

City of London Corporation City Plan 2040 — Examination in Public

Matters Statement

Main Matter 9: The Temple, the Thames Policy Area & the Key Areas of Change • Are the policies relating to The Temple, the Thames Policy Area & the Key Areas of Change justified by appropriate available evidence, having regard to national guidance and local context; and are they in 'general conformity' with the LP?

The policies relating to The Temple, the Thames Policy Area and the Key Areas of Change are set out in Chapter 14 of the CP and are justified by appropriate available evidence and having regard to national guidance, local context and are in 'general conformity' with the LP.

The Thames Policy Area, The Temple and the Key Areas of Change are defined on the CP's Key Diagram (See Figure 1 and Figures 20-34). Policies TP1 and S17 are required to reflect the unique nature and 'specialist cluster' of the Temple (see LP Policy SD5 (G)), and of the Thames Policy Area (see LP Policy SI14 (D)). The Key Areas of Change (S18-S25) have been identified as it is expected there will be significant growth or regeneration in these areas of the City. Through shaping an appropriate mix of uses in these areas, development in these areas will contribute towards the commercial requirements and other strategic functions of the Central Activities Zone (CAZ) (see LP Policy SD4).

The Key Areas of Change are underpinned by the development requirements identified within the Future of Office Use Report (ED-OFF1), Retail Needs Assessment (ED-RET1), Culture Planning Framework (ED-CAV2), the Visitor Accommodation Needs Study (ED-CAV1) and Infrastructure Delivery Plan (ED-INF1).

The CP policies have had regard to Paragraph 86(a) of the NPPF which states *"Planning policies should: set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration"*. The policies within the chapter also contribute towards meeting the objectively assessed need for housing and other uses (see NPPF Paragraph 11(b)).

The policies set out in Chapter 14 assist in fulfilling the social objective in Paragraph 1.3 of the CP which states: "Delivering new, inclusive open spaces and enhancing the City's public realm for everyone", "Enhancing the City's riverside for everyone through the delivery of new and improved public realm and greater vibrancy" and "Enhancing and transforming seven Key Areas of Change where significant change is expected and providing a policy framework to guide sustainable change in those areas".

The policies are in general conformity with Policy GG2(E) of the LP, which seeks to create successful sustainable mixed-use places that make the best use of land by ensuring that those involved in planning and development *"understand what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character"*. They also support the aims of LP Policy SD4 regarding the Central Activities Zone (CAZ). Policy TP1: The Temple seeks to meet the aims of LP Policy SD4(G) which states that *"the CAZ as a centre of excellence and specialist*

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clusters including functions of state, health, law, education, creative and cultural activities, and other more local Special Policy Areas should be supported and promoted".

Policy S21 City Cluster reflects LP Policy E1(c) which states that "The unique agglomerations and dynamic clusters of world city businesses and other specialist functions of the central London office market, including the CAZshould be developed and promoted." It is also in alignment with the vision for the CAZ as detailed at LP Policy SD4(b), specifically Paragraph 2.4.7 that identifies the City of London as a "nationally important location for globally-oriented financial and business services."

The CP policies are in general conformity with Policy H8 of the LP regarding the regeneration of estates Policy S20(2e) of the CP seeks to *"facilitate the regeneration of the Mansell Street Estate and adjacent sites, re-providing existing social housing, alongside additional residential units, reduced levels of air and noise pollution, community facilities and good quality open and play spaces"*.

Policy S17 (Thames Policy Area) reflects the London Plan approach. Paragraph 2.4.4(n) of LP Policy SD4 states that the strategic functions of the CAZ include but are not necessarily limited to: *"use and enjoyment of the River Thames"*. The LP identifies the Thames Policy Area within Policy SI14 and set out spatially in Figure 9.7 - the central section which runs through the Square Mile is referred to as 'Wandsworth to Bermondsey'. This has been taken forward into the CP, and the two Key Areas of Change in this area are set out within CP Policies S18 and S19 which include what uses will be appropriate in these locations. • Are the policies relating to The Temple, the Thames Policy Area & the Key Areas of Change positively prepared 'in a way that is aspirational but deliverable'?

The policies relating to The Temple, the Thames Policy Area and the Key Areas of Change are set out in Chapter 14 of the CP are positively prepared *'in a way that is aspirational but deliverable'*. The policies have been designed to avoid repetition of national policy and the LP. The approach taken within the policies is aspirational, reflecting the positive impact of carefully managing the change of these unique areas in ways that respond to their individual character and contribution to the City as a whole. While each policy is tailored to the specific area, there is an overarching theme that seeks to secure significant enhancements to the public realm and making the areas more sustainable, resilient and welcoming for all. For example, the Puddle Dock area in Blackfriars is a key renewal opportunity in Policy S18 that would provide significant public realm upgrades and improvements along the City's riverside.

These policies also set out (where appropriate) the focus of particular uses for the relevant area. For example, in relation to Policy S23 Smithfield and the Barbican of the CP, Paragraph 2.4.14 of the LP states that "*It will be important to promote and sustain certain clusters...such as the arts, cultural and creative clusters in Barbican/Smithfield/ Farringdon....*". CP policies S23 and S24 both encourage culture-led mixed-use development on major sites in the area as well as cultural infrastructure and complementary uses and delivering art and cultural attractions and public realm improvements. Paragraph 2.4.15 of the LP states: "Special Policy Areas are supported, particularly where development pressures and market conditions could lead to the loss of valued specialist clusters of uses or functions identified as having particular significance to London's unique identity, economic function or cultural heritage". • Are the policies clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?

Paragraph 16(d) of the NPPF states that plans should *"contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;"*.

The policies are clearly and positively worded, for example TP1 supports the unique functions of the Inner Temple and Middle Temple. Policy S17 makes clear the measures and projects which will assist in delivering the aims of the policy S17 (3). Policies S18 to 25 refer to the Key Areas of Change which set out the mix of uses appropriate within each area (see S19 (2)) which encourages office-led mixed use development; key projects (see S18 (3)) relating to the Thames Tideway Tunnel; and facilitating public realm or connectivity improvements (see S20 (4)).

There are three types of policies in Chapter 14. Policy TP1 relates to the Temple, but does not anticipate the 'significant change' of the Key Areas of Change; S17 directly reflects the requirements of the London Plan in relation to the part of the Thames Policy Area in the City of London; and the remaining policies S18 to 25 relate to the Key Areas of Change. The Key Areas of Change also include maps demonstrating the existing context and proposed spatial priorities, which are further expanded on in the policy text. The supporting text is split into the '*Reason for the policy*' and '*How the policy works*' setting out why the policy is required and how it will be applied in decision-making. The policies will contribute to meeting key aims of these unique areas, improving their environment and thereby helping to manage change successfully and helping to deliver sustainable development of the City and London as a whole.