentrated in a small geographical area. Paragraph 8.1.3 of 'How the policy works' states that developers will be required to demonstrate liaison with infrastructure providers at an early stage of building design, ensuring that future needs are planned and delivered in a timely fashion with minimal disturbance to City streets, businesses and residents.

CP policy IN1 (2) states that in order to avoid delays to prospective tenants, developers should consider pre-installing telco communal chambers or other innovative solutions to help facilitate communications networks, into the new development. Paragraph 8.2.0 of the 'Reason for the policy' outlines that the impact of Covid-19 has highlighted the importance of digital connectivity and the transition to an increasingly digital-reliant economy. Paragraph 8.2.5 of 'How the policy works' states that it is essential for the City to be digitally connected and responsive to the changing requirements for business, equipping businesses to benefit from the digital transformation stimulated by the Covid-19 pandemic. The policy is clear to decision makers that buildings must be equipped to meet the digital needs of current and future occupiers.

CP policy IN2 (3) states that developers are required to demonstrate through effective engagement with providers, that adequate utility infrastructure will be provided, both on and off the site, to serve the development during construction and operation. In 'Reason for the policy' paragraph 8.3.0 states that early engagement with infrastructure providers is essential to ensure that there is adequate capacity to serve the development during its construction and operational phases. Paragraph 8.3.4 of 'How the policy works' outlines that developers will be required to submit written evidence from utility providers that effective engagement has been carried out. This could include a joint statement of intent endorsed by the relevant providers. Paragraph 8.3.4 states that section 106

agreements may be used to ensure continuous engagement regarding route planning and confirmation of load demands.

CP policy IN3 states that developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes where these are available. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged. Paragraph 8.4.0 of 'Reason for the policy' states that the provision of additional pipe subways would provide greater capacity for pipes and cables, reducing the need for streetworks which often cause disruption. Paragraph 8.4.1 of 'How the policy works' states that the City Corporation will seek the expansion and integration of development into the pipe subway network where there is sufficient evidence to demonstrate that services to development would be better integrated within an established pipe subway. Given the cost of installing new pipe subways, it is especially important to make efficient use of the existing network. Developments which are located adjacent to existing pipe subways will normally be expected to install connections.