

# Draft City Plan 2036 Consultation Comments

## Strategic Policy

## Introduction

### Policy Number

Paragraph

1.3.14

Type of Comment

General

### Comment

There is a lack of up-to-date evidence with regard to the historic environment, including in relation to the potential impacts of tall buildings. Where evidence exists it remains unclear to what extent it has been used to inform the content of the draft Plan to date. Further detail on the nature of the additional studies commissioned (as indicated in 1.3.14) would be welcome, together with how any further evidence in relation to the historic environment will be used to shape relevant policies and proposals in the Plan.

Contact Name

Tim Brennan

Contact Organisation

Historic England

### City Response

Comments noted. Further evidence documents will be published alongside the Proposed Submission version of the Local Plan providing more detail to support the policies in relation to the historic environment and tall buildings. A background paper will be prepared to explain how the evidence base has informed the content of the Plan.

Recommendation

No Change

Recommendation Details

Paragraph

1.3.21

Type of Comment

Object

### Comment

The text of the City's new draft Local Plan appears to make no mention whatsoever of neighbourhood plans or neighbourhood planning. The introductory paragraphs are deficient in giving an inaccurate explanation of the statutory basis of London's planning system. London has had a three tier planning system since the 2011 Localism Act. At the very least, paragraph 1.3.21 should have additional wording so that it refers to made neighbourhood plans as well as to the Local

# Draft City Plan 2036 Consultation Comments

Plan, the London Plan and the NPPF, otherwise it is non-compliant with the NPPF.

The City's current Statement of Community Involvement (SCI) is non-compliant with section 6 of the Neighbourhood Planning Act 2017, which requires LPA's to set out in their SCI's how they will provide 'advice and assistance' to neighbourhood forums. This section came into force on July 31st 2018.

We would welcome the inclusion of some additional information, and expressions of support for this layer of the planning system, and believe that many of the City's residents would also. Lack of reference to neighbourhood planning jars with many of the aspirational statements about 'involvement' and 'a flourishing society' in the draft Plan.

## Contact Name

Henry Peterson

## Contact Organisation

Neighbourhood Planners London

## City Response

Although there are currently no neighbourhood plans in the City, it is agreed that the Local Plan should refer to the role of neighbourhood plans as part of the statutory development plan for the City and that such plans should be in general conformity with the strategic policies in the Local Plan.

At the next review of the City of London SCI, additional references will be included relating to the advice that the City Corporation would intend to provide to any future neighbourhood forums. However, this is not directly a matter for the Local Plan.

## Recommendation

Change

## Recommendation Details

Two new paragraphs have been added to the introduction of the Local Plan under the sub-heading of Neighbourhood plans as follows:

"Neighbourhood plans should support the delivery of strategic policies set out in the Local Plan. Once approved, a neighbourhood plan becomes part of the development plan for the neighbourhood area and is given the same legal status as a local plan. The local planning authority must co-operate with a neighbourhood forum in the preparation of neighbourhood plans, providing assistance as required.

At the time of preparation of City Plan 2036, no neighbourhood forum had been established in the City of London and no neighbourhood plans were in preparation or had been adopted. The City Corporation will co-operate with any neighbourhood forum in the preparation and adoption of a neighbourhood plan within the City of London administrative area in accordance with statutory requirements."

## Paragraph

1.3.22

## Type of Comment

General

# Draft City Plan 2036 Consultation Comments

## Comment

### Enforcement

The City's current resources for enforcement are slight. Good conditions are useless if developers and operators know they will not be enforced. We would like to see requirements in conditions given more precision, which would aid enforcement.

For example, on light pollution as well as specifying that developers should install automated systems to turn office lighting off, the City should also specify that they commission those systems and operate them, and specify the hours at which they should operate. If night working in offices is necessary then the condition should specify the installation and operation of black out blinds. We suggest that these should operate so light is not visible at nearby residences between 7pm and 8am.

### Contact Name

Jane Smith

### Contact Organisation

Barbican Association

## City Response

The City's approach to enforcement is set out in the Enforcement Plan SPD and is not a matter for the Local Plan. Likewise the wording of conditions is not directly a matter for the Local Plan.

However, the concerns about light pollution are noted and a change has been made to the supporting text to Policy HIC3 to address this issue.

## Recommendation

Change

## Recommendation Details

The following wording has been added to the supporting text:

"Careful planning and design are required to ensure proper consideration of key issues where lighting has an impact such as movement, safety, security as well as the reduction of energy use and light pollution. Light pollution is a particular problem where large commercial buildings have lights on during the night, which can impact residential amenity."

# Draft City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S1: Healthy and Inclusive City

### Policy Number

### Paragraph

### Type of Comment

General

### Comment

British Land broadly supports Policy S1, however consider that point 4 could be expanded to include the provision of spaces for rest, such as benches, and to cater to the needs of parents and young children also.

British Land understand there are other healthy focussed certifications emerging other than just Well Building Standard, such as Fitwel. To reflect this, point 5, bullet point 2 of the policy could be revised to state "promote healthy buildings and consider inclusion of health focussed certifications".

### Contact Name

### Contact Organisation

British Land Company PLC

### City Response

Agree wording could be amended to provide clarity on the provision of facilities.

### Recommendation

Change

### Recommendation\_Details

Wording was amended in Policy S1, point 4 as follows:

"Requiring the design and management of buildings, streets and spaces to provide for the access needs of all the City's communities, including the particular needs of those with disabilities or mobility impairment disabled people, older people and people with young children".

### Type of Comment

Support

### Comment

We support an increased focus on healthy buildings as a priority for all users and reference should be made to global benchmarks that position the Square Mile as a leader in sustainability (especially in consideration of emerging Low Emissions Policy & Transport Strategy). The committee noted that according to WELL standards very few buildings meet all requirements.

# City Plan 2036 Consultation Comments

## Contact Name

## Contact Organisation

City Property Association NextGen Steering Group

## City Response

Comments noted.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

TfL requests that the Healthy Streets Approach is embedded into this policy. While we acknowledge that the Healthy Streets 'wheel diagram' is reproduced as figure 13 in section 6.3 (Walking, Cycling and Healthy Streets), please consider including the diagram in this strategic policy to ensure that the Healthy Streets Approach is embedded in all development in the City.

## Contact Name

## Contact Organisation

Chris Leong - Assistant Planner

Transport for London - Spatial Planning

## City Response

The principles of the Healthy Streets approach is embedded in the Plan, where appropriate through policy and supporting text wording.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

Fire alarm testing at the weekend is very intrusive for residents. I can see it is most convenient for occupiers of the building, but residents should not suffer the consequences. Fire alarms should be tested between 7am and 11pm on weekdays. Many buildings have alarms on the roof which carry long distances, so this policy should apply throughout the City.

## Contact Name

## Contact Organisation

# City Plan 2036 Consultation Comments

David Coleman

## City Response

Comment noted. The testing of fire alarms is an operational matter and not something which can be controlled through the Local Plan.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

We strongly support active policy measures to enhance the public realm which will have direct benefits for residents, workers, and visitors. Lack of green and community spaces, and space to exercise, is an issue for health and wellbeing. This is compounded by air and noise pollution. Appropriate public realm enhancements can ameliorate some of these factors, promote biodiversity, and support making the City an attractive place to live, work, and visit.

We welcome the implementation as part of the Plan of the principles of the City of London's Joint Health and Wellbeing Strategy as this will be critical for improving health and wellbeing outcomes, particularly in the most deprived areas of the City. There is clear evidence that local environments are critical for shaping physical and mental health outcomes by encouraging physical exercise, reducing stress and improving overall well-being. But for workers and residents in the City, the lack of green and community spaces, and space to exercise, are an issue.

We have taken note of the projected growth in employment and population in and around the City of London, and that there is significant variation in indices of deprivation. It is right that the Plan flags the importance of promoting opportunities for training and skills development to improve access to employment, particularly for City residents and those in neighbouring boroughs.

## Suggested Amendments

The inclusion of Health Impact Assessment for major developments, as well as expectations of community engagement throughout the entirety of the planning and building process are positive (4.1.20). However, we are concerned that the trigger level for this at 1000 sqm could be onerous for smaller scale developments just over this threshold. We have similar concerns in terms of practicability and viability of requiring new developments to provide facilities such as drinking water and accessible toilets to the public.

## Contact Name

Dr Sophie V Taysom

## Contact Organisation

Merchant Land

## City Response



# Draft City Plan 2036 Consultation Comments

The thresholds for HIA's and requirement for drinking water and toilets are considered reasonable, in order to create a healthy environment in the City.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

Additional wording is suggested in Strategic Policy S1 that might constructively reinforce the Corporation's position in a manner consistent with the messages conveyed by officers at the public presentation of the Draft City Plan 2036:

- Add reference to "Cultural/historic assets" in the opening paragraph.
- Add "street level" before "public realm" in part 2
- In part 5, bullet point 1 delete the word "amenity" as not all adverse impacts can be defined in terms of their amenity.
- In part 5, bullet point 3 add "contribute towards biodiversity and enhancement of street level open and green spaces" after the existing wording
- In part 5, bullet point 4 refer to the City's "quieter places and spaces" instead of "quieter areas" to reflect wording used elsewhere.
- Add "access to and use of" before "existing community facilities..." in part 11

The intention of these changes is to:

- Win greater recognition of the physical contribution of heritage buildings and connected buildings, spaces and yards to the City as a whole
- Further emphasise the importance of publicly accessible spaces being at street level
- Thereafter, to broaden the application out of simply being a passive 'amenity' value into an active use of spaces and places
- A nudge in the policy towards enhanced access and improved use of places and spaces to better provide for residents, visitors and workers

## Contact Name

## Contact Organisation

Fr Luke Miller

Diocese of London

## City Response

Comments noted. Several changes have been made as detailed below. Other suggested changes were considered not to add clarity.

## Recommendation

Change

## Recommendation\_Details

In part 5, bullet point 1 delete the word "amenity" has been deleted.as not all adverse impacts can be defined in terms of their amenity.

- In part 5, bullet point 4 has been amended to refer to the City's "quieter places and spaces" instead of "quieter areas" .



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

The London Diocesan Board for Schools is the largest provider of educational services in the Capital and the provider, with our partners, of the only state school in the Square Mile. It supports the City's wish to protect and enhance education but sees this as including the pre school facilities and that education is a service, which need not be physically confined to the Square Mile in order to benefit the Square Mile. School catchment areas do not follow local authority boundaries for example. The Diocese would like to see greater recognition for pre school, primary and secondary schools in the near vicinity of the City under the policy through the following amendment:

- Amend bullet point 6 to read: "Protecting and enhancing existing public health and educational facilities, including St Bartholomew's Hospital and existing all City primary and secondary schools and pre-school facilities, working in partnership with neighbouring boroughs and education providers to deliver accessible additional educational and health facilities in appropriate locations."

### Contact Name

Fr Luke Miller

### Contact Organisation

Diocese of London

### City Response

Policy S1 recognises that due to the City's small residential population, it is cost effective for the Corporation to work jointly with neighbouring boroughs and service providers to ensure shared services can be provided.

### Recommendation

No Change

### Recommendation\_Details

## Type of Comment

Object

### Comment

The "range of partners" should be identified.

It's difficult to understand how constructing – or more relevantly deconstructing – buildings can help "protect and improve the health of all the City's communities" (2).

What are classed major developments and why will only these require Health Impact Assessments, irrespective of what is being developed (3)?

It seems "expecting" should be replaced by "requiring" if (5) is to mean anything.





# City Plan 2036 Consultation Comments

What does “protecting and enhancing existing public health and educational facilities including St Bartholomew’s Hospital and existing City schools” mean? The latter are, of course, Sir John Cass’s Foundation Primary School, GSM&D, CoL School and CoL School for Girls and how these are to be protected and enhanced needs explanation. Working in partnership with neighbouring boroughs should also include housing (6).

Why should CoLC be encouraging the provision of any private health facilities, let alone further ones (7)?

There seems to be a contradiction between CoLC’s decision to withdraw its annual subsidy to Golden Lane Children’s Centre for children of City residents aged under 3 and “supporting nursery provision” etc. (10).

Neither Middlesex Street Estate nor Barbican Estate have community centres; CoLC is currently occupying the Mansell Street “Green Box” and Golden Lane Estate Residents have had to fight for theirs and may still lose some of it to CoLC’s administration. Accordingly, a lot needs to be done, and done sooner rather than later and this should not mean the Middlesex Street Estate Community Centre is located in Little Somerset Street (11).

That residential developments which don’t provide play spaces are approved is simply callous (12).

## Contact Name

## Contact Organisation

Fred Rodgers

## City Response

Not necessary to list the range of partners.

Comment noted.

Agree that HIA's should not only be on major developments. Will amend wording. A new policy on HIA's has been added to the Plan which contains significant detail and clarity on when assessments should be carried out.

## Recommendation

Change

## Recommendation Details

Bullet 3 has been amended to read as follow:

"Requiring Health Impact Assessments of different levels depending on the scale and impact of the development proposals".

## Type of Comment

General

## Comment



# City Plan 2036 Consultation Comments

Accessing wellness and fitness facilities and the development of some shared health facilities are options we would ask the City of London to consider. This could include development of primary care facilities that could be accessed by workers who do not receive any additional healthcare benefits; including those on lower wages or working social hours. This would prevent people having to travel home for appointments. A larger diagnostic centre could be created and made available to City residents as a shared benefit.

We would also like to see the expansion of the public defibrillator scheme in all areas of the City including the retail area and there should be 24/7 access.

Contact Name

Contact Organisation

Gail Beer

Healthwatch City of London

City Response

Policy HIC5 encourages the development of new social and community facilities that provide flexible, multi-use spaces suitable for a range of different uses. This wording is considered adequate in terms of multi-use spaces.

The Plan encourages commercial developers to provide defibrillators, but can not include detailed policy on defibrillator usage.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

Your policy does not mention restricting smoking on the streets. It should be limited to designated areas. As a non-smoker I should not be subjected to passive smoking as I walk through the city. But that is exactly what happens unless you are good at holding your breath.

Contact Name

Contact Organisation

Gary Mclean

City Response

Restriction of smoking is not a planning issue.

Recommendation

No Change

Recommendation Details



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

No mention is made of extra GP practices in the City to accommodate the growing residential population, and also the need for City workers to have NHS GP facilities near the workplace. Some years ago the Corporation commissioned a report which recommended the need to provide dedicated workers' GP facilities in the square mile. Although this was not taken up by the health authorities, an update has been commissioned by the current City and Hackney CCG and if similar recommendations are made, the City Plan needs to take account of the resulting space requirements.

### Contact Name

Gerald Hine

### Contact Organisation

### City Response

Agree that additional wording added to the supporting text could clarify the issue of GP provision.

### Recommendation

Change

### Recommendation Details

The following wording has been added to supporting text.

"The City Corporation will work with the City and Hackney Clinical Commissioning Group and other NHS and community organisations to regularly assess the need for health and social care facilities locally and sub-regionally".

## Type of Comment

General

### Comment

We welcome this policy. We would like to see more robust language around "respect the City's quieter areas" – eg by not allowing uses that generate noise, such as late night entertainment, crowded places.

Para 4.1.6. Please specify that the health impact assessments should include the effects of the development on other users' access to daylight and sunlight and the potential impact of night time noise on sleep in residences.

### Contact Name

Jane Smith

### Contact Organisation

Barbican Association

### City Response



# City Plan 2036 Consultation Comments

Policies throughout the Plan and environmental health strategies seek to minimise disturbance to residents and workers. It is not feasible to ban all future places of entertainment in a vibrant City centre location such as the City.

Health impact assessments will include consideration of sunlight and daylight issues and noise disturbance.

## Recommendation

No Change

## Recommendation Details

### Type of Comment

Support

### Comment

The Mayor welcomes that health and well-being is prioritised within the draft plan recognising that the built environment can play an important role in determining the mental and physical health of Londoners as set out in paragraph 1.3.1 of the Draft New London Plan and builds on Draft New London Plan Policy GG3. The requirement for health impact assessments for major development proposals is particularly welcomed and is in line with Draft New London Plan Good Growth Policy GG3. Health priorities from the City of London's Joint Health and Wellbeing Strategy are clearly set out.

The plan recognises the area's nationally important role for globally orientated financial and business services and its correspondingly low resident population means that it is not always effective to locate residential services within the area. The Mayor is pleased to see that it is the intention of the City of London to work collaboratively with neighbouring authorities to deliver those services in a more efficient manner but should also commit to regularly assessing the need for health and social care facilities locally and sub-regionally in order to address borough and CCG cross-boundary issues in accordance with Draft New London Plan Policy S2.

### Contact Name

Juliemma McLoughlin

### Contact Organisation

Mayor of London

### City Response

Comments noted.

## Recommendation

No Change

## Recommendation Details

### Type of Comment

General

### Comment



# City Plan 2036 Consultation Comments

1. Should have designated smoking areas and ban smoking in green spaces. Find that walking and smoking in the City is normalised, particularly smoking breaks at lunchtimes.
2. Food prices in the City are expensive because of wealthy workers. Find it hard to live on a budget in the City.

Contact Name

Lucy Sandford

Contact Organisation

The C4ty - City of London Youth Forum

City Response

Comments noted. The Plan is unable to include policies on the management of smoking or the control of food prices.

Recommendation

No Change

Recommendation\_Details

Type of Comment

Support

Comment

The reference to expecting development to limit the City's contribution to unnecessary light spillage and 'sky glow' is supported. This is particularly relevant with regard to ensuring that lighting from riverside developments does not negatively effect the River Thames, in terms of both river ecology and navigation.

Contact Name

Michael Atkins

Contact Organisation

Port of London Authority

City Response

Comment noted.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment



# City Plan 2036 Consultation Comments

Suggest adding a reference to cultural/heritage assets in the opening paragraph of Policy S1.

Under point 5, add to the end of third bullet point "contribute towards biodiversity and enhancement of street level open and green spaces".

Under point 5, amend fourth bullet point to read "respect the City's quieter places and spaces" (remove the word areas to reflect wording used elsewhere).

Chapter is interested in how the City defines 'all communities', especially because there are sectors of our society which are hard to reach and may not necessarily be identified as a 'structured community' to which policies and resources can be applied. Some disenfranchised people are very visible in our streets and doorways, but the Cathedral also works to actively reach out to the less visible in our society. Our schools and music outreach programmes helpfully bring us close to some groups or sectors. Based on that experience, we hope that planning policy will recognise the need for purposeful and deliberate outreach in policy delivery.

## Contact Name

## Contact Organisation

Oliver Caroe

Surveyor to the Fabric of St Paul's Cathedral

## City Response

Culture and heritage are dealt with in detail in Policy S6.

The public realm and biodiversity are dealt with in detail in Policy S14.

Agree that 'areas' could be replaced by 'places and spaces' for clarity. Wording has been added to the 4th bullet point in section 5 of the policy.

Policies in the Plan recognise the importance of community and social interactions in the City. Outreach work by churches is too detailed to mention in the Plan.

## Recommendation

Change

## Recommendation Details

Wording was changed in bullet point 4 of section 5 of the policy to read as follows;  
"respect the City's quieter places and spaces".

## Type of Comment

General

## Comment

The Plan makes scant reference to the CASS Business School of the City University. I would have thought that this was an area which should be seriously considered in any long term plan. If the City is to take its place as a World Class Financial Centre then a well respected Research Centre in its midst would appear to be a must. Whilst CASS has a good reputation it does not match up to INSEAD in Paris or the Harvard Business School.

## Contact Name

## Contact Organisation

Rodney Clark



# City Plan 2036 Consultation Comments

## City Response

The CASS Business School has moved outside of the City to the London Borough of Islington.

## Recommendation

No Change

## Recommendation Details

### Paragraph

4.1.18

### Type of Comment

General

## Comment

Point 5: It is not enough to expect development to engage and achieve these 6 bullet points. Development should be "required" to do this. More emphasis needs to be placed on prevention of light spillage from developments and the City's street lighting. Reducing light spillage is necessary both for residents' health and well-being but also that of the bat population which can be denied access to forage and roost sites by excessive light levels.

Point 6 should include the word "public" before the word "educational".

Point 12 should include facilities accessible to children with special needs and vulnerable adults including those with Sensory Processing Disorder.

4.1.18: Should it not be a planning "requirement" of new development that publicly available toilets, water and defibrillators are made available and that there is adequate signage to these facilities.

## Contact Name

Sarah Hudson

## Contact Organisation

Friends of City Gardens

## City Response

The Plan can not require developers to achieve the actions in the 6 bullet points. For example there is no legislative basis to require developers to engage with neighbours before and during construction.

Policy D9 addresses lighting and amenity issues, seeking to prevent light spillage from developments impacting nearby occupiers, the wider public realm and biodiversity. Policy D5 seeks to prevent lighting from terraces impacting nearby occupiers.



# City Plan 2036 Consultation Comments

The Corporation seeks to protect all educational services so feels it unnecessary to add "public" before educational in the point 6.

It is considered that this general policy on sport, play and recreation facilities should not specify particular groups. Policy HIC8 encourages sensory elements in play facilities and areas and Policy C5 encourages sensory elements in works of art.

The Plan can not require developers to provide defibrillators or drinking water, as there is no legislative basis to do so.

## Recommendation

No Change

## Recommendation\_Details

## Paragraph

4.1.6, 4.1.8

## Type of Comment

General

## Comment

The CPA fully supports the sentiment of Policy S1, it is understood there is a need to improve health and wellbeing within the Square Mile by tackling poor air quality, noise and a lack of green space. That being said, we have set out some recommended alterations. As drafted, we do not consider that the draft policy is "effective". Part 3 requires Health Impact Assessments (HIA) on major development proposals and part 5 expects developments to promote healthy buildings and the Well Building Standard. The supporting text at paragraph 4.1.16, however, simply encourages developers to use established methodologies, such as Well Certification under the Well Building Standard.

For HIA, it is noted that developers should use the NHS London Healthy Urban Development Unit's Rapid HIA Tool for development between 1,000-9,999 sqm and full HIAs should be submitted with planning applications for over 10,000 sqm. Firstly, it is not completely clear whether the floorspace thresholds relate to total floorspace or net additional floorspace. In addition, it is considered a threshold of 1,000 sqm is too low for such an assessment. The CPA considers that a figure of 10,000sqm of total floorspace and/or 5,000 sqm net additional floorspace would be more appropriate for such assessments in the Square Mile.

Having regard to the HUDU Rapid HIA Tool, it is clear this has been prepared for housing developments and as such it is not considered fit for purpose for commercial developments. Further, an assessment using the HUDU methodology and the assessment criteria listed will confirm nothing more than the information typically set out in a Sustainability Assessment. Accordingly, the need for a HUDU Assessment is not effective or justified and should be omitted from the draft policy.

In respect of the Well Building Standard, we would note this is not an established methodology and is currently used very little in the industry, particularly in the UK. That said, the CPA recognises the importance of this topic; accordingly, we suggest that the alignment between BREEAM and the Well Building Standard is referred to. The link with the BREEAM scheme, which developers are familiar with, is considered more appropriate. We also suggest that the terminology in this





# City Plan 2036 Consultation Comments

draft policy and supporting text are aligned i.e. requires, expects, encourages etc.

At paragraph 4.1.8 it is noted that major commercial developments should “reach outwards” and provide publicly available drinking water, defibrillators and toilets. Whilst the CPA supports the appropriate provision of defibrillators within commercial buildings, it will not always be appropriate to provide public facilities such as toilets and drinking water. The CPA considers that such provision should be made by the City Corporation and other statutory providers, who can more appropriately provide these facilities.

## Contact Name

Charles Begley

## Contact Organisation

City Property Association (CPA)

## City Response

Health Impact Assessments are being increasingly used as a tool to assess potential issues concerning health, and are supported by national policy and guidance.

Agree that wording around health certification methodology needs clarifying. Wording has been amended as below.

## Recommendation

Change

## Recommendation\_Details

Supporting text has been amended as follows:

"Developers are encouraged to use established methodologies to ensure that development contributes towards a healthy city. There are a number of accreditation systems that attempt to measure the health and well-being elements of building design, construction and operation and how these features impact on health and wellbeing".

## **Policy Number**

HL1

## **Paragraph**

## **Type of Comment**

General

## **Comment**

We encourage the policy to encourage inclusive design consultation at detailed design stage. We wonder if this could be focussed specifically on implementing consultation with relevant local community groups and local residents with a particular focus on how participation in such consultation could tie in and give participants further access to employment and training opportunities within the development and construction industries within the City.

## **Contact Name**

Dr Sophie V Taysom

## **Contact Organisation**

Merchant Land



# City Plan 2036 Consultation Comments

## City Response

Comment noted. Suggested wording is too detailed for the Plan.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

What a pity then that only four of sixteen underground stations in the City have step-free access and there is no step-free access to the National Rail service at Moorgate.

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response

Comment noted. This issue is outside the remit of the Local Plan.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

Whilst this section provides the right feeling, there is limited comment on how those considering major development will be encouraged to comply with the proposed standards. The language is 'should'. How this will be enforced is not made clear.

We would suggest that businesses are required to fully engage with local communities as a condition of their planning application. There has been a feeling recent planning applications have failed to engage sufficiently and often this is 'lip service'. However, the mutual benefits can be many, and HWCOL would like to suggest a more robust framework for developing these mutual benefits.

It is also difficult to see how this policy will work given security issues.



# City Plan 2036 Consultation Comments

## Contact Name

Gail Beer

## Contact Organisation

Healthwatch City of London

## City Response

Policy uses the word "must" in introductory line of the Policy. Implementation of the Policy will be achieved through the planning application and negotiation process.

Wording regarding developer engagement in paragraph 4.1.20 has been strengthened as below.

## Recommendation

Change

## Recommendation Details

Supporting text has been amended as follows;

"Developers will be required to submit Design and Access Statements which demonstrate a commitment to inclusive design and engagement with relevant user groups, including health and social care providers. Such engagement should take place at the detailed design stage prior to submission of an application to ensure maximum effectiveness and inclusive design within the building and in the surrounding public realm. Design and Access Statements must should include details both on how best practice standards have been complied with and how inclusion will be maintained and managed throughout the lifetime of the building".

## Type of Comment

General

## Comment

Please add that new development should be taken as an opportunity to improve public access by assessing the need for public lifts, escalators, etc. For, example the City could require the installation of a public lift to the Barbican tube station platforms when the buildings around the Barbican tube are redeveloped, to make the tube station fully accessible. Please add that public lifts installed by developers should meet certain standards and ensure arrangements for adequate maintenance to keep the lifts in continuous service.

## Contact Name

Jane Smith

## Contact Organisation

Barbican Association

## City Response

The City of London Transport Strategy seeks to provide new public and publically accessible lifts on the Barbican Highwalks, where required, through the development process. The strategy states the Corporation will maintain existing public lifts.

Wording has also been added to policy W1 on pedestrian movement to clarify maintenance expectations for pedestrain routes as below.

## Recommendation

Change

# City Plan 2036 Consultation Comments

## Recommendation Details

A new paragraph has been added as follows:

" Appropriate management and maintenance arrangements for the public realm and pedestrian routes should be agreed, including for public space that is privately owned (in accordance with the Mayor of London's Public London Charter) and secured through legal agreement or planning condition".

## Paragraph

4.1.20

## Type of Comment

General

## Comment

Paragraph 4.1.20 states that developers will be required to submit Design and Access Statements, which demonstrate a commitment to inclusive design and engagement with relevant user groups. Whilst the CPA supports this draft policy, clarification would be welcome on the involvement of "relevant user groups", and how engagement is expected to take place at the application stage. Opportunities for such engagement are considered limited at the application stage, as it is only at the detailed design stage when applicants and their design teams may really benefit from physical engagement with relevant user groups. This paragraph should be tailored accordingly.

## Contact Name

Charles Begley

## Contact Organisation

City Property Association (CPA)

## City Response

Agree that paragraph could benefit from clarification. Wording as been amended as bellow:

## Recommendation

Change

## Recommendation Details

Paragraph has been amended as follows:

"Developers will be required to submit Design and Access Statements which demonstrate a commitment to inclusive design and engagement with relevant user groups, including health and social care providers. Such engagement should take place at the detailed design stage prior to submission of an application to ensure maximum effectiveness and inclusive design within the building and in the surrounding public realm. Design and Access Statements must should include details both on how best practice standards have been complied with and how inclusion will be maintained and managed throughout the lifetime of the building".

## Policy Number

HL2

# City Plan 2036 Consultation Comments

## Paragraph

### Type of Comment

General

### Comment

As a resident who cycles, runs and walks throughout The City, my concern for my health with regards to the quality of the air I am breathing is obviously important, as it is for anyone using our streets. The City's Air Quality Strategy is due for review in 2020. I would like to see an open and honest review of where The City has failed in its current Air Quality Strategy, as it is only through acknowledging failure that changes for the better can be implemented. Failures are learning opportunities. Please consider placing the intention for such a review within the Local Plan.

### Contact Name

Allison Parkes

### Contact Organisation

### City Response

Comment noted.

### Recommendation

No Change

### Recommendation\_Details

### Type of Comment

General

### Comment

Suggest air purification filters on top of new buildings (new Suisse technology)

### Contact Name

Carol Van Der Vorst

### Contact Organisation

### City Response

Comment noted. The City of London Air Quality Strategy seeks solutions to poor air quality using new technological solutions, where appropriate.

### Recommendation

No Change

### Recommendation\_Details



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

The CPA agrees that all developments should be at least Air Quality Neutral, but is concerned that “Major developments must provide an Air Quality Impact Assessment”. Major development is defined on p.211 of the draft Plan. It is not sustainable to provide AQIA on all major schemes. Such a definition will capture, amongst others, change of use applications. It is considered the criteria for AQIA should be a minimum of 1,000 sq m of new/net additional floorspace because of the disproportionately high number of major applications submitted within the Square Mile.

Further, it is not always possible to provide full details on this topic at the application stage, given that much will depend on the detailed MEP strategy of the proposed building. We would therefore advocate that the City’s current approach of applying a standard planning condition to the grant of planning permissions is carried forward, with only the largest applications (10,000 sqm net additional floorspace) required to submit an AQIA at the application stage.

### Contact Name

### Contact Organisation

Charles Begley

City Property Association (CPA)

### City Response

It is considered appropriate that all major developments must provide an AQIA.

### Recommendation

No Change

### Recommendation Details

## Type of Comment

Support

### Comment

I strongly support the priority given to improving air quality. Point 2 suggests that any development which would increase vehicle movements into the City would be refused - for example a hotel? If not, how will the impact of different developments on pollutants be assessed?

### Contact Name

### Contact Organisation

David Coleman

### City Response

The policy advises that developments should not worsen pollution levels by following advice in the City Corporation's Air Quality Strategy.

### Recommendation

No Change

# City Plan 2036 Consultation Comments

## Recommendation\_Details

### Type of Comment

General

### Comment

I would like to see more money and resources put into reducing air pollution from vehicles and building works. No use having policies that are not backed up with money.

### Contact Name

David Jones

### Contact Organisation

### City Response

Comment noted.

### Recommendation

No Change

## Recommendation\_Details

### Type of Comment

General

### Comment

Air quality is fine now - was worse in the big smog in the 1950s.

### Contact Name

Ethel Roberts

### Contact Organisation

### City Response

Comment noted.

### Recommendation

No Change

## Recommendation\_Details

### Type of Comment

General



# City Plan 2036 Consultation Comments

## Comment

Air pollution is awful in the City and is a really unpleasant part of working in the City environment. It is troubling to think that the place so many people work is making a contribution to shortening their respective life expectancy. This is not a problem which it is the gift of any individual to solve, but the City of London Corporation is in a position to make a real difference. Schemes that have been put in place like the improvements to Bank junction have made a big difference and is exactly the sort of scheme that needs to be rolled out more widely. The draft Plan acknowledges air pollution, but really could be a lot more explicit about tackling the problem.

In times of particularly bad air pollution there is a strong argument that London should follow other cities, such as Paris, and issue temporary bans to highly polluting vehicles until pollution levels have dropped. I suspect that the City does have the infrastructure to implement this on its own at present but at the very least the Corporation would be able to lobby the Mayor of London/TfL to implement something similar.

## Contact Name

Fr Luke Miller

## Contact Organisation

Diocese of London

## City Response

Comment noted. Policies in the Local Plan, in conjunction with the City of London Transport Strategy are seeking to implement Healthy Street principles which reduce air pollution.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

Recent reports highlighting the air pollution in the underground raises a subject that will emerge with growing emphasis during the life of City Plan 2036. The Diocese asks if consideration should be given to ensure that additional ventilation shafts and facilities anticipated to improve air quality below ground by LUL/TfL, is not to the detriment of the public open spaces at ground level. Wording similar to that regulating the exhausting of kitchen exhaust fumes could be introduced constructively now in anticipation of need to assist in making an effective provision at the earliest practical opportunity.

## Contact Name

Fr Luke Miller

## Contact Organisation

Diocese of London

## City Response





# City Plan 2036 Consultation Comments

The supporting text of Policy DE2 advises that ventilation louvres should be located away from busy streets.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

What does “effectively manage” mean?. Surely any impact must be to ensure there is no adverse impact. Also, why limit the provision of Air Quality Impact Assessments to major developments anyway (1)?

Whilst the intention to refuse such developments has to be welcomed, that intention must be carried into practice (2).

“Must” to replace “should”. (3).

“Required” instead of “encouraged”. The use of low voltage DC circuits within developments along with voltage optimisation during the development process should be another requirement (4).

What is CoLC’s definition of “poor air quality” as the CoLPAI development is in an area of poor air quality (5)?

Again, whilst the intention to reduce air quality impacts has to be welcomed, that intention must be carried out (6 and 7).

## Contact Name

## Contact Organisation

Fred Rodgers

## City Response

Comments noted.

"Effectively manage" means that developers will be expected to manage the impact of their proposals in an effective manner, within the circumstances of their site and location.

It is considered that requiring Air Quality Impact Assessments on minor developments would not be useful. All developments are assessed through policies that seek to improve air quality standards.

Agree that "Should" is more appropriate, to strengthen intention of this bullet point.

Agree that "Encouraged" should be amended to strengthen this bullet point.

Agree that the supporting text of Policy HIC2 should be clarified.



# City Plan 2036 Consultation Comments

## Recommendation

Change

## Recommendation Details

"Should" has been replaced by "must" in 3rd bullet point.

"Encouraged" has been replaced by "expected" in 4th bullet point.

The supporting text of Policy HL2 has been strengthened to clarify poor air quality criteria.

## Type of Comment

General

## Comment

The policy expresses the right sentiment however, air quality in the City remains poor. It is essential the City enforces the regulations. We note the recent consultation on the Transport Strategy and expect to see progress as a result of its implementation.

Increased building activity will increase traffic to small areas and dust and noise will be a problem. The City should commit to minimising large-scale building works where children live and play.

We would like to see a larger number of smoke free public places with a reduction in associated litter.

Restricting deliveries and access to night- time hours is one solution, but this must not impact on residents. Night time traffic should not be directed through residential areas.

## Contact Name

Gail Beer

## Contact Organisation

Healthwatch City of London

## City Response

It is not possible to limit large scale building work as the City is primarily a commercial area.

The management of smoking is not a planning matter.

Policy VT2 seeks to minimise night-time servicing in residential areas.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General



# City Plan 2036 Consultation Comments

## Comment

Air pollution should be reduced to meet the EU requirements. Vehicle pollution should be limited to electric cars, bikes etc.

## Contact Name

Jane Bickerton

## Contact Organisation

## City Response

Policies in the plan and the City of London Air Quality Strategy seek to reduce air pollution in the City.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

We welcome this policy.

Point 7. Add that combustion flues – and other vents and their associated plant – should be properly maintained. Conditions might need to specify the frequency of cleaning and maintenance.

This policy – and the Transport Strategy – imply there should be fewer vehicle movements in the City. Should it not also imply that developments that will bring vehicles to the City – such as hotels – should be discouraged.

## Contact Name

Jane Smith

## Contact Organisation

Barbican Association

## City Response

The Plan is unable to include all detail relating to policies. The Air Quality Strategy contains detailed guidance on combustion flues, including maintenance. Policies throughout the Plan, and in other relevant strategies, seek to reduce motorised vehicle numbers and their impact, whilst encouraging development necessary to maintain the City's position as an international business centre.

## Recommendation

No Change

## Recommendation\_Details



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

Air quality is already at illegal levels. Surely it needs to be improved quickly, with specific targets to monitor annual reductions. We would expect to see a stated target for air quality, or at the very least a statement that air quality levels will become legal.

On a broader point, the Plan should address the impact on air quality from other sources of pollution as well as traffic, for example aeroplanes; underground particulates; building work; and industrial plant/air conditioning units.

### Contact Name

### Contact Organisation

John Ramsey and Jane Northcote

### City Response

Agree that including targets would provide greater clarity.

### Recommendation

Change

### Recommendation Details

Wording has been added in a new paragraph as follows;

"The City Corporation is working with a wide range of organisations to address this problem and levels of NO2 are falling, although the health-based limits are still not met everywhere in the Square Mile. The City's Air Quality Strategy aims to ensure that air quality in over 90% of the Square Mile meets the health-based Limit Values and World Health Organisation (WHO) Guidelines for NO2 by the beginning of 2025. Limits set in European Directives for particulate matter (PM10 and PM2.5) are generally met in the City, except adjacent to the busiest roadsides in unfavourable weather conditions. However, the WHO has identified health impacts even at very low concentrations. The City's Air Quality Strategy aims to support the Mayor of London to meet the tighter WHO Guidelines for PM10 and PM2.5 by 2030".

## Type of Comment

General

### Comment

The Mayor welcomes the City of London's intention to promote and support development that will lead to an improvement in air quality in Policy HIC2. The aim to improve air quality throughout the capital is one of the Mayor's key priorities in response to studies which illustrate the negative impacts on the health of London's resident population. The policy should go further by identifying Air Quality Focus Areas as illustrated in the Draft New London Plan Figure 9.1 and implementing policies in accordance with Policy SI1. Furthermore, in accordance with Policy SD4 of the Draft New London Plan, an air quality positive approach should be adopted in all City of London proposals wherever this is possible.



# City Plan 2036 Consultation Comments

## Contact Name

Juliemma McLoughlin

## Contact Organisation

Mayor of London

## City Response

The City of London's Transport Strategy has introduced Zero Emission Zones covering Barbican and Golden lane and the City Cluster by 2022. Air quality focus areas will be dealt with in the Transport Strategy.

Policy HIC2, bullet 3 has been amended to refer to air quality positive approach as below.

"All developments should must be at least Air Quality Neutral. Developments subject to an Environmental Impact Assessment should adopt an air quality positive approach wherever possible".

## Recommendation

Change

## Recommendation\_Details

Policy HL2, bullet 3 has been amended as follows;

"All developments should must be at least Air Quality Neutral. Developments subject to an Environmental Impact Assessment should adopt an air quality positive approach wherever possible".

## Type of Comment

General

## Comment

Suggests additional consideration of air quality surrounding primary schools. While very impressed with the work done around Sir John Cass School, would like to see St Paul's Cathedral School and Charterhouse Square School get similar attention.

Please consider making New Change Street ULEV (Low Emission Vehicle) only, which allows for electric and some hybrid cars to drive through, similar to the Moor Lane scheme. Most buses going through are already electric or hybrid and other traffic can be redirected to Bread Street and Warwick Lane.

## Contact Name

Lida Charsouli

## Contact Organisation

Superfusionlab

## City Response

The Plan and the City of London Transport strategy prioritise pollution sensitive areas of the City , such as schools, when implementing pollution reduction measures.

## Recommendation

No Change

# City Plan 2036 Consultation Comments

## Recommendation Details

### Type of Comment

General

### Comment

Air pollution: Traffic control is an issue.

### Contact Name

Lucy Sandford

### Contact Organisation

The C4ty - City of London Youth Forum

### City Response

Comment noted. Policies in the Plan and the City of London Transport strategy seek to reduce and manage traffic levels throughout the City.

### Recommendation

No Change

## Recommendation Details

### Type of Comment

General

### Comment

I am a parent whose children attend St Paul's Cathedral School and would like to see some change towards reducing traffic on New Change. My suggestions would be:

- to create an Ultra Low Emissions neighbourhood either permanently or during peak times that would reduce traffic near the school.
- I would also favour moving the bus stop further up New Change so that it doesn't affect traffic near the school.
- I would also ask to remove the taxi stop from New Change.
- Finally, I would like to ask for no emission buses to be used on route 4.

### Contact Name

Marilena Barakos

### Contact Organisation

### City Response

The Plan and the City of London Transport Strategy recognise schools as priority locations where reducing air pollution is a priority. The area around St. Paul's Cathedral School will be subject to pollution reducing initiatives through transport and environmental health action plans.

### Recommendation

No Change

# City Plan 2036 Consultation Comments

## Recommendation Details

### Type of Comment

Support

### Comment

I strongly support all efforts to clean up the City's polluted air. It's a health emergency and we need to do as much as possible to address it.

### Contact Name

Martin Luff

### Contact Organisation

### City Response

Support noted.

### Recommendation

No Change

## Recommendation Details

### Type of Comment

General

### Comment

The reference to the need for the construction and deconstruction and the transport of construction materials and waste to minimise air quality impacts is welcomed, as well as the reference to the Air Quality SPD which includes references to using the river as a transportation mode rather than by road.

### Contact Name

Michael Atkins

### Contact Organisation

Port of London Authority

### City Response

Comment noted.

### Recommendation

No Change

## Recommendation Details

### Paragraph

4.1.22

# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

Unblock the Embankment welcomes proposal 4.1.22 which aims to tackle poor air quality through a range of actions. Several City of London Air Quality Annual Status Reports have made clear that current conditions on the City's streets are better for cyclists than on the Embankment. Improving the air quality in the City for cyclists further supports the case for rerouting the cycle superhighway from Lower and Upper Thames Streets for the benefit of both cyclists and road users.

### Contact Name

Tony Halmos

### Contact Organisation

Unblock the Embankment

### City Response

Comments noted. The City of London Transport Strategy contains detailed policy on cycling in the City.

### Recommendation

No Change

### Recommendation\_Details

## Paragraph

4.1.22; 4.1.24

## Type of Comment

General

### Comment

Point 3: Please substitute 'must' for 'should' in the first sentence.

4.1.22: During the construction phase, developers must be required to take power from the grid rather than use generators and diesel powered equipment on site.

4.1.24: The City needs to take a robust approach to Air Quality Impact Assessments. Having read a few, they appear to be merely a box ticking exercise. The City should employ, at the developer's expense, consultants to rigorously review the methodology and evidence used in these Statements and to monitor outcomes. Where permitted by law, the City should enforce compliance with agreed levels of emissions and seek powers to close buildings (or delay commissioning) until they comply.

### Contact Name

Sarah Hudson

### Contact Organisation

Friends of City Gardens

### City Response





# City Plan 2036 Consultation Comments

Agree. Point 3 of policy should be strengthened.

Supporting text of Policy IN1 states developers should must engage with energy providers prior to commencement of development works to ensure the availability of Temporary Building Supplies, avoiding the need for diesel generators to provide electricity.

Comment noted.

Recommendation Change

Recommendation\_Details

"Must" has replaced "should" in bullet point 3.

<u>Policy Number</u>	HL3
----------------------	-----

<u>Paragraph</u>	
------------------	--

<u>Type of Comment</u>	General
------------------------	---------

Comment

The CPA welcomes the intent of this draft policy, but would recommend splitting these planning considerations to create two distinct policies, one addressing noise pollution and one addressing light pollution. Whilst the policy deals with two areas of pollution, noise and lighting are unrelated in design terms and as such give rise to different planning considerations. We would recommend creating two policies.

<u>Contact Name</u>	<u>Contact Organisation</u>
Charles Begley	City Property Association (CPA)

City Response

The current organisation of the policy is considered appropriate.

Recommendation No Change

Recommendation\_Details

<u>Type of Comment</u>	Object
------------------------	--------

Comment

# City Plan 2036 Consultation Comments

Not only must impacts be considered, these must be positive ones (1).

Surely Noise Impact Assessments must be required for all developments (2).

Again, the use of low voltage DC circuits must be required in any event, as must the universal adoption of LED lighting, automatic dimming, reduced on-time for automatic lighting and, if all else fails, the use of blinds, which will also assist noise reduction (3).

“Must” is needed instead of “should” and impracticality result in refusal and not mitigation (4).

There appears to be no consideration of the impact of “vibration” on health in the Plan. Whilst noise can be measured, the fact that vibration can adversely affect health has to be addressed and acted on (5).

Presumably the demonstration will take place before installation but if the post installation levels show an increase, the equipment must be replaced and the facility closed in the meantime (6).

Again, the requirement should extend to all developments (7).

Contact Name

Contact Organisation

Fred Rodgers

City Response

Comments noted. All development is assessed through policies in the Plan that seek to minimise noise disturbance.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

An important area with the right commitments however, we would like to see a greater emphasis on ‘must’ rather than ‘should’. The City should be at the forefront of managing noise and light pollution and have much to show the rest of the world. Perhaps working with designers and builders to develop new ways of managing these urban problems. A commitment to be a world leader in minimising Noise and Light Pollution would be a bold statement.

We would recommend that the City commits to reducing light and noise pollution at night in residential areas, where we know the impacts on poor sleep and



# City Plan 2036 Consultation Comments

mental health may be greatest.

Contact Name

Contact Organisation

Gail Beer

Healthwatch City of London

City Response

The wording in Policy HIC3 is considered to be robust enough, in the context of the Plan. The opening sentence of the Policy states developers "must" consider the lighting impacts of their development.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

1. Noise pollution should be taken seriously and should exclude flight paths and underground noise.
2. Maintain artificial light pollution within required levels.
3. Ancient Light requirements should be maintained.

Contact Name

Contact Organisation

Jane Bickerton

City Response

Policies in the Plan and related guidance and strategies deal with the management of noise and light and seek to minimise pollution from these sources.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment



# City Plan 2036 Consultation Comments

This policy is particularly welcome to Barbican residents. Both noise and light pollution have been growing problems over the past decade – as the City has got busier and more developed. We remind planners that the centre of the Barbican estate is one of the City’s most tranquil spaces (Noise Strategy), and we would like to keep it that way – as befits a residential area. It is also notable for its biodiversity and for the bats that roost there because it is relatively dark.

4.13. In addition to the Lighting Strategy Guidelines we would like the City to specify that developers should install and operate automated systems to turn office lighting off (so it is not visible at nearby residences between 7pm and 8 am) or enforce the use of blinds between those hours.

We also point out that some of the most bright lighting in the City skyline at night is from the construction sites for tall buildings. The Code of Construction should require developers to limit the lighting on construction sites to the minimum necessary for safety.

Please also add something on fire alarm testing. Such tests shatter the weekend peace. Please confine fire alarm testing to weekdays between 8 am and 9 pm. Ideally, this should be City wide because some alarms are on the roof and can be heard across the City.

Contact Name

Contact Organisation

Jane Smith

Barbican Association

City Response

Comments noted.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

Developers and occupiers of office blocks need to do more to minimise light spillage at night. The compulsory fitting of movement sensors to control lights in offices at night should be considered.

Contact Name

Contact Organisation

Peter Savage

City Response

Planning can not control internal lighting.



# City Plan 2036 Consultation Comments

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

Support

## Comment

We consider the draft local plan to robustly address the 'Agent of change' principle, which should prevent inappropriate development coming forward in proximity to existing noise-generating arts, cultural and evening/night time uses. Where such development is proposed, there is a clear requirement for sufficient mitigation articulated.

## Contact Name

Tom Clarke

## Contact Organisation

Theatres Trust

## City Response

Comment noted.

## Recommendation

No Change

## Recommendation\_Details

## Paragraph

4.1.31

## Type of Comment

General

## Comment

FoCG has identified the presence of bats in the Golden Lane / Barbican / Bunhill / Postman's Park area and they may also exist elsewhere. Bats are adversely affected by excessive light levels. The City should designate certain roads/routes as bat corridors, and street lighting and building lighting levels and spillage should not be increased in these areas. The City should make sure that the lighting is in the red end of the spectrum, similar to Zuidhoek-Nieuwkop in the Netherlands, and where spillage occurs it is in the same red spectrum.

## Contact Name

Sarah Hudson

## Contact Organisation

Friends of City Gardens

## City Response

# City Plan 2036 Consultation Comments

Policy D9 addresses lighting issues and impacts on biodiversity, and the City of London Lighting Strategy seeks to manage lighting to benefit biodiversity in the City. Policy OS3 seeks to ensure lighting schemes in developments are positive for biodiversity.

Recommendation No Change

Recommendation\_Details

**Policy Number** HL4

Paragraph

Comment

“Will be expected to” needs replacing by “must”.

Contact Name Contact Organisation

Fred Rodgers

City Response

Current wording is considered appropriate for the City's circumstances.

Recommendation No Change

Recommendation\_Details

**Policy Number** HL5

Paragraph

Type of Comment General

Comment



# City Plan 2036 Consultation Comments

The CPA considers it may be helpful to define “social and community facilities” in the Glossary of the Plan. Public and private social and community facilities in the Square Mile provide an essential amenity for workers and residents, and it would be sensible for any definition to distinguish between these different types of facilities.

Contact Name

Charles Begley

Contact Organisation

City Property Association (CPA)

City Response

Agree.

Recommendation

Change

Recommendation Details

Social and community facilities has been defined in the glossary of the Plan.

Type of Comment

General

Comment

1. Suggests the erection of an employment bureau office for the locals, together with a community or recreation hall where they could meet socially seven days a week.
2. Library opening hours should be extended, i.e. Monday-Friday 8am-9pm and Saturday-Sunday 10am-6pm.
3. The local museum should open 24 hours from Monday through to Friday and on Saturday/Sunday from 10am-6pm.
4. Affordable cinema tickets i.e. annually or weekly or monthly.

Contact Name

Charles Kwokori

Contact Organisation

City Response

Comments noted. Policies in the Plan seek to provide appropriate social, community and cultural facilities for all the City's communities.

Recommendation

No Change

Recommendation Details



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

We would suggest the scope of this policy be increased to incentivise provision of community facilities within new developments/new floor space such as drop in surgeries offering a range of services such as mentoring, counselling and other services with community value.

### Contact Name

Dr Sophie V Taysom

### Contact Organisation

Merchant Land

### City Response

Wording has been added in the office section of the Plan which addresses this issue, as follows;

"Major commercial developments are encouraged to provide space which can be used for community needs such as public health facilities, community, cultural or sporting activities. The adequate provision of floorspace for these activities is vital for the health and well-being of the City's communities. Such space could be made available at an affordable rent and be accessible from street level independently from commercial operations".

### Recommendation

No Change

### Recommendation\_Details

## Type of Comment

General

### Comment

The Diocese is opening the door to discussions over increased use of church buildings for a range of uses, especially in connected halls and spaces, thereby promoting a more widely recognised role as part of the facilities available to the City Neighbourhood as a whole. This might be achieved with a new balance being found in Policy HIC5 through inclusion of the following changes:

- In the opening paragraph of part 1, after "existing social and community facilities will be protected", add "and supported where appropriate through CIL Neighbourhood Funds and S106 Agreements..."
- Add "near" before "vicinity" in part 1, bullet point 1
- In part 1, bullet point 2, after "necessary services can be delivered", add "and sustained". Also add "long-term" before "shortfall in provision".
- In part 1, bullet point 3, add "extensive" before "active marketing" and insert "another social or community use on the site" instead of "another similar use on the site".
- In part 2, bullet point 3, refer to "residential and educational areas" instead of "residential areas".
- Reword part 3 to read: "Developments that result in additional need for social and community facilities will be required to enhance existing facilities and open





# City Plan 2036 Consultation Comments

spaces to enable them to meet identified needs or, if not possible, provide the necessary additional facilities".

The Diocese takes the view that there ought to be greater cross recognition between the emerging Neighbourhood Policy for CIL charges and the eventual City Plan 2036 and this policy provides a clear opportunity to demonstrate the joined up application of policies by The Corporation.

## Contact Name

Fr Luke Miller

## Contact Organisation

Diocese of London

## City Response

Agree that suggested change to Point 1, bullet 3 will add clarity.

The supporting text of policy S27 is considered to make clear how CIL monies will be used for social and community projects.

## Recommendation

Change

## Recommendation Details

Bullet three of Point 1 has been amended as follow:

"it has been demonstrated through active marketing, at reasonable terms for public, social and community floorspace, that there is no demand for the existing facility or another social or community use on the site".

## Type of Comment

General

## Comment

The recent CoLPAI decision led to the closure of the Community Education Centre and, as a result, some classes were relocated to Guildhall Library. This is hardly "on-site or within the vicinity" of the CoLPAI site. How that meets the "needs of the users of existing facility" requires explanation (1).

Unless social and community facilities are being provided solely for residents then it is difficult to understand why permission should require the stated qualifications (2).

Again, both with CoLPAI and the Denizen, it is a great pity that the requirement was either ignored or qualified (3).

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response

It is not always possible to replace social and community facilities as close as would be liked.



# City Plan 2036 Consultation Comments

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

This section addresses the removal of space due to building programmes and is less about the benefits of a well-developed accessible open space, however we would like to see the City develop an open space strategy, which commits to quiet places. There are many good examples of this around the City.

We note the recent consultation on the use of CIL monies and there may be proposals to use monies to develop quiet spaces. Encouraging visitors into the city especially those with small children or indeed young adults, will require access to space that is unpolluted by noise, poor quality air, smoke and the impacts of excessive consumption of alcohol.

Contact Name

Contact Organisation

Gail Beer

Healthwatch City of London

City Response

Comments noted. The Plan and the City of London Noise Strategy both recognise the need for and seek to create and preserve quiet spaces in the City.

Recommendation

No Change

Recommendation\_Details

Type of Comment

Support

Comment

We welcome this policy.

Contact Name

Contact Organisation

Jane Smith

Barbican Association

City Response

Support noted.

# City Plan 2036 Consultation Comments

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

New developments will provide "flexible multi-use spaces". It would be helpful to give examples of what the planners have in mind? The strategy states that these would be built where they would "not be prejudicial to the business City". But the business City needs healthy workers, so community spaces should be near the workers.

Contact Name

Contact Organisation

John Ramsey and Jane Northcote

City Response

It is considered that the term "flexible multi-use spaces" and the supporting text which references libraries, educational facilities and meeting room being used for various activities is sufficient.

Recommendation

No Change

Recommendation Details

Type of Comment

Support

Comment

Welcome the intention to provide community space at affordable cost to the communities which they serve.

Contact Name

Contact Organisation

Sarah Hudson

Friends of City Gardens

City Response

Comment noted.

Recommendation

No Change

Recommendation Details



# City Plan 2036 Consultation Comments

## Policy Number

HL6

## Paragraph

## Type of Comment

General

## Comment

There are not enough public toilets in the City.

## Contact Name

Craig Boland

## Contact Organisation

## City Response

Comment noted. Policy HL6 seeks to meet the demand for toilet facilities through the provision in large developments when planning applications are processed and by expanding the community toilet scheme.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

Reference to “public conveniences” in the Plan, when the Local Plan refers to “public toilets”, as well as the “public demand” for the same requires explanation. Whilst access is mentioned, there is no requirement to provide accessible toilets nor any mention of cost of either provision or entry nor is there any mention of who will be making the provision or be responsible for cleaning them etc.

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response

Agreed. There is inconsistency in terminology. Not appropriate to include detailed

## Recommendation

Change

# City Plan 2036 Consultation Comments

## Recommendation Details

Minor wording changes to ensure consistency of terms.

### Type of Comment

General

### Comment

Healthwatch supports the increase in facilities, especially at night time when access is more limited and night-time revellers are often in need. This is a problem near residential areas. We are pleased there is a City public toilet App, however feel this could be better publicised and improved through consultation with City residents and workers. We are aware of the Community Toilet Scheme which is excellent and could be further developed as suggested.

We would also ask the City to consider a pilot of some monitored public shower facilities, especially for rough sleepers.

### Contact Name

### Contact Organisation

Gail Beer

Healthwatch City of London

### City Response

Comments noted.

Public shower facilities for the homeless would not fall under the remit of the Plan.

### Recommendation

No Change

## Recommendation Details

### Type of Comment

Support

### Comment

We support this policy. Urinating in public late at night is a problem in the City – and does not fit the City's vision as a world class financial centre.

### Contact Name

### Contact Organisation

Jane Smith

Barbican Association

### City Response

Support noted.

### Recommendation

No Change

# City Plan 2036 Consultation Comments

## Recommendation\_Details

### Type of Comment

Support

### Comment

Chapter is particularly supportive of this policy to increase the range and availability of public toilets generally, including facilities for disabled people and their carers and to ensure there is 24-hour provision in areas with a concentration of night-time activity.

### Contact Name

Oliver Caroe

### Contact Organisation

Surveyor to the Fabric of St Paul's Cathedral

### City Response

Comment noted.

### Recommendation

No Change

## Recommendation\_Details

### Type of Comment

General

### Comment

How many public toilets are available in the City? A map of their location and opening hours would be useful. What is the City policy on providing (and staffing) public toilets - or is it relying on retail outlets to provide this facility on their premises?

### Contact Name

Peter Savage

### Contact Organisation

### City Response

The City Corporation website provided information on public toilets, accessibility and opening hours. Policy HIC6 encourages large developments to provide toilets and the Community Toilet scheme is encouraged to expand.

### Recommendation

No Change

## Recommendation\_Details



# City Plan 2036 Consultation Comments

## Policy Number

HL7

## Paragraph

## Type of Comment

General

## Comment

This draft policy seeks to protect existing public sport and recreational facilities. Whilst sport and recreational facilities are not defined in the glossary, private gyms are discussed in the supporting text at paragraph 4.1.43. The CPA is concerned that private sport and recreation facilities are provided policy protection by this policy. Whilst the supporting text confirms it will not always be necessary to prevent their change of use, it is essential that specific flexibility is provided for within the wording of the draft policy, such that private sport and recreation facilities in the ground or lower ground of office buildings do not potentially hinder their future redevelopment potential. The CPA would welcome clarification within this draft policy.

## Contact Name

Charles Begley

## Contact Organisation

City Property Association (CPA)

## City Response

Agree, clarification is needed regarding the role of public and private gyms. Amendments to paragraph 4.1.44 clarifies the issue.

## Recommendation

Change

## Recommendation Details

Paragraph has been amended as follows:

"The City Corporation will protect existing public sports and recreation facilities in situ, where there is a need, and encourage the provision of new public and private facilities. Where in situ provision is not feasible, services should be delivered from other facilities without reducing the level of provision. However, any proposals involving the loss of public sport and recreational facilities must be accompanied by evidence of a lack of need for those facilities. Current public facilities and uses should be retained where a continuing need exists. If this is not feasible, preference will be given to a similar type of sport and recreational use in the first instance. The loss of private facilities such as gyms through redevelopment or change of use will be permitted where the replacement uses meet other objectives in this Plan".

## Type of Comment

General

## Comment



# City Plan 2036 Consultation Comments

Outdoor spaces could include outdoor gyms or climbing walls to promote health and fitness. There is an outdoor gym in Abbots Park, London Borough of Waltham Forest that is regularly used.

Contact Name

Contact Organisation

City worker (no name provided)

City Response

The provision of new sport and recreational facilities in the City is encouraged.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

The open spaces of the Barbican Estate have recently become a “go-to” venue for skateboarding and parkour and there are almost daily occurrences during spring, summer and autumn. Both activities constitute both a noise nuisance and anti-social behaviour. Skateboarding is directly prohibited. Parkour is not mentioned as such but there is a prohibition on climbing upon balustrades and walls which is what parkour involves. However, the penalties for infringement are pitifully small and according to the CoL Police, make taking offenders to court financially unviable. Today, the problem is already vexing but it has the potential to be magnified as other initiatives advertise the nature of the Barbican estate.

Another impact of these activities is damage to the estate. Parkour activity has destroyed sections of plantings on the upper podium and skateboards have caused damage to tiled surfaces. We believe the CoL should tackle this misuse of the urban space head on. Firstly, it should modify by-laws to significantly increase the penalties so that ‘prosecutions’ become cost-effective. Secondly, it should work with the CoL Police to ensure that the bye-laws are enforced. Thirdly, it should add CCTV cameras to monitor affected areas of the estate so that policing can be done efficiently. Fourthly, given that the desire to do these activities seems unlikely to go away, we recommend the CoL should build a skate park/parkour arena away from residential areas for these activities. The park should be indoors to help manage noise issues and make it an all-year venue. We would suggest that part of the old Smithfield Market would be suitable.

Contact Name

Contact Organisation

Dr Alexander Wilson

Shakespeare Tower House Group

City Response

Comment noted. Strategies to resolve these issues are not appropriate in the Plan.



# City Plan 2036 Consultation Comments

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

The same comments apply as for HIC5 (1).

If the use is temporary then there should be no need for concern regarding either return to original use or redevelopment for other suitable uses (3).

Contact Name

Contact Organisation

Fred Rodgers

City Response

Comment noted. The wording is considered necessary as the length of time temporary uses are present on a site can, in some circumstances, set a precedent which causes difficulties in reverting to the original use.

Recommendation

No Change

Recommendation\_Details

Type of Comment

Comment

This section appears to be aimed at the private market. We would like to see a greater emphasis on facilities for those who cannot afford gym membership, particularly those on zero hours or who work overnight or in unsocial hours. Many of these workers are unseen and their voice is unheard. We would like to see the City encourage providers of recreational and sports facilities to provide cheaper or free access for these groups of people. Likewise, residents who may not have access to community facilities including young mothers, the elderly, those with disabilities, the unemployed or groups who find gym membership prohibitive. Options for providing access for younger people should also be pursued through working with local business and providers of membership gyms. The City should also consider creating outdoor facilities for gym classes, Pilates etc. The Olympic park and other boroughs have similar facilities.

Contact Name

Contact Organisation

Gail Beer

Healthwatch City of London

City Response

# City Plan 2036 Consultation Comments

These detailed initiatives are not in the remit of the Plan.

Recommendation

No Change

Recommendation\_Details

Type of Comment

Support

Comment

We support this policy.

Contact Name

Jane Smith

Contact Organisation

Barbican Association

City Response

Support noted.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

Need more free/low cost recreational facilities - gyms are too expensive. Need free outdoor activities or make large office buildings provide facilities.

Contact Name

Stacey Johnston

Contact Organisation

City Response

Agree that opportunities for outdoor recreation should be encouraged. Wording has been added to paragraph 4.1.45 as below.

Recommendation

Change

Recommendation\_Details



# City Plan 2036 Consultation Comments

Wording has been added to the supporting text as follows:

"Open spaces and publicly accessible rooftops can provide valuable formal or informal sports and recreational facilities in the densely built City environment. An imaginative approach to multi-purpose structures in outdoor spaces can allow seating and other street furniture to be designed to also facilitate physical activities that promote health and fitness, such as stretching, sit ups and markers for walking and running distances".

## Type of Comment

General

## Comment

I would like to see more sport and exercise provision in open spaces, within large corporate buildings and on roof tops. Amenity and recreation/sport can co-exist.

## Contact Name

Stacey Jones

## Contact Organisation

## City Response

Agree that opportunities for outdoor recreation should be encouraged. Wording has been added to paragraph 4.1.45 as below.

## Recommendation

Change

## Recommendation Details

Wording has been added to the supporting text as follows:

"Open spaces and publicly accessible rooftops can provide valuable formal or informal sports and recreational facilities in the densely built City environment. An imaginative approach to multi-purpose structures in outdoor spaces can allow seating and other street furniture to be designed to also facilitate physical activities that promote health and fitness, such as stretching, sit ups and markers for walking and running distances".

## Paragraph

4.1.43

## Type of Comment

General

## Comment

British Land note that public sports and recreational facilities are not defined within the Plan glossary, but private gyms are discussed within paragraph 4.1.43 of the supporting text. British Land are concerned that private sport and recreational facilities, such as gyms, will be protected through Policy HIC7. Whilst the supporting text confirms it may not always be necessary to prevent a change of use of these facilities, British Land considers that the Policy wording should also provide such flexibility to prevent impacting future development potential.

## Contact Name

## Contact Organisation



# City Plan 2036 Consultation Comments

British Land Company PLC

## City Response

Agree that wording could be usefully amended to provide clarity regarding the loss of private gyms.

## Recommendation

Change

## Recommendation\_Details

Wording has been amended to read as follows:

" The City Corporation will protect existing public sports and recreation facilities in situ, where there is a need, and encourage the provision of new public and private facilities. Where in situ provision is not feasible, services should be delivered from other facilities without reducing the level of provision. However, any proposals involving the loss of public sport and recreational facilities must be accompanied by evidence of a lack of need for those facilities. Current public facilities and uses should be retained where a continuing need exists. If this is not feasible, preference will be given to a similar type of sport and recreational use in the first instance. The loss of private facilities such as gyms through redevelopment or change of use will be permitted where the replacement uses meet other objectives in this Plan".

## Policy Number

HL8

## Paragraph

## Type of Comment

General

## Comment

Whilst this section is highly commendable there is limited information and it appears to be more aspirational. We would urge the City to think about the safeguarding of children and safety generally when considering how to implement more access. We have cross referenced this with HIC5.

## Contact Name

Gail Beer

## Contact Organisation

Healthwatch City of London

## City Response

Comment noted. Safeguarding is not in the remit of the Plan.

## Recommendation

No Change

## Recommendation\_Details



# City Plan 2036 Consultation Comments

## Type of Comment

Support

## Comment

We support this policy.

## Contact Name

Jane Smith

## Contact Organisation

Barbican Association

## City Response

Support noted.

## Recommendation

No Change

## Recommendation Details

## Paragraph

4.1.48

## Type of Comment

General

## Comment

Puts forward a proposal for a sensory garden and community centre, together with upgrades to at least one open playground and two green spaces to make them safer and sensory friendly for individuals with special needs. The City has an extraordinary and unique heritage, which includes a network of small green spaces. However, there aren't yet any green spaces or sensory gardens dedicated to families, carers and individuals with special needs.

A sensory garden is a garden designed to stimulate the senses. Both the community centre and the garden would be designed to meet sensory (e.g. colours, light, sound, texture), accessibility (e.g. wheelchair friendly) and safety needs (e.g. enclosures). The community centre would include a café and a community room for education and recreational activities tailored to the special needs population.

While targeting mainly families/carers and individuals with special needs, everyone living, working in or visiting the City would be welcome to benefit from spending time in this facility. The proposal aims to improve standards of open space, natural planting to help biodiversity, play space and activities for young people.

This proposal contributes to various activities and strategies, including the London Environment Strategy (particularly the air quality and green infrastructure sections); and the City of London's Look and Feel Strategy, Cultural Strategy and Open Space Strategy. In addition to the three existing public playgrounds in the

# City Plan 2036 Consultation Comments

City, there are opportunities to create child friendly and safe areas for children in the gardens near St Paul's Cathedral and at Finsbury Circus when it is reinstated. A range of potential partners and funding sources are identified to take forward the project.

## Contact Name

Harshita Patel

## Contact Organisation

## City Response

Noted. Policy S14 and OS1 both seek the protection of existing open and green space. Policy S1 states the City will protect and enhance existing sport, play space and recreation facilities and encourage the provision of further facilities, including publicly accessible facilities, within major developments. Policy HL8 states in the policy text that the City plans to provide appropriate sensory play areas in the City for children and young people with special educational needs.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

Welcome the intention to provide sensory play areas for children and young people with special educational needs (SEN). We would like to see similar sensory design in green spaces used more generally by older members of the community and visitors.

## Contact Name

Sarah Hudson

## Contact Organisation

Friends of City Gardens

## City Response

Agree that paragraph could be amended to include adults. Wording as been added to paragraph 4.1.48 as below.

Policy C5 encourages public art to include sensory elements for all communities.

## Recommendation

Change

## Recommendation Details

Wording has been amended as follows;

"Public realm spaces improvements and the creation of new open spaces should be designed imaginatively to serve the needs of workers but also offer informal play opportunities. Where the opportunity arises, the The City Corporation plans to provide will enable appropriate sensory play areas in the City for children, and



# City Plan 2036 Consultation Comments

young people and adults with special educational needs and disabilities".

# City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S2: Safe and Secure City

### Policy Number

### Paragraph

### Type of Comment

General

### Comment

Suggested amendments to Policy S2:

- In part 2, after "The Traffic and Environmental Zone", insert reference to "vehicle exclusion zones, creation of peak time pedestrian zones..."
- In part 4, insert "...better able to respond during and quickly recover from emergencies sustained or atrocities inflicted..." instead of "...better able to recover from emergencies..."

The Diocese welcomes the installation of additional vehicle bollards around railheads and bridgeheads. These are a regrettable necessity in the light of the recent and unwelcome escalation in the use of road vehicles as weapons targeted at crowds. Not to have recognition of this policy here seems a missed opportunity, as there must be pressure for an increased use of defensive measures such as these. There may come a day when deployment of similar measures will be required at locations where the Diocese hosts large gatherings and to provide policy flexibility to allow for this eventuality seems prudent.

Over the life of the City Plan it may be time to identify further Peak Time Pedestrian Only Zones, achieved to wide acclaim at Bank. This might next be achieved around areas of Critical National Infrastructure where these zones could also provide space for biodiversity and help reduce pollution.

There is room for developing a policy response here for managing the immediate consequences of an atrocity as experienced at London Bridge. This may require reviewing and re-identifying places that could be used at short notice for short term interim emergency facilities.

### Contact Name

Fr Luke Miller

### Contact Organisation

Diocese of London

### City Response

It is considered that the current wording in the Plan is sufficient. Policies S8 (Design), S2 (Safe and Secure City) and SSC3 (Designing in Security) set out how appropriate security and safety provision must be incorporated into all development.

### Recommendation

No Change

### Recommendation Details





# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

Hopefully City of London Police will have been merged with Metropolitan Police Service long before 2036.

### Contact Name

Fred Rodgers

### Contact Organisation

### City Response

Comment noted. Not in the remit of the Plan.

### Recommendation

No Change

### Recommendation Details

## Type of Comment

General

### Comment

We welcome this policy. Please add something about ensuring fire safety in existing and new buildings, both residential and offices, paying attention to building materials and construction methods.

### Contact Name

Jane Smith

### Contact Organisation

Barbican Association

### City Response

Fire safety has recently gained increased significance. A new paragraph has been added in the supporting text to address fire safety issues, as below.

### Recommendation

Change

### Recommendation Details

A new paragraph has been added in supporting text as follows:

"All development proposals must achieve the highest standards of fire safety and developers must liaise at an early stage in the design process with the City Corporation's District Surveyor and the London Fire Brigade on fire safety considerations, incorporating London Plan fire safety requirements. Major development proposals must be accompanied by a Fire Statement which addresses how the development will address fire safety in the design, construction and operation of the



# City Plan 2036 Consultation Comments

building".

## Type of Comment

General

### Comment

Need more CCTV cameras.

### Contact Name

Lucy Sandford

### Contact Organisation

The C4ty - City of London Youth Forum

### City Response

Comment noted. The supporting text of Policy SA3 now encourages CCTV use, where appropriate.

### Recommendation

No Change

### Recommendation Details

## Type of Comment

General

### Comment

Security and public safety continue to be a top priority for Chapter and we have supported the City in their introduction of vehicle exclusion measures to the west and north of the Cathedral. Notwithstanding our aspirations for a much wider permanently pedestrianised enhancement zone or 'world square' around the Cathedral, we would suggest adding reference to "vehicle exclusion zones, creation of peak time pedestrian zones" within point 3 of Strategic Policy S2.

### Contact Name

Oliver Caroe

### Contact Organisation

Surveyor to the Fabric of St Paul's Cathedral

### City Response

Policy refers to broad areas where collective security measures could be applied. The existing identified areas provide flexibility to implement security measures across the whole City.

### Recommendation

No Change

### Recommendation Details



# City Plan 2036 Consultation Comments

## Paragraph

4.2.2

### Comment

At the public consultation event on 28th Jan it was stated that the CoL Police were 'comfortable with the Plan' and thus could cope with the anticipated influx of visitors. We would dispute that based on our discussions with the Police. They claim they are unable to police the current level of anti-social behaviour due to a lack of resources sufficient to respond timeously. In the absence of a CoL Police plan allied to and integrated with CP2036, we seriously doubt that the CoL Police will be able to cope. Consequently, we recommend a close liaison with the CoL Police be established to critically examine whether additional resources will be required to deal with the greater number of visitors and the increased activity associated with the burgeoning Night-Time Economy that is envisaged in CP2036.

Having attended several briefings to CoL residents given by the CoL Police, I can only conclude that the listing in Section 4.2.2 of CP2036 accurately reflects their ranking of issues and thus their priorities, with 'Public Order' of lesser importance. We would like to see policing of 'Public Order' given more priority. One aspect which is certainly worthy of consideration is the provision of enhanced CCTV monitoring. We understand there are CoL Police initiatives in this area but believe they fall short of installing cameras on the Estate. CCTV not only improves the efficiency of policing but also acts as a deterrent on anti-social behaviour and thus reduces the demand on police manpower.

### Contact Name

Dr Alexander Wilson

### Contact Organisation

Shakespeare Tower House Group

### City Response

Comments noted.

### Recommendation

No Change

### Recommendation Details

## Policy Number

SA1

## Paragraph

## Type of Comment

General

### Comment

# City Plan 2036 Consultation Comments

The CPA welcome the intention of continuing to provide safe public areas within the Square Mile where crowding can be an issue. Policy SSC1 requires that all major development satisfy a number of “principles and standards”, yet these are not set out and it is unclear what these are specifically. The policy should make this clear.

The draft policy seeks “all major developments” to conduct a full risk assessment. Having regard to the definition of major development in the glossary, it is evident that this low threshold for major development may capture applications relating to change of use or applications for a partial change of use with extensions. In these circumstances, such a threshold seems too low.

The need for a full risk assessment should be ascertained through consultation with the City of London Police and other relevant stakeholders through the planning process. On this basis, we suggest the policy is reworded as follows:

“All major developments where relevant are required to satisfy the principles and standards that address the issue of crowded places and counter-terrorism by...”

Having regard to the details of what is expected from risk assessments, using a more flexible threshold seems reasonable.

Contact Name

Charles Begley

Contact Organisation

City Property Association (CPA)

City Response

Recommendation

Recommendation\_Details

Type of Comment

General

Comment

Again, hopefully City of London Police will have been merged with Metropolitan Police Service long before 2036.

Contact Name

Fred Rodgers

Contact Organisation

City Response

Not a matter for the Plan.

Recommendation

No Change



# City Plan 2036 Consultation Comments

## Recommendation\_Details

### Policy Number

SA2

### Paragraph

### Type of Comment

Object

### Comment

The CPA does not consider that a Management Statement should be required for all applications for major commercial developments and development which proposes night time uses. In many instances, the location of the site in relation to nearby sensitive uses will determine whether such a Statement is required.

Accordingly it is considered that the draft policy should be reworded:

"Applications for major commercial development and developments which propose night-time uses should include a Management Statement, where necessary setting out detailed proposals..."

In addition, in many instances detail relating to the preparation of Management Statements is not known at the application stage, therefore the CPA considers strongly that the requirement for a Management Statement could be secured by planning condition.

### Contact Name

Charles Begley

### Contact Organisation

City Property Association (CPA)

### City Response

It is considered that management statements are necessary for smaller applications, to protect the amenity of residents.

Agree that wording in supporting text could be amended for clarity on timing of management Statements. Wording in the supporting text of Policy CV4 has been amended as below.

### Recommendation

Change

### Recommendation\_Details

Policy CV4 has been amended as follows;

"It is recognised that it may not be possible to submit detailed Management Statements when details of the end use operator are not known. However, applicants should submit an outline Management Statement which considers physical design measures to minimise disturbance, such as those outlined in the paragraph above. In such cases, conditions will be attached to any planning permissions granted requiring full Management Statements to be submitted once the occupiers

# City Plan 2036 Consultation Comments

are known".

## Type of Comment

General

### Comment

This policy should perhaps have a clearer heading as it relates to management of the Night Time Economy but lacks any real identity under its current title, thereby seeming to undermine the undoubted commitment behind it.

Further the Diocese would like to see a greater emphasis in the policy on engagement between occupiers, stakeholders and the business operator prior to plans and strategies being drawn up. In this the Diocese represents both our resident vicars and the congregations. The conditions agreed should then become irrevocably binding in S106 and by condition.

Suggest additional wording after "Management Statement" in Policy SSC2 so as to read: "...should include a Management Statement which demonstrates prior engagement with and recognition of local occupier and stakeholder concerns and thereafter setting out detailed proposals..."

### Contact Name

### Contact Organisation

Fr Luke Miller

Diocese of London

### City Response

Night time economy issues are dealt with under Policy CV4.

Policy CV4 has had wording added to encourage engagement with nearby residential and commercial occupiers.

### Recommendation

No Change

### Recommendation\_Details

## Type of Comment

General

### Comment

Presumably there will be a need for approved routes for escape from fire and "should" needs to be "must" in any event.

### Contact Name

### Contact Organisation

Fred Rodgers

### City Response



# City Plan 2036 Consultation Comments

Agree wording should be amended for clarity.

Recommendation Change

## Recommendation\_Details

"Should" has been replaced by "must" in policy.

Type of Comment General

## Comment

Please make specific mention of the need to protect residential amenity by ensuring that the full extent of routes (eg to tube stations) is channelled away from residential areas. Broken sleep caused by street noise is a health issue.

Contact Name Contact Organisation

Jane Smith Barbican Association

## City Response

Policy SA2: Dispersal Routes addresses amenity and dispersal of people.

Recommendation No Change

## Recommendation\_Details

Type of Comment General

## Comment

We are warmly supportive of the need for a carefully managed night-time economy in the City which can benefit citizens and a rich quality of life for workers and residents. Chapter would also like to see policy that encourages consultation with stakeholders at a pre-application stage and would suggest the following additional wording in Policy SSC2: "...should include a Management Statement which demonstrates prior engagement with and recognition of local occupier and stakeholder concerns and thereafter setting out detailed proposals..."

Contact Name Contact Organisation

Oliver Caroe Surveyor to the Fabric of St Paul's Cathedral

## City Response



# City Plan 2036 Consultation Comments

Agree that wording could be added for clarity. Wording has been added to the supporting text as below.

## Recommendation

Change

## Recommendation\_Details

Wording has been added to the supporting text as follows;

"Early engagement with nearby residents and occupiers, as well as the City of London Police and the City Corporation as Licensing Authority, can help ensure that the measures contained in the Management Statement are appropriate to local circumstances".

## Policy Number

SA3

## Paragraph

## Type of Comment

General

## Comment

The CPA supports this draft policy in principle. At part 3, it should be clarified that developers will be expected to contribute towards the cost of on-street mitigation only where these cannot be integrated within the building or within the boundary of the site, and only where it has been demonstrated through a risk assessment for the need for HVM on the public highway.

## Contact Name

Charles Begley

## Contact Organisation

City Property Association (CPA)

## City Response

Agree that wording could be added to part 3 of policy to clarify expectations of developers. Wording has been added to part 3 of policy as below.

## Recommendation

Change

## Recommendation\_Details

Wording has been added to part 3 of policy as follows;

"All development should be designed to minimise the need for Hostile Vehicle Mitigation on the public highway. Developers will be expected to contribute towards the cost of necessary and proportionate on-street mitigation of the risk of vehicle attacks in the vicinity of their developments, or within a wider area where area based security measures are proposed".



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

When Hostile Vehicle Mitigation measures are required, consideration should first be given to more engaging street furniture, such as the use of trees, planters, benches, and cycle parking.

### Contact Name

Chris Leong - Assistant Planner

### Contact Organisation

Transport for London - Spatial Planning

### City Response

Policy SA1 states that design should be considered when hostile vehicle mitigation measures are planned.

### Recommendation

No Change

### Recommendation\_Details

## Type of Comment

General

### Comment

Throughout “should” needs to be “must” and, once again, hopefully City of London Police will have been merged with Metropolitan Police Service long before 2036.

### Contact Name

Fred Rodgers

### Contact Organisation

### City Response

### Recommendation

### Recommendation\_Details

# City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S3: Housing

### Policy Number

### Paragraph

### Type of Comment

General

### Comment

Draft policy S3 part 4 requires 10% of new dwellings to meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and 90% to meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. It should be made clear that this applies to conventional housing and not PBSA. During the London Plan examination in public it was confirmed that this London Plan policy requirement does not relate to PBSA.

The requirements for conventional residential accommodation should not be applied to student housing as typical demand from students per annum falls significantly below the 10% mark. Less than 0.5% of Unite's London portfolio is occupied by wheelchair users. Further, Building Regulations require that 5% of units are wheelchair accessible. This ensures that, whether there is a planning policy position or otherwise, an element of wheelchair accessible units is provided which is still more than 10 times the identified need for such units.

Meeting the requisite design standards results in larger student bedrooms and kitchens, thus fewer standard units per development can be provided. This has the knock on effect of reducing the overall supply of units; increasing the cost and rent levels of existing stock and placing more pressure on the supply of conventional homes. Unite operate a policy of meeting the needs of an individual user and not applying a one size fits all policy. Should individual bedrooms need to be adapted, this can be done quickly and relatively easily to meet requirements. Unite have undertaken such additional alterations in discussion with the end user and provided a bespoke solution to a student's needs. It is therefore unnecessary to over provide on wheelchair accessible units which will not be used.

We understand the 10% requirement was introduced in order to help meet a shortfall in wheelchair accessible housing within conventional housing. Generally, those who live in conventional dwellings are of an older demographic thus the percentage who have a disability and require wheelchair accessibility is far greater than the demographic affiliated with student accommodation. The normal age range of students is between 18 and 25, highlighting that the 10% requirement is wholly unreasonable and blatantly unnecessary. We recommend that specific reference is made within the sub-text to policy S3 to clarify which tenures the 10% requirement applies to.

Recommendation: Whilst we acknowledge this is an important requirement, in Unite's London portfolio we have provision for 528 students that may need a wheelchair room. This is over 5.5% of our total London rooms. Over the last 5 years, Unite have provided 41 students with these rooms. For this current year, Unite have 7 students in need of wheelchair sized rooms out of an approximate total of c.9500 bedrooms. This equates to a 0.07% take up demonstrating an exceptionally low need for accessible bedrooms.



# City Plan 2036 Consultation Comments

## Contact Name

## Contact Organisation

Unite Students

## City Response

London Plan policy has changed to reduce the requirement for student housing for people with disabilities. Local Plan policy has been amended to reflect this change, as below:

## Recommendation

Change

## Recommendation\_Details

Text has been added as follows:

"National space and accessibility standards do not apply to student accommodation but other Plan policies require inclusive and high quality design, which will assist in ensuring the needs of students with disabilities are accommodated."

## Type of Comment

Object

## Comment

In respect of part 2, Policy S3 seeks the provision of 35% of affordable housing on-site and exceptionally provision off-site or an equivalent cash in lieu contribution. Within this context, the City faces particular challenges because of the opportunity costs of providing affordable housing on-site, which in every case, is particularly expensive. This is because the value of standing assets in the City is often very high. This means that if affordable housing is always provided on site, less affordable housing will be delivered. In the City it is likely to be more effective to provide affordable housing to enable off-site provision of more homes, including on the City's Estates. We strongly suggest that "exceptionally" is removed from the draft policy.

## Contact Name

Charles Begley

## Contact Organisation

City Property Association (CPA)

## City Response

To be in conformity with the London Plan, off-site provision of affordable housing is only sought in exceptional circumstances.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

# City Plan 2036 Consultation Comments

## Comment

Need more affordable housing for the local residents.

## Contact Name

Charles Kwokori

## Contact Organisation

## City Response

Comment noted. The housing policies in the Plan seek to provide affordable housing for people on the City's housing register.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

The City was a pioneer of new housebuilding just after the war with Golden Lane estate and the Barbican, both designed by a vibrant young architects practice. Surely there is a great need now to have homes young people with skills you need are able to afford in order to live in London's City? This living in London tradition started way back in medieval times - it is very valuable and helps keep retail and pubs alive in the evenings, and engenders community spirit.

## Contact Name

Elizabeth Wrigley

## Contact Organisation

Core Connections

## City Response

Comments noted.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment



# City Plan 2036 Consultation Comments

## Financial Viability Appraisals (FVAs)

It would be easy to accept that the drastic shortfall in on-site provision and cash in lieu payments is simply due to the developments not being financially viable if the policy requirements had to be met in full. That is not necessarily the case since CoLC appears to have failed to ensure the application of due, or any, diligence in the selection of consultants instructed to act on its behalf in negotiating FVAs.

43 Golden Lane is quoted as an example where the City Corporation is considered to have failed to follow due diligence in the selection of viability consultants and ensuring that the viability appraisal considered actual land value rather than purchase price. The High Court judgement in respect of Parkhurst Road in Islington is highlighted to suggest that the City Corporation's approach to viability on Golden lane was incorrect.

To its credit, CoLC's Planning and Transportation Committee required a review of FVAs and this is reflected positively in the draft Plan. However, consideration has to be more than "robust" and needs to be subjective to the site and proposed development, ensuring that all claimed development costs are verified as having been paid.

The draft Plan's positive proposals regarding FVAs must be welcomed but only if rigorously applied, ensuring that if quotations are sought for viability appraisal work, the consultants include those that specialise in providing advice to local authorities.

### Contact Name

### Contact Organisation

Fred Rodgers

### City Response

Comments noted.

### Recommendation

No Change

### Recommendation Details

### Type of Comment

General

### Comment

Housing trajectory

Whether the annual target is 90, 110, 141 or 146 units, inherent in the number must be a proportion of affordable units and/or cash payments in lieu, in accordance with policy. As at 31 March 2018, the targets should have delivered up to 216 on-site affordable units – but there have been none – or the cash in lieu equivalent of up to 432 units. Taking £154,584 per unit indexed linked from before 2008 as £165,000, CoLC should have received £71.28 million by that date.

However, as at 31 March 2018, CoLC had only received £41.38 million with £4.455 million



# City Plan 2036 Consultation Comments

outstanding re 43 Golden Lane. Whilst no affordable units have been built on development sites in this period, CoLC has used cash in lieu payments to provide 23 units on its Middlesex Street Estate, with another nine being converted from retail units – still far short of the 52 envisaged in the officer’s report to committee re 08/00225/FULL.

As it seems that housing delivery up to 31 March 2018 is ahead of target, more affordable units should have been delivered or more cash in lieu payments received in accordance with policy. A rough estimate suggests a total of 261 affordable units or £86.13 million cash in lieu for 522 units at £165,000 per unit. Even at only £165,000 per unit, CoLC has lost out to the tune of £44.75 million!

There should have been 13 affordable units in a 74-unit scheme at 24-30 West Smithfield approved in 2014 but that was never implemented. In 2016 planning permission was granted for the erection of a Premier Inn hotel on the site. Whilst the loss of 202 hostel rooms at Barbican YMCA (Blake Tower) has been taken into account in the Housing Trajectory 2018, there is no evidence that the loss of 110 hostel rooms at Bernard Morgan House, 43 Golden Lane has been. Although outside the Square Mile, the ongoing redevelopment of City YMCA in Errol Street has caused the temporary loss of 116 bedrooms but completion should see the delivery of 146 rooms. It is good to see that CoL Social Investment Fund is one of the funders of this project along with the Mayor of London and City businesses.

The loss of the planned 74 residential units at 74-30 West Smithfield and the planned 36 residential units at Broken Wharf House, where planning permission was granted for an apart-hotel in lieu of housing - has had an adverse effect on CoLC’s housing delivery target to 2025/26. However, this wasn’t even acknowledged in the application for the former and was dismissed in the application for the latter. Accordingly, the FALP requirement of 1,078 residential units from 2015 to 2025 will not be met on CoLC’s Housing Trajectory 2018.

Contact Name

Contact Organisation

Fred Rodgers

City Response

Comments noted.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

Increase in affordable housing is welcomed, but the real need is more social housing within the square mile. There is an increase of low paid workers in the City - hotels, shops, cleaners, care workers etc who need this type of housing rather than having to pay heavy commuting costs. There is a danger that such workers may dry up as their living/commuting costs escalate.

# City Plan 2036 Consultation Comments

## Contact Name

Gerald Hine

## Contact Organisation

## City Response

Comment noted.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

Residential areas

We understand why the City has decided to only allow new residential development in existing residential areas – to prevent the needs of residents from interfering with the City’s commercial development and to better protect residential amenity. We also welcome the greater emphasis in this plan than in the previous one on protecting residential amenity.

To enact and embed that emphasis, however, we would like to see Strategic Policy S3 Housing provide more detail on “protecting existing housing and amenity”. At present S3 gives detail on “providing additional housing” but gives none on “protecting existing housing and amenity”. We suggest that elements of Policy H3 Residential Environment should be summarised in the main S3 policy. A point 5 could say something like: "In identified residential areas uses that adversely affect residential amenity will be resisted and the cumulative affect of developments and activities on residential amenity will be taken into account in assessing those adverse impacts." Without this, the many fine words in this plan about protecting residential amenity have little value because they are not embodied in a strategic policy.

We would welcome further changes to ensure real protection of residential amenity. There are too many places in the plan where the hope is that disparate activities can continue to be balanced by “mitigation” measures, “good management” etc. We would like to see some firm commitments that some applications in or next to residential areas will be refused because the activities are incompatible with residential life.

## Contact Name

Jane Smith

## Contact Organisation

Barbican Association

## City Response

The current wording and arrangement of text regarding residential uses and amenity is considered to be adequate.



# City Plan 2036 Consultation Comments

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

This policy makes no mention of social housing. Affordable housing is often expensive, and the City needs key workers – teachers, nurses, policemen, carers, etc – to be able to live nearby.

It also makes no mention of hostel and step up accommodation for homeless people – of whom there are an increasing number in the City. There should be a policy on homeless hostels – this should be more of a priority (and a more implementable one) than self-build accommodation, yet self-build accommodation has its own policy (H9).

We suggest an additional item 5 in this policy: "In identified residential areas uses that adversely affect residential amenity will be resisted and the cumulative effect of developments and activities on residential amenity will be taken into account in assessing those adverse impacts." This is to embody in a major strategic policy the intention, stated several times in the plan, to provide better protection for residential amenity.

Contact Name

Contact Organisation

Jane Smith

Barbican Association

City Response

Policy S3 includes social housing in the affordable housing section.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

We read that the City will fulfil its target of 146 housing units a year, but it senses that "demand will be higher, owing to the severe shortage of housing identified in the wider London Plan". We do not understand this comment as written: does this mean the City will provide more than the 146 housing units a year? Where are workers expected to live, if not in the City?





# City Plan 2036 Consultation Comments

The way residents appear in the City strategy is as a regretted necessity. It would be preferable that they were seen in a more positive light. The residential population is beneficial to the environment by reducing air pollution and congestion, when people living close to their place of work can walk to work; a residential population makes the City 'live' and creates character. Residents take care of their surroundings and are alert to anti-social behaviour, litter and security risks; residents make the City safer as many people feel insecure when areas are deserted at night, or populated only by customers of the night time economy.

## Contact Name

## Contact Organisation

John Ramsey and Jane Northcote

## City Response

Comments noted. The City Corporation seeks to exceed the target set by the Mayor, to contribute to London's wider housing needs.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

The Mayor's position on the requirement for affordable housing to be provided on-site from major development has been strengthened in Draft New London Plan Policy H5 and this should be recognised in the City Plan. However, a flexible approach may be considered appropriate where minor and small housing developments are proposed as set out in Policy H6C of the Draft New London Plan (minor suggested changes). The City of London's Strategic Policy S3 should differentiate its approach towards minor, small and major housing development accordingly.

The City of London sets a minimum affordable housing target of 35% in proposed Strategic Policy S3 and where development proposals do not meet this target there is a requirement for viability assessments. The policy does not apply the Mayor's overall strategic affordable housing target and the City of London is advised to follow both the Threshold Approach set out in Draft New London Plan Policy H6 and to reflect the 50% strategic target for affordable housing set out in Policy H5. The City is welcome to include a higher threshold if this is supported by its viability evidence. In addition, the City of London should follow the guidance in Draft New London Plan Policy DF1 as well as the revised NPPF/PPG and recognise that both seek to limit site specific viability requirements to circumstances where there are clear and genuine barriers to delivery (paragraphs 11.1.2 and 11.1.3 Draft New London Plan).

The City's Local Plan does not set a desired tenure mix for affordable housing in accordance with the Draft New London Plan but instead seeks to determine this on a case by case basis. Draft New London Plan Policy H7 requires that 30% of affordable housing be social/affordable rent and 30% be intermediate housing products, with the remaining 40% to be determined by the borough. In order to follow the Fast Track Route, 35% of homes must meet these requirements and for any additional affordable housing provided above that level a more flexible tenure mix can be applied in accordance with Draft New London Plan (minor suggested changes) Policy H7B. City of London should set out its required affordable housing tenure mix based on its local housing evidence and viability which indicates a

# City Plan 2036 Consultation Comments

greater need for social and affordable rented housing products.

While the Draft New London Plan prevents boroughs from setting prescriptive dwelling size mix requirements for market and intermediate homes it encourages boroughs to set out guidance for the size of units required for social and affordable rented homes. The City Plan should set out its required dwelling size mix for low cost rented homes in accordance with Draft New London Plan Policy H12D based on local and up-to-date evidence which identifies a greater need for one and two bedroom units.

## Contact Name

Juliemma McLoughlin

## Contact Organisation

Mayor of London

## City Response

Policy C3 explains the Corporation's flexible approach to the size of housing developments in the supporting text. Wording has been added to the supporting text for clarity, as below.

The Mayor's overall strategic target is referenced in paragraph 4.3.20 as below.

Tenure mix is referenced in paragraph 4.3.25.

4.3.30. Various types of affordable housing products are included within the national definition of affordable housing. The draft London Plan indicates that a minimum of 30% should be low cost rented homes, including social rent and London affordable rent, and a minimum of 30% should be intermediate products, such as shared ownership. The remaining 40% should be determined by the relevant borough based on identified need. The City's SHMA found that the need for intermediate housing products was relatively low and that social rented units would most successfully address the City's affordable housing needs. However, different and innovative forms of affordable housing are being developed and the viability and suitability of particular tenures is likely to change over the Plan period. The tenure of affordable housing will therefore need to be determined on a site by site basis, having regard to evidence of need in the City and London Plan requirements. Developers should liaise with the City Corporation's Department of Community and Children's Services to determine an appropriate mix for proposed schemes. The term 'intermediate' housing covers a range of different housing types, including shared ownership products, other low-cost homes for sale and intermediate rent. The City Corporation will take a flexible approach towards intermediate housing, based on the circumstances of each site, and will encourage provision that meets the needs of essential local workers where possible".

The size of units is dealt with in Policy H4 which states that all new housing must follow London Plan space standards.

## Recommendation

Change

## Recommendation Details



# City Plan 2036 Consultation Comments

Policy CV3 explains the Corporation's flexible approach to the size of housing development in the supporting text as follows;

"If past trends continue, new housing delivery in the City is likely to fluctuate from year to year and monitoring and delivery performance should therefore be assessed against overall delivery in the period up to 2028/29, rather than on an annual basis. The City Corporation's Housing Trajectory shows that the supply of small and larger windfall sites, together with sites in the development pipeline, will provide sufficient capacity to meet the London Plan housing target by 2028/29."

The supporting text has been amended to reflect housing percentages as follows;

"The draft London Plan and the Mayor's adopted Affordable Housing and Viability Supplementary Planning Guidance set a strategic target for 50% of all new homes across London to be affordable, with a minimum threshold of 35% affordable housing on all developments comprising more than 10 units or which have a combined floorspace greater than 1,000m<sup>2</sup>. The Mayor has adopted a threshold approach to the consideration of applications for housing. Schemes which meet or exceed 35% affordable housing, or 50% on public sector land, are not required to submit viability information. Where an application does not meet these requirements, a viability assessment is required and the development will be subject to viability review as development progresses".

The supporting text references tenure details as follows;

" Various types of affordable housing products are included within the national definition of affordable housing. The draft London Plan indicates that a minimum of 30% should be low cost rented homes, including social rent and London affordable rent, and a minimum of 30% should be intermediate products, such as shared ownership. The remaining 40% should be determined by the relevant borough based on identified need. The City's SHMA found that the need for intermediate housing products was relatively low and that social rented units would most successfully address the City's affordable housing needs. However, different and innovative forms of affordable housing are being developed and the viability and suitability of particular tenures is likely to change over the Plan period. The tenure of affordable housing will therefore need to be determined on a site by site basis, having regard to evidence of need in the City and London Plan requirements. Developers should liaise with the City Corporation's Department of Community and Children's Services to determine an appropriate mix for proposed schemes".

## Type of Comment

General

### Comment

More housing is needed for young people who work in the City which they can afford, e.g. shared facilities so cheaper. Housing needs to be easy to access with no complicated leases.

### Contact Name

Kate Roberts

### Contact Organisation

### City Response

Comments noted.

### Recommendation

No Change

# City Plan 2036 Consultation Comments

## Recommendation\_Details

### Type of Comment

Support

### Comment

TfL CD supports the City's objective to make provision for an annual requirement of 146 additional residential units in the City up to 2036, in line with targets set out in the draft London Plan.

TfL CD has land holdings in the City which may be suitable for future residential development. In terms of affordable housing, TfL CD has an agreed portfolio approach with the Mayor to deliver 50% affordable housing on its landholdings across London. In line with paragraph 4.6.5A of the draft London Plan, where there is an agreement with the Mayor to deliver at least 50% across the portfolio of sites, then the 35% threshold should apply to individual sites. Any development bought forward by TfL CD will deliver at least 35% affordable housing on site in line with the City Plan policy and the draft London Plan.

### Contact Name

Luke Burroughs

### Contact Organisation

Transport for London Commercial Development

### City Response

Support noted.

### Recommendation

No Change

## Recommendation\_Details

### Paragraph

4.3.18

### Type of Comment

General

### Comment

Off-site affordable housing provision

The draft Plan, 4.3.18, states:

"[CoLC] therefore works with housing partners to deliver new affordable housing on sites in the City fringe and in neighbouring boroughs, principally on [CoLC] housing estates, utilising commuted sums from commercial and housing developments within the City. This approach has been supported by the GLA and has provided affordable housing in locations in or near the City that meet local housing need".



# City Plan 2036 Consultation Comments

Whilst the 32 units on Middlesex Street Estate and the three proposed for the Golden Lane Estate are “in the City fringe”, the developments at Horace Jones House and Twelve Acres House mean that CoLC have been unable to use 50% of those units to reduce numbers on its own Housing List. The proposed 66 units at CoLPAL, which will be substantially funded by London Borough of Islington, are only being built in order to satisfy CoLC’s misguided ambition as a Multi Academy Trust operator. When built, only 33 units will be occupied by people on CoLC’s Housing List. Then, of course there is the elusive Kensington Row Development, where public statements of CoLC’s intent remain unfulfilled.

## Conclusions

There is, of course, a lot to be welcomed regarding housing, particularly affordable, in the draft Plan but the same can be said of the current Plan and the 2011 Core Strategy, although the pre-2011 position has been substantially eroded. Since the evidence is that policies are ignored in determining planning applications, the proposed 35% on-site provision might as well be 50% anyway, although any “ambition” here is pointless in the absence of enforcement of policies. Even if 35% is accepted, why isn’t the cash in lieu payment being increased to an equivalent of 70%, rather than left at 60%?

Unless the policies of the draft Plan are not only going to be accepted but properly enforced, CoLC will continue to lose the benefit of policy compliant on-site affordable housing and/or cash in lieu payments. As a substantial amount - £34.38 million, as at 31 March 2018 - has been, and is being, raised for affordable housing from commercial developments, where there seems to be more of a zero-tolerance regime with regard to policy compliance, there is no reason why the welcome changes in the draft Plan should not be similarly enforced. No one should expect the rules to be changed during the game and the rule-maker should never do so.

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response

Comments noted.

## Recommendation

No Change

## Recommendation Details

## Paragraph

4.3.5

## Type of Comment

Support

## Comment

At paragraph 4.3.5 the Mayor welcomes recognition of the City’s housing target of 146 new homes including its small housing sites target of 74 new homes a year as set out in the Draft New London Plan Tables 4.1 and 4.2, and its intention to meet these over the plan period as set out in Strategic Policy S3.



# City Plan 2036 Consultation Comments

Contact Name

Juliemma McLoughlin

Contact Organisation

Mayor of London

City Response

Comment noted.

Recommendation

No Change

Recommendation Details

**Policy Number**

4.3.35

**Paragraph**

H3

**Type of Comment**

Object

Comment

The draft Plan 4.3.35 states: "The avoidance of overlooking of residential accommodation is a consideration in the design and layout of both new residential buildings and other development. However due to the density of development in the City avoidance of overlooking may not always be possible".

Irrespective of the "density of development in the City" the avoidance should be a requirement and not merely a consideration.

Contact Name

Fred Rodgers

Contact Organisation

City Response

Due to the intensity of conflicting interests in the City, the City Corporation can not ensure there is no impact from overlooking and other disturbances.

Recommendation

No Change

Recommendation Details

**Policy Number**

HS1



# City Plan 2036 Consultation Comments

## Paragraph

### Type of Comment

### Object

#### Comment

This policy, H1, appears to be simply arrogant. “Large parts of the City are unsuitable for new housing because they could have an adverse impact on the City’s primary business role and its ability to operate 24/7 and would be likely to have poor residential amenity” is certainly nothing less. Use of parts of the Square Mile for residential housing may be unacceptable but not only is there a limit to the number of office buildings that can be built, there is an even more important issue in respect of the number of people who can work there.

All new housing may have come forward on ‘windfall’ brownfield sites and CoLC may not consider it necessary to allocate sites in the draft Plan to meet housing targets. However, the Housing Trajectory 2018, with the required amendments shows housing delivery to 2026 is unlikely to meet its target. Where the 1460 units – under the London Plan – from 2026 to 2036 will come from, these are unlikely to come solely from brownfield sites and CoLC will have to allocate sites.

#### Contact Name

#### Contact Organisation

Fred Rodgers

#### City Response

There are inherent difficulties in allocating housing sites in the City. The City Corporation is working with GLA colleagues to maximise opportunities to meet housing targets.

#### Recommendation

No Change

#### Recommendation Details

### Type of Comment

### Object

#### Comment

As a resident of over 5 years, the drafted policy leaves me feeling extremely disappointed. Having purchased a flat (my sole residence) with fantastic amenity, all of my rights are essentially being stripped away and compromised in the name of growing office floorspace quotas. In an area where we have an established level of amenity and the majority of the building has acquired a right to light, the policy seems to read that there will be far more sympathy to encourage development and reject/strip back our rights despite the detrimental impact development proposes to our residential amenity.

We are already seeing this attitude come to light with an existing planning proposal and I fear that this situation will merely worsen. As we are not within a 'residential cluster' we are already having critical daylight, sunlight and amenity challenged with little regard to our status as existing residents. The proposed policy



# City Plan 2036 Consultation Comments

will enable these sorts of developments to construct mere metres away from bedrooms and habitable rooms as there is no viable way to meet all the City's development/planning policies. I would welcome a further conversation around the proposed development and planning processes to see where existing residential amenity can be protected in terms of quality of life or asset protection in the event where development is seen as critical.

Contact Name

Contact Organisation

Grant Winton

City Response

Sunlight and daylight issues are dealt with in the Design section; Policy D8 seeks to protect daylight and sunlight levels to residential units.

Recommendation

No Change

Recommendation\_Details

Type of Comment

Support

Comment

We support this policy. We hope the City will consider residential development for the Bastion House site. It is next to the Barbican, the City's largest single area of housing.

Contact Name

Contact Organisation

Jane Smith

Barbican Association

City Response

Support and comments noted.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment



# City Plan 2036 Consultation Comments

The City strategy states (p 49) that "new housing must not prejudice the primary business function of the City". In this case the plans of other London boroughs need to consider the growth in demand from the increase in workers. We would be interested to know which other London boroughs are able and willing to provide the housing for the increase in workers.

Contact Name

Contact Organisation

John Ramsey and Jane Northcote

City Response

There is a recognition that many people who work in the City will live in other parts of London. However, as the City's workforce is very large and complex, with a very large geographical catchment area (also covering areas outside London) it is not feasible for individual boroughs to specify housing requirements for City workers.

Recommendation

No Change

Recommendation Details

Type of Comment

Support

Comment

Welcome the City's intention in proposed Policy H1, to limit housing development to already established residential areas including the Barbican, Golden Lane, Middlesex Street and Mansell Street. This approach is in line with Policy SD5 of the Draft New London Plan which sets out that residential development is not appropriate in defined parts of the City of London area.

Contact Name

Contact Organisation

Juliemma McLoughlin

Mayor of London

City Response

Comment noted.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment



# City Plan 2036 Consultation Comments

TfL CD is broadly supportive of this policy. However, TfL CD believes that applications for new residential development should be assessed on a case by case basis throughout the City and that new housing should not only be developed in or near identified residential areas, so long as suitable amenity can be achieved and development does not compromise economic competitiveness. This will allow for the most appropriate form of development to come forward on individual sites. While TfL CD agrees it is essential that the primary business function of the City is not undermined, new residential development, particularly as part of mixed use development can help support economic success.

## Contact Name

Luke Burroughs

## Contact Organisation

Transport for London Commercial Development

## City Response

Concentrating new residential development in or near existing residential concentrations minimises adverse amenity issues and maximises appropriate office development.

## Recommendation

No Change

## Recommendation\_Details

## Paragraph

4.3.7

## Type of Comment

General

## Comment

HWCoL supports the comments made in 4.3.7 regarding protection of residential areas but given the proximity of business and new developments alongside the established housing stock it is difficult to see how this is enforceable.

Any new housing within the City would require additional primary care services and access to good diagnostic services. This access could be coupled with increased provision for city workers who do have access to healthcare though their workplace. Likewise access to the purchase of high quality, healthy and affordable food.

## Contact Name

Gail Beer

## Contact Organisation

Healthwatch City of London

## City Response

Comment noted.

## Recommendation

No Change

# City Plan 2036 Consultation Comments

## Recommendation\_Details

### Policy Number

HS2

### Paragraph

### Type of Comment

Support

### Comment

Draft Local Plan Policy H2 which protects against the net loss of housing is welcomed.

### Contact Name

Juliemma McLoughlin

### Contact Organisation

Mayor of London

### City Response

Comment noted.

### Recommendation

No Change

## Recommendation\_Details

### Paragraph

4.3.33

### Type of Comment

General

### Comment

Whilst the draft Plan 4.3.33 claims “the net loss of existing housing will be resisted because of the limited opportunities to replace that housing stock in the City’, it continues to suggest “the net loss of existing housing may be acceptable, particularly outside residential areas where the development of offices will have a significant beneficial impact for the City”. Of course, that suggestion applies in exceptional circumstances, an environment in which CoLC has decided all residential planning applications to date.

### Contact Name

Fred Rodgers

### Contact Organisation

### City Response

# City Plan 2036 Consultation Comments

Comments noted.

[Recommendation](#)

No Change

[Recommendation\\_Details](#)

**[Policy Number](#)**

HS3

[Paragraph](#)

[Type of Comment](#)

Support

[Comment](#)

I strongly support the wording of this policy which recognises that mitigation and management are not always sufficient to reduce the impact of a development on residents to an acceptable level. Permission should sometimes be refused.

Point 1: I also support the use of planning conditions which are inherently more powerful than licensing conditions.

[Contact Name](#)

[Contact Organisation](#)

David Coleman

[City Response](#)

Comments noted.

[Recommendation](#)

No Change

[Recommendation\\_Details](#)

**[Type of Comment](#)**

General

[Comment](#)

It is difficult to see how the commitments in this section are achievable given the City's primary aims. It would be good to see exactly how the City intends to achieve this goal and how communities will work together. HWCofL would like to see more information.

[Contact Name](#)

[Contact Organisation](#)

# City Plan 2036 Consultation Comments

Gail Beer

Healthwatch City of London

## City Response

The Plan is unable to include this level of detail.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

Support

## Comment

We consider the draft local plan to robustly address the 'Agent of change' principle, which should prevent inappropriate development coming forward in proximity to existing noise-generating arts, cultural and evening/night time uses. Where such development is proposed, there is a clear requirement for sufficient mitigation articulated.

## Contact Name

Tom Clarke

## Contact Organisation

Theatres Trust

## City Response

Comment noted.

## Recommendation

No Change

## Recommendation Details

## Paragraph

4.3.34

## Type of Comment

Object

## Comment

The wording of 4.3.34 undermines Policy H3, requiring the City only to “endeavour to minimise” impacts. It is certainly not a “reason for the policy”! The first two sentences are a reasonable observation; the remainder of the paragraph should be deleted.

## Contact Name

## Contact Organisation

# City Plan 2036 Consultation Comments

David Coleman

## City Response

Due to the intensity of conflicting interests in the City, the City Corporation can not ensure there is no impact from noise and other disturbances.

## Recommendation

No Change

## Recommendation Details

### Paragraph

4.3.34; 4.3.40

### Type of Comment

General

### Comment

This policy is very important to Barbican residents and we support it. We welcome the intention to resist uses that will adversely impact residents. We would like this intention backed up with more specific statements about refusing certain sorts of applications in residential areas.

Item 1. We would like to strengthen the wording to make it clear that adequate noise mitigation measures in mixed areas include design solutions such as ensuring that entrances (including delivery entrances) are sited at the side of buildings that are away from residential frontages.

Item 4. We particularly welcome the provision in item 4 that the cumulative impact of individual developments on the amenity of existing residents will be considered.

Para 4.3.34. This seems to undermine the thrust of Policy H3. If this is meant to refer to residences that are not within residential areas (as suggested at the Local Plan presentation on 28 January 2019) please make that clear.

Para 4.3.40. Amenity space could include... "roof top terraces." Please includes hours of operation for these where they are next to existing residences – the noise from terraces is a demonstrable nuisance (see for example, problems with the use of terraces at Moor Place).

### Contact Name

Jane Smith

### Contact Organisation

Barbican Association

## City Response

The Plan can not include detail of all Corporation policies. Othr guidance and strategies address amenity issues in more detail, such as environmental health and licensing guidance.

# City Plan 2036 Consultation Comments

Recommendation

No Change

Recommendation\_Details

**Policy Number**

HS4

Paragraph

Type of Comment

General

Comment

Policy H4 seems to fail at the outset in that no new housing within the Square Mile is of a high-quality design and a standard that facilitates the health and well-being of occupants and neighbouring occupants nor maximises opportunities for providing open and leisure space for residents.

In the case of 43 Golden Lane, CoLC required the developer to provide a letter confirming that the development would be built to the highest possible standard, which is both meaningless and unenforceable. Worse though, that development will have no play space for children because of the number of three-bedroom flats, completely ignoring the fact that children are brought up in flats of two bedrooms and less.

Contact Name

Contact Organisation

Fred Rodgers

City Response

Housing and other policies in the Plan seek to maximise high quality housing with greenery and outdoor space, where feasible.

Recommendation

No Change

Recommendation\_Details

**Paragraph**

4.3.38-4.3.39

Type of Comment

Support

Comment

# City Plan 2036 Consultation Comments

It is encouraging to see in Policy H4: Housing quality standards and sections 4.3.38 and 4.3.39, that all new housing will be expected to incorporate sustainable design and meet Excellent or Outstanding against the BREEAM criteria for water by incorporating principles of sustainable design. It is also encouraging to see that all new developments will be required to comply with the Mayor's London Housing Design Guide, including a target of 105 litres or less per head per day.

## Contact Name

Matthew Pearce

## Contact Organisation

Environment Agency

## City Response

Comments noted.

## Recommendation

No Change

## Recommendation Details

## Policy Number

HS5

## Paragraph

## Type of Comment

General

## Comment

It seems that there are around 7,250 homes, including over 1,400 second homes in the Square mile with around 7,400 adult residents. However, there is no indication as to the number of commercial serviced apartments and the like within those 7,250 homes, many of which are in blocks where there are also permanent residents. This appears to be in contravention of policy but the latter is mealy mouthed and there doesn't appear to be any enforcement policy, if the current situation is anything to go by. Also, CoLC's Housing Trajectory 2018 doesn't identify the use of residential units for short-term lets, despite the policy referring to commercial short term lets.

A full audit of the use of all residential accommodation in the Square Mile should be undertaken as soon as possible. This should include ensuring that all residential accommodation, including that used for short-term lettings, meet housing and amenity standards.

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response





# City Plan 2036 Consultation Comments

Short-let developments are expected to meet the same housing policy standards as permanent housing. In-house monitoring of housing tenures contributes to the development of housing policies.

## Recommendation

No Change

## Recommendation\_Details

---

## Comment

It is unfortunate to suggest an increase in 'short-term residential letting' as such letting is often prohibited under leases. Additionally the incursion of such firms as Airbnb is to be discouraged.

## Contact Name

Gerald Hine

## Contact Organisation

## City Response

The policy recognises that short-term lets for commercial purposes can help to meet the accommodation needs of business visitors. Recent government legislation changes now allow letting of domestic premises for under 90 days a year without obtaining planning permission.

## Recommendation

No Change

## Recommendation\_Details

## Policy Number

HS6

## Paragraph

## Type of Comment

Object

## Comment

Part 1 (b) and (c) of the draft policy does not define what is deemed to be an excessive concentration of student housing. Whilst we acknowledge there is a general concern over the concentration of student accommodation, this policy requirement is onerous and there is no evidence or justification provided that the concentration of PBSA creates harm to business functions or residential communities. There is no supporting policy text which explains the reasoning of this policy nor indicates how the Council will assess levels of concentrations.



# City Plan 2036 Consultation Comments

A number of London boroughs have included similar draft policies in their emerging local plans, however, there are further policy considerations rather than just solely focusing on 'excessive concentration', this policy should be further evolved to recognise these and how concentrations of students enhance these:

- a) Infrastructure – the student population supports and enhances this;
- b) Transport – there is no evidence as to how students will have an adverse impact on the transport network compared to conventional residential. There are a number of institutions in the local area including UCL and thus a large proportion of students will walk or cycle;
- c) Open space – there are extensive existing areas of open space in the local borough which can also be supplemented by internal and external space on site; and
- d) Residential occupiers – purpose-built student accommodation is very well managed and co-exists with residential developments across London and the wider UK.

There are a number of appeal decisions where Inspectors have granted consent for student development proposals where the main issue for consideration has included whether the proposals would result in an excessive over-concentration as stated in draft policy H6, albeit it does not define what this is deemed to be.

[Note - copies of appeal decisions in Exeter, Chester and Edinburgh x2 provided in support of this representation]

In these examples, the percentage of the student population exceeded 30% and reached a maximum of 62% and in all cases the Inspector concluded this did not result in an over-concentration and the delivery of PBSA would not cause harm. A 30% policy guidance threshold was removed in Edinburgh following the appeal decisions.

Recommendation: The policy is not definitive on what is deemed to be considered excessive concentration and it is clear by the examples that each of the above applications are considered on their merits, therefore the policy needs to have consideration to other factors e.g. infrastructure. In addition, there is no evidence that concentration of PBSA development creates harm to residential communities and they in fact have a positive impact on residential communities as evidenced above. It is recommended that part 1 (b) and (c) should be removed as PBSA does not have an adverse impact on the residential amenity of an area.

## Contact Name

## Contact Organisation

Unite Students

## City Response

Agree. "Excessive concentration" can not be defined in this context. Reference to "excessive concentration" will be deleted as below:

## Recommendation

Change

## Recommendation Details

The second bullet point of policy HS6 which read "result in an excessive concentration of student housing and/or hostel" has been deleted.

## Type of Comment

Object

## Comment



# City Plan 2036 Consultation Comments

Part 1 (a) of the draft policy fails to recognise that PBSA can enhance the primary business function of the city and can be developed alongside office buildings as part of mixed-use developments. The policy wording seeks to prohibit student schemes from central London business locations or where it may result in the loss of office buildings or sites. This has perhaps been influenced by a concentration of growth in student accommodation in central London Boroughs with Islington, Tower Hamlets, Southwark and Camden having accommodated approx 57% of student schemes over the adopted plan period. However, in perspective, 60% (23 of 38) of London's HEIs are located within the central sub-area. This includes locations within the City of London.

Given the majority of London's HEIs are concentrated within the central area, it is a logical and sustainable location for further student developments as this is where demand is greatest and future developments can benefit from the infrastructure, services and facilities which are already in place and those which are tailored specifically to serve students. The concentration of student accommodation should be embraced as there are economic benefits/economies of scale which derive from their agglomeration in their existing central locations.

London Plan evidence estimates the existing provision of PBSA bedspaces in London at 83,000 and the projected net requirement between 2016 and 2041 at 88,500 additional bedspaces, which equates to 3,500 per annum over the 25 year plan period. Recent data presented in a report by Jeremy Leach Research Ltd on behalf of The Watkin Jones Group, June 2017, indicates that the need for student bedspaces within Central London outweighs current supply. The report states: "...the level of provision of PBSA in the Central sub-region is projected to stand at 30.4% by 2020 which equates to a gap of 102,707 bedspaces."

These statistics demonstrate there is a significant undersupply of student accommodation in all London Boroughs therefore we do not support the intention of the policy which indicates PBSA will prejudice other uses in central locations. There are 23 HEIs in Central London which are recognised as making a vital contribution to the local economy, subsequently the requirement for associated facilities should not be understated neither should their future growth be comprised by inadequate provision of new student accommodation.

Recommendation: We propose Policy H6 part 1(a) is amended to recognise that PBSA can in fact support the business function of the city. The policy as drafted will limit the geographical distribution of student accommodation across the City of London and consequently suppress future supply of PBSA in central business locations.

## Contact Name

## Contact Organisation

Unite Students

## City Response

The retention of suitable offices is essential to the maintenance of the City of London as an international business centre. Student housing will be permitted where it does not prejudice the primary business function of the City.

## Recommendation

No Change

## Recommendation Details



# City Plan 2036 Consultation Comments

## Type of Comment

## Object

### Comment

Part 3 states that 35% of student housing on a site should be secured as affordable student accommodation as defined through the London Plan and associated guidance.

Unite are concerned that the proposed affordable rent requirement is too high and will ultimately hinder the future delivery of good quality student schemes. Affordable rent cannot be considered in isolation and must be considered alongside the introduction of Borough and Mayoral CIL which collectively amount to significant additional development costs and will continue to have a dramatic adverse impact on the supply of student accommodation in the City. Unite are concerned that additional barriers will further slow-down the delivery of pipeline schemes across the city and ironically, result in unintended consequences comprising:

- A reduction in the supply of purpose-built student accommodation;
- A reduction in the supply of affordable rent;
- Lack of supply of student housing not being able to address the increased demand and thus existing rents increasing; and
- An increase in students using the HMO/general needs housing market and thus reducing the supply of conventional housing.

With supply being reduced, market forces will dictate the rents of the limited supply of PBSA and will inevitably become more expensive. Additionally, if the 35% affordable rent requirement is strictly enforced it is highly likely that accommodation providers will increase the rent levels on the remaining 65% to mitigate the financial impact on viability. As such, the practicality of the implementation of this policy and the principle is ultimately flawed and should be left to the free market. The proposed wording is not only counterproductive to the policy of delivering affordable student accommodation but also to overall housing requirement given the positive contribution PBSA can make to the release of other conventional forms of housing.

Evidence on viability which underpins the draft London Plan and is the source of this draft policy requirement doesn't adequately demonstrate how the proposed 35% requirement has been justified. This requirement does not reflect the approach taken by a number of London Borough's and contradicts initiatives proposed by student accommodation providers. Some boroughs already have in place affordability schemes such as bursaries and require developers to sign up to these. Where this is the case, another affordability scheme is not required and would be a double provision. If insisted upon, it will only serve to reduce the viability of student accommodation development which is already under pressure due to rising land values in London.

Research demonstrates that a flexible approach has been taken in the determination of recent planning applications for major student schemes in London since the Mayor's affordable housing policy has been in force. This indicates that the policy has not been enforced strictly or consistently and in many circumstances it has been deemed appropriate to consider applications on a case by case basis and negotiate an appropriate provision which would be viable and satisfy all parties. Similar to an example in the LB of Ealing, we consider it appropriate to remove the affordable housing requirement if student accommodation schemes are able to demonstrate a connection with a higher education provider.

Recommendation: We therefore propose the policy is amended to: "10 per cent of the accommodation is secured as affordable student accommodation as



# City Plan 2036 Consultation Comments

defined through the London Plan and associated guidance. However, if student accommodation schemes are able to demonstrate a connection with a higher education provider, point 4 of this policy does not apply and an affordable rent contribution will not be sought”.

Contact Name

Contact Organisation

Unite Students

City Response

Policy on the percentage of affordable housing required of student housing developments must comply with London Plan guidance, which requires a percentage of 35%.

Recommendation

No Change

Recommendation\_Details

Type of Comment

Object

Comment

The policy requirement that proposals for PBSA must be supported by identified further or higher educational institutions operating in the City or the Central Activities Zone and provide accommodation for their own students is onerous and should be deleted as it is clear in London that students travel and live across boroughs. Furthermore it is not possible to have this agreement/support with HEI's prior to achieving planning permission. The draft policy could therefore prohibit PBSA developments coming forward and does not follow the policy thrust of the Draft London Plan.

Unite do not support this approach as this type of binding connection with a specified provider at such an early stage in the planning process is extremely restrictive and does not coincide with the manner in which Unite operate, which is to generate demand through students letting directly. Additionally, Unite have found that Universities are often reluctant to engage in such agreements where they are liable to pay void payments if they are unable to fill rooms or take a risk on losing a development (and therefore committed rooms) if it falls behind in the planning and/or construction process, which can take 4 – 5 years. The removal of this restriction will afford the applicant a greater degree of flexibility and enable rather than hinder delivery of high-quality student accommodation schemes which is essential to addressing the student accommodation shortfall in London Boroughs over the plan period.

Recommendation: This policy requirement should be removed as students live and study across boroughs, in addition it is not possible to have this agreement/support from universities prior to achieving planning permission.

Contact Name

Contact Organisation

Unite Students



# City Plan 2036 Consultation Comments

## City Response

London Plan policy has been amended to weaken the requirement of the link between student housing and higher educational establishments. Supporting text of policy HS6 has been amended to reflect this change, as below.

## Recommendation

Change

## Recommendation Details

Supporting text has been amended to reflect changes regarding the link between student housing and higher educational institutions as follows:

" New Purpose-Built Student Accommodation (PBSA) will only be permitted when should be supported by an identified further or higher educational institution for the housing of its own students. To reduce the need to travel between student accommodation and educational institutions, PBSA providers should seek support from institutions within the City or the Central Activities Zone, through nomination agreements in line with London Plan requirements. Nomination agreements, secured by s106 agreements, will be required for all affordable student accommodation"

## Type of Comment

Object

## Comment

Part 1(d) refers to the loss of permanent residential accommodation but does not recognise the contribution of PBSA towards the overall housing supply. PBSA provision will alleviate housing needs by increasing the availability of larger family sized dwellings. Student housing provided by private landlords is often a lower-cost form of housing. Encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock. In addition, Planning Practice Guidance enables student accommodation to be included towards the housing requirement.

Most importantly the draft London Plan recognises that new flats, houses or bedrooms in PBSA all contribute to meeting London's housing need and is not in addition to this 'conventional' need. This echoes the NPPG stance. The supporting policy text states that every three student bedrooms in PBSA that are completed equate to meeting the same need that one conventional housing unit meets and contribute to meeting a borough's housing target at the same ratio of three bedrooms being counted as a single home.

This part of the policy is strongly objected to as the position has been made clear by the NPPG and emerging London Plan which states contrary to this. The delivery of student accommodation can be counted toward the supply of conventional housing and does not result in the loss of permanent self-contained residential accommodation. In addition, there have been a series of appeal decisions where Inspectors have granted consent for student development where issues have been raised by the local planning authority in terms of the perceived conflict with the development plan due to the view that the site should deliver conventional housing.

[Note - copies of appeal decisions in Cambridge and Falmouth x2 provided in support of this representation]

Recommendation: this policy requirement should be removed as it has been demonstrated that PBSA does not compromise the delivery of conventional housing



# City Plan 2036 Consultation Comments

and this assumption is contrary to the national and strategic policy position. In addition, the supporting text should be subsequently removed as this is also contrary.

## Contact Name

## Contact Organisation

Unite Students

## City Response

Disagree that student housing fulfills the same role in providing residential accommodation as conventional housing. The Housing Delivery Test has established a national ratio that every 2.5 student bedrooms in PBSA completed meet the same housing need as one conventional housing unit. The Corporation consider student housing at this ratio will contribute to meeting the City's housing target.

## Recommendation

No Change

## Recommendation Details

## Paragraph

4.3.47

## Type of Comment

General

## Comment

A substantial number of student accommodation units are included in CoLC's Housing Trajectory 2018, although the qualifying number has been substantially reduced as a result of the draft London Plan. However, the loss of 120 hostel rooms at 43 Golden Lane hasn't been made good and the requirement of 4.3.47 that new PBSA "will only be permitted when supported by an identified further or higher educational institution for the housing of its own students" is questionable. Limiting occupation in that way will deny much needed single person accommodation to key workers and CoLC should advocate for changes in the Council Tax system to allow mixed occupancy, with nil and ordinary tax rates, where appropriate, especially when the needs of the City's economy are apparently paramount.

## Contact Name

## Contact Organisation

Fred Rodgers

## City Response

Comments noted.

## Recommendation

No Change

## Recommendation Details



# City Plan 2036 Consultation Comments

## Policy Number

HS8

## Paragraph

## Type of Comment

General

## Comment

CoLC's concern for housing older persons within the City seems to date back to 1990 and the eventual completion of Tudor Rose Court in 1997. Since then the concern seems to have remained silent until publication of the draft Plan. It is noticeable that Tudor Rose Court residents, in their response to the recent Barbican and Golden Lane Conservation Area public consultation, specifically requested the exclusion of their block. Reading Policy H8, particularly "supporting development that replaces existing provision for older people with better provision that addresses care needs or fosters independent living" offers some explanation for that request.

It will be interesting to see how, and where, this policy is put into practice. Certainly, CoLC's record of either ensuring any on-site affordable housing provision or anywhere near the policy compliant cash in lieu payments offers no encouragement here. A more specific and enforceable policy is needed.

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response

Comments noted. To reflect the growing number of older residents, the policy on older person's housing has been strengthened in the Plan.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

This section is limited, and we would suggest, given the growing older population, and the requirement to keep people in their homes for longer that more consideration be given to this section. HWCOL would be happy to participate in this. Consideration should be given to access to parking and other facilities for carers and healthcare professionals required to support people in their own homes. Likewise access to open spaces and community facilities should be considered.

## Contact Name

Gail Beer

## Contact Organisation

Healthwatch City of London





# City Plan 2036 Consultation Comments

## City Response

Agree that section on older persons housing needs expanding. Wording to address the issues raised has been added, as below.

## Recommendation

Change

## Recommendation\_Details

Wording has been added to Policy HS8 and the supporting text as follows:

"Policy HS8: Older persons housing

The City Corporation will aim to ensure there is a sufficient supply of appropriate housing available for older people by:

- supporting development that meets the specific needs of older people;
- supporting development that replaces existing provision for older people with better provision that addresses care needs or fosters independent living;
- ensuring new development is inclusive and accessible to all to allow people to continue living in their own homes; and
- resisting development that involves the net loss of housing for older people.

Reason for the policy

4.3.60. The City of London has an ageing resident population profile, in line with national demographic trends. Some people will wish to remain in their own homes, with suitable adaptations, or may choose to move into specialist housing which caters for the needs of older people, with varying degrees of support. The City of London SHMA identifies a need for 67 specialist older person units over the life of the Plan, and the London Plan has an indicative figure of 10 units per year.

How the policy works

4.3.61. The City Corporation will work with developers to encourage the provision of sufficient accommodation suitable for older people, including provision of specialist older persons accommodation, where feasible, to meet identified needs identified in the City of London SHMA. Specialist older persons housing should deliver affordable housing in line with Policy S3. Some older or disabled residents may need regular visits from carers and healthcare professionals and the provision of visitor parking would support their ability to live in their own homes. This issue is addressed in Policy VT3".

## Type of Comment

Support

## Comment

We welcome this policy.

## Contact Name

Jane Smith

## Contact Organisation

Barbican Association

## City Response

Support welcomed.

## Recommendation

No Change

# City Plan 2036 Consultation Comments

## Recommendation\_Details

### Type of Comment

General

### Comment

Query whether the forecasted need for 10 units of older persons accommodation a year is sufficient. As both the resident and the working population age, then facilities will be needed, including specialist medical facilities and accessible buildings, benches in streets and more public toilets. What is the strategic assumption of the future age profile of City workers and residents?

### Contact Name

### Contact Organisation

John Ramsey and Jane Northcote

### City Response

The forecast of the needs for housing for older people in the City is based on Census population data and projections. The figure of 10 units can be exceeded if there is the demand for units and developers seek to provide such housing.

### Recommendation

No Change

## Recommendation\_Details

### Type of Comment

Support

### Comment

I would like to welcome this new policy, as a City resident of advancing years who would like to continue to live here for the foreseeable future but am finding it difficult to be sure of appropriate accommodation.

### Contact Name

### Contact Organisation

Mollie Bickerstaff

### City Response

Comment noted.

### Recommendation

No Change

## Recommendation\_Details



# City Plan 2036 Consultation Comments

## Paragraph

4.3.53

### Comment

The City of London's recognition of its annual borough benchmark for specialist older persons housing of 10 units, as set out in Table 4.4 of the Draft New London Plan, is welcomed.

### Contact Name

Juliemma McLoughlin

### Contact Organisation

Mayor of London

### City Response

Comment noted.

### Recommendation

No Change

### Recommendation Details

## Policy Number

HS9

## Paragraph

### Type of Comment

General

### Comment

How realistic is this policy? The City itself proposes only to build 146 houses a year – because of lack of land on which to build. And many self-builders do self-building to limit their costs, yet land in the City is ferociously expensive.

### Contact Name

Jane Smith

### Contact Organisation

Barbican Association

### City Response

The Corporation is required by Governemnt Legislation to include this policy.



# City Plan 2036 Consultation Comments

[Recommendation](#)

No Change

[Recommendation Details](#)

# City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S4: Offices

### Policy Number

### Paragraph

### Type of Comment

Support

### Comment

British Land supports the intention to increase the City's office floorspace in Strategic Policy S4. British Land also supports the encouragement of high-quality flexible workspace for a variety of different sizes and types of occupiers, including space suitable for SMEs stated in Strategic Policy S4. Where affordable workspace is required, for start-up and scale-up businesses, affordability should be assessed with regard to lease lengths, fit-out and service provision, to take into account the total cost of occupancy. It is important that any requirement for affordable workspace is applied flexibly and has regard to local circumstances.

Part of British Land's Broadgate vision is to diversify the occupier base and encourage a range of business sizes and sectors through the provision of flexible and adaptable office floorspace and the creation of a world class, mixed use campus, which responds to changing work practices. This is aligned to the Draft City Plan which identifies that there has been a shift away from the dominance of financial services and increased take up of office space from media and tech firms. In addition to the delivery of a broader range of office accommodation, British Land's research has shown that the provision of a range of other commercial uses is essential to meet the needs of these occupiers and their workforce. This underpins the current transformation that is happening at Broadgate. British Land consider mixed-use development, incorporating a range of complementary commercial uses critical to the continued success of Broadgate and the City as an attractive and world class office location.

### Contact Name

### Contact Organisation

British Land Company PLC

### City Response

Policy O1 seeks that office floorspace is flexible and designed so that it can be used for a range of occupiers including small and medium sized enterprises. At present there is no evidence that subsidised workspace is required in the City.

### Recommendation

Change

### Recommendation\_Details

# City Plan 2036 Consultation Comments

Provide clarity through merger of bullet points within policy box

Be designed for future flexibility to future proof the City's office stock and where appropriate, provide a proportion of flexible workspace suitable for micro, small and medium enterprises.

## Type of Comment

Support

### Comment

We support Policy S4 and the proposals for the City Corporation to facilitate significant growth in office development of the highest quality to meet projected economic and employment growth by increasing the City's office floor space stock by a minimum of 2,000,000 m2 net during the period 2016 to 2036, to meet the long-term economic needs of the City and accommodate projected employment growth.

We also provide support for the floor space to be designed to be flexible to allow adaptation of space for different types and sizes of occupiers and to meet the need for a variety of workspace types suitable for SMEs, start-up companies and those requiring move-on accommodation.

### Contact Name

### Contact Organisation

Endurance Land

### City Response

Noted.

### Recommendation

No Change

### Recommendation Details

## Type of Comment

Support

### Comment

We support the City of London's ambition under Policy S4 to increase the City's office floorspace stock by a minimum of 2,000,000 sqm net during the period 2016 to 2036, to meet the long-term economic needs of the City and accommodate projected employment growth. Indeed, it is understood that if the City of London is to maintain its status as the world's leading financial and professional services centre, then continued growth and a plentiful supply of office floorspace is needed to meet a range of different office tenants.

This is especially the case when factoring in the impending arrival of Crossrail to Liverpool Street which will improve commuting times from parts of London that are currently less well connected to the City of London and relieve congestion along existing Central Line stations. All this means that the City, that already benefits from very good public transport accessibility, will only become more desirable as a location for potential office tenants.



# City Plan 2036 Consultation Comments

Indeed, despite the projected difficulties of Brexit on the London economy, JLL's Central London Office Market Report for Q4 2018, showed a strong outturn to the year was evident for the central London office market. Despite the uncertainty in the wider political and economic arena, occupiers' continued commitment to London was evident. JLL's report demonstrated that the City specifically experienced a robust end to the year, with above average levels of leasing activity recorded whilst in contrast, East London was comparatively subdued. The City also recorded the highest annual levels of leasing since 2014 at 6.7 million sq ft.

Confidence in the office market in the City of London therefore persists. Attention therefore turns to how to accommodate the office provision given the City of London's lack of available land and historically rich townscape and urban fabric.

## Contact Name

## Contact Organisation

LaSalle Investment Management

## City Response

Support Noted. The COL will facilitate significant growth in office development increasing it by a minimum of 2,000,000sqm net during the period 2016-2036.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

We support the aim of strategic policy S4 for office development to encourage provision of office workspace that allows small and growing businesses the opportunity to take up space within the City of London. Islington Council operates a policy that secures affordable workspace on-site as part of development of major employment schemes in growth areas and town centres. A number of affordable workspaces have been delivered in Islington and the Council has experience in securing the development and administration of affordable workspaces.

If space for small and growing businesses is unable to be accommodated on-site within development in the City, we would welcome discussions on whether the policy could secure off-site contributions which could fund affordable workspace on sites in Islington; or alternatively, whether actual physical space can be directly provided on Islington sites, where opportunities arise and align with proposed development timescales. Islington Council can take on delivery and management of such space through our existing process, and work with the City to establish principles for what type of firms can occupy the space.

## Contact Name

## Contact Organisation

Ben Johnson

London Borough of Islington



# City Plan 2036 Consultation Comments

## City Response

The City of London presently seek s106 contributions for employment and skills training.

The City of London comprises dynamic clusters of world City businesses and a unique agglomeration vital to London's economic success. This contributes to its reputation as a dynamic place to do business reflected by the relative high levels of demand. The local plan provides a proportion of flexible workspace suitable for micro, small and medium sized enterprises to include incubator, co-working and accelerator space. At present there is no evidence that subsidised workspace is required in the City. Therefore, any affordable workspace provision is likely to a complementary facility to those in neighbouring boroughs and will require co-operation in consideration of the wider economic needs and to support a wider range of occupiers/businesses.

## Recommendation

Change

## Recommendation Details

Further amplification in policy to refer to complementary facilities for affordable workspace in neighbouring boroughs.

The City of London Corporation will therefore work with neighbouring boroughs under its statutory Duty to Co-operate requirements to deliver affordable workspace in suitable locations in consideration of the wider economic needs and to support a wider range of occupiers/businesses.

## Type of Comment

General

## Comment

The CPA broadly supports this draft policy and particularly the need to ensure new floorspace is designed to be flexible to allow adaption of space for different types and size of occupiers. It is important, however, that the policy is applied flexibly. We note that the spatial requirements of a medium-sized enterprise potentially employing up to 250 people will be very different to a start-up of circa 1-5 people, and who now typically seek a co-working type environment. Co-working accommodation provides much more flexible terms than traditional office accommodation, and is now preferred by start-up businesses given the flexibility and working environments these office products provide. The CPA believe there is sufficient flexibility within an office (Class B1) use to allow the market to respond to the needs of new businesses, start-ups and SMEs. However, the CPA would welcome clarification as to how the City would seek to apply this policy through detailed development management policies which are not present in the Plan.

Part 3 seeks to encourage the provision of affordable office workspace, which is further supported at paragraph 5.1.10 noting that it is important to ensure there is floorspace that is affordable to start up and growing businesses. The CPA is not aware of any locally specific evidence showing a need for policy intervention in order to address evidenced market failures in the Square Mile. Such a policy approach should only be introduced where there is a clear evidence base. The relative stability of rental values in the Square Mile and the cyclical nature of the office market confirms such policy encouragement is not required.

Further it is not clear that small and growing businesses would wish to take up such affordable office workspace in the City. Co-working accommodation provides much more flexible terms than traditional office accommodation. With this in mind, it is important that part 3 of the policy is applied extremely flexibly, and having regard to localised circumstances and the cyclical nature of the office market. We also note the UK's exit from the EU in 2019 is likely to have an adverse economic





# City Plan 2036 Consultation Comments

impact on the London economy, and an associated impact on the supply and demand of office floorspace (albeit the exact impact on the London economy is hard to quantify at this stage).

Supporting paragraph 5.1.8 refers to the significant and increasing take up of office floorspace in the City from media and tech firms, acknowledging the requirement for a broader range of office types as a result. In order for these firms to anchor within the City, the supporting text should also refer to the broad range of ancillary uses that are equally required to support an increasingly diverse workforce. It is important that the City adapts away from a 9-5 financial-based business district to cater for a wide variety of businesses, working populations, visitors and tourists. This is widely acknowledged throughout the draft Plan and is carried through into Policy O1 (Office Development), however the CPA would wish for this to be acknowledged within the overarching Strategic Policy S4.

## Contact Name

Charles Begley

## Contact Organisation

City Property Association (CPA)

## City Response

The local plan provides a proportion of flexible workspace suitable for micro, small and medium sized enterprises to include incubator, co-working and accelerator space. At present there is no evidence that subsidised workspace is required in the City. Therefore, any affordable workspace provision is likely to a complementary facility to those in neighbouring boroughs.

The Vision and objectives of the plan state that the City will be open to new business, new ideas and new ways of working reflected in the office floorspace that is flexible and adaptable to meet the demands of different types of business operators, including incubators, start-ups and other small and medium sized enterprises. COL acknowledges that there is a broad range of occupiers of City office floorspace and demand for new types of occupiers is likely over the course of the local Plan period as new trends emerge and City adapts to meet the expectations. The LP will continue to be monitored to reflect changing circumstances.

The GLA London Office Review Report 2017 undertook a range of sensitivity analysis on the possible impacts of leaving the European Union and concluded that there were a number of other factors that will influence London economy irrespective of Brexit and that the true impact will be extremely difficult to measure in isolation.

## Recommendation

Change

## Recommendation Details

Further wording in policy amplification to refer to complementary facilities for affordable workspace in neighbouring boroughs

The City of London Corporation will therefore work with neighbouring boroughs under its statutory Duty to Co-operate requirements to deliver affordable workspace in suitable locations in consideration of the wider economic needs and to support a wider range of occupiers/businesses

## Type of Comment

General



# City Plan 2036 Consultation Comments

## Comment

We appreciate the emphasis on the role of The City Corporation in facilitating growth in office development of the highest quality to meet projected economic and employment growth as outlined in Strategic Policy S4 and with an emphasis on flexibility in new development to meet the needs of a range of occupiers.

## Suggested Amendments

We feel the purpose of this policy ought to be to allow the market to respond to these needs within a supportive planning framework rather than err towards market intervention.

## Contact Name

Dr Sophie V Taysom

## Contact Organisation

Merchant Land

## City Response

The nature of the policy is to set out a framework for the future development in relation to the City economy. This development framework provides flexibility for the market to respond to developer needs.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

It is difficult to discern what exactly the City's priorities are here. There are specific numbers provided but the timings are vague and the baseline not entirely clear. Careful consideration might be given as to how to better communicate the position here to non-planning professionals. Specifically in the case of the office development pipeline it is possible to interpret the information on projected supply as having already largely been achieved. This muddies the waters as to whether the plan is in reality for office expansion or containment.

## Contact Name

Fr Luke Miller

## Contact Organisation

Diocese of London

## City Response

Noted. GLA projects that employment in the City of London will grow by 116,000 from 2016 to 2036 as per the ONS Business Register and Employment Survey figures produced in 2016. The overall office floorspace target of 2,000,000sqm is derived from the estimated growth in office employment between 2016 and 2036 which will ensure that there is enough office development to meet economic and employment growth. Development schedule September 2018 indicates office

# City Plan 2036 Consultation Comments

stock of B1 as 8.95m sqm across the City and the City Plan seeks to provide for a 20% increase in stock. Further background paper to be undertaken around the stock in the pipeline.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

Object

## Comment

The suggestion of a continuing increase in office space does not take account of the fact that more and more businesses are re-locating into cheaper accommodation outside the City. More workers are working from home, so requiring less expensive City office space. It is noted that there are many empty offices in Canary Wharf, where some space is now being offered to start-ups; this puts more pressure on the misguided policy of increasing office space in the City. Indeed, more office space in the City is being changed to residential/hotel property.

## Contact Name

## Contact Organisation

Gerald Hine

## City Response

The GLA labour market projections have derived the employment office requirements. City of London is entirely within the Central Activities Zone as outlined in the London Plan. The London Office Policy Review (LOPR) 2017 made assumptions that going forward the utilisation of office space would continue the current trend for being increasingly dense, at a ratio of 1.2 workers per desk, and account for part time, flexible and home workers to create a figure of 9sqm NIA per worker and 11.3sqm GIA. The LOPR also builds in allowance for 8% vacancy rate as recommended in London Plan EIP although City of London vacancy sits below this figure. It is therefore appropriate to adjust for a vacancy rate appropriate to the COL and contingency to meet demands of the market. Policy O1 seeks that applications for office development provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises to ensure growth of these enterprises within the City. For offices Low vacancy within the city suggests that there is still demand. There will be further publication of evidence base in due course. COL acknowledge the need for additional housing in the City.

## Recommendation

Change

## Recommendation\_Details

Additional bullet point in loss of office accommodation policy resiting loss unless on can be demonstrated that it is near residential areas and would result in the provision of additional housing.

# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

Item 1. We note that the rate of growth of office building slows dramatically after 2026 and that most of the projected new office buildings are already under construction.

Item 2. We hope that the requirement for office floor space to be adaptable will result in more sustainable buildings that do not have to be redeveloped every 25 years. This would conserve resources, reduce air pollution, and make the day to day environment nicer.

### Contact Name

Jane Smith

### Contact Organisation

Barbican Association

### City Response

Policy O2 Protection of existing office floorspace states that refurbishment of office floorspace will be encouraged to accommodate future needs, whilst aligning with sustainability principles set out in Strategic Policy S8, Policy DE1.

### Recommendation

No Change

### Recommendation\_Details

## Type of Comment

General

### Comment

For the City of London the delivery of sufficient office space that is able to meet demand and ensure the continued growth of City of London's internationally important business community over the plan period is of paramount importance. The Mayor welcomes the City of London's intention to meet its established target of 2 million sqm of office space up to 2036 and its recognition of the changing and evolving nature of its business community as increasing numbers of media and tech companies take up space within the City of London. The City of London's proposed office employment floorspace will go some way in contributing towards the 3.5 million sqm projected office floorspace demand (CAZ and Northern Isle of Dogs) set the Draft New London Plan.

It is noted that according to the City of London Office Floorspace Target (Nov 2018) at 31st March 2018, almost 1.5 million sqm of office space had been granted planning permission and that over 1.2 million sqm of that was already under construction. This means that approximately, 710,000m<sup>2</sup> of further office space will be required over the plan period to meet projected demand. Further site level work identifying potential development sites and associated indicative capacity should be set out to demonstrate that the City Plan is able to deliver this quantum of office space over the plan period.

### Contact Name

### Contact Organisation

# City Plan 2036 Consultation Comments

Juliemma McLoughlin

Mayor of London

## City Response

1. The City of London Corporation will assist deliverability of the planned office floorspace through 3D modelling of the City and City Cluster Public Realm vision to manage the project growth to include site specific public realm enhancements and alignment with Transport Strategy to ensure delivery is coordinated with development.

2. Policy OS1 builds on the London Plan policy to provide flexible workspace stating that office development should provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises to include incubator, co-working and accelerator space. At present there is no evidence that subsidised workspace is required in the City. The City of London has a unique agglomeration and comprises dynamic clusters of world City businesses and other specialist functions vital to London's economic success as stated in the draft London Plan. This contributes to its reputation as a dynamic place to do business reflected by the relative high levels of demand. Therefore, any affordable workspace provision is likely to be a complementary facility to those in neighbouring boroughs and will require co-operation in consideration of the wider economic needs and to support a wider range of occupiers/businesses.

## Recommendation

Change

## Recommendation Details

Further amplification in policy to refer to complementary facilities for affordable workspace in neighbouring boroughs.

The City of London Corporation will therefore work with neighbouring boroughs to deliver affordable workspace in suitable locations in consideration of the wider economic needs and to support a wider range of occupiers/businesses.

## Type of Comment

General

## Comment

Draft Local Plan Policy S4 which promotes the provision of affordable office workspace and recognises its importance is welcome. However, the City of London should follow the approach set out in Draft New London Plan Policy E2 in supporting the provision of new and the protection of existing low-cost business space. The City of London should seek the provision of low cost business space from office development proposals that exceed 2,500m<sup>2</sup> (or an equivalent locally determined threshold based on up-to-date evidence).

## Contact Name

Juliemma McLoughlin

## Contact Organisation

Mayor of London

## City Response



# City Plan 2036 Consultation Comments

Policy OS1 builds on the London Plan policy to provide flexible workspace stating that office development should provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises to include incubator, co-working and accelerator space. However at present there is no evidence that subsidised workspace is required in the City .... The City of London has a unique agglomeration and comprises dynamic clusters of world City businesses and other specialist functions vital to London's economic success as stated in the draft London Plan. This contributes to its reputation as a dynamic place to do business reflected by the relative high levels of demand . Therefore, any affordable workspace provision is likely to a complementary facility to those in neighbouring boroughs and will require co-operation in consideration of the wider economic needs and to support a wider range of occupiers/businesses.

Recommendation Change

## Recommendation Details

Further wording in policy amplification to refer to complementary facilities for affordable workspace in neighbouring boroughs  
The City of London Corporation will therefore work with neighbouring boroughs to deliver affordable workspace in suitable locations in consideration of the wider economic needs and to support a wider range of occupiers/businesses

Type of Comment Support

## Comment

TfL CD supports the draft Plan's objective to "facilitate significant growth in office development of the highest quality to meet projected economic and employment growth by increasing the City's office floorspace stock by a minimum of 2,000,000m2 net during the period 2016 to 2036."

TFL CD owns existing properties used for office accommodation within CoL and is currently bringing forward approximately 13,000 sq.m of new office development above Bank station which was granted permission in 2014. TfL CD will work closely with CoL in identifying other potential TfL owned sites that may be suitable for further office development in appropriate locations.

Contact Name Luke Burroughs  
Contact Organisation Transport for London Commercial Development

## City Response

Noted.

Recommendation No Change

## Recommendation Details

Type of Comment General



# City Plan 2036 Consultation Comments

## Comment

The City of London is designated as a nationally important location for globally-oriented financial and business services in the draft New London Plan. The GLA projects that employment in the City of London will grow by 116,000 jobs (2,000,000m<sup>2</sup>) from 2016 to 2036, which may have implications for parts of Shoreditch.

Hackney and City have been working closely on the approach to office and employment-led schemes to ensure a balanced mix to support the continued success and growth of digital/creative sector and business floorspace across both boroughs. We look forward to continuing to work with the City to monitor the movement and demand for specific types of offices and employment uses, ensuring that employment growth can be accommodated in a way that is positive for both Hackney and the City around the City Fringe Opportunity Area.

The provision of affordable and low cost workspace remains a priority for Hackney. We note that Strategic Policy S4: Offices encourages the provision of affordable office workspace and lower cost business space in order to support start-ups and growing businesses given the high land/rental values in the City. Hackney supports this objective and suggests that policy could go further in requiring a specified proportion of new floorspace as affordable to ensure this is secured in all new development. Hackney's new Local Plan and draft Shoreditch AAP requires 10% of the gross new floorspace within major commercial developments to be affordable or low cost floorspace. We welcome continued engagement with the City on affordable workspace policies and best practice to ensure the economic needs of Hackney and the City are met.

## Contact Name

Natalie Broughton

## Contact Organisation

London Borough of Hackney

## City Response

The City of London comprises dynamic clusters of world City businesses and a unique agglomeration vital to London's economic success. This contributes to its reputation as a dynamic place to do business reflected by the relative high levels of demand. The local plan provides a proportion of flexible workspace suitable for micro, small and medium sized enterprises to include incubator, co-working and accelerator space. At present there is no evidence that subsidised workspace is required in the City. Therefore, any affordable workspace provision is likely to be a complementary facility to those in neighbouring boroughs and will require co-operation in consideration of the wider economic needs and to support a wider range of occupiers/businesses.

## Recommendation

Change

## Recommendation Details



# City Plan 2036 Consultation Comments

Further amplification in policy to refer to complementary facilities for affordable workspace in neighbouring boroughs.

The City of London Corporation will therefore work with neighbouring boroughs under its statutory Duty to Co-operate requirements to deliver affordable workspace in suitable locations in consideration of the wider economic needs and to support a wider range of occupiers/businesses.

## Type of Comment

Support

### Comment

FSB welcomes the proposals listed within 'support a thriving economy' - to increase the City's office stock and that the Local Plan recognises the importance of providing new offices which are flexible and adaptable for different occupiers including SMEs, start-up companies and those requiring move-on accommodation. Also, to protect existing office floor space.

### Contact Name

Sarah King

### Contact Organisation

Federation of Small Businesses

### City Response

Noted

### Recommendation

No Change

### Recommendation Details

## Paragraph

5.1.1 - 5.1.3

## Type of Comment

Object

### Comment

The claims in 5.1.1 are obviously subject to challenge but, even if these can be substantiated with credible evidence, the claim in 5.1.2 that "the whole of the City forms the business cluster and is suitable for further commercial development" is plainly unsustainable. In this context, what does "suitable" mean? Even if "employment is projected to continue to grow over the long term" (5.1.3) there is no evidence of a lack of overall space and the claimed evolution in 5.1.1 is likely to mean that space will always be available as businesses come and go.

### Contact Name

Fred Rodgers

### Contact Organisation

### City Response





# City Plan 2036 Consultation Comments

City of London is entirely within the Central Activities Zone as outlined in the London Plan where further economic and employment growth is promoted. The London Office Policy Review 2017 made assumptions that going forward the utilisation of office space would continue the current trend for being increasingly dense, taking into account workers per desk and agile working. The City of London has a low vacancy rate, meaning that demand is high and it is appropriate to provide occupier choice. The justification will be set out in further evidence published in due course.

Recommendation No Change

Recommendation\_Details

Paragraph 5.1.4 - 5.1.5

Type of Comment General

Comment

There might be more credibility in the claim in 5.1.4 were it not for Canary Wharf and other centres in London and the UK. Where more and more business is conducted digitally, the need for space in the City will become less important or, at least, the need for significant space will.

Presumably 5.1.5 refers to the New London Plan. If not, those forecasts are pre-Brexit and subject to challenge. In any event an increase of 116,000 over 20 years is equivalent to around 2% per annum, hardly enough to get excited about and the fact that an increased population will need employment doesn't simply equate to more space being needed to accommodate it, unless the employment is real.

Contact Name Contact Organisation

Fred Rodgers

City Response

City of London is entirely within the Central Activities Zone as outlined in the London Plan. London Office Review Report from the GLA assumes significant growth in office floorspace and forms the evidence for strategic policy S4.

Recommendation No Change

Recommendation\_Details

Paragraph 5.1.5

Type of Comment Object



# City Plan 2036 Consultation Comments

## Comment

It is unfortunate that, in 2019, we are having to rely on 2016 figures for estimating what will happen over the next 20 years. An additional 2,000,000m<sup>2</sup> of office space to accommodate 103,000 additional office workers equates to 19.4m<sup>2</sup> per employee, which seems over-generous. Certainly it is significantly more than the statutory minimum of 11m<sup>3</sup> and obviously totally unsustainable, unless the Strategic Policy S4 is aimed at development for the sake of GDP and not because of need and in ignorance of its affect on the environment.

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response

City of London is entirely within the Central Activities Zone as outlined in the London Plan. The London Office Policy Review (LOPR) 2017 made assumptions that going forward the utilisation of office space would continue the current trend for being increasingly dense, at a ratio of 1.2 workers per desk, and account for part time, flexible and home workers to create a figure of 9sqm NIA per worker and 11.3sqm GIA. The LOPR also builds in allowance for 8% vacancy rate as recommended in London Plan EIP although City of London vacancy sits below this figure. It is therefore appropriate to adjust for a vacancy rate appropriate to the COL and contingency to meet demands of the market. Policy O1 seeks that applications for office development provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises to ensure growth of these enterprises within the City. Low vacancy within the city suggests that there is still demand.

## Recommendation

No Change

## Recommendation Details

## Paragraph

5.1.5 - 5.1.6

## Type of Comment

General

## Comment

As the GLA's employment forecast assumes that the underlying strengths of the City will drive continued growth which in turn drives the building proposals, should there be a sensitivity analysis on the impact of Brexit, which is already driving businesses from the City?

## Contact Name

John Ramsey and Jane Northcote

## Contact Organisation

## City Response



# City Plan 2036 Consultation Comments

The GLA London Office Review Report 2017 undertook a range of sensitivity analysis on the possible impacts of leaving the European Union and concluded that there were a number of other factors that will influence London economy irrespective of Brexit and that the true impact will be extremely difficult to measure in isolation.

Recommendation No Change

Recommendation Details

Paragraph 5.1.6

Type of Comment General

Comment

Wishing is not planning (5.1.6) and the effect of Brexit, even if the City is less affected than the rest of the UK, must have a knock-on effect which will leave the City as the last bastion. However, the last bastion will soon become isolated and fall.

Contact Name Contact Organisation

Fred Rodgers

City Response

The GLA London Office Review Report 2017 undertook a range of sensitivity analysis on the possible impacts of Brexit and concluded that there were a number of other factors that will influence London economy irrespective of Brexit and that the true impact will be extremely difficult to measure in isolation.

Recommendation No Change

Recommendation Details

Paragraph 5.1.8

Type of Comment Support

Comment

The use of a minimum target of 2 million square metres of new office floorspace to be delivered by 2036 is supported, and is considered absolutely necessary if London is to maintain its status as a world leading international financial and professional services centre. Supporting paragraph 5.1.8 refers to the significant and increasing take up of office floorspace in the City by media and tech firms, acknowledging the requirement for a broader range of office types as a result. The



# City Plan 2036 Consultation Comments

acknowledgement that 98% of City businesses are SMEs and that particular focus should be given to this scale of occupier is welcomed. In order for these firms to anchor within the City, the supporting text should also refer to the broad range of ancillary uses that are equally required to facilitate an increasingly diverse and demanding workforce and new ways of working.

It is important that the City moves away from the perception of being just a traditional office district and in the future needs to cater for a wider variety of businesses with different working hours, a more diverse working population, visitors and tourists. This is widely acknowledged throughout the draft Plan which is encouraging.

## Contact Name

## Contact Organisation

Tenacity

## City Response

Policy amplification of the City Plan acknowledges that complementary commercial uses enhance areas vitality and provide support services to the residential and working community and policy OS1 encourages commercial uses as part of an office led development particularly at ground and basement levels.

## Recommendation

No Change

## Recommendation Details

## Paragraph

5.1.9 - 5.1.10; 5.1.13

## Type of Comment

General

## Comment

Points 2 and 3 of S4 are appreciated as my reply to question 3.6 of CoLC's Local Plan – Issues and Options public consultation called for more frame construction, to provide greater flexibility, along with more temporary and/or adaptable structures. However, as I made clear in my reply to 3.5 the good intentions set out in 5.1.9 and 5.1.10, are only effective if the space is subsidised but there is nothing under “How the policy works” that even mentions the need for subsidy, let alone “how it works”.

I would take issue with point 4 of S4 and the subsequent boast in 5.1.13. As mentioned in my reply to question 3.2, there is a case for workspaces which incorporate living accommodation – as has actually been the case for the 800 years that the City has lived off the fat of the world – and the Article 4 Direction should be reconsidered to enable good quality and well-provisioned mixed developments, particularly where these will also contribute to the economy.

## Contact Name

## Contact Organisation

Fred Rodgers



# City Plan 2036 Consultation Comments

## City Response

COL will seek that applications for office development provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises. It is acknowledged the impact that small and medium sized businesses, industries and enterprises have to the City economy and employment. The Article 4 direction seeks to prevent the loss of quality office accommodation as the predominant land uses in the City, necessary for future economic growth of the City however does not prevent the application of quality mixed use development proposals that include residential use coming forward.

The City of London has a unique agglomeration and comprises dynamic clusters of world City businesses and other specialist functions vital to London's economic success as stated in the draft London Plan. This contributes to its reputation as a dynamic place to do business reflected by the relative high levels of demand. Land within the City is an expensive and limited resource. Therefore, any affordable workspace provision is likely to a complementary facility to those in neighbouring boroughs and will require co-operation in consideration of the wider economic needs and to support a wider range of occupiers/businesses.

## Recommendation

No Change

## Recommendation\_Details

### **Policy Number**

O1

### **Paragraph**

### **Type of Comment**

Support

### **Comment**

British Land supports the encouragement of high-quality flexible workspace for a variety of different sizes and types of occupiers, including space suitable for SMEs stated in Policy O1. Where affordable workspace is required, for start-up and scale-up businesses, affordability should be assessed with regard to lease lengths, fit-out and service provision, to take into account the total cost of occupancy. It is important that any requirement for affordable workspace is applied flexibly and has regard to local circumstances.

### **Contact Name**

### **Contact Organisation**

British Land Company PLC

## City Response

Policy O1 seeks that office floorspace is flexible and designed so that it can be used for a range of occupiers including small and medium sized enterprises. At present there is no evidence that subsidised workspace is required in the City.

## Recommendation

Change



# City Plan 2036 Consultation Comments

## Recommendation Details

Change to policy

Provide clarity of bullet points within policy box.

Be designed for a range of occupiers to allow for sub-division to provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises and also amalgamation of floorplates to ensure flexibility and future proof the City's office stock

## Type of Comment

General

## Comment

We support draft Policy O1 and in particular the need for new office development to allow maximum flexibility for sub-division and amalgamation of floorplates to future proof the City's office stock. The scheme at 60 London Wall was designed so that it could be multi-let or could be used as the head offices for a larger firm, with the ability to create a private entrance if needed. Prospective office tenants have advised us that they want high quality efficient floorplates, designed to let as a whole, or floor by floor, with few supporting columns, appropriate ceiling heights and with good levels of daylighting.

Under draft Policy O1, the draft wording states that new office development should provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises. Whilst it is noted that new office development should be adaptable, it should be appreciated that there are some instances where new office development is developed with a specific occupier in mind. A prominent example of this is the new Bloomberg European Headquarters that was designed to a specification based on a client's brief. The building went on to win the coveted Stirling Prize for 2018 and received the title of 'the most sustainable office building in the world,' garnering much acclaim for its exceptional design, community benefits, its unique working environment for employees and its technological advances to enhance sustainability.

In this instance, the City of London were amenable to allow a new office building that had been customised to the specification of the applicant, and the scheme has been highly successful as a result. We would therefore encourage the wording of the draft Policy to make provision for such an eventuality and acknowledge that whilst flexible office floorspace should be encouraged, there are instances where new buildings should be allowed to be designed with a particular occupier in mind.

## Contact Name

## Contact Organisation

LaSalle Investment Management

## City Response

Policy O1 does not prevent single occupier buildings however it ensures that the design of the building is adaptable and flexible for future occupiers and therefore is viable and sustainable.

## Recommendation

No Change

# City Plan 2036 Consultation Comments

## Recommendation Details

### Type of Comment

General

### Comment

We agree with the spirit of Policy O1 with its focus on micro and SMEs and development focus on office floorspace suitable for a range of occupiers including other commercial uses at street level that will contribute to activating streets and provide services for residents, workers and larger businesses.

However, we would add that market forces also need to be able play out to achieve the best outcome for a robust business district during future property cycles. We feel the emphasis should be on challenging all new office floor space to be flexible and adaptable to suit a wide range of business types and sizes and therefore future proof office stock.

We would suggest amending Policy OS1 to state: "Office development should aim to incorporate the following priorities..." to allow for a more flexible approach.

We also suggest the supporting narrative to Policy O1 be updated to include reference to development viability as a consideration in requiring design and sustainability standards to be applied, and that these should not be applied mechanically where this would conflict with the broad requirements established in Policy S4, namely to deliver 2,000,000 sqm net new office floorspace over the plan period to 2036. Over-encumbering new development will serve to constrain delivery and reduce the overall ability for the sector to meet this ambitious target.

### Contact Name

Dr Sophie V Taysom

### Contact Organisation

Merchant Land

### City Response

Policy amplification Protection of existing office floorspace states that refurbishment of office floorspace will be encouraged to accommodate future needs, whilst aligning with sustainability principles set out in Strategic Policy S8, Policy D1. COL will implement sustainability standards at a local level to contribute towards the aim of achieving a zero emission and climate resilient City and exemplars of sustainable building design.

### Recommendation

No Change

## Recommendation Details

### Type of Comment

General

### Comment

# City Plan 2036 Consultation Comments

Policy O1 must be pre-conditioned on not only actual need to justify planning permission but, more importantly, the need not to cause any environmental harm both in and as a result of the development. Without a definition of “outstanding design” the use of the phrase is meaningless as is “an exemplar of sustainability” unless it means there will be no harm to the environment.

Otherwise, substituting “must” for “should” Policy O1.1 is acceptable. However, OS1.2 should make it clear that any development must provide sustainable green space at ground floor level.

Contact Name

Contact Organisation

Fred Rodgers

City Response

Strategic Policy S14 open spaces and infrastructure seeks that urban greening should be integral to the design and layout of buildings and public realm.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

Developers need to do more to accommodate the extra people generated by large office developments.

Contact Name

Contact Organisation

Hamish Robertson

City Response

The delivery of floorspace will be phased enabling effective planning for support services and infrastructure required by the planned growth. The Local Plan will liaise and align with the Transport Strategy and Public Realm enhancements to ensure coordinated delivery such as the enhancement of the pedestrian experience within the City Cluster. Ensure City Cluster vision made publicly available .

The draft City Plan recognises that good design at ground level, good use of available space and a good mix of uses are critical in order that large numbers of people can move around safely.

Recommendation

No Change

Recommendation\_Details





# City Plan 2036 Consultation Comments

## Type of Comment

Support

### Comment

We support this policy. However, we think the City could do more to ensure outstanding design by being more interventionist on the quality of designs, using a design panel to judge the quality of designs, as suggested in section 2 of our response.

### Contact Name

Jane Smith

### Contact Organisation

Barbican Association

### City Response

The requirement for external design panels would add greater complexity, cost and uncertainty to development in the City and ignores the significant experience on design matters within the City Corporation. Through internal and external consultation COL will undertake assessments of planning applications against adopted policy to ensure that the policy criteria is met.

### Recommendation

No Change

### Recommendation Details

## Type of Comment

General

### Comment

We support continued new development in the office sector, but do have concerns that the sector is experiencing a significant change, which may lead to some divestment. An increasingly flexible workforce across so many businesses, the changing age and demographic of the City worker, shorter leases, higher tenant incentives and less security of income pose a sectoral risk that is not cyclical. With the flexible office providers starting to dominate take up, much of which is let on very short and flexible terms, there is an increased risk that business responses to economic cycles as we have known them may change, much as retail has changed beyond all recognition. In short, it will be easier for tenants to walk away giving rise to increased voids. Centres dominated by a mono asset class could start to resemble the risk that shopping centres now present.

We would urge the City to think ahead and perhaps reflect an increase in residential allocation. Whilst urban living is on the up, actual take up of office space is changing in its nature and it is reasonable to expect it to change further. The City of London needs to remain relevant, not just as a world class office location, but more simply, as a world class location for people.

### Contact Name

Jo Upton

### Contact Organisation

Pegasi



# City Plan 2036 Consultation Comments

## City Response

City of London Corporation are meeting the draft London Plan 2017 targets for housing allocation.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

Support

## Comment

TfL CD supports the objectives of this policy. TfL owns land within CoL which is suitable for office development such as the over station development at Bank. This scheme will comply with the objectives of this policy regarding design quality and providing office floorspace suitable for a range of occupiers. TfL CD will work closely with CoL in identifying other potential TfL owned sites that may be suitable for further office led development in appropriate locations.

## Contact Name

Luke Burroughs

## Contact Organisation

Transport for London Commercial Development

## City Response

Support noted.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

Object

## Comment

Please stop granting approval for bland glass towers that have no character. Its ruining the classic city skyline.

## Contact Name

Mital Pate

## Contact Organisation

## City Response

Policy O1 seeks that office development should be of an outstanding design alongside design policies S8 within the plan to ensure that development is of high quality, sustainable, in accordance with the St Pauls Height limitations and London Views Management Framework.



# City Plan 2036 Consultation Comments

Recommendation

No Change

Recommendation Details

Paragraph

5.1.3

Type of Comment

General

Comment

Draft Policy O1 states that office development should provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises, yet at paragraph 5.1.3 it is stated that over 98% of all City business are SMEs and 80% have fewer than 10 employees. With this in mind, the CPA is concerned that the draft policy could be worded differently in relation to flexible/SME workspace to take account of office market forces within the Square Mile.

It is recommended that the fourth bullet point of part 1 of the draft Policy is reworded as follows: “ where necessary, provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises.”

The CPA considers there is sufficient flexibility within an Office (Class B1) use class, and that the issue of flexible workspace of varying sizes can be appropriately catered to within the market. If there is an instance where this should be dealt with through the planning process, a more flexible policy will allow Planning Officers to apply this on a case-by-case basis.

Contact Name

Contact Organisation

Charles Begley

City Property Association (CPA)

City Response

Policy O1 seeks that office floorspace is flexible and designed so that it can be used for a range of occupiers including small and medium sized enterprises.

Recommendation

Change

Recommendation Details

Provide clarity through merger of bullet points within policy box

Be designed for future flexibility to future proof the City’s office stock and, where appropriate provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises.

Policy Number

O2



# City Plan 2036 Consultation Comments

## Paragraph

### Type of Comment

General

### Comment

British Land considers that Policy O2 should include the wording set out at paragraph 5.1.21 which supports the change of use of office floorspace at ground and lower ground floor levels to improve the mix of uses and vibrancy of an area by introducing active frontages. The policy should not require detailed marketing or viability evidence for proposals, which meet this criterion, to support a planning application.

### Contact Name

### Contact Organisation

British Land Company PLC

### City Response

COL seeks to protect the loss of office floorspace to other uses unless it can be demonstrated that there has been adequate marketing, a viability assessment undertaken or consideration of office space within mixed use commercial development. COL agree that there are further opportunities to develop the City's retail offer and have identified 4 principal shopping centres and numerous retail links across the City where ground floor retail frontages is encouraged. Elsewhere in the City retail is encouraged provided they provide active frontages and do not adversely impact on the vitality or viability of the PSC's or links.

### Recommendation

No Change

### Recommendation Details

### Type of Comment

Object

### Comment

The proposed introduction of a 18 month marketing period by way of justification of loss of office floor space appears contrived and we feel viability assessments and a proper examination of specific issues on a case by case basis is more appropriate.

### Contact Name

### Contact Organisation

Dr Sophie V Taysom

Merchant Land

### City Response



# City Plan 2036 Consultation Comments

COL will need to be satisfied that active promotion has been undertaken by the agents marketing the site. COL have considered the latest amendment to the London Plan 2019 which has set a formal marketing period of 12 months and consider that this is appropriate discentive to change of use and would not undermine the policy objective which is to protect office floorspace whilst any greater length of time risks blight through long term vacancy and weaken prospects of the continued occupation of surrounding buildings.

Recommendation Change

## Recommendation Details

Amend to 12 months

Type of Comment Support

## Comment

TfL CD supports the objective to protect office floorspace in CoL. However, we agree that office units may be appropriate for redevelopment in CoL where justified, in line with the requirements set out in this proposed policy . TfL owns a range of office accommodation within the City and is examining the potential future uses of these sites in line with this draft local plan policy.

## Contact Name

Luke Burroughs

## Contact Organisation

Transport for London Commercial Development

## City Response

Noted

Recommendation No Change

## Recommendation Details

Paragraph 5.1.17; 5.1.22

Type of Comment Object

## Comment

Policy O2 seems to be desperation whilst clinging on to the manta of – “The City is the world’s leading international financial and professional services centre and is recognised as having a key role in the UK economy” (5.1.17). Certainly, this policy is hardly robust in the light of the unneeded 2,000,000m2 of planned new office accommodation and the lead time between an owner’s decision to change an use, particularly to housing/mixed office and housing, until the actual use changes

# City Plan 2036 Consultation Comments

will be significant – or even worse - if the 18 month period required by 5.1.22.

Contact Name

Contact Organisation

Fred Rodgers

City Response

City of London is entirely within the Central Activities Zone as outlined in the London Plan London Office Review Report from the GLA assumes significant growth in office floorspace and forms the evidence for strategic policy S4. GLA projects that employment in the City of London will grow by 116,000 from 2016 to 2036 as per the ONS Business Register and Employment Survey figures produced in 2016. The overall office floorspace target of 2,000,000sqm is derived from the estimated growth in office employment between 2016 and 2036.

Recommendation

Change

Recommendation Details

Amend to 12 months

Paragraph

5.1.21

Type of Comment

Object

Comment

The CPA is concerned with the introduction of a marketing period of not less than 18 months at draft policy O2. The CPA does not consider that marketing of office accommodation should be a prerequisite to demonstrate lack of demand. Factors such as condition, quality and location and other site specific considerations can also be an important determinant of the viability of a continued office use. Whilst it is appreciated that robust evidence will be required to demonstrate the loss of office accommodation, viability assessments are considered a more appropriate tool to demonstrate the viability of offices, rather than a fixed marketing period.

Further, stating a period of not less than 18 months is too rigid, since marketing the building in itself cannot be considered a measure of demand and long-term viability i.e. letting a building for £20psf does not mean that building will be viable in terms of covering its costs and producing a return to a rational investor. A period of not less than 18 months is overly onerous, and in many instances may not be possible to demonstrate. Flexibility needs to be built into the draft policy.

The CPA considers that the policy should, where necessary, seek applicants to provide information concerning marketing periods, and reasonableness of approach to pricing the accommodation given the use, condition, quality and location of the building. This may refer to the length of time the property has been on the market and number of enquiries received from prospective purchasers or tenants (including as to the suitability of continued office use). The CPA does not consider it will be appropriate to market a building in each and every case and the policy should acknowledge this fact.



# City Plan 2036 Consultation Comments

The draft policy should acknowledge the constraints presented by designated and non-designated heritage assets, particularly in terms of the additional costs and constraints these buildings present. Heritage assets often limit the ability to meet requisite office standards through conversion and as a result impact on viability in the longer term. The draft policy should acknowledge some flexibility is needed on a site-by-site basis, especially where there may be heritage or other public benefits which could be achieved as a result of a loss of office accommodation.

We also consider the draft policy needs to acknowledge the City's residential areas. The policy needs to recognise that the residential areas offer the appropriate environment for housing and that housing should be directed to these areas. The draft policy or supporting text should confirm that the City may, in appropriate circumstances, provide a more flexible approach to the assessment of buildings or sites located in or near the defined residential areas.

The CPA would also like to see the sentiment of supporting paragraph 5.1.21 set out in policy O2. It is important the City's position in respect of minor losses of ground and lower ground office floorspace to active uses such as retail and gym uses is clearly set out. The draft policy should state that change of use to more active uses can be supported without a detailed justification being provided in support of a planning application.

## Contact Name

Charles Begley

## Contact Organisation

City Property Association (CPA)

## City Response

COL acknowledge the need for additional housing in the City.

COL agree that a flexible approach to change of use ought to be taken to ground floor retailing elsewhere in the City provided that they incorporate active frontages and not adversely impact on the vitality or viability of the PSC's or links.

COL are of the opinion that a 12 months marketing period is sufficient and comparable to other neighbouring boroughs.

## Recommendation

Change

## Recommendation Details

Additional bullet point loss of office space resisted unless demonstrated that it is within or near residential areas and would result in the provision of additional housing.

## Paragraph

5.1.23

## Type of Comment

General

## Comment

No doubt the "exceptional circumstances" of 5.1.23 will mean no viability assessment will be made public. However, unless CoLC employs consultants who are actually properly prepared to scrutinise and challenge the same, there would be little point anyway.



# City Plan 2036 Consultation Comments

Contact Name

Contact Organisation

Fred Rodgers

City Response

COL are producing a draft Homelessness Strategy which provides actions around housing requirements for a range of housing needs across the City and the draft City Plan will support this.

Recommendation

No Change

Recommendation Details

**Policy Number**

O3

**Paragraph**

5.1.25

**Type of Comment**

General

Comment

The exclusion of housing of any type from O3 is, at best, short sighted, particularly in view of the City's dire homelessness and rough sleeping problem. Properly provisioned – heating, cooking, washing and sanitary facilities – buildings could provide day and night shelters for up to 36 months and that use should be welcomed and not rejected.

To “ensure the vitality and vibrancy of the City is maintained” (5.1.25) does not justify an all fur coat and no drawers policy.

Contact Name

Contact Organisation

Fred Rodgers

City Response

COL do not consider residential development a temporary use.

Recommendation

Change

Recommendation Details

Amend loss of office floorspace policy to take a more flexible approach near residential areas in the conversion of office floorspace.





# City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S5: Retailing

### Policy Number

### Paragraph

### Type of Comment

Support

### Comment

We support an increased provision of retail within the Square Mile to facilitate a thriving and working day/night economy (especially over the weekend). We recognise the constraints of the current retail market (and traders), so to ensure viability and sustainability we welcome flexible retail use provisions and incentives for a variety of retail space, especially orientated towards food & beverage & meanwhile/maker space. This will ensure that the Square Mile can attract, retain and sustain a diverse range of retailers & consumers from surrounding boroughs and markets.

### Contact Name

### Contact Organisation

City Property Association NextGen Steering Group

### City Response

Noted. We promote markets and specialist retail centres and diversity of retail see Policy R4 wording and Policy R5 (Markets).

### Recommendation

No Change

### Recommendation Details

### Type of Comment

Object

### Comment

A1 Retail and Town Centre Uses

We welcome the City of London taking a more flexible approach to A1 retail protection within the PSCs, when compared with the current retail policy, which is too restrictive in requiring that 70% of the PSC retail frontage is A1 and refusing permission where more than 2 in 5 consecutive premises are not A1 or A2 use. We would however advocate that further flexibility is applied within PSCs so that the loss of A1 uses within PSCs is not readily resisted, either through new development or a change of use away from existing A1 uses at ground floor level.

It has been well publicised in recent news that with the growth of online retail, traditional A1 uses are suffering from a decline in demand and there is a need for principle shopping frontages to adapt and evolve to maintain a healthy pedestrian footfall by expanding their offer and range of uses. There is a need for retail



# City Plan 2036 Consultation Comments

centres to repurpose and allow a wider range of town centre uses such as D2 fitness, D1 community, other retail uses, and leisure uses to retain active frontage and a healthy footfall.

With the exception of the One New Change Shopping Centre, it should be acknowledged that the City of London is not traditionally thought of as a prominent retail destination, particularly when compared with the West End.

The draft London Plan at policy SD6 (Town centres) acknowledges that to remain resilient, the adaptation and restructuring of town centres should be supported in response to the challenges and opportunities presented by multi-channel shopping and changes in technology and consumer behaviour.

Draft Policy S5 should therefore allow for the loss of A1 retail uses so that PSCs can adapt to changing retail habits and reduce the risk of vacant retail units. Draft Policy S5 should expand the land uses that are acceptable in PSCs to allow more town centre uses, with an appreciation that for PSCs to maintain a healthy footfall, more diversity in land uses including A3 restaurants, D1 community, D2 leisure and A4 drinking establishments at ground floor and basement levels should be supported. We would propose that draft policy S5 is reworded so that reference to predominance to A1 retail is omitted, and that other town centre uses are considered appropriate uses within the PSCs, particularly as they retain active frontage.

## Contact Name

## Contact Organisation

LaSalle Investment Management

## City Response

Noted. Draft policy provides more flexibility to retail offer. Policy S5 wording states that there is demand for a better range and quality of retail and leisure facilities. We appreciate there is growth in leisure/experiential retail and will include some additional wording in the policy text to reflect this.

## Recommendation

Change

## Recommendation Details

Wording added to paragraph 5.2.10 re leisure uses.

## Type of Comment

General

## Comment

Most retail units within the Moorgate/Liverpool Street PSC and along London Wall specifically comprise of small and shallow retail units as opposed to larger and/or deep units. The Moorgate/Liverpool Street PSC is therefore not an attractive, nor a suitable location for traditional high street retailers such as department stores, health and beauty, book and clothing retailers who seek large units of a specific size. In fact, it is well documented that the closure of department stores such as BHS, House of Fraser and scaling down of M&S and Debenhams stores has left large retail units vacant on high streets for a sustained period of time, reducing active frontage and negatively impacting the vitality and health of the town centre.



# City Plan 2036 Consultation Comments

Detailed feedback from retail agents has advised against providing narrow deep retail units (with poor natural light and shop window elevations with no street frontage) as these represent poor quality sales floorspace to retailers who find customers do not want to walk to the rear of the shop and are therefore more difficult to let. Retail agents have advised that prospective tenants seek modern retail units that are appropriately sized with more regular floorspace, straight walls, less depth to the units, higher ceiling heights and extensive shop windows.

The focus of the policy should be to protect active frontage at ground floor level within the PSCs and place less emphasis on protecting retail floorspace. We would therefore recommend that the wording of draft policy S5 focuses less on the loss of retail floorspace, but rather focus more on protecting active retail frontage. We would suggest that the draft policy is reworded to allow for larger retail units to be subdivided into smaller units, and that the rear of larger A1 units can be reduced in size to create smaller A1 units, to better suit prospective retail tenants. The draft policy should allow large vacant A1 units to change use to other active land uses capable of operating in such a large space such as D2 fitness or as an A3 restaurant.

## Contact Name

## Contact Organisation

LaSalle Investment Management

## City Response

Noted. Policy S5 wording states that there is demand for a better range and quality of retail and leisure facilities. We appreciate there is growth in leisure/experiential retail and will include some additional wording in the policy text to reflect this. Retail policy encourages active frontages and Policy R1 promotes varied unit sizes and frontage lengths.

## Recommendation

Change

## Recommendation Details

Wording added to paragraph 5.2.10 re leisure uses.

## Type of Comment

General

## Comment

Draft Part 3 of the policy states that major shopping developments will be required to be located within or near Principal Shopping Centres, which is supported. However the policy subsequently defines 'near' as 'immediately adjoining'. Our view is that the latter wording is overly prescriptive and does not provide sufficient flexibility. It is therefore suggested that 'immediately adjoining' is replaced with 'in close proximity to...'

## Contact Name

## Contact Organisation

Tenacity



# City Plan 2036 Consultation Comments

## City Response

Noted. The policy provides enough flexibility for retail in the PSCs and retail links.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

We very much appreciate the value of active frontages and a diverse retail offer that supports the needs to communities, workers and visitors, as well as micro businesses and SMEs. Coupled with this retail offer is the need to support a 24/7 economy.

## Suggested Amendments

As leisure uses are an important partner to a successful retail landscape we would suggest that SP5 is expanded to include such uses. Whilst outside the scope of the Draft City Plan we would also comment that business rates for retailers/leisure premises will impact on deliverability of SP5 if a truly diverse and vibrant range of occupiers is sought.

## Contact Name

Dr Sophie V Taysom

## Contact Organisation

Merchant Land

## City Response

Noted. Policy S5 wording states that there is demand for a better range and quality of retail and leisure facilities. We appreciate there is growth in leisure/experiential retail and will include some additional wording in the policy text to reflect this. We encourage independent shops, but planning cannot control business rates.

## Recommendation

Change

## Recommendation Details

Wording added to paragraph 5.2.10 re leisure uses.

## Type of Comment

Object

## Comment



# City Plan 2036 Consultation Comments

Unfortunately, nowhere in S5 is there either an acknowledgement of the effect of the City's retail offer on its environment nor any proposal as to how that effect is to be limited. Litter from food, drink, free newspapers and cigarette butts is a major problem, as is the affect of nicotine on planting and, as for human deleterious. The Plan should ensure that not adversely affecting the City's environment comes first and foremost in S5.

Contact Name

Contact Organisation

Fred Rodgers

City Response

Noted. Additional wording has been added to the policy wording to refer to litter in Policy R2. The Plan should be read as a whole so please refer to Policy C4 and Policy CEW1.

Recommendation

Change

Recommendation Details

Added word 'litter' to paragraph 5.2.23.

Type of Comment

General

Comment

The Plan does not mention access to healthy foods. There are any number of restaurants, bars and cafes but there is limited opportunity to buy food that is other than ready prepared. The City should give thought to developing a farmer's market and increasing the number of fruit and vegetable outlets within the City. Both Barts and the Barbican Centre would make ideal venues in the Northern part of the City whilst Petticoat Square could be considered to the East. Access to transport for some City residents especially the disabled people and the older people may prohibit going out to shop and greater consideration should be given to access to healthy foods adapting models issued in Tower Hamlets when dealing with urban food deserts.

Contact Name

Contact Organisation

Gail Beer

Healthwatch City of London

City Response

Noted. A new Policy HIC9 (Health Impact Assessment) has been added since the consultation in November to encourage the provision of opportunities to access healthy food outlets.

Recommendation

Change

Recommendation Details



# City Plan 2036 Consultation Comments

Policy HIC9 which is new covers this query regarding healthy foods.

## Type of Comment

General

### Comment

The City, as landowner and planning authority, has an opportunity to create fascinating areas of small shopkeepers and independent service providers. This is part of the history of Cheapside and other streets in the City. Cheapside has now become yet another 'mall' with well known brands, which is a lost opportunity and should not be allowed to happen again.

Smaller retailers are already being driven out of the City by sharp rent increases, leaving a continued growth in big-chain coffee shops and bars. This is happening in the row of shops on Aldersgate Street under the Golden Lane estate, where useful independent shops are no longer trading. Bow Street passage is already degenerating into a series of chain stores and Leadenhall Market has lost all of the characterful shops.

The City Strategy should state the City's aim to promote retail areas of character and interest, specifically favouring small independent enterprises and start-ups, which will contribute to the City's business character and echo its historic roots.

### Contact Name

### Contact Organisation

John Ramsey and Jane Northcote

### City Response

Noted. We encourage independent shops, but planning cannot control business rates.

### Recommendation

No Change

### Recommendation Details

## Type of Comment

General

### Comment

There are too many chain stores in the City. Can anything be done to increase the number of independent shops?

### Contact Name

### Contact Organisation

John Sgouros

### City Response



# City Plan 2036 Consultation Comments

Noted. We encourage independent shops, but planning cannot control business rates.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

FSB is pleased to note that the Local Plan acknowledges that the retail sector has dramatically changed in recent times but that it is committed to supporting this business sector going forward. Additional retail floor space allocations with ambitions to develop a 7-day a week destination along with a day/night time economy will help to boost this sector which includes a high percentage of small businesses.

FSB looks for the Local Plan to allocate a percentage of new retail space of appropriate unit sizes to support the independent retailer sector.

The protection of specialist retail uses and permitting markets and temporary pop-ups in appropriate areas is supported by FSB and it is vital that small businesses, both office and retail, can operate easily within the Square Mile and that servicing and deliveries to these businesses can be undertaken efficiently and with ease.

Contact Name

Contact Organisation

Sarah King

Federation of Small Businesses

City Response

Noted. We encourage independent shops, but planning cannot control business rates.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

How many fast food shops does the City need? They open and close down on a regular basis and pose a litter concern.

Contact Name

Contact Organisation

Susan Fryer



# City Plan 2036 Consultation Comments

## City Response

Noted. Currently there are 56 (A5) units across 5,400sq.m of floorspace in the City of London further information can be found in the “Retail Units in the City of London Report”. A5 floorspace accounted for no more than 1% of the total retail floorspace throughout the 2011-2019 period.

## Recommendation

No Change

## Recommendation Details

Should we include further wording on takeaways? See The London Plan (Policy E9).

## Paragraph

5.2.1

## Type of Comment

General

## Comment

The Plan’s context in respect of retailing seems at odds with the actuality but, if correct, ignores the needs of retail workers in servicing expanding retail hours. Where is the London Living Wage in all this, along with any assistance for small retailers to pay it and ensuring that members of family businesses are paid it?

Also, what is “quantity and quality”? The provision of 2sq.m. of retail space for each additional City worker over the next 20 years hardly seems justified, particularly as more and more retail outlets are closing. Does “quality” mean the space or the product?

## Contact Name

## Contact Organisation

Fred Rodgers

## City Response

Noted. The London Living Wage is not something we can control through planning. The target accords with the Retail Needs Assessment Study (November 2017). More diverse retail offer equals quality.

## Recommendation

No Change

## Recommendation Details

## Paragraph

5.2.2

## Type of Comment

General





# City Plan 2036 Consultation Comments

## Comment

It may well be the case that the City is devoid of charity shops but whether that is good or bad seems to be open to conjecture. Is this because all City retail outlets are thriving as if so, more retail outlets could challenge that status and lead to charity shops appearing. Or is it because of a determined policy to keep charity shops out by ensuring subsidised rents to retain retailers.

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response

Noted. The nature of retail demand in the Square Mile is vastly different to that seen elsewhere in the UK mainly due to a high daily worker population and small residential population. Rents and rates in the City are significantly lower in the City than the West End. See Retail Needs Assessment Study (November 2017) Chapter 6 regarding Future Retail Trends.

## Recommendation

No Change

## Recommendation\_Details

## Paragraph

5.2.3

## Type of Comment

Support

## Comment

British Land supports Strategic Policy S5, in particular the acknowledgment at paragraph 5.2.3 that the City's retail offer needs to adapt to address changing consumer and leisure habits and the support for additional retail floorspace within the City. Leisure uses are an important factor in creating a vibrant and successful seven-day destination and should be supported within the PSCs. British Land supports the focus for new large-scale retail development to be focused within the PSC's with smaller scale retail uses encouraged throughout the City.

Strategic Policy S5 states support for proposals that "contribute towards the delivery of 196,000 sqm gross of additional retail floorspace". The Retail Needs Assessment (2017) suggests that the 196,000 sqm figure is a minimum. We consider that this should be reflected in the policy.

## Contact Name

## Contact Organisation

British Land Company PLC

## City Response



# City Plan 2036 Consultation Comments

Noted. The figures are taken from the Retail Needs Assessment Study (November 2017), so considered to be appropriate and reflected in Policy S5.

## Recommendation

No Change

## Recommendation Details

### Type of Comment

General

### Comment

The CPA broadly support this draft policy and particularly welcome the recognition at paragraph 5.2.3 of the supporting text that the City's retail offer needs to adapt to address changing consumer and leisure habits. The CPA considers that leisure in particular should be specifically addressed in this strategic policy. The importance of leisure activities (and experiential retail) as part of the attraction of retail destinations, must be set out in detail in this strategic policy. Leisure must be recognised as an essential part of a vibrant, 21st Century retail offer, rather than distinct from it. These leisure uses are increasingly important contributors to 'vitality and viability' and this should be acknowledged at a strategic level. The CPA fully supports the encouragement of retail floorspace across the City.

### Contact Name

Charles Begley

### Contact Organisation

City Property Association (CPA)

### City Response

Noted. Policy wording states that there is demand for a better range and quality of retail and leisure facilities. We appreciate there is growth in leisure/experiential retail and will include some additional wording in the policy text to reflect this.

## Recommendation

Change

## Recommendation Details

Wording added to paragraph 5.2.10 re leisure uses.

### Type of Comment

General

### Comment

There is and must continue to be a case for small retail units, especially of the type that are fast disappearing, and these may have to be treated as undesignated heritage and/or community assets before they disappear completely. Unfortunately, retirement means a lot of small retail units are no longer contributing to communities as they did but the new occupiers must be encouraged and protecting the use of small retail units would help ensure this.

### Contact Name

### Contact Organisation

# City Plan 2036 Consultation Comments

Fred Rodgers

## City Response

Noted. Smaller scale retail development will be encouraged throughout the City, where it provides an active frontage and facilities which meet the needs of the City's working population or local residents.

Recommendation No Change

## Recommendation Details

Paragraph 5.2.5

Type of Comment General

## Comment

Item 6. Please add an additional caveat "where they would not detract from...retail links or damage residential amenity or spoil heritage assets."

We are thinking of the Barbican here, where some of the surroundings of the estate should not have active frontages because the design conception of the Barbican is to make it inward looking and active frontages would destroy that and potentially disturb residential amenity. There are other ways of making these streets attractive (more gardens, subtle lighting).

Para 5.2.5 Figure 9. It is not clear why Golden Lane is identified as a Retail link (it currently has no shops) or why the northern end of Aldersgate Street running into Goswell Road is not identified as a retail link (is this a mistake on the map?). This last street has many shops on it that are of direct importance to a residential area (in line with policy R3).

Contact Name Contact Organisation

Jane Smith Barbican Association

## City Response

Noted. The purpose of the retail links in the City is to encourage activity and improve connectivity between the PSCs by encouraging additional retail along them. Golden Lane was incorrectly identified as a Retail Link on the map so this will be amended.

Recommendation Change

## Recommendation Details



# City Plan 2036 Consultation Comments

Remove Golden Lane as a Retail Link and replace with Goswell Road.

## Policy Number

R1

## Paragraph

## Type of Comment

General

## Comment

British Land supports the proposed merging of Moorgate and Liverpool Street Principal Shopping Centres (PSC), indicated by Figure 9, to reflect the capacity of the area to accommodate future retail growth and the improved transport connectivity which will be provided by the opening of Crossrail. British Land welcomes the recognition that the Moorgate and Liverpool Street PSC will experience increased retail demand as a result of the opening of the Elizabeth Line and following the completion of the current redevelopment and refurbishment projects at Broadgate. This includes 1-2 Broadgate, which obtained resolution to grant from the City's Planning and Transportation Committee in January this year.

British Land considers for PSCs to succeed, they must offer both high quality retail and visitor experiences to continually enhance the retail environment and help the City achieve a 7 day a week economy. It is considered that this policy should also reflect the need to improve transport accessibility, the public realm, the quality of the built environment and inclusion of other supporting uses such as entertainment and leisure which provide a diverse visitor offer alongside retail.

British Land also consider that Policy R1 should allow flexibility for innovative new uses, start-ups and entrepreneurs who wish to introduce new variations of retail uses, to reflect changing retail patterns and provide a more varied visitor experience and offer. It should also be noted that the retail market and the way in which retailers operate is evolving which is starting to lead to a blurring of the retail use classes. Sufficient flexibility should be provided so that retail and other supporting uses are supported based on their ability to contribute to the vitality and vibrancy of the centres, rather than based on specific use classes.

## Contact Name

## Contact Organisation

British Land Company PLC

## City Response

Noted. Draft policy provides more flexibility to retail offer. Policy S5 wording states that there is demand for a better range and quality of retail and leisure facilities. We appreciate there is growth in leisure/experiential retail and will include some additional wording in the policy text to reflect this.

## Recommendation

Change

## Recommendation Details

Wording added to paragraph 5.2.10 re leisure uses.



# City Plan 2036 Consultation Comments

## Type of Comment

## Object

### Comment

We welcome the City of London taking a more flexible approach to A1 retail protection within the PSCs, when compared with the current retail policy, which is too restrictive in requiring that 70% of the PSC retail frontage is A1 and refusing permission where more than 2 in 5 consecutive premises are not A1 or A2 use. We also welcome the removal of some of the 'side streets' including Cophall Avenue from the Moorgate/Liverpool Street PSC which experience far less footfall than the high streets within the PSCs, and feature less active frontage. We would however advocate that further flexibility is applied within PSCs so that the loss of A1 uses is not readily resisted, either through new development or a change of use away from existing A1 uses at ground floor level.

It has been well publicised that with the growth of online retail, traditional A1 uses are suffering from a decline in demand and there is a need for principal shopping frontages to adapt and evolve to maintain a healthy pedestrian footfall by expanding their offer and range of uses. There is a need for retail centres to repurpose and allow a wider range of town centre uses such as D2 fitness, D1 community, other retail uses, and leisure uses to retain active frontage and a healthy footfall.

With the exception of the One New Change Shopping Centre, it should be acknowledged that the City of London is not traditionally thought of as a prominent retail destination, particularly when compared with the West End.

The Moorgate / Liverpool Street PSC, and particularly London Wall is not a premier retail destination, rather its existing retail offer at ground floor level comprises mostly of A1 food/drink retail, and shops for essentials, rather than traditional high street retailers. London Wall is not somewhere those working in the City would specifically visit for 'shopping' or browsing, rather it caters to the working population to provide convenient breakfast, lunch or coffee options, during select hours of the day. Existing A1 food/ coffee retail uses along London Wall bear more similar characteristics to A3 café/ restaurant uses; when compared with traditional high street retailers.

Detailed feedback from retail agents has identified that demand for ground floor A1 retail in locations such as London Wall is very limited, with any minimal interest restricted to A1 food outlets and coffee shops. There is a risk in these locations that if new or existing retail units are restricted to A1 use and do not have the flexibility to change to and operate as other town centre uses, they will remain vacant, and footfall will reduce in these key locations. Feedback from retail agents has identified a substantial rise in both operators and demand for D2 fitness in the City of London and specifically in locations such as London Wall where there is a high working population who seek such uses outside working hours.

Draft policy R1 should therefore acknowledge that some streets within the Moorgate / Liverpool Street PSC such as London Wall are not premier shopping destinations in the same vein as Cheapside and One New Change would be typified as, and therefore A1 uses in these PSCs should not be afforded the same level of protection in policy.

### Contact Name

### Contact Organisation

# City Plan 2036 Consultation Comments

LaSalle Investment Management

## City Response

Noted. Draft policy provides more flexibility to retail offer. Policy S5 wording states that there is demand for a better range and quality of retail and leisure facilities. We appreciate there is growth in leisure/experiential retail and will include some additional wording in the policy text to reflect this.

## Recommendation

Change

## Recommendation Details

Wording added to paragraph 5.2.10 re leisure uses.

## Type of Comment

General

## Comment

Retail Floorspace v Frontage

Most retail units within the Moorgate/Liverpool Street PSC and along London Wall specifically comprise of small and shallow retail units as oppose to larger and/or deep units. The Moorgate/Liverpool Street PSC is therefore not an attractive, nor a suitable location for traditional high street retailers such as department stores, health and beauty, book and clothing retailers who seek large units of a specific size. In fact, is well documented that the closure of department stores such as BHS, House of Fraser and scaling down of M&S and Debenhams stores has left large retail units vacant on high streets for a sustained period of time, reducing active frontage and negatively impacting the vitality and health of the town centre.

Detailed feedback from retail agents has advised against providing narrow deep retail units (with poor natural light and shop window elevations with no street frontage) as these represent poor quality sales floorspace to retailers who find customers do not want to walk to the rear of the shop and are therefore more difficult to let. Retail agents have advised that prospective tenants seek modern retail units that are appropriately sized with more regular floorspace, straight walls, less depth to the units, higher ceiling heights and extensive shop windows.

The focus of the policy therefore should be to protect active frontage at ground floor level within the PSCs and place less emphasis on protecting retail floorspace. We would recommend that the wording of draft policy R1 focuses less on the loss of retail floorspace, but rather focus more on protecting active retail frontage. We would suggest that the draft policy is reworded to allow for larger retail units to be subdivided into smaller units, and that the rear of larger A1 units can be reduced in size to create smaller A1 units, to better suit prospective retail tenants. The draft policy should allow large vacant A1 units to change use to other active land uses capable of operating in such a large space such as D2 fitness or as an A3 restaurant.

## Contact Name

## Contact Organisation

LaSalle Investment Management



# City Plan 2036 Consultation Comments

## City Response

Noted. Policy S5 point 6 states that "...the provision of retail uses that provide active frontages at street level across the City..." would be supported. Revised Policy R1 (Principal Shopping Centres) is more flexible than current Policy – see point 2. Policy S5 wording states that there is demand for a better range and quality of retail and leisure facilities. We appreciate there is growth in leisure/experiential retail and will include some additional wording in the policy and text to reflect this.

## Recommendation

Change

## Recommendation Details

Wording added to paragraph 5.2.10 re leisure uses.

## Type of Comment

General

## Comment

The designation of the Fleet Street area as a 'shopping centre/area' seems quite bold and imaginative. As a worker in the area and a resident, it is sorely lacking in a number of areas, beyond sandwiches, coffees and expensive gentlemen's work clothes. Even then it is only Monday - Friday. This needs much more thought.

## Contact Name

Celine Luppo McDaid

## Contact Organisation

Dr Johnson's House

## City Response

Noted. We have identified Fleet Street as a Key Area of Change and recognise that improvements to the public realm would help to improve the visitor and shopper experience and that there are potential development opportunities to develop a more distinctive retail mix.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

The CPA considers that for the PSCs to continue to succeed, they must offer both first class retail and a first-class visitor experience to ensure that the retail environment is continually improved. This is particularly important for the City to achieve a 7 day a week retail economy. This also encompasses transport accessibility, public realm and the quality of the built environment, and, vitally, other supporting uses such as entertainment and leisure that can provide a diverse leisure offer alongside retail. It is important that the visitor experience, including entertainment and leisure uses are supported by this draft policy, to ensure the



# City Plan 2036 Consultation Comments

PSCs are sustained in the long term.

The CPA considers that this policy should allow flexibility for the PSC more widely, to be at the cutting edge of accommodating innovative new uses, start-ups and entrepreneurs who wish to challenge conventional assumptions about the categorisation of retail uses, in the face of rapidly changing retail patterns. This should be reflected in draft policy R1. On this basis, the CPA wish to see this revised approach to retailing policies taken into account at a detailed and strategic level.

In addition to promoting active ground floors uses, the Plan should recognise that occupiers are often seeking additional flexibility in respect of ground floor land uses. It is important that planning policy can respond appropriately and support the need to integrate the main office use with subordinate ground floor uses where such demand exists. There is demand currently from occupiers for developers and landowners to deliver spaces that allow occupiers to manage retail and leisure uses within their office demises which can presently create land use planning considerations, particularly where there is a blurring of planning units and uses. This strong trend has emerged in recent years and the CPA strongly feel that this needs to be addressed in the draft Plan such that decision making in the City can effectively respond to continually evolving market demands for commercial spaces.

## Contact Name

Charles Begley

## Contact Organisation

City Property Association (CPA)

## City Response

Noted. Draft policy provides more flexibility to retail offer. Policy S5 states that there is demand for a better range and quality of retail and leisure facilities. We appreciate there is growth in leisure/experiential retail and will include some additional wording in the policy text to reflect this.

## Recommendation

Change

## Recommendation Details

Wording added to paragraph 5.2.10 re leisure uses.

## Paragraph

5.2.12

## Type of Comment

General

## Comment

Cheapside, Fleet Street, Leadenhall Market and Liverpool Street are all identified in Table A1.1 of the Draft New London Plan as CAZ retail clusters and are recognised in City of London's draft Local Plan as Principal Shopping Centres (PSCs). Strategic Policy S5 sets out City of London's proposed target to deliver 196,000m<sup>2</sup> in the existing PSCs and this strategic approach is welcomed by the Mayor.

City of London adopts a town centres first type approach, applying the sequential test to the full range of retail Class A1 uses and directing these towards the PSCs.





# City Plan 2036 Consultation Comments

This approach is welcome and is in line with Draft New London Plan Policy SD8. Limiting active frontages to retail uses only at paragraph 5.2.12, fails to recognise the contribution that wider town centre uses can bring, and guidance set out in Draft New London Plan Policy D1A7 should be followed which promotes active frontages which generate liveliness and interest.

## Contact Name

Juliemma McLoughlin

## Contact Organisation

Mayor of London

## City Response

Noted. We have made minor amendments to the draft Local Plan Policy to reflect Draft New London Plan Policy.

## Recommendation

Change

## Recommendation\_Details

Wording added to paragraph 5.2.10 re leisure uses.

## Paragraph

5.2.17

## Type of Comment

General

## Comment

Tenacity strongly believe that a first class retail and a first class visitor experience are fundamental requirements for Primary Shopping Centres (PSC) and their immediate surrounds in order to ensure that the retail environment is continually evolving. This is particularly important for the City to achieve a broader 7 day a week vibrant retail and evening economy. This should encompass transport accessibility, public realm and the quality of the built environment, and, vitally, other supporting uses such as entertainment and leisure that can provide amenities to shoppers, whether City workers or visitors, and provide a diverse leisure offer alongside retail.

Tenacity also considers that this policy should allow flexibility for the PSC more generally, to be at the cutting edge of accommodating innovative new uses, start-ups and entrepreneurs who wish to challenge conventional assumptions about the categorisation of retail uses, in the face of rapidly changing retail patterns. This should be reflected in draft policy R1. Intrinsic to such policies should be a desire to increase dwell time and thus create an extended shopping offer and shopping hours - in short a better all round experience.

Paragraph 5.2.17 recognises the importance of the Leadenhall Market PSC at the southern end of the City Cluster which accommodates a significant and growing proportion of the City's workforce. Whilst the text states that the likely increased demand will be met by larger, modern units in the surrounding streets, Tenacity submit that the future success of retail in this location will not be dependent on large units but instead on the creation of a clustering effect as at Cheapside, Broadgate and Liverpool Street. We welcome the proposal for a vibrant retail link from the Leadenhall Market PSC via Monument to the Pool of London to help



# City Plan 2036 Consultation Comments

meet the increased retail demand which cannot be accommodated within the PSC. The listed Market Building's architectural quality and the site's Roman origins provide a unique appeal to the PSC and an opportunity which should be built upon to strengthen the retail and cultural offer, providing animation and activity through attracting a greater more diverse footfall.

In order to achieve something outstanding, the City needs to attract retail tenants who currently may not have representation in the Square Mile. For this goal of dynamic retailing with new retailers to garner interest, the City itself must improve on permeability, linkages with different buildings and change the general perception that the City is just a business district. There must be a renewed and permanent emphasis on the City being a 24/7 place welcoming to all.

## Contact Name

## Contact Organisation

Tenacity

## City Response

Noted. Policy S5 wording states that there is demand for a better range and quality of retail and leisure facilities. We appreciate there is growth in leisure/experiential retail and will include some additional wording in the policy text to reflect this.

## Recommendation

Change

## Recommendation Details

Wording added to paragraph 5.2.10 re leisure uses.

## Type of Comment

General

## Comment

This section requires appropriate reference to the significance of the Grade II\* listed Leadenhall Market building. Suggested change - 'The character and significance of the historic market ....'

## Contact Name

## Contact Organisation

Tim Brennan

Historic England

## City Response

Noted. We appreciate the significance of the historic market so will make minor amendments to the policy text.

## Recommendation

Change

## Recommendation Details



# City Plan 2036 Consultation Comments

Amended wording of paragraph 5.2.18.

## Paragraph

5.2.20

### Comment

As far as the PSCs are concerned, with the greatest will in the world, identifying and accepting these as being anything other than suburban centres is past the limit of credibility. Whatever it is you say they are, that is what they are not. The claimed need for additional retail space in PSCs has already been questioned and it follows that the need for an additional 85,000m<sup>2</sup> in other parts of the City is simply incredible.

### Contact Name

Fred Rodgers

### Contact Organisation

### City Response

Noted. See Retail Needs Assessment Study (November 2017) which sets out the evidence base for additional retail space.

### Recommendation

No Change

### Recommendation Details

## Policy Number

R2

## Paragraph

### Type of Comment

General

### Comment

Strategic Policy S5 seems to suggest that the PSCs will expand and there will be expanded Retail Links between them. Why the need for Retail Links, if these will delay, even dissuade, passage between the PSCs. After all, even in a 24-hour economy, time for shopping is limited and the West End, as well as the various Westfields, probably provide more attractive destinations, especially to serious shoppers.

### Contact Name

Fred Rodgers

### Contact Organisation



# City Plan 2036 Consultation Comments

## City Response

Noted. The purpose of the retail links in the City is to encourage activity and improve connectivity between the PSCs by encouraging additional retail along them. Policy R2 states that the Retail Needs Assessment Study (November 2017) concluded that the Retail Links continue to play an important role in meeting demand but suggested advocating a different occupier mix in these areas compared to the PSCs. See Retail Needs Assessment Study Chapter 5 regarding Retail Links. Retail links are still justified and seek to provide vitality and active frontages.

## Recommendation

No Change

## Recommendation\_Details

## Comment

I use Defoe/Shakespeare carpark alongside Beech Street. It is a highly used car park and its car parking spaces and access to it cannot be lost due to retail development on Beech Street.

## Contact Name

Neil Sanders

## Contact Organisation

## City Response

Noted. It is envisaged that improvements are required to Beech Street to reduce volume of vehicle traffic, improve air quality and improve pedestrian flows. There are no current proposals to remove the Defoe / Shakespeare Car Park.

## Recommendation

No Change

## Recommendation\_Details

## Policy Number

R3

## Paragraph

## Type of Comment

Object

## Comment

# City Plan 2036 Consultation Comments

We note that draft Policy R3 (Ground floor retail provision elsewhere in the City) resists the loss of A1 shops that meet a local residential need. It has been well publicised in recent news that with the growth of online retail, traditional A1 uses are suffering from a decline in demand and there is a need for principle shopping frontages to adapt and evolve to maintain a healthy pedestrian footfall by expanding their offer and range of uses. There is a need for retail centres to repurpose and allow a wider range of town centre uses such as D2 fitness, D1 community, other retail uses, and leisure uses to retain active frontage and a healthy footfall.

In addition to rewording draft Policy S5 so that reference to predominance to A1 retail is omitted and that other town centre uses are considered appropriate uses within PSCs, we would further suggest that draft policy R3 does not resist the loss of A1 uses.

Contact Name

Contact Organisation

LaSalle Investment Management

City Response

Noted. Retail Needs Assessment Study (November 2017) highlights need to protect PSCs.

Recommendation

No Change

Recommendation\_Details

Type of Comment

Support

Comment

Item 2. We welcome the resistance to the loss of A1 units that meet residential needs.

Contact Name

Contact Organisation

Jane Smith

Barbican Association

City Response

Support noted.

Recommendation

No Change

Recommendation\_Details

Policy Number

R4

# City Plan 2036 Consultation Comments

## Paragraph

### Type of Comment

General

### Comment

This is key to keeping character in the City. Rent control should be introduced like it is in other major cities to ensure what people love about the City stays and isn't ruined by large chains with finances to pay almost any rent. This should include small independently owned greasy spoons, sandwich shops, niche retailers etc.

### Contact Name

Kate

### Contact Organisation

### City Response

Noted. We encourage independent shops but planning cannot control business rates.

### Recommendation

No Change

### Recommendation Details

## Paragraph

5.2.26

### Type of Comment

General

### Comment

The principle of the policy and supporting text at 5.2.25 are fully supported. However, the further supporting text at 5.2.26 is somewhat ambiguous and may result in the policy being interpreted in a less than robust manner.

Our concerns regarding paragraph 5.2.26 are twofold. Firstly, in terms of the phrase "permanent loss" the policy doesn't recognise that if the use was lost for a substantial period (i.e. 3, 4 or 5 years) during a lengthy redevelopment, this would seriously threaten the viability of the Silver Vaults (SV). There may not be any SV surviving to take up new space in a re-developed building after a number of years closure.

Secondly, the wording "replacement of specialist facilities will be required" doesn't make clear whether the City would seek replacement facilities at the same site or would consider the provision of alternative space in another building elsewhere, i.e. through legal agreement. It is assumed it is the former which is intended but we suggest this needs to be made clear. This is very important in terms of the SV because a key element of its draw is the collection of the 30 different but complimentary traders / tenants operating from within actual vault spaces. Off site replacement in a generic building or split over a number of sites would detract significantly from the special character of the SV as a collection of historic vault spaces.



# City Plan 2036 Consultation Comments

Suggest rewording paragraph 5.2.26 as follows:

"The City Corporation will resist proposals which result in the permanent loss of specialist retail uses or could, by virtue of the length of a temporary loss threaten their ongoing viability. Where redevelopment is proposed, the replacement of specialist facilities will be required to be provided at the same site and in space which is at least comparable in terms of its character and quality."

Contact Name

Contact Organisation

London Silver Vaults

City Response

Noted. Policy R4 wording has been amended.

Recommendation

Change

Recommendation Details

Removed words 'where redevelopment is proposed' from paragraph 5.2.27.

# City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S6: Culture, Visitors and the Night-Time Economy

### Policy Number

### Paragraph

### Type of Comment

Support

### Comment

We support an increased requirement on the flexibility of planning uses to support 24/7 activation and utilisation of property and associated spaces.

### Contact Name

### Contact Organisation

City Property Association NextGen Steering Group

### City Response

Support noted.

### Recommendation

No Change

### Recommendation\_Details

### Type of Comment

Support

### Comment

Support the indication that Farringdon / Culture Mile is a priority area for new retail floorspace as set out in Policy S6.

### Contact Name

### Contact Organisation

GMS Estates and MacTaggart Third Fund

### City Response

Comment noted.

### Recommendation

No Change

### Recommendation\_Details





# City Plan 2036 Consultation Comments

## Type of Comment

Support

### Comment

The Mayor of London has advocated for London to thrive as a 24-hour city and has introduced 'A Vision for London as a 24-Hour City' which acknowledges the importance of the night-time economy, and that workers want more flexibility in the times they work, shop, or go to the gym. The introduction and success of the night tube has also been tipped to create 2,000 permanent jobs and boost London's economy by £360 million. We therefore support draft policy S6 and in particular, enabling a vibrant evening and night-time economy in the City and permitting hotel development where it supports the primary business or cultural role of the City.

### Contact Name

### Contact Organisation

LaSalle Investment Management

### City Response

Comments noted.

### Recommendation

No Change

### Recommendation Details

## Type of Comment

Support

### Comment

The CPA fully supports this draft policy, which seeks to complement the City's business function and is an essential component to future business growth and ensuring competitiveness with the West End and other European Cities.

### Contact Name

### Contact Organisation

Charles Begley

City Property Association (CPA)

### City Response

Comment noted.

### Recommendation

No Change

### Recommendation Details

# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

The importance of management in mitigating impacts on residents and workers is correctly identified but it should be clearer who is responsible.

The fifth bullet should read: "Enabling a vibrant evening and night-time economy, while ensuring that operators proactively manage night-time entertainment premises to minimise potential disturbance to residents and workers;"

### Contact Name

David Coleman

### Contact Organisation

### City Response

Agree that wording could be amended to provide further clarity.

### Recommendation

Change

### Recommendation Details

Bullet point amended to read as follows:

"Enabling a vibrant evening and night-time economy, while ensuring that operators proactively manage night-time entertainment premises to minimise potential impact to residents and workers".

## Type of Comment

Object

### Comment

Strategic Policy S6 is an area of concern to residents. New venues especially those involved in the Night Time Economy should be kept away from current residential clusters. The Plan refers to the POTENTIAL for noise from such venues. This is gilding the lily. Experience should tell us that such venues WILL increase noise and disturbance. The problem is that venues can only attempt to manage noise etc within and just outside their premises. The Barbican Centre manages to do this most of the time. However, once revellers move off, the ability of a venue to manage behaviour quickly evaporates. Noisy behaviour in the public space can only really be controlled by the Police. We are concerned that the CoL Police are not set up to cope with an increase in footfall and consequent disturbances.

### Contact Name

Dr Alexander Wilson

### Contact Organisation

Shakespeare Tower House Group

### City Response

# City Plan 2036 Consultation Comments

Policies in the Plan and in particular in the Smithfield and Barbican KAOC, seek to minimise disturbance to residents from increased activities and movements of people.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

It is difficult to gain clarity on what constitutes the emerging Culture Mile other than it is not a mile in any shape or form and to be located in the 'North West' of the City. It is certainly significant; heralding the relocation of Smithfield Market and recognising the alternative uses the site could accommodate with the Museum of London providing the cultural backbone. This begs clarity as to what defines 'culture' in terms of planning policy. The Diocese would welcome additional clarity on what is intended here. The Diocese has been woven into the culture of the City for centuries and looks to contribute well into the future. The additional wording offered below looks to build partnership across the full spectrum of communities affected:

- The Diocese would like to see bullet point 1 split into two distinct policies or there is a risk that Culture Mile will eventually exclude all others due to its scale and complexity.
- Amend bullet point 2 to read: "Protecting and where possible enhancing existing culturally significant facilities..." and deleting the word "overall" before "loss of cultural facilities or diversity in the City".
- Amend bullet point 7 to add "in the Culture Mile" after "open spaces and streetscape" [again splitting this point is considered beneficial]; to "encourage" as well as "accommodate" cultural events and activities; and to insert "particularly in venues that give access to buildings of architectural merit and can be made accessible..." after "cultural events and activities".

## Contact Name

Fr Luke Miller

## Contact Organisation

Diocese of London

## City Response

Comments noted. It is considered that the content and breadth of the chapter makes it self evident what comprises "culture" and no further refinement is necessary.

Agree suggested wording changes for bullet point two would add clarity.

Suggested amendments to bullet point 7 are not considered necessary.

## Recommendation

Change

## Recommendation\_Details



# City Plan 2036 Consultation Comments

Bullet point 2 has been amended to read:

" Protecting and enhancing existing cultural buildings and facilities where a continuing need exists and ensuring there is no overall loss of cultural facilities or diversity in the City".

## Type of Comment

Object

### Comment

As with Strategic Policy S5, the City's environment has to come first and foremost in S6 as well. More and more visitors will cause more pollution, creating more litter and putting more wear and tear on already worn and torn green space. That is unacceptable and the failure to acknowledge the problem is inexcusable.

### Contact Name

Fred Rodgers

### Contact Organisation

### City Response

Comments noted.

### Recommendation

No Change

### Recommendation\_Details

## Type of Comment

General

### Comment

Please add to the 4th bullet point – refusing new hotels where they would adversely affect residential amenity.

5th bullet point. Please strengthen this point to state that the City will resist vibrant evening and night time activities where they would adversely impact on residents. Management will not always be adequate to mitigate the effects. Where permission is given it should be made clear in conditions that it is the venue's operators who will be held accountable for managing night time activity and dispersal to minimise disturbance. But it should not be left to those operators to specify the conditions.

### Contact Name

Jane Smith

### Contact Organisation

Barbican Association

### City Response



# City Plan 2036 Consultation Comments

Hotel permissions must demonstrate how they will minimise disturbance to residents from the operation of the hotel. Policy S6 has been strengthened to emphasise that the operators of the hotels are responsible for enforcing the strategies in the Management Plans that are submitted with planning applications.

## Recommendation

Change

## Recommendation Details

Wording has been added to policy to emphasise the role of the operator in minimising disturbance as follows:

"Enabling a vibrant evening and night-time economy, while ensuring that operators proactively managing manage night-time entertainment premises to minimise potential disturbance impact to residents and workers".

## Type of Comment

General

## Comment

The City doesn't promote it's visitor attractions enough, particularly the lesser known attractions such as smaller museums, Wren churches with lunchtime concerts, pocket parks and hidden green spaces, e.g next to Livery Halls.

## Contact Name

John Sgouros

## Contact Organisation

## City Response

The City Corporation seeks to promote lesser known attractions through its website and wide range of promoted events.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

- Does the Night Time Economy need to be included in the same Policy as Culture and Visitors? They are not necessarily connected, and there may be a risk that night time activities are viewed as primarily 'cultural', rather than including, for example, F&B, pubs etc. Could reference be moved to Policy C4: Evening and Night time Economy?
- We would like to see a policy included that requires all significant development/ refurbishment, commensurate with the nature and scale of the development, to produce and implement a Cultural Strategy which would demonstrate how a development would enrich the City's cultural offer and unique heritage, in



# City Plan 2036 Consultation Comments

particular where development is in the Culture Mile and where development incorporates the City's unique heritage assets. Outside the Culture Mile area, we would like to see all new major developments producing a Cultural Strategy, in particular where there would be a significant element of public access. Cultural Strategies of this kind should detail how the proposed development will deliver on the aims and outcomes of the Cultural and Visitor Strategy, the Culture Mile Strategy and the Look and Feel Strategy.

- Recommend more involvement of the Culture Mile team in Pre-App discussions, particularly to signpost and promote the Culture Mile Property Strategy and early engagement between the City Corporation and developers re. the City's expectations in the Culture Mile area. Examples: activities in ground floor spaces; creative meanwhile use; artistic commitments in interior and exterior architecture, landscape design, public art etc. Our ideal will be if Culture Mile strategies can be used as a 'prospectus of interest' by developers, so that ideas are developed in ways that create a unified and confident identity for the area over time.
- Propose that the relationship between planning and licensing is considered more fully as more F & B licenses will be expected in the Culture Mile area, and there will be a need to balance these ambitions against the views and needs of local resident communities.
- "Protecting existing cultural facilities where a continuing need exists and ensuring there is no overall loss of cultural facilities or diversity in the City". What is the meaning of "diversity" in this context - are we talking about diversity on term of buildings or activities?
- Suggest adding "production and showcasing spaces" to third bullet point.
- We would like to see a point about the provision and enhancement of public spaces for informal and formal gatherings as social focal points.

## Contact Name

## Contact Organisation

Tim Jones

Culture Mile

## City Response

It is considered that the night-time economy is most usefully included with issues relating to culture and visitors, as there are many issues in common between the three topic areas.

Agree. A policy requiring developers to submit a Cultural Strategy with applications for major developments would strengthen cultural outcomes. A new paragraph has been added after paragraph 5.3.6 as below.

The Plan is unable to specify arrangements for pre-application discussions.

The relationship between planning and licensing is addressed in policy C4 "Evening and night-time economy".

Agree that the term "diversity" could usefully be defined. The 2nd bullet point of the policy, and a new paragraph after paragraph 5.3.5, as below.



# City Plan 2036 Consultation Comments

Considered that adding "production and showcasing" to 3rd bullet point would create unnecessary detail.

It is considered that the provision and enhancement of public spaces for informal and formal gatherings as social focal points is dealt with adequately in the final bullet point of the policy.

## Recommendation

Change

## Recommendation\_Details

A new paragraph has been added as follows;

"Developers will be required to submit Cultural Plans as part of planning applications for major developments. These should set out how the development will contribute towards enriching and enhancing the City's cultural offer for example by incorporating cultural activities or displays in ground floor spaces; facilitating public access and providing exhibitions/interpretation boards in relation to matters of historic interest; providing permanent or temporary space for creative enterprises; and incorporating public art either within the design of the building or as freestanding structures".

Wording has been added to the 2nd bullet point of policy to clarify the scope of diversity as follows;

"Protecting and enhancing existing cultural buildings and facilities where a continuing need exists and ensuring there is no overall loss of cultural facilities or diversity in the City".

Wording has been added to clarify the scope of diversity as follows;

"The City's Cultural Strategy highlights that commerce and creativity thrive side by side and sets out a vision to position the City as a world capital for commerce and culture. The Strategy embraces a definition of culture that is broad and inclusive; it recognises that culture exists both in the buildings and heritage of the City's institutions and in the streets and informal spaces in between. Culture is seen as being for everyone and is a driver of social mobility".

## Type of Comment

Support

## Comment

We support this strategic policy which seeks to support and develop a range of facilities in the area as well as deliver a new 'Culture Mile'. This includes protecting valued facilities and ensuring there is no overall loss. The policy is consistent with paragraph 20 of the NPPF 2019, which calls on strategic policies to set out an overall strategy and make sufficient provision for community facilities which includes cultural infrastructure. Facilities for the arts and culture help bring people together, provide opportunities for participation and reduce loneliness and isolation. They contribute towards social and cultural well-being, and help attract, retain and support surrounding businesses.

## Contact Name

Tom Clarke

## Contact Organisation

Theatres Trust



# City Plan 2036 Consultation Comments

## City Response

Comment noted.

## Recommendation

No Change

## Recommendation Details

### Paragraph

5.3

### Type of Comment

Support

## Comment

We welcome the commitment in this section of the Plan to ensuring that the current arts, heritage and cultural offer to be found in the City will be maintained and enhanced.

Suggested change - We would suggest that the overall theme in the Plan of enhancing the cultural offer within the city could be strengthened by making stronger linkages with emerging proposals in the Smithfield & Barbican Key Area of Change (specifically the Culture Mile) and explicitly identifying the Barbican Centre as an important existing cultural facility.

## Contact Name

Tim Brennan

## Contact Organisation

Historic England

## City Response

It is considered that the role of, and linkages between cultural activity in the City, the Barbican Centre and Culture Mile are adequate.

## Recommendation

No Change

## Recommendation Details

### Paragraph

5.3.1

### Type of Comment

General

## Comment



# City Plan 2036 Consultation Comments

The context manages to include “City of London, “City” and “Square Mile” in its first sentence. The Michael Caine – “not a lot of people know that” – approach hardly seems credible as the Barbican Centre approaches its 47th anniversary. However, whilst the City’s culture offer is much appreciated, it doesn’t have that many theatres, art galleries or museums.

Contact Name

Contact Organisation

Fred Rodgers

City Response

Agreed. There are inconsistencies in referring to 'the City' in the context.

Recommendation

Change

Recommendation\_Details

Minor changes made to achieve consistency in referencing 'the City'.

Paragraph

5.3.2

Type of Comment

General

Comment

The Culture Mile is an invention of necessity to justify CoLC’s ill-considered decision to move the Museum of London to Smithfield Central Market as a result of its contemptible failure to properly maintain that building. A more acceptable, and less expensive alternative would have been to retain Bastion House and refurbish the same to house the expansion of both MoL and the City of London School for Girls. Instead we have to endure the Culture Mile’s touchy-feeliness.

Contact Name

Contact Organisation

Fred Rodgers

City Response

Comment noted.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General



# City Plan 2036 Consultation Comments

## Comment

The Barbican is identified in Table A1.1 of the Draft New London Plan as a strategic night-time location of national or international significance and its reflection in paragraph 5.3.2 of the City Plan is welcome. There are two further areas of strategic night-time function identified in Draft New London Plan Table A1.1, namely, Cheapside and Liverpool Street, both classified as areas of more than local significance. Both should be recognised, and their night-time classifications reflected in the City Plan.

## Contact Name

Juliemma McLoughlin

## Contact Organisation

Mayor of London

## City Response

Paragraph has been amended to include Cheapside and Liverpool Street as night-time areas as below.

## Recommendation

Change

## Recommendation Details

Paragraph has been amended as follows:

"The City's cultural offer has become increasingly important and is an integral element of the Square Mile, alongside the business City. The Barbican is identified as a Strategic Cultural Area night-time location of national or international significance while Cheapside and Liverpool Street are identified as night time areas of more than local significance in the London Plan. and The City Corporation has ambitious plans for Culture Mile, as explained in the Key Areas of Change section".

## Paragraph

C1

## Type of Comment

General

## Comment

Policy C1 could easily be protected by CoLC's intervention, including as a buyer of cultural facilities subject to potential alternative uses. However, whilst Livery Halls are unique to the City, this didn't prevent CoLC excluding both Barber Surgeons and Ironmonger Halls from the Barbican and Golden Lane Conservation Area nor proposing to demolish the latter as part of its Centre for Music development.

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response

Comments noted.

# City Plan 2036 Consultation Comments

Recommendation

No Change

Recommendation Details

**Policy Number**

CV1

Paragraph

Type of Comment

Object

Comment

The CPA does not consider that the loss of such facilities should only be permitted where the existing facility has been actively marketed for the existing or an alternative cultural use. Whilst the CPA recognises the importance of cultural facilities, particularly with the decline of public funding, it is important the draft policy recognises that the loss of such facilities may be appropriate where it is part of a recognised business plan/strategy or where funding from the sale of an existing facility can enhance or secure the long term use and future of another similar facility nearby.

The CPA does not consider that protection and loss of such facilities should be simply related to a marketing exercise, without having regard to other strategic objectives of the supplier of the facility. This policy should be revised to ensure an effective and holistic approach is taken.

Contact Name

Contact Organisation

Charles Begley

City Property Association (CPA)

City Response

Agreed that wording of the supporting text could be amended to clarify policy on the loss of cultural uses. Wording has been amended as below;

Recommendation

Change

Recommendation Details

Wording has been added to the supporting text as follows;

"Marketing will not be required if it can be demonstrated that the loss of a facility is part of a business plan to deliver improvements to another similar facility nearby".

Type of Comment

General

Comment

# City Plan 2036 Consultation Comments

Need to bring more people into the churches and surrounds - for example the church on Leadenhall Street could potentially provide cycle parking for the City Cluster.

Contact Name

Contact Organisation

Church Warden (no name provided)

City Response

Comment noted.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

We would like to see due consideration of 'like for like' facilities in the case of a risk of loss of existing visitor, arts, heritage and cultural facilities – i.e. we would recognise that while certain facilities might come to a natural 'end of life', there is a requirement to consider and factor in opportunities to create/sustain an appropriate new offer that would create equivalent value for communities and visitors, and which could be sustainable.

Similarly, in the event of a loss of facility due to an operating organisation being unable to sustain itself due to financing, engagement or business model issues, we would like to see the City proactively engaging with such organisations in advance to explore how the loss could be prevented if possible.

Contact Name

Contact Organisation

Tim Jones

Culture Mile

City Response

Agree that wording could be amended to strengthen policy in the case of loss of facilities. Wording has been amended in bullet point 1 of section 1 as well as section 2 of the policy as below:

Recommendation

Change

Recommendation Details



# City Plan 2036 Consultation Comments

Wording has been added to the first bullet point of the policy as follows;

"replacement facilities of at least equivalent quality are provided on-site or within the vicinity which meet the needs of the City's communities".

Wording has been added to point 2 as follows;

"Proposals resulting in the loss of visitor, heritage, arts and cultural facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where this would facilitate the overall enhancement of visitor, arts or cultural provision within the vicinity or where it has been demonstrated that the existing facility has been actively marketed for its current or an alternative visitor, heritage, arts or cultural use at reasonable terms for such a use".

## Type of Comment

Support

### Comment

The Trust is supportive of this policy which resists the loss of valued facilities and sets robust criteria for the assessment of any such proposals in line with paragraph 92 of the NPPF.

### Contact Name

Tom Clarke

### Contact Organisation

Theatres Trust

### City Response

Comment noted.

### Recommendation

No Change

### Recommendation Details

## Paragraph

5.3.8

## Type of Comment

General

### Comment

Paragraph 5.3.8 correctly notes that the Silver Vaults should be regarded as a "cultural facility" which is "unique to the City" and which "maintains historic and cultural association with the Square Mile".

The general approach of the policy and supporting text is supported. However it is considered that alterations and additions are required to remove ambiguity and to ensure the policy is robustly applied. Suggest changes to the wording of Policy C1:



# City Plan 2036 Consultation Comments

Point 1: Change "resist" to "refuse applications which propose".

First bullet point: add "Like for like facilities of at least comparable character and quality" are provided on-site, and delete reference to replacement facilities within the vicinity.

Second bullet point: add facilities of "comparable character and quality"; add "active marketing for a period of at least 18 months"; and add " the continued" use on the site "for its current purposes".

Third bullet point: Add "active marketing for a period of at least 18 months".

Point 2: Where marketing is mentioned, add "for at least 18 months prior to the application's submission".

Contact Name

Contact Organisation

London Silver Vaults

City Response

Comments noted. Policies RE4 and CV1 are drafted to provide generic guidance in respect of a range of specialist retail uses, not solely the Silver Vaults (SV), so it is not possible/appropriate to specifically tailor their wording to exactly that which we consider is required in respect of the Silver Vaults.

Recommendation

No Change

Recommendation\_Details

**Policy Number**

CV2

Paragraph

Type of Comment

General

Comment

Contact Name

Fr Luke Miller

Contact Organisation

Diocese of London

# City Plan 2036 Consultation Comments

## City Response

### Recommendation

#### Recommendation\_Details

#### Type of Comment

Object

#### Comment

Notably Policy C2 excludes any reference to the City's environment coming first and foremost and residents will not be the only people to complain about an influx of visitors, especially into the confines of the City. More visitors will also put pressure on City workers for access to open spaces, retailing and travel. What residents in the proposed CoLPAI residential will think about preferring visitors' children to their children in the provision of playspaces appears to be ignored.

#### Contact Name

#### Contact Organisation

Fred Rodgers

## City Response

Policies throughout the Plan seek to minimise disturbance resulting from visitors.

### Recommendation

No Change

#### Recommendation\_Details

#### Type of Comment

Support

#### Comment

Agree with incorporating well-designed signage to visitor facilities and destinations, and suggest this is prioritised as a quick win.

#### Contact Name

#### Contact Organisation

John Ramsey and Jane Northcote

## City Response

Comment noted.

### Recommendation

No Change

# City Plan 2036 Consultation Comments

## Recommendation\_Details

### Type of Comment

General

### Comment

We suggest that policy C2 should also include Public Conveniences and Changing Places within the list of facilities that meet the needs of visitors to help them to plan a full day within the City.

### Contact Name

Oliver Caroe

### Contact Organisation

Surveyor to the Fabric of St Paul's Cathedral

### City Response

Agree that changing place toilets could be usefully added to the list of facilities in policy CV2. Wording has been amended to add changing place toilets as below.

### Recommendation

Change

## Recommendation\_Details

Point 4 of policy CV2 has been amended as follows;

"Well-designed public convenience provision, including changing places toilets, which is accessible to all users".

### Type of Comment

General

### Comment

Additional visitors/tourists at the weekend need more facilities such as amenity spaces and public conveniences.

### Contact Name

Resident (no name provided)

### Contact Organisation

### City Response

Comment noted. Policy CV2: Provision of Visitor Facilities encourages facilities to meet the needs of visitors.

### Recommendation

No Change

## Recommendation\_Details



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

There should be an intention to provide sensory green space and facilities for children and adults with special educational needs (SEN) or Sensory Processing Disorder (SPD).

### Contact Name

Sarah Hudson

### Contact Organisation

Friends of City Gardens

### City Response

This issue is addressed in Policy HL8.

### Recommendation

No Change

### Recommendation Details

## Type of Comment

General

### Comment

- We hope it would be possible to require, rather than encourage, the sought policy outcomes which are considered essential to securing the success of visitor facilities and with explicit links back to the outcomes of the Culture Mile and Look and Feel Strategies, such as the year-round public realm activation programmes, embedding learning and education, innovative bespoke lighting strategies, new green spaces and celebration of the area's rich history.
- Facilities that are proposed in this area should be flexible where possible to enable a range of uses of public realm spaces.
- A strategic approach to creating more green and public spaces is essential in the Culture Mile area. We would advise a requirement that developers are strongly encouraged to consider designing in such spaces within their plans, and that these are made accessible to the public and are well-signposted.
- Children's play and school group facilities should be created to a high, contemporary standard with consideration of the wider and associated needs of users (e.g. access to toilets).
- "Performance spaces where appropriate" – we feel it is important that these are well designed and technically equipped, with consideration as appropriate of factors including sightlines, access to power, load bearing points, flooring, acoustics, lighting, etc.
- We would like to see consideration of how key routes/streets and walkways within the Culture Mile area can be animated, through infrastructure spend, to

# City Plan 2036 Consultation Comments

support the experience of visitors and local communities, through infrastructure for audio, digital.

Contact Name

Tim Jones

Contact Organisation

Culture Mile

City Response

It is considered that policies in the Plan relating to visitors and culture, green spaces and public realm and the Smithfield and Barbican KAO, Culture Mile are sufficient. Various changes have been made to a range of policies through the consultation and redrafting exercise which have strengthened the offer for visitors in the City.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

We welcome support for the provision of new cultural facilities. Temporary and pop-up facilities can help activate vacant units, which supports the health and vitality of designated centres and other retail/commercial environments. We would suggest this aspect might be articulated within the Plan.

Contact Name

Tom Clarke

Contact Organisation

Theatres Trust

City Response

The Smithfield and Barbican KAO further addresses the role of animation and pop-ups in Culture Mile and surrounding areas.

Recommendation

No Change

Recommendation\_Details

Paragraph

5.3.11

Type of Comment

General

Comment



# City Plan 2036 Consultation Comments

Para 5.3.11. Please add that these facilities must be capable of being accommodated without detracting from residential amenity. We are particularly concerned that the Culture Mile should not turn the Barbican Estate into a version of the South Bank – constantly crowded with visitors and food outlets catering for them.

Contact Name

Jane Smith

Contact Organisation

Barbican Association

City Response

Comments noted. Wording has been added as below to emphasise that visitor facilities should not impact unduly on the amenity of residents.

Recommendation

Change

Recommendation Details

Wording has been added to supporting text as follows:

" The City Corporation will work with developers and arts and culture institutions to ensure that new developments and open spaces near tourist attractions provide facilities that improve the experience for visitors and cater for how visitors use the space. These facilities must be capable of being accommodated without detracting from the setting of the relevant tourist attraction, or the wider townscape or residential amenity".

**Policy Number**

CV3

Paragraph

Type of Comment

General

Comment

Draft Policy C3 which permits new hotels and other visitor accommodation is supported, however we note in supporting text, the policy explains that hotel development should not prejudice the primary business function of the City by displacing sites that are suitable for office accommodation. Whilst this is noted, and we appreciate that existing office supply should be protected, hotel and office development can successfully co-exist and there should not necessarily exist a trade-off between the two.

Contact Name

Contact Organisation

LaSalle Investment Management

City Response

Comment noted.

# City Plan 2036 Consultation Comments

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

We note that designation of the Culture Mile may create more demand for visitor accommodation. We also note the in-principle support for hotel uses in the City Plan under policy C3. Islington has limited capacity for new hotels beyond those identified in the development pipeline. Islington's emerging Local Plan will only support development of new visitor accommodation on allocated sites and on sites with existing visitor accommodation where business uses are not feasible. We would request that this issue is considered carefully as the Culture Mile and the City Plan both progress, to ensure there is certainty that any need/demand for new visitor accommodation can be accommodated within the City of London.

Contact Name

Contact Organisation

Ben Johnson

London Borough of Islington

City Response

Comments noted.

Recommendation

No Change

Recommendation Details

Type of Comment

Object

Comment

Hotels provide an appropriate subordinate use within the Square Mile, and the CPA is concerned that as currently drafted, policy C3 could suppress hotel development opportunities in the City. This policy needs to provide sufficient flexibility to ensure that sites and buildings are able to come forward for hotels and are not unduly stifled as this could prejudice other aspirations of the plan.

For example, sites in and around the Culture Mile and on the peripheries of the City should be afforded more policy support for hotel development. The CPA does not feel that the City can actively promote the Culture Mile, Centre for Music, night-time economy and other cultural and historic attractions, without equally providing policy support for additional hotel accommodation. Draft policy C3 should not be as rigid and recognise that sites, in particular on the periphery of the Square Mile, are suitable for hotels. Clusters of visitor accommodation are likely to emerge around key visitor attractions. Rather than resist this, the policy should be based on supply and demand and impact assessments to ensure the amenity of local areas in which they are proposed are preserved. Accordingly, Part 2 should

# City Plan 2036 Consultation Comments

be applied flexibly, particularly in parts of the City where hotel operators wish to locate to as a result of demand i.e. Tower of London, Culture Mile etc.

Based on the CPA's collective experience, it is suggested the draft policy is amended to remove the need to provide satisfactory arrangements for coach drop-offs for visitor accommodation. The City is a highly accessible location and studies have shown that the majority of visitors arrive by public transport. This should be encouraged further, with policy specifically precluding coach hotel drop-offs in the Square Mile.

Paragraph 5.3.15 states that 'Proposals for new hotels and other visitor accommodation will be considered more favourably in Culture Mile [...] and are not appropriate in the City Cluster'. Effectively preventing the creation of any new hotels in the City Cluster is excessively onerous, especially in the context of the continued demand for additional bed spaces, generated by the business visitors, the City's cultural offer, Sculpture in the City, and viewing galleries, which are all found in and around the City Cluster area. Indeed, draft policy S21(7) specifically encourages complementary land uses in the City Cluster. The CPA would suggest this paragraph is reworded accordingly, with the reference to hotels not being appropriate in the City Cluster being removed.

## Contact Name

Charles Begley

## Contact Organisation

City Property Association (CPA)

## City Response

Agree that paragraph 5.3.15 is too prescriptive of locational considerations. Paragraph has been deleted.  
Agree that it is no longer necessary to require satisfactory arrangements for coaches in hotel developments.

## Recommendation

Change

## Recommendation Details

Paragraph which states that hotels and other visitor accommodation will be considered more favourably in Culture Mile are not appropriate in the City Cluster has been deleted.

The requirement for satisfactory arrangements for coaches in Policy CV3, bullet point 4 has been removed.

## Type of Comment

General

## Comment

Active travel and public transport modes should be prioritised by hotel development proposals to discourage the use of private vehicles, including taxis. Pick-up/drop-off facilities for taxis, coaches and service deliveries should be limited to operational needs in line with draft London Plan policy T6.4 (Hotel and leisure uses parking); infrastructure for electric or other Ultra-Low Emission vehicles should be provided.

## Contact Name

Chris Leong - Assistant Planner

## Contact Organisation

Transport for London - Spatial Planning

# City Plan 2036 Consultation Comments

## City Response

Agree that hotels should prioritise active travel and public transport modes. Wording has been added in paragraph 5.3.14 addressing this issue as below.

## Recommendation

Change

## Recommendation Details

Wording has been added as follows;

"New hotel proposals will be expected to prioritise access by walking, cycling and public transport."

## Type of Comment

General

## Comment

Add to bullet point 4 that entrances/exits, delivery and drop off points should be sited away from residences where hotels are placed in residential areas. Where this is not possible hotels will be refused (See City of London Hotel Study. Market Strategy and Policy Advice for New Hotel Development in the City of London, June 2009.)

## Contact Name

Jane Smith

## Contact Organisation

Barbican Association

## City Response

Comments noted. Agree that wording could be added to emphasise that activity around entrances and exits can cause amenity issues.

## Recommendation

Change

## Recommendation Details

Wording has been added to supporting text as follows:

"Hotels can also cause amenity issues for surrounding occupiers, for example through noise nuisance or traffic and servicing impacts. New hotel proposals will be expected to prioritise access by walking, cycling and public transport. The location of entrances and exits, drop-off points and servicing and delivery arrangements will be considered in the context of surrounding occupiers. Where new hotels are considered to be acceptable, they should enable the public to access facilities such as co-working space, meeting rooms, restaurants or leisure facilities in order to bring the maximum benefit to the City's communities".

## Paragraph

5.3.15

## Type of Comment

Object



# City Plan 2036 Consultation Comments

## Comment

The supporting text to draft Policy C3 states that "Proposals for new hotels and other visitor accommodation will be considered more favourably in Culture Mile [...] and are not appropriate in the City Cluster". Preventing the creation of any new hotels in the City Cluster is excessively onerous, especially in the context of the continued demand for additional bed spaces generated by business visitors together with the City's evolving cultural offer. The ability to vertically mix complimentary land uses will make efficient use of the City's scarce land and enable an intensification of the functions essential to a vibrant thriving place. In light of the above, we would advocate that the reference to hotels not being appropriate in the City Cluster be removed from paragraph 5.3.15.

## Contact Name

## Contact Organisation

Tenacity

## City Response

Agree that the wording could be amended to clarify the Plan's approach to hotel location. Policies which prioritise office development and policies in the Key Areas of Change set out the locations where hotel development would be acceptable. Paragraph 5.3.15 has been deleted.

## Recommendation

Change

## Recommendation\_Details

Delete paragraph

## Paragraph

5.3.19

## Type of Comment

Object

## Comment

Policy C3 appears unnecessary, except as replacing like with like, since the current and planned hotel stock provides sufficient rooms to meet the seemingly outdated target. However, the loss of Unite from the underachieving housing target to apart-hotels has to be stopped.

"Other visitor accommodation" conjures up thoughts of camping and caravanning sites, which would be interesting, but appears to relate to apart-hotels and serviced apartments. Many of the latter were built as homes and contributed to the failing housing target but, even so, the proposals in 5.3.19 that "planning conditions will be considered to ensure that units would not be used or occupied by permanent households as this would reduce the availability of accommodation for short-term visitors to the City and would put pressure on local services and infrastructure" and that conditions "will therefore be used to ensure units are subject to maximum lease lengths (typically 90 days)" seems to ignore the need for the City's environment to come first and foremost.

## Contact Name

## Contact Organisation



# City Plan 2036 Consultation Comments

Fred Rodgers

## City Response

Comments noted.

## Recommendation

No Change

## Recommendation Details

### **Policy Number**

CV4

### **Paragraph**

### **Type of Comment**

General

### **Comment**

Draft Policy C4 permits new evening and night-time entertainment and related uses and the extension of existing premises subject to being effectively managed which is supported. We would add that evening and night-time economy uses should be encouraged as much as possible in the City of London, given that the increase in footfall from Crossrail and increase in those working in the City, attributed to the significant amount of new floorspace being delivered, will facilitate opportunities for more night-time offerings to cater to the large workforce.

D2 leisure and A4 drinking establishment uses should be acknowledged in policy as being important contributors to the evening economy and can also provide viable alternative land uses to A1 retail, whilst retaining active frontage. We also endorse supporting text that mentions that residential development built near to an existing night-time entertainment use would be responsible for providing appropriate soundproofing or other mitigation measures to avoid any impact.

### **Contact Name**

### **Contact Organisation**

LaSalle Investment Management

## City Response

Comments noted. The policy recognises a wide range of uses which comprise the night-time economy.

## Recommendation

No Change

## Recommendation Details





# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

Policy C4 gives an overview of how planning applications for new venues will be viewed. We believe that the issues of egress from the venues to transport links should also be considered as that is likely to be as big if not a bigger contribution to noise nuisance for residents as noise emanating from the venue itself. The CoL should give consideration to pedestrian traffic flows for after-hours revellers so that noise disturbance to residents is minimised. Routing people through Beech St 'tunnel' as opposed to the Estate might be one solution.

### Contact Name

Dr Alexander Wilson

### Contact Organisation

Shakespeare Tower House Group

### City Response

Policy SA2 addresses dispersal routes and flows of pedestrians to and from transport hubs and how adverse impacts can be mitigated.

### Recommendation

No Change

### Recommendation Details

## Type of Comment

General

### Comment

In Policy C4, The Diocese in effect repeats earlier comments for consistency. Suggest rewording part 2 to read: "...submit Management Statements evidencing engagement with local occupiers detailing how local concerns and issues will be addressed..." instead of "...submit Management Statements detailing how these issues will be addressed.

### Contact Name

Fr Luke Miller

### Contact Organisation

Diocese of London

### City Response

Agree suggested wording will add clarity to policy.

### Recommendation

Change

### Recommendation Details



# City Plan 2036 Consultation Comments

Added wording to point 2 of Policy CV4 to read as follows:

"Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises, and are encouraged to engage with nearby residential and commercial occupiers."

## Type of Comment

General

### Comment

Policy C4 in respect of the evening and night-time economy is acceptable as long as the need to ensure that the City's environment comes first and foremost is included as a pre-condition. However, conditions are of little use unless these are enforced. In this case, enforcement powers must include those under the Licensing Acts.

### Contact Name

Fred Rodgers

### Contact Organisation

### City Response

Comments noted.

### Recommendation

No Change

### Recommendation Details

## Type of Comment

General

### Comment

Please add to this policy that the City will take account of the cumulative impact of evening and night time venues. Planning restrictions on siting of such venues are more protective than licensing measures.

### Contact Name

Jane Smith

### Contact Organisation

Barbican Association

### City Response

Policy CV4 point 1 currently addresses the cumulative impact of evening and night time venues.

### Recommendation

No Change

### Recommendation Details

# City Plan 2036 Consultation Comments

## Type of Comment

Object

### Comment

There should be no unacceptable impact on amenity of residents and other noise sensitive uses from the evening and night time economy. Suggest there is scope for a blanket ban on licenses between 11pm and 7am in the four residential areas. If not, what criteria will be applied?

### Contact Name

John Ramsey and Jane Northcote

### Contact Organisation

### City Response

Policy CV4 seeks to minimise the impact of the evening and night-time economy on residents, in conjunction with licensing regulations.

### Recommendation

No Change

### Recommendation\_Details

## Type of Comment

General

### Comment

Chapter would suggest additional wording is reflected appropriately in Policy C4 to indicate that Management Statements should demonstrate "prior engagement with and recognition of local occupier and stakeholder concerns".

### Contact Name

Oliver Caroe

### Contact Organisation

Surveyor to the Fabric of St Paul's Cathedral

### City Response

Agree that policy wording could be amended to strengthen the process of procuring management statements. Wording of point 2, policy C4 has been amended.

### Recommendation

Change

### Recommendation\_Details

Wording of point 2 of policy CV4 has been amended as follows:

"Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises and are encouraged to engage with nearby residential and commercial occupiers".



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

More visitors to Culture Mile, as well as more City workers through the area will require more provision for such items as extra WC provision, probably in the public accessible buildings, plus street cleaning/cleansing; and security (especially policing to prevent anti- social behaviour).

### Contact Name

Tim Jones

### Contact Organisation

Culture Mile

### City Response

Policy CV2 encourages the provision of facilities that met the needs of visitors in new cultural developments and in nearby open spaces and the public realm. Street cleansing and policing are dealt with through other Corporation plans. Other policies in the Plan seek to ensure adequate facilities for all communities, including visitors, such as drinking fountains, toilets, seating, play facilities and defibrillators.

### Recommendation

No Change

### Recommendation Details

## Paragraph

5.3.20; 5.3.23

## Type of Comment

General

### Comment

I am concerned that references to a 24-hour City are creeping back in here. The first (5.3.20) refers to London as a whole, which is reasonable. However the suggestion that the pressure for 24-hour entertainment in the City is driven by its role in 24-hour financial trading (5.3.23) is tenuous, verging on the absurd! The nightclubs in Smithfield and other parts of the City are not attracting mainly traders.

However the core text of C4 is good and I support it.

### Contact Name

David Coleman

### Contact Organisation

### City Response

Agree with suggested change. Wording amended as below.



# City Plan 2036 Consultation Comments

## Recommendation

Change

## Recommendation Details

Following wording at end of paragraph deleted;  
"which includes 24-hour trading with other financial centres around the globe".

## Paragraph

5.3.29

## Type of Comment

General

## Comment

Part 2 of this draft policy seeks the submission of Management Statements detailing how issues associated with evening and night time uses will be addressed; paragraph 5.3.29 sets out further details of what should be included in a Management Statement. The CPA is concerned that it will not always be possible to submit such statements at the application stage, when details of the end use operator and detailed design considerations are not fully known. It is important that the draft policy takes a proportionate approach to the level of detail that can be submitted at the application stage, with planning conditions securing the detail of a full Management Statement.

## Contact Name

Charles Begley

## Contact Organisation

City Property Association (CPA)

## City Response

Agree with the difficulties with the timings of the submission of Management Statements and that wording should be amended.

## Recommendation

Change

## Recommendation Details

Wording of paragraph has been amended as follows:

"Assessment of the Management Statement will have regard to the City Noise Strategy, the provisions of the City of London Statement of Licensing Policy and to any submitted licence application operating schedule. It is recognised that it may not be possible to submit detailed Management Statements when details of the end use operator are not known. However, applicants should submit an outline Management Statement which considers physical design measures to minimise disturbance, such as those outlined in the paragraph above. In such cases, conditions will be attached to any planning permissions granted requiring full Management Statements to be submitted once the occupiers are known".

## Type of Comment

General



# City Plan 2036 Consultation Comments

## Comment

It is important to protect the amenity of SINC's and green corridors where bats may be disturbed by noise, vibration or light spillage.

Point 1: Please include after "amenity of residents", "amenity of SINC's and welfare of protected species, such as bats and roosting birds".

Point 3: Please add at the end of the sentence "and no adverse impact on protected species".

5.3.29: Please add "noise mitigation, avoidance of light spillage and disturbance to SINC's and protected species".

## Contact Name

## Contact Organisation

Sarah Hudson

Friends of City Gardens

## City Response

Policies elsewhere in the Plan and The City of London Lighting Strategy deals with lighting, noise and disturbance and to wildlife in the City.

## Recommendation

No Change

## Recommendation Details

## **Policy Number**

CV5

## **Paragraph**

## **Type of Comment**

General

## Comment

When installing artwork in the City of London it should be multi-functional - i.e. it could be used as a shelter from the elements, or maybe it could incorporate surfaces with different textiles that can be felt and touched by children to encourage them to explore the world of art. The latest installation at St Paul's serves no purpose and is not pleasing on the eye.

## Contact Name

## Contact Organisation

City worker (no name provided)

## City Response



# City Plan 2036 Consultation Comments

Agreed. Will add text to policy.

## Recommendation

Change

## Recommendation\_Details

New paragraph added in supporting text of Policy CV5 to read "Where appropriate, artworks should be multi-functional so that a variety of community needs can be met. Artworks can provide shelter from the elements, include sensory elements and provide play opportunities".

## Type of Comment

General

## Comment

I support the qualifications in this policy. The drafting could be improved by increasing the distinction between temporary installations (generally acceptable, give it a go) and permanent (we must be really sure they enhance the area).

## Contact Name

David Coleman

## Contact Organisation

## City Response

Comments noted. It is considered that the policy provides sufficient guidance regarding temporary and permanent art works.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

Whilst all public art must be encouraged it must be provided after prior consent. To animate ground floors, especially, murals, like Dorothy Annan's which were removed from Farringdon Street to the Barbican Centre must be encouraged.

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response

Comments noted.

# City Plan 2036 Consultation Comments

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

Unfortunately, CoLC has been hypocritical with regard to its zero-tolerance approach to graffiti in not only retaining but also protecting, at substantial cost, what is nothing more than graffiti. After over 18 months, the graffiti remains at the bottom of Golden Lane and there is no intention to remove it, despite it being on a listed building. CoLC's Department of the Built Environment is either unable or unwilling to state whether this graffiti offends against the Barbican's Grade II listed status.

Contact Name

Contact Organisation

Fred Rodgers

City Response

Comments noted.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

Please add that specific attention will be paid to illuminated artworks, to ensure they do not impose light pollution onto neighbouring residences.

We are pleased there is a group to advise on artistic merit and siting and support the fact that time limits may be imposed on an artwork staying in place.

Contact Name

Contact Organisation

Jane Smith

Barbican Association

City Response

Agreed. Adding wording to the supporting text of the policy would improve clarity regarding illuminated artworks. Wording has been added as below.



# City Plan 2036 Consultation Comments

## Recommendation

Change

## Recommendation Details

Wording has been added to supporting text as follows:

" Illuminated artworks must be sited to avoid light pollution impacting on nearby residential occupiers".

## Type of Comment

General

## Comment

Bring back the black horse statue on Bishopsgate.

## Contact Name

## Contact Organisation

Street Art 123

## City Response

Comment noted. Plan is unable to adress this issue.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

We note that there isn't a separate section on Outdoor Performance in the Plan as it stands – much of Culture Mile's programme takes this form, as does the event programming across the rest of the City led by Culture & Visitor Services. Suggest this be integrated here as a 'Public and Outdoor Arts' section or created as a new section.

Culture Mile is mounting temporary "Look and Feel experiments" (creating public realm interventions) to test the approach to the permanent realisation of the Look and Feel Strategy, including sites for public use/congregation and new activity. In relation to this we would like to see a point about the City enabling activity of this kind, as well as public performances/events through a supportive approach around licensing of events which meet the Culture Mile objectives, and that it will seek to develop user-friendly and streamlined processes where these projects are temporary or ephemeral (e.g. a one-off public performance).

## Contact Name

## Contact Organisation

Tim Jones

Culture Mile

# City Plan 2036 Consultation Comments

## City Response

Policy CV2 encourages temporary pop up art installations as well as performance spaces in open spaces and the public realm. Agree that more encouragement could be given to performance spaces. Wording has been added to CV2 to encourage the animation of key routes in the City and Policy S24 has been amended to support performance space, as below;

## Recommendation

Change

## Recommendation Details

Wording has been added to the 7th bullet point of Policy CV2 as follows;

"performance spaces and animation of key routes where appropriate."

Wording has been added in Policy S24 as follows;:

"Secure the area's distinctive ecology, including encouraging investment in the creative sector, developing new creative workspaces and protecting and encouraging formal and informal performance space".



# City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S7: Smart Infrastructure and Utilities

### Policy Number

### Paragraph

### Type of Comment

General

### Comment

Presumably cable TV is also included in Strategic Policy S7 but, again, what is noticeably excluded is the specific need to put the City's environment first and foremost. At the same time covert deals like the one with Cornerstone Telecommunications Infrastructure Limited does nothing to assure residents that CoLC will ensure – "The improvement and extension of utilities infrastructure should be designed and sited to minimise adverse impacts on the visual amenity, character and appearance of the City and its heritage assets".

### Contact Name

Fred Rodgers

### Contact Organisation

### City Response

Policy SI1 seeks that utility infrastructure and connections are designed and integrated with development planning for a range of environmental issues.

### Recommendation

No Change

### Recommendation Details

### Type of Comment

General

### Comment

We support this policy and in particular that infrastructure should not be allowed to be built where it will have adverse impacts on visual amenity, character and appearance of the City and its heritage assets. Nor should it impact on residential amenity.

### Contact Name

Jane Smith

### Contact Organisation

Barbican Association

### City Response

Support noted. The City Plan is designed to be read as a whole, and residential amenity covered within S3.



# City Plan 2036 Consultation Comments

## Recommendation

No Change

## Recommendation Details

### Type of Comment

General

### Comment

This section seems very general/reactive. For example are there minimum performance levels for WiFi which should be quoted? If the City grows by 115,000 people, and given the 18m forecast annual visitors, how will the infrastructure need to develop? The City is notorious for the problems in obtaining 4G signal and WiFi because of the tall buildings re-inforced with steel bars which screen the signal. Is there a plan to address this issue?

### Contact Name

John Ramsey and Jane Northcote

### Contact Organisation

### City Response

COL will update the Infrastructure delivery plan to set out the expected infrastructure necessary to deliver the level of growth envisaged in the plan. COL agree that to ensure that the City remains highly attractive for residents as well as businesses and ensure social inclusivity, digital connectivity is of paramount importance. Policy seeks that development to avoid reducing mobile connectivity surrounding new developments.

## Recommendation

Change

## Recommendation Details

Suggested possible amendment 'where this is not possible, suitable mitigation measures will be required' (from London plan amendments)  
Additional text to amplification to ensure that buildings do not worsen existing signal strength in the area and consider provision of in-building solutions where signal strength is poor. Include reference to the roll out of 5G and additional cells.

### Paragraph

5.4.2

### Type of Comment

Support

### Comment

It is positive to see that in section 5.4.2, Policy S7: Smart Infrastructure and Utilities points 1 and 2, plans to minimise demand on infrastructure and early engagement with infrastructure providers along with Sustainable Drainage Systems (SuDS).

### Contact Name

### Contact Organisation



# City Plan 2036 Consultation Comments

Matthew Pearce

Environment Agency

## City Response

Noted

## Recommendation

No Change

## Recommendation Details

### **Policy Number**

SI1

### **Paragraph**

### **Type of Comment**

Support

### **Comment**

The CPA welcomes the City's commitment on this topic and the fact that it has established strong links with the infrastructure providers.

### **Contact Name**

Charles Begley

### **Contact Organisation**

City Property Association (CPA)

## City Response

Support noted

## Recommendation

No Change

## Recommendation Details

### **Type of Comment**

General

### **Comment**

For a world-leading financial and business centre, CoLC has been slow to wake up to digital needs and only now does the Barbican area have BT optic fibre broadband but, even then the offered speeds are slow compared with the independent VFM service.

Having had to fight a constant battle with the developers of The Denizen and CoLPAI – CoLC in the latter case – over the on-site use of generators instead of mains



# City Plan 2036 Consultation Comments

electricity, Policy S11 must require that only developments relying solely on mains electricity supplies throughout will be permitted.

Contact Name

Contact Organisation

Fred Rodgers

City Response

Agree that amending policy text and justification would strengthen the policy

Recommendation

Change

Recommendation Details

Insert into policy amplification that air quality is a fundamental concern for the COL and reference the City's trajectory towards zero carbon.

Type of Comment

General

Comment

Developers should be required to install fibre optic and other communications infrastructure into new residential developments.

Contact Name

Contact Organisation

Jane Smith

Barbican Association

City Response

COL agree that digital connectivity is paramount to ensure that the City remains highly attractive for residents as well as businesses and ensure social inclusivity. Approx. 90% of the City of London is covered by Open Reach fibre cabling already.

Recommendation

Change

Recommendation Details

Amplification of text of Policy S11 regarding the requirement for additional mobile infrastructure and cells.

Type of Comment

General

Comment



# City Plan 2036 Consultation Comments

Has enough thought been given to less glamorous aspects of infrastructure, such as sewage and water pressure? A modern-day strategy should insist that new developments are self-sustaining as regards sewage, and should set out conditions for water sustainability and reducing water run-off. Planning conditions can insist that the building flushes its toilets with 'grey' water and that it collects and processes its own sewage.

Contact Name

Contact Organisation

John Ramsey and Jane Northcote

City Response

These aspects are addressed in various parts of the City Plan 2036

Policy S7 Smart Infrastructure and Utilities and SI1 Infrastructure provision and connection address infrastructure requirements for development including sewerage and water supply needs. Policy CEW1 Zero Waste City requires suitable provision for off street management of waste and recycling. Water sustainability is addressed through policy D1 sustainability standards which requires maximum BREEAM credits for Water. Policy CR3 Sustainable Drainage Systems (SuDS) addresses reduction in rainwater run off

Recommendation

No Change

Recommendation Details

Type of Comment

Support

Comment

FSB welcomes the aims to ensure world-leading digital connectivity, including full fibre wired and wireless infrastructure. FSB agrees that this 'smart infrastructure' is essential to business to flourish. We have long argued for London to have the ambition to strive to become a 1GB/minute capital – and we hope the City of London can work to making this a reality through this Local Plan process.

Contact Name

Contact Organisation

Sarah King

Federation of Small Businesses

City Response

Support noted.

Recommendation

No Change

Recommendation Details



# City Plan 2036 Consultation Comments

Paragraph 5.4.8

Type of Comment Object

Comment

“Should” in 5.4.8 is insufficient.

Contact Name

Fred Rodgers

Contact Organisation

City Response

Air quality is a fundamental concern for the COL and to address these issues the draft policy seeks that developers must engage with utility providers.

Recommendation Change

Recommendation Details

Agree that amending policy text and justification would strengthen the policy.  
Replace should with must.

Paragraph 5.4.8-5.4.9

Type of Comment General

Comment

It is not clear whether the intention is to require developers to connect the construction site to the electricity grid so that plant and machinery can be plugged in. This is essential to reduce air pollution from running diesel generators and machinery. This is obviously the intention as 5.4.8 demonstrates.

5.4.8: Replace 'should' with 'must'.

5.4.9: What enforcement will there be? Lane rental and financial penalties should be used to ensure compliance. There should also be a presumption that pedestrian pathways closed during construction should be reopened as a priority and always prior to occupation.

Contact Name

Sarah Hudson

Contact Organisation

Friends of City Gardens





# City Plan 2036 Consultation Comments

## City Response

Policy D1 of S8 Sustainability standards requires all development to demonstrate the highest feasible and viable sustainability standards. Policy amplification states that developers should ensure availability of Temporary Building Supplies to avoid need for diesel generators with the assumption that this would be set out in any management plan accompanying a planning application. Lane rental is supplied in accordance with TFL requirements and the Transport Strategy.

Recommendation No Change

## Recommendation\_Details

**Policy Number** SI3

## Paragraph

Type of Comment General

## Comment

The City should itself develop a policy to work with infrastructure suppliers and developers to extend the Pipe subway network within the City.

Contact Name Contact Organisation

Jane Smith Barbican Association

## City Response

SI3 seeks development to use pipe subways routes where these are available.

Recommendation No Change

## Recommendation\_Details

Type of Comment Support

## Comment

Strongly support initiative for pipe subways for cabling.

Contact Name Contact Organisation

John Ramsey and Jane Northcote



# City Plan 2036 Consultation Comments

## City Response

Support noted.

## Recommendation

No Change

## Recommendation\_Details

# City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S8: Design

### Policy Number

### Paragraph

### Type of Comment

General

### Comment

British Land supports improving permeability throughout the City and providing public realm which is inclusive, welcoming, convenient, comfortable and attractive to enhance the City's network of streets and buildings.

Strategic Policy S8 seeks the provision of public access to the upper levels of buildings to maximise the amount of accessible and free to enter roof terraces and spaces. Whilst British Land acknowledge the benefit of providing public access to upper levels, this will not be possible and appropriate for all buildings. The policy should recognise the following factors which should be taken into account in considering whether or not it is practical and appropriate to provide publicly accessible space at roof level: access, safety and security, core and lift configurations, ground floor layouts and the provision of public space at the lower levels of the building.

British Land welcomes the City's ambition to deliver world-class sustainable, mixed-use, resilient and adaptable buildings. Policy S8 aligns with the Broadgate Vision of creating a mixed use, accessible, green and welcoming campus for the local community and visitors.

British Land's Sustainability Brief for Developments requires adaptation to climate change, demographic changes and structural flexibility, as well as detailed operational energy and whole life carbon modelling to form part of the basic scope of the Broadgate developments. For local air quality improvements, British Land will continue to review current and emerging technology to minimise local NOx emissions (E.g. ultra-low and zero NOx) from heating systems, as well as incorporate and support measures to incentivise low-emission modes of transport, such as by investing in wayfinding, creating accessible neighbourhoods, prioritising cycling facilities and developing electric vehicle charging infrastructure.

### Contact Name

### Contact Organisation

British Land Company PLC

### City Response

Support for permeability and improved public realm in the City is noted.

The policy does not state that every building should be required to provide public access at upper levels however this is expected for tall building developments which 'may include public viewing galleries where appropriate'

# City Plan 2036 Consultation Comments

Support for policy approaches that are in line with British Land's sustainability brief for development is noted. Policy seeks design solutions which "contribute towards" a zero emission, zero carbon and climate resilient City as per the Draft London Plan.

## Recommendation

Change

## Recommendation Details

Policy will be amended to clarify public access at upper level is not mandatory for all development.

## Type of Comment

Support

## Comment

The Trust supports part 9 of the policy which states that the City Corporation will promote development which: "Delivers high quality sustainable architecture of a height, bulk, massing, scale, urban grain, material, quality and depth of modelling and detail which conserves and enhances the City's local and wider character and appearance."

## Contact Name

## Contact Organisation

London Sephardi Trust

## City Response

Support noted.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

The draft policy requires public space to be delivered at the upper levels of buildings, by maximising the amount of accessible and free to enter roof terraces and spaces. A significant number of new, consented and proposed buildings in the City already incorporate high level publically accessible spaces. With this in mind and looking to the future, it is suggested that the policy wording be amended to provide greater flexibility on the basis that not every building should be required to provide high level public access, particularly when in close proximity to existing public roof spaces. Many schemes have the opportunity to make greater contributions to the public realm through other means and equal weight for this should be included in the policy.

# City Plan 2036 Consultation Comments

Under 'Quality and character', reference is made to development delivering "high quality sustainable architecture of a height, bulk, massing, scale, urban grain, material, quality and depth of modelling and detail which conserves and enhances the City's local and wider character and appearance" (point 9). We would add that this should be achieved hand in hand with the objective of maximising the development potential of individual sites and should not be considered as a pre-requisite against the development of large scale and/or tall buildings. An appropriate solution for each site should be judged individually according to its own townscape and heritage context.

Contact Name

Contact Organisation

Tenacity

City Response

Noted. We would encourage publicly accessible space within the building and this not have to be at the upper levels of the building.

Recommendation

Change

Recommendation Details

The wording for Policy S8 point 3 will be amended from '...at the upper levels of buildings..' to '...within the building...' for clarity

Type of Comment

General

Comment

I study MArch Architecture in the University of Greenwich, the site I am designing is Bloomberg, I need to see anything relating to that for designing realisation.

Contact Name

Contact Organisation

Asal

City Response

Noted. This comment is not a local plan matter.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment



# City Plan 2036 Consultation Comments

Strategic policy S8 seeks to optimise pedestrian movements by maximising permeability, and providing external and internal pedestrian routes. The CPA is very concerned that the draft policy is seeking internal pedestrian routes, which can only be contemplated in a very small number of instances having regard to design and security considerations. Internal pedestrian routes have a big impact on the design of buildings, including the ground floor layout, access and safety, and core position. The provision of internal pedestrian routes is therefore not often feasible, practical or viable, and the policy should be amended.

Strategic policy S8 seeks the provision of public access at the upper levels of buildings by maximising the amount of accessible and free to enter roof terraces and spaces. The CPA acknowledges the benefit of providing public access to the upper levels of buildings in some circumstances, but this can only be contemplated in a very small number of instances. Public access at the upper levels has an impact on the ground floor layout, access and safety, core position and lift configuration. The last few years has seen a number of free to enter roof terraces being provided in new large and tall buildings and it is not at all clear that these roof terraces will be well used. It is important that any public space in commercial buildings is sustainable, viable and practical. This should be acknowledged in the policy, with a recognition that free to enter roof terraces are not a prerequisite of the design. The CPA considers that public access should only be sought in appropriate circumstances and only in tall buildings or groundscrapers, where such provision may be feasible. The CPA is concerned that public access may be sought in buildings along the river and around City landmarks, as these locations are often constrained by other factors including St Paul's Heights, River Prospects and Monument Views.

Parts 11, 12 and 13 of draft policy S8 consider lighting, signage and security, seeking that they are integral elements of the design. Whilst the CPA recognises these are important elements of design, decision makers should understand these elements are often not designed up to any level of detail at the application stage. Accordingly, the CPA seeks flexibility in the policy such that these elements can be designed at the appropriate stage of a project, and not unduly constrain design approaches at RIBA Stage 2 and 3.

## Contact Name

Charles Begley

## Contact Organisation

City Property Association (CPA)

## City Response

Noted.

The policy does not state that every building should be required to provide public access at upper levels however this is expected for tall building developments which 'may include public viewing galleries where appropriate'.

## Recommendation

Change

## Recommendation Details

Add additional wording 'where feasible' to Policy D4 bullet point 2 regarding pedestrian permeability.

Policy will be amended to clarify public access at upper level is not mandatory for all development. The wording for Policy S8 point 3 will be amended from '...at the upper levels of buildings..' to '...within the building...' for clarity.



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

The Healthy Streets Approach should be embedded into this policy to further emphasise that streets also function as places where people want to spend time and engage in various activities, not just for pedestrian movement.

We welcome the focus of this policy on a holistic urban design approach, recognising the importance of buildings and streets in delivering Healthy Streets in the City and mitigating air quality while growth continues. The roofs and upper levels of buildings will be important locations for new inclusive and publicly accessible open space, particularly in and around the City Cluster and on the riverside.

This policy outcome should therefore potentially also be tied back to Strategic Policy S14 (Open Spaces and Green Infrastructure) so that whenever it is feasible, all new major development are obliged to provide publicly accessible upper level space ideally with daylight, cleaner air, views and tranquil spaces.

This would support draft London Plan policies SD4 (The Central Activities Zone); T2 (Healthy Streets); D1 (London's form and characteristics); D7 (Public realm); GG3 (Creating a healthy city); G1 (Green infrastructure) and G4 (Open space).

### Contact Name

Chris Leong - Assistant Planner

### Contact Organisation

Transport for London - Spatial Planning

### City Response

Noted. The London Plan policies are reflected in the City Plan. Additional wording has been added to refer to TfL's Healthy Streets - see Policy HIC9 wording (paragraph 4.1.62) and Policy S10 (paragraph 6.3.8). We acknowledge that the public space provision need not apply just to upper floor/ roofspace; it could be provided elsewhere especially ground floor level.

### Recommendation

No Change

### Recommendation Details

## Type of Comment

General

### Comment

Would like to see higher quality architecture.

### Contact Name

David Sexton

### Contact Organisation



# City Plan 2036 Consultation Comments

## City Response

Noted.

## Recommendation

No Change

## Recommendation Details

### Type of Comment

#### Comment

In addition, it is essential that developers deliver high quality sustainable architecture of a height, bulk, massing, scale, urban grain, material, quality and depth of modelling and detail which conserves and enhances the City's local and wider character and appearance; and are appropriate in relation to their surrounds.

As part of this, we would welcome the addition of reference to the role of local community groups, in particular those in more deprived areas, in becoming involved in community driven design and build projects (the design and construction of new pocket parks, community centres, renovations and so on).

#### Contact Name

Dr Sophie V Taysom

#### Contact Organisation

Merchant Land

## City Response

Noted. Wording has been added to Policy S1 stating that major commercial developments are encouraged to provide space which can be used for community needs such as public health facilities, community, cultural or sporting activities. Policy HIC5 also includes wording regarding location and protection of social and community facilities.

## Recommendation

No Change

## Recommendation Details

### Type of Comment

General

#### Comment

Welcome the focus on promoting innovative, sustainable and inclusive high-quality buildings, streets and spaces. As part of this, we agree on the importance of delivering world class sustainable buildings which are mixed-use, resilient, adaptable and contribute towards a zero emission, zero carbon and climate resilient City.

Suggested Amendments





# City Plan 2036 Consultation Comments

With regard to design, we wonder if zero carbon emissions is realistic for new buildings within this timescale. We would suggest a more realistic target such as reducing carbon emissions by 50% in new buildings by 2030.

## Contact Name

Dr Sophie V Taysom

## Contact Organisation

Merchant Land

## City Response

The emerging London Plan requires all major new development to be zero carbon. The City Plan 2036 must be in general conformity with the London Plan and therefore should include ambitious aspirations for new development which will be in place for decades. The International Panel on Climate Change 2018 report states that we have only 12 years to act to prevent global temperatures rising by more than 1.5 degrees. It would be irresponsible to dilute these zero carbon targets in the City Plan 2036. Where constraints make achievement of zero carbon on site unrealistic then carbon offsetting can be used to account for the shortfall.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

Use better quality materials in development. Promote eco-lighting and use of solar power etc.

## Contact Name

Gill Smith

## Contact Organisation

## City Response

Noted. Policy S8 seeks to promote innovative, sustainable and inclusive high-quality buildings, streets and spaces and deliver world class sustainable buildings which are mixed-use, resilient, adaptable and contribute towards a zero emission, zero carbon and climate resilient City. Policy D2 point 2 bullet point 2 states that "The design of all new development must ensure that: appropriate, high quality and durable materials are used".

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment



# City Plan 2036 Consultation Comments

## Ensuring high quality visual design

We suggest that the City should have a design review panel to comment on the architectural merit of buildings, to encourage more sensitivity to the surrounding area and less egotism in designs. Such a panel could raise the standards of submitted designs (3.3.5) by setting standards for the quality of architecture that the City needs, assessing applications, and helping applicants meet the highest standards of visual design.

We understand that officers oppose this because one borough that has such a panel ends up with inconsistent opinions because of the changing membership of the panel. This sounds like a problem that could be avoided in the way the panel is set up – for example by having a small group of trusted panellists who meet regularly and consistently and devise some guidelines on what they expect to see. Also, the urban design criteria contained in the Plan suggest that the role of a panel would be to interpret whether a proposal met these criteria, not necessarily to establish new criteria.

### Contact Name

Jane Smith

### Contact Organisation

Barbican Association

### City Response

COL agree of the importance of design panels and have a specialist team of design officers in the Development Management Team.

### Recommendation

No Change

### Recommendation\_Details

### Type of Comment

General

### Comment

Point 3: We welcome the policy to deliver free access public space at the top of buildings. This needs to be easily available rather than only when booked in advance or restricted in other ways. The policy should also include the presumption that developments must include extensive green roofs (not necessarily open to the public) providing habitats for Black redstarts.

Point 11: Lighting levels should be kept to a minimum and not increased, which will protect bats and migratory birds.

### Contact Name

Sarah Hudson

### Contact Organisation

Friends of City Gardens

### City Response



# City Plan 2036 Consultation Comments

Noted. Many of the free access spaces on the top of the buildings are freely accessible and do not require pre-bookings in advance. Through Policy OS2 we encourage both extensive or extensive green roofs and varying extensive green roof substrate levels will be encouraged to improve rainwater retention and enhance biodiversity. Extensive green roofs would be encouraged where there are issues which impact on residential amenity. Policy D9 states that lighting should be sensitively co-ordinated with the overall design of any new development. Paragraph 6.1.63 states that the 'Avoidance of light spillage onto urban green spaces is crucial for biodiversity in the urban setting'.

Recommendation No Change

Recommendation\_Details

Paragraph 6.1

Type of Comment General

Comment

The contextual and high quality approach to the design of new development is supported. While clause 9 of Strategic Policy S8 is logical, we consider that an amendment to ensure that consideration of potential impacts in areas immediately outside the boundaries of the City of London would further strengthen the Plan. This is important given the potential effects of tall buildings located within the City.

Suggested change - Strategic Policy S8: Design - Clause 9 "... which conserves and enhances the local and wider character and appearance of both the City and potentially affected locations in other local authority areas."

Contact Name Contact Organisation

Tim Brennan Historic England

City Response

Noted. We have amended wording of Policy S8 point 9.

Recommendation Change

Recommendation\_Details

See Policy S8 point 9.

Paragraph 6.1.10



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

6.1.10 refers to the City having “numerous small open spaces” but then adds “the design of these small spaces requires innovative and sensitive solutions which respect their settings and create high quality, accessible areas for all the City’s communities”. Why should these “numerous small open spaces” which already exist be subject to change in any event?

2.8 Also, in 6.1.10 – “the City’s streets provide space for public enjoyment” but Policy D2 includes a requirement that “proposed uses” must “be accommodated within the curtilage of the development” so “do not rely on use of the public realm”. What, in this context is “public enjoyment”?

### Contact Name

### Contact Organisation

Fred Rodgers

### City Response

Noted. Open spaces inevitably need remedial work over-time even if the design doesn’t change. Changes may be required to meet changing requirements – be they additional seating, improved access or replanting vegetation. Public enjoyment in this context means the pleasure derived by anyone who lives, works or visits the City.

### Recommendation

No Change

### Recommendation Details

## Paragraph

6.1.11

## Type of Comment

General

### Comment

Whilst access (6.1.11) has to be encouraged, access to public transport also has to be ensured. The deficit, particularly at London Underground stations, where ten out of 14 have no step-free access, is a matter of serious concern – disgrace even for a purported world class city. CoLC even waives the opportunity to secure step free access through developments around stations in the planning process.

### Contact Name

### Contact Organisation

Fred Rodgers

### City Response



# City Plan 2036 Consultation Comments

Noted. Policy S9 point 3 states that we will promote further improvements to public transport capacity and step-free access at existing mainline rail and London Underground train stations. The Transport Strategy sets out how the City of London will support and champion accessibility improvements to underground stations. See page 49 which states: “Through the planning process we will identify opportunities to introduce step free access as part of new developments and major refurbishments. We will also work with Network Rail to introduce step free access to Moorgate national rail platforms. Our ambition is that all stations within the Square Mile are accessible by 2044. We will liaise with TfL to identify the programme of investment to achieve this...”.

Recommendation No Change

Recommendation\_Details

Paragraph 6.1.3

Type of Comment General

Comment

6.1.3 refers to the demand for additional office space but this demand has to be questioned in the light of both Brexit and the changed and changing economy up to 2036. Not only working from home, which will accelerate as technology advances, commuting costs rise and housing becomes more expensive, since wages won't rise but also the increased cost of the provided services will all reduce, if not eliminate, demand. At the same time, the obsession with growth – good or bad – must be reviewed and the Natural Capital Accounting has to be recognised, introduced and adhered to.

Contact Name Contact Organisation

Fred Rodgers

City Response

Noted.

Recommendation No Change

Recommendation\_Details

Paragraph 6.1.4

Type of Comment Object

Comment



# City Plan 2036 Consultation Comments

Draft policy S8 and para 6.1.4 state that development should contribute towards the aim of achieving a zero emission and climate resilient City. Whilst the CPA supports this ambition, it is not considered that achieving a zero emission City is realistic in any meaningful timescale. The draft Plan should set out realistic targets or an ambition related to the Plan period. It could refer to the London Plan target or the Government's target to halve the energy usage of new buildings by 2030. It is considered that setting emission reduction targets are more likely to achieve the desired outcome. The CPA considers that zero carbon targets may not be realistically achievable within the very constrained context of the City of London, where other environmental and amenity considerations must also be balanced, as well as market expectations. Imposing unachievable zero carbon targets is not considered sound. It is important that, whilst ambitious, the policy is enforceable and realistic.

## Contact Name

Charles Begley

## Contact Organisation

City Property Association (CPA)

## City Response

Noted. Paragraph 6.1.4 sets the aspiration for development to "contribute towards the aim of achieving a zero emission and climate resilient City" The Mayor of London has set the ambition that London should be a zero-carbon city by 2050. The City of London Zero Emissions City Report prepared by AECOM (July 2018) provides a trajectory to a Zero Emissions City by 2050 including the contribution that building design and energy supply will play. The wording of this paragraph has been changed to include an end date of 2050.

The policy wording in S8 Design seeks design solutions which "contribute towards" a zero emission, zero carbon and climate resilient City. Emerging London Plan policies will require all new development to be zero carbon. The City Plan 2036 must be in general conformity with the London Plan and therefore should include ambitious aspirations for new development which will be in place for decades. The International Panel on Climate Change 2018 report states that we have only 12 years to act to prevent global temperatures rising by more than 1.5 degrees. It would be irresponsible to dilute these zero carbon targets in the City Plan 2036. Where constraints make achievement of zero carbon on site unrealistic then carbon offsetting can be used to account for the shortfall.

## Recommendation

Change

## Recommendation\_Details

Change wording of the final sentence of paragraph 6.1.4 to read "Development should contribute towards the aim of achieving a zero emission and climate resilient City by 2050 in accordance with the London Plan"

## Paragraph

6.1.5 - 6.1.6

## Type of Comment

General



# City Plan 2036 Consultation Comments

## Comment

Whether or not the City is “a world leading financial and business centre” – in 6.1.62 it’s only a business centre - CoLC’s policies to date should be ensuring “a zero-emission, sustainable City” and it should require that “development must be designed to minimise environmental impacts and be resilient to climate change throughout its lifecycle” (6.1.5 and 6.1.6). Natural Capital Accounting should ensure that only development that improves the City’s environment is acceptable and developments be preconditioned to producing environmental improvement, which can be monitored and implementation enforced.

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response

Noted. Policy D1 Sustainability Standards requires all development to demonstrate the highest feasible and viable sustainability standards. Natural Capital Accounting could form part of that demonstration. The BREEAM (Building Research Establishment Environmental Assessment Methodology) is an internationally recognised, independently verified methodology for assessing the sustainability of buildings, which includes a post construction verification stage. In order to achieve consistency between different developments Policy D1 requires a BREEAM rating of “Excellent” or “Outstanding” which is higher than most authorities expect in their Local Plans.

## Recommendation

No Change

## Recommendation Details

## Paragraph

6.1.7

## Type of Comment

General

## Comment

We welcome this strategy. However, we think it could usefully include a caveat in Item 6, so that it reads: “Where appropriate, delivers street level building frontages so they are active, public facing, useable, permeable, interesting, well detailed and appropriately lit (but respecting the heritage of the buildings and their use), delivering suitable levels of passive surveillance.”

The reason for this is that the architecture and conception of some heritage City buildings is not appropriate for active permeable frontages. This applies to heritage assets from all ages – from the Tower of London, the Inns of Court, and St Paul’s to the Barbican Estate. We are anxious that the City should appreciate that the Barbican’s design is deliberately inward looking, to protect residential amenity and that installing permeable active frontages will spoil the design and the purpose.



# City Plan 2036 Consultation Comments

Para 6.1.7. The City needs a mechanism to ensure that all development should meet the highest standards of urban design; we suggest a design panel.

Contact Name

Jane Smith

Contact Organisation

Barbican Association

City Response

Noted. The policy as proposed would protect heritage assets from inappropriate development.

We agree of the importance of design panels and have a specialist team of design officers in the Development Management Team.

Recommendation

No Change

Recommendation\_Details

Paragraph

6.1.8; 6.1.13

Type of Comment

General

Comment

According to 6.1.8, “the City has a large workforce whose numbers are expected to grow substantially” but this seems inconsistent with 6.1.13 – “social and environmental responsibility is high on the agenda for many City businesses and their workforce [sic]” and “a working environment that supports these goals is essential to attract the City’s future businesses”.

Contact Name

Fred Rodgers

Contact Organisation

City Response

Noted. Workforce growth is a statement of fact – as is social and environmental responsibility being high on many business and workforce agendas. While logically more people equates to more pressure on resources the intention of the Policy S8 is to accommodate the growth in population while at the same time reducing the use of energy, water and other resources and reducing pollution. This reflects the government’s Clean Growth Strategy.

Recommendation

No Change

Recommendation\_Details





# City Plan 2036 Consultation Comments

## Paragraph

Section 6.1

## Type of Comment

Object

## Comment

The only question asked in respect of “design” in CoLC’s Local Plan – Issues and Options public consultation was – “What are the new design issues for the City that we need to consider in the Local Plan review? Should more detail be included in the design policies?”. My response was – “Whatever design issues are to be considered, the Local Plan should clearly set out not only what “good” design is required to be but also the specific parameters against which it is to be judged. Unfortunately that has been ignored.

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response

Noted.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

Object

## Comment

The implication in the grandiosely entitled "City Plan 2036" that CoLC is planning for 15 years hence has to be challenged, not least because of both its inherent lack of ambition and total disconnect from technological advance, particularly the rate. Put simply, it is both boring and outdated, not even acknowledging the Plan's own policy CEW1 - Zero Waste City in this section. As a result, substantial rethinking is required.

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response

Noted.

## Recommendation

No Change



# City Plan 2036 Consultation Comments

## Recommendation\_Details

### Type of Comment

### Object

#### Comment

It is assumed that references to the London Plan relate to the New London Plan although there appears to be no intention on the part of CoLC to adopt Design Review Panels as recommended. Arrogance and celebrity architect worship apparently justifying a refusal to accept the views of others, mostly better qualified. Worse though, architects are professionally restrained from making gratuitous public comments on the quality, or lack of, of other architects' schemes, no matter how respected they are themselves. Iconoclasm should challenge rather than be ignored.

The use of Design Review Panels, where peer review, rather than hero worship, informs and advises the planning process, should be adopted. This would give residents some confidence that inappropriate and unwanted developments of poor architectural merit, such as The Denizen. Whilst LB Islington's design review process may deliver CoLPAI, that was more as a result of CoLC pre-emptive decision to open a school before it had planning permission for its building than architectural merit.

The New London Plan also has guidance regarding maintaining design quality. All of this guidance, along with the guidance on design scrutiny should be included in this Plan.

#### Contact Name

#### Contact Organisation

Fred Rodgers

#### City Response

We agree of the importance of design panels and have a specialist team of design officers in the Development Management Team. We also agree that COL is at the forefront of delivering the highest and most sustainable design standards.

#### Recommendation

Change

#### Recommendation\_Details

Incorporate within S8 that COL seek that all development should demonstrate how it delivers the highest standard of design.

### Policy Number

D1

#### Paragraph



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

British Land's Sustainability Brief for Developments requires a minimum BREEAM Excellent rating for commercial developments and aspires to achieve Outstanding wherever feasible. British Land supports the prioritisation of BREEAM energy targets and we are one of the 22 project partners that supports, funds and oversees the Design for Performance Project, pilot testing the new Enhanced Building Energy Modelling methodology on the campus. We apply a material and water standard that exceeds current BREEAM requirements, including responsibly sourced timber, a zero waste to landfill from demolition, strip-out and construction target, a detailed material schedule of priorities and a whole life carbon assessment of building and servicing elements.

British Land's Sustainability Brief for Developments includes ambitious water management and conservation targets and well as measures to safeguard local air quality, and we will continue to develop this to align with emerging policy. British Land will continue to review opportunities to minimise local NOx emissions from heating systems and vehicular transport, and review technologies that enable energy recovery, storage and sharing wherever possible.

### Contact Name

### Contact Organisation

British Land Company PLC

### City Response

Noted

### Recommendation

No Change

### Recommendation\_Details

## Type of Comment

General

### Comment

Planning regulations should be changed to encourage new buildings to incorporate rainwater capture in their plumbing designs.

### Contact Name

### Contact Organisation

Respondent (no details provided)

### City Response

Noted. Policy CR3 Sustainable Drainage (SuDS) promotes rainwater capture through SuDS. Policy SI1 seeks "...rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network" and Policy OS2 refers to rainwater harvesting.



# City Plan 2036 Consultation Comments

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

Welcome that all developments must demonstrate the highest levels of sustainability standards but are concerned that the inclusion of provisos 'feasible' and 'viable' will make this policy difficult to enforce without independent and rigorous evaluation and monitoring by either expert in-house City personnel or consultants independent of the developer.

Contact Name

Contact Organisation

Sarah Hudson

Friends of City Gardens

City Response

Noted. If sustainability features are not feasible (eg wind turbines in an enclosed location) it would be inappropriate to insist on them being included. Any viability arguments put forward by developers would be assessed alongside other viability issues through independent verification.

Recommendation

No Change

Recommendation Details

Paragraph

6.1.12

Type of Comment

General

Comment

CoLC should be advocating the government for powers to ensure wastage of water through leakages and burst mains is sanctioned by penalties. Not only would this benefit the environment but might reduce the proliferation of road works.

Contact Name

Contact Organisation

Fred Rodgers

City Response



# City Plan 2036 Consultation Comments

The City of London' lobbying programme is beyond the scope of the City Plan however we will work in tangent with Strategic Infrastructure Advisors.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

Support

## Comment

It is encouraging to see in Policy D1: Sustainability Standards, Point 2, that all new housing will be expected to incorporate sustainable design and meet Excellent or Outstanding against the BREEAM criteria for water by incorporating principles of sustainable design. It is also encouraging to see that all new developments will be required to comply with the Mayor's London Housing Design Guide, including a target of 105 litres or less per head per day.

It is good to see in paragraph 6.1.12 and 6.6.11, opportunities to incorporate innovative design in new and existing buildings to provide positive environmental outcomes such as the inclusion of blue infrastructure, rain gardens and rainwater harvesting to mitigate against periods of intense rainfall and to reduce water use in this water stressed area.

## Contact Name

Matthew Pearce

## Contact Organisation

Environment Agency

## City Response

Support noted

## Recommendation

No Change

## Recommendation\_Details

## Paragraph

6.1.14

## Type of Comment

General

## Comment

A "zero-emissions, zero-waste, climate resilient City" is more than a must but, whilst there is reference to battery storage, there is no specific reference to photovoltaic panels. Why is this? These seem more appropriate, certainly in this context, than roof terraces and gardens. The potential to consider other alternative power sources, such as hydrogen produced in the City must be considered.

# City Plan 2036 Consultation Comments

Despite the good intentions of 6.1.14 until pollution from construction sites, NRMM, freight vehicles and private cars is tackled by a blanket ban on all such non-EV machines, there will be negligible reduction. Future development must provide a reduction.

Contact Name

Contact Organisation

Fred Rodgers

City Response

Noted. Policy D1, Paragraph 6.1.14 has been amended to add wording regarding hydrogen infrastructure. Policy S1 point 5 expects development to improve local air quality, particularly nitrogen dioxide and particulates PM10 and PM 2.5. This is supported by the City of London Air Quality Supplementary Planning Document.

Recommendation

Change

Recommendation Details

Wording in paragraph 6.1.14 has been amended to include hydrogen infrastructure. "The role of collective infrastructures such as smart grids, battery storage, heating and cooling networks and hydrogen infrastructure are highlighted as essential elements of a future zero emissions City, where decarbonised electricity, that does not contribute to future local levels of pollution, is the main energy source. "

Paragraph

6.1.15

Type of Comment

General

Comment

Why is it thought necessary to add (6.1.15) "including major new development, extensions to existing buildings and minor development" to "the policy applies to all developments in the City"? The standards required by those policies should extend to those likely to come into effect during the planning process.

Contact Name

Contact Organisation

Fred Rodgers

City Response

This wording is important to make it clear that this policy applies to a range of different development types in contrast to London Plan carbon targets which apply to Major development. Policy D1 Supporting text has been amended to clarify the range of development to which this policy applies

Recommendation

Change

# City Plan 2036 Consultation Comments

## Recommendation Details

Paragraph 6.1.15 has been amended to read " The requirement for the highest feasible and viable sustainability standards applies to all development in the City, including major new development, extensions to existing buildings, major refurbishments and minor development. Refurbishments of existing buildings are also subject to this policy where proposed works constitute development. Refurbishments bring the benefit of re-using some of the existing building's embodied carbon. Standards required are those that are in place at the time of submission of a planning application.

<u>Paragraph</u>	6.14, 6.1.5, 6.1.7
------------------	--------------------

<u>Type of Comment</u>	Object
------------------------	--------

## Comment

Draft policy D1 sets out that major development will be required to demonstrate that London Plan carbon emission and air quality requirements have been met on site. The CPA is concerned that these requirements are not always achievable in the City of London context, particularly given current technological constraints, and does not agree that off-setting should only be considered "in exceptional circumstances". The policy should adopt a more flexible and pragmatic approach to off-setting. Relying on London carbon emissions requirements is not sufficiently flexible for the life of the Local Plan, and the policy should be more specific.

Draft policy D1 should clarify what it meant by "zero-waste". The CPA presumes that this relates to zero-waste to landfill sites.

At paragraph 6.1.14, the CPA welcomes the recognition of decarbonised electricity as the main energy source. This should be promoted more strongly in policy D1 and taken into account in energy assessments, rather than relying solely upon Part L 2013 carbon factors which are now somewhat outdated and will likely be updated over the Plan period.

A distinction should be made within major development for new build and refurbishment projects. The Zero Emissions City Report, prepared by Aecom highlights that the carbon savings need to be achieved through refurbishment of existing buildings. The CPA are concerned that this policy does not differentiate the two and that it could place all of the onus on new build development.

Paragraph 6.1.15 confirms that draft policy D1 will apply to major new development, extensions to existing buildings and minor development. The CPA queries whether this is realistic, as extensions to existing buildings and minor development do not always provide opportunities to achieve the aspirations of this policy. This position is well demonstrated within the City, and is recognised by the GLA. It should be clarified how these standards would be differentiated between refurbishment schemes and new build development, with reference to Section 7 of the Mayor of London's Energy Assessment Guidance (Oct 2018), which sets out energy expectations for refurbishments. It is not always possible to achieve a BREEAM "Excellent" rating for extension or minor development, with "Very Good" typically being the highest possible rating achievable. This should be recognised in the policy and flexibility provided accordingly. Whilst paragraph 6.1.17 provides some qualification for paragraph 6.1.15, this does not go far enough, and further clarification is required.

<u>Contact Name</u>	<u>Contact Organisation</u>
---------------------	-----------------------------



# City Plan 2036 Consultation Comments

Charles Begley

City Property Association (CPA)

## City Response

Policy D1 Sustainability Standards Requires all development to demonstrate the highest feasible and viable sustainability standards.

Carbon offsetting should only be used as a last resort where it is not feasible to reach the required standards on site. The policy allows for developers to identify the exceptional circumstances for the particular site which prevent the achievement of London plan zero carbon standards. Building that are built now will be in place for decades to come and must minimise carbon emissions if we are to meet the government and London targets of zero emissions by 2015. The IPCC has highlighted the need for action in the next 12 years. It would be irresponsible if the City Plan 2036 diluted the London Plan targets.

Zero Waste City - The City needs to adopt circular economy principles to minimise waste arisings. All waste is exported from the City and other Waste Planning Authorities in London and beyond are restricting the waste capacity in their areas – as are nations which have traditionally dealt with the UKs waste. Development must play its part in reducing total waste not just waste to landfill. Refer to Circular Economy and Waste Policy CEW1 Zero Waste City and definition of Zero Waste in the glossary

Decarbonisation – London Plan guidance allows developers to use SAP 10 carbon factors which includes more up to date carbon factors. Review of the Building Regulations will update carbon factors in line with decarbonisation of grid electricity.

Amend paragraph 6.1.15 to read “Point 1 of the policy applies to all development.....” Paragraph 6.1.17 makes it clear under extensions that major extensions should be treated as new development. The potential for refurbishments to address carbon reduction will depend on the extent of the refurbishment.

The BREEAM (Building Research Establishment Environmental Assessment Methodology) is an internationally recognised, independently verified methodology for assessing the sustainability of buildings, which includes a post construction verification stage. In order to achieve consistency between different developments Policy D1 requires a BREEAM rating of “Excellent” or “Outstanding” which is higher than most authorities expect in their Local Plans.

## Recommendation

No Change

## Recommendation Details





# City Plan 2036 Consultation Comments

## Policy Number

D2

## Paragraph

## Type of Comment

General

## Comment

There must be an understanding that to meet the significant increase in office provision, that the City of London cannot solely rely on provision of new tall buildings, particularly given the restraints placed on additional height by the protected vistas and St Paul's Heights area.

We acknowledge under draft Policy D2 that the introduction of additional height and massing must be a managed process, whereby they have a positive relationship to the surrounding townscape and are sensitively designed with regard to heritage assets. We support the more positive wording of D2 which sets out that new development should 'enhance the townscape and public realm', when compared with the current Local Plan that stated new development should 'avoid harm to the townscape and public realm'.

The prevailing height of the surrounding townscape to a site can often dictate the level of height for new development that can be deemed appropriate by local planning authorities. This approach however does not necessarily factor the constraints of a site and therefore the costs needed for a site to be viable to develop. Inability to be allowed to achieve additional height on such sites can fetter any prospects of redevelopment coming forward. The redevelopment of existing buildings of limited architectural or historical merit, that in turn deliver increased office floorspace through additional height and massing should be actively encouraged, particularly those that currently have a negative impact on the conservation area. Sensitively designed extensions to existing buildings should also be encouraged by policy, especially if those buildings are structurally capable of withstanding additional storeys.

The site at 60 London Wall is located in an area of relatively modest height in the City, within the Bank Conservation Area. The approved scheme currently under construction provides an additional four storeys when compared with the previous building, sensitively designed to minimise any visual bulk when viewed at street level, and of high architectural quality. By providing an uplift of 14,665sqm GIA of office floorspace, the scheme makes a significant contribution to the City of London's office stock and demonstrates that new development within conservation areas can accommodate additional height, if designed sensitively.

We therefore encourage the draft policy to be as positively worded as possible by taking a pragmatic approach to allowing scope for additional height and massing of new buildings, through redevelopment or roof extensions on existing buildings, whilst achieving a successful design relationship with their surroundings.

## Contact Name

## Contact Organisation

LaSalle Investment Management

## City Response



# City Plan 2036 Consultation Comments

COL acknowledge that not all new development in the City will be within Tall buildings. Development that would affect the character, appearance or amenities of the buildings or area will be resisted.

Recommendation No Change

Recommendation Details

Type of Comment Support

Comment

The Trust supports part 2 of the Policy, which states that the design of all new development must ensure that:

- "The bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of the area , enhancing pedestrian permeability;
- "...The design and materials should avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm".

Contact Name

Contact Organisation

London Sephardi Trust

City Response

support noted.

Recommendation No Change

Recommendation Details

Type of Comment General

Comment

Please consider including in this policy that the design of all new development should be legible to support active travel and public transport use.

Contact Name

Contact Organisation

Chris Leong - Assistant Planner

Transport for London - Spatial Planning

City Response

# City Plan 2036 Consultation Comments

Noted. The wording for Policy D4 point 1, bullet point 1 has been amended to include the word 'legible'.

## Recommendation

Change

## Recommendation\_Details

Amended wording for Policy D4 bullet point 1 to include the word 'legible'.

## Type of Comment

Object

## Comment

Policy D2 requires that all new development must ensure that "there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments and urban greening". However, "maintenance", which is an essential requirement is omitted.

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response

Noted. Policy D2 does not refer to 'maintenance' as this is covered in Policy OS2 point 2 which states that "Major development proposals will be required to submit an operation and maintenance plan to demonstrate that the green features will remain successful throughout the life of the building".

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

New developments should provide rain cover at ground level.

## Contact Name

Respondent (no details provided)

## Contact Organisation

## City Response

Noted. Climate change can be expected to bring more unpredictable weather patterns and extreme heat – so shelter from sun and rain will be needed. Policy D1 prescribes major development to demonstrate climate resilience in building and landscape design and such shelter could be incorporated as part of this.



# City Plan 2036 Consultation Comments

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

Would like to see included in Point 2 that new developments and significant refurbishment of older buildings include habitat for Black Redstarts and bats to contribute to green corridors for migratory species.

Contact Name

Contact Organisation

Sarah Hudson

Friends of City Gardens

City Response

Noted. Policy S14 aims to ensure new development and refurbishment protects and enhances the City's biodiversity. Please note Policy OS3 paragraph 6.6.26 states that "Measures to enhance biodiversity should address the need to provide habitats that benefit the City's target species..." This includes reference to black redstarts which are one of the City's target species

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

There is a need for interest on the streets instead of blank faceless office frontages which create sterile unpleasant environments, particularly around the Middlesex Street Estate. The lobbies of large buildings should be open to the public with art exhibitions, cafes and community events.

Contact Name

Contact Organisation

Vicky Stewart

City Response



# City Plan 2036 Consultation Comments

Noted. Policy O1 paragraph 5.1.15 promotes active frontages to enhance area's vitality. Policy D2 provides for new development that has attractive and visually interesting street level elevations, providing active frontages to enhance vitality of the street. Policy S8 point 6 provides for frontages "...that are active, public-facing, usable, permeable, interesting, well-detailed and appropriately lit...". Policy D4 point 1 bullet point 3 provides for "...publicly accessible ground floors for improved pedestrian movement, where feasible".

Recommendation No Change

Recommendation Details

Paragraph 6.1.19

Type of Comment General

Comment

We welcome policy D2 and its requirement that development proposals should be appropriate to the nature of their surroundings. Taking the opportunity for a holistic approach to the potential impacts would be helpful, and we recommend that a reference to the historic environment in para 6.1.19 would be helpful. This would ensure that the section entitled 'How the policy works' better reflects the intentions of policy D2.

Suggested change to paragraph 6.1.19 - "In assessing development schemes detailed consideration will be given to the bulk and massing and special characteristics of their locality, including heritage assets and historic character."

Contact Name Contact Organisation

Tim Brennan Historic England

City Response

Support noted. It is intended that the wording for Policy D2 paragraph 6.1.19 'special characteristics of their locality' includes the historic environment.

Recommendation No Change

Recommendation Details

Paragraph 6.1.22

Type of Comment General

Comment

# City Plan 2036 Consultation Comments

6.1.22 requires that “design [of each ground floor elevation] should be given particular attention to ensure that it is legible, visually attractive and provides active frontages” but fails to define both “legible” and “visually attractive”. Are these to be judged subjectively or objectively?

Also, under 6.1.22, public art – such as murals but not Golden Lane style graffiti - should be encouraged as a way of providing active frontages.

Contact Name

Contact Organisation

Fred Rodgers

City Response

Noted. In Policy D2 paragraph 6.1.22 the word ‘Legible’ is generally accepted term to mean easy to understand the route through. ‘Visually attractive’ is of course subjective but will be judged by the design team during the application process.

Policy states that “Public art can mitigate the impacts of development by the creation of works giving visual pleasure and helping to re-establish local identity and sense of place”.

Recommendation

No Change

Recommendation Details

Paragraph

6.1.24

Type of Comment

General

Comment

The current fad for “public and private viewing galleries” which mean that “many workers, residents and visitors see the townscape from above” hardly justifies a lack of PV panels. Additionally, the higher the viewing point the longer the disconnection to the vitality at surface level and, as such offers any community benefit from tall buildings.

Contact Name

Contact Organisation

Fred Rodgers

City Response

Noted. Policy OS2 encourages extensive green roofs and BioSolar green roofs count as this type of green roof.

Public access to tall buildings is important in creating an inclusive City and public access to private open space will be encouraged. Policy S8 aims to deliver public spaces within the curtilage of the building and by maximising the amount of accessible and free to enter roof terraces and spaces.



# City Plan 2036 Consultation Comments

## Recommendation

Change

## Recommendation Details

Additional wording to include reference to BioSolar extensive green roofs in Policy OS2.

The wording for Policy S8 regarding public access will be amended from ‘...at the upper levels of buildings..’ to ‘...within the building...’ for clarity.

## Paragraph

6.1.25

## Type of Comment

General

## Comment

According to 6.1.25 “all chimneys should terminate at the highest point of the building”. Ignoring the fact that the chimney should be the highest point of a building, to ensure all smoke is released from above occupants of roof gardens and terraces, why are buildings being constructed with chimneys?

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response

Noted. The City of London agrees that the use of the word ‘chimney’ in Policy D2, paragraph 6.1.25 to describe combustion flues is out of date. This paragraph has now been amended to reflect the wording in Policy HIC2 point 7.

## Recommendation

Change

## Recommendation Details

The relevant sentence has been amended to read : "Intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development to ensure maximum dispersion of pollutants."

## Paragraph

6.1.27

## Type of Comment

General

## Comment



# City Plan 2036 Consultation Comments

It seems a perverse policy that states (6.1.27) suitable off-street facilities for smokers should be provided where feasible but, in respect of social housing supply in the City, land is too expensive. In any event, where provision isn't feasible and CoLC's policy of discouraging smoking fails, then developers must provide a sufficient number of receptacles to ensure a zero tolerance for cigarette butts being deposited on the ground. However, the lethal effect of nicotine on vegetation has to be resolved if smoking is to be encouraged in green spaces.

Contact Name

Contact Organisation

Fred Rodgers

City Response

Noted. Please refer to Policy C4, paragraph 5.3.26 regarding disturbance and nuisance from excessive noise, particularly from people drinking and smoking. Some of the more detailed issues are beyond the scope of the draft Local Plan and the existing wording is therefore considered appropriate.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

We particularly welcome that plant and building services equipment are fully screened from view. This should also include that plant noise and air intakes and emissions should not be apparent at street level or next to residences.

Contact Name

Contact Organisation

Jane Smith

Barbican Association

City Response

Noted. Please refer to Policy D2 point 2 bullet point 6 which states that plant and building services equipment are fully screened from view. Policy HIC2 point 7 states that all combustion flues should terminate above the roof height of the tallest building in the development. Policy HIC3 point 6 states that "Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment".

Recommendation

No Change

Recommendation Details

Policy Number

D3



# City Plan 2036 Consultation Comments

## Paragraph

### Type of Comment

Support

### Comment

British Land fully supports the enhancement of streets and public spaces within the City as detailed within Policy D3. Broadgate is located in close proximity of Liverpool Street Station, the most significant transport interchange within the City, which is set to experience increased footfall with the arrival of the Elizabeth Line. British Land is working with the City, TFL and Network Rail to investigate opportunities to enhance the public realm around Liverpool Street Station to improve the sense of arrival, enhance permeability and generally improve the environment for workers, residents and visitors to the area.

### Contact Name

### Contact Organisation

British Land Company PLC

### City Response

Support noted.

### Recommendation

No Change

### Recommendation\_Details

### Type of Comment

General

### Comment

Add benches where possible.

### Contact Name

### Contact Organisation

Carol Van Der Vorst

### City Response

Noted. COL produce public realm strategies and area enhancements which may incorporate seating where appropriate.

### Recommendation

No Change

### Recommendation\_Details



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

Provide more greenery and lighting for the local residents

### Contact Name

Charles Kwokori

### Contact Organisation

### City Response

Policy S14 states that the City will work to promote a greener City by protecting existing and open green space and seek the provision of new space through development, public realm or transportation improvements. Policy D3 Public Realm seeks the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes. Policy S8 and Policy D8 set out policies in relation to daylight and sunlight.

### Recommendation

No Change

### Recommendation Details

## Type of Comment

General

### Comment

TfL welcomes that this policy is principally in conformity with draft London Plan policy D7 (Public Realm). Please include a reference to putting the community at the heart of multi-functional shared public space for uses of all ages. See TfL's Small Change, Big Impact guide to changing London's public spaces.

### Contact Name

Chris Leong - Assistant Planner

### Contact Organisation

Transport for London - Spatial Planning

### City Response

Support noted. Please refer to the City of London Public Realm SPD and the City of London Transport Strategy where further information regarding shared space is provided.

### Recommendation

No Change

### Recommendation Details

# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

For consistency, The Diocese would welcome adding a reference in bullet point 4 of Policy D3 so that it includes cultural experience alongside City heritage, character and appearance. Suggested rewording of bullet point 4 to read: "...contribute positively to the cultural experience, character and appearance of the City".

### Contact Name

Fr Luke Miller

### Contact Organisation

Diocese of London

### City Response

Noted.

### Recommendation

Change

### Recommendation Details

Additional wording to Policy D3 point 4 'cultural experience'

## Type of Comment

General

### Comment

Need more rubbish bins in the City

### Contact Name

Lucy Sandford

### Contact Organisation

The C4ty - City of London Youth Forum

### City Response

Rubbish bins are not a matter for the City Plan but please refer to Policy S16 regarding the Circular Economy and Waste. A new waste and recycling contract started in April 2019

### Recommendation

No Change

### Recommendation Details

## Type of Comment

General

# City Plan 2036 Consultation Comments

## Comment

We are keen to encourage more radical measures to reduce car use and reclaim associated 'grey space' to improve the public realm in the City. This agenda is promoted quite strongly in the related draft Transport Strategy for the City but it is the draft Local Plan that will be vital in delivering key elements of that strategy.

Policy D3 on the Public Realm is broadly welcome but should be supported by an ambitious delivery programme which targets particular sites requiring intervention.

Policy D3 covers a number of important issues but is not strong enough on promoting the greening agenda as part of public realm improvements.

## Contact Name

## Contact Organisation

Neil Sinden

CPRE London

## City Response

Policy S14 states that the City will work to promote a greener City by protecting existing and open green space and seek the provision of new space through development, public realm or transportation improvements. Policy D3 Public Realm seeks the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes. Major development proposals will be required to submit an operation and maintenance plan to demonstrate that the green features will remain successful throughout the life of the building. Policy S8 and Policy D8 set out policies in relation to daylight and sunlight and Policy S12 on impact of tall buildings.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

Welcome the inclusion of trees, promotion of diversity and providing green corridors. We question whether DBE has the in-house resources to be able to deliver this and would like to see appointment of either in-house ecology professionals or the use of eco-consultants to ensure that public realm interventions do not destroy existing beneficial habitats or fail to create high quality biodiverse environments.

We raise again the imperative not to increase lighting levels in areas where there is a bat population or along routes that bats use.

## Contact Name

## Contact Organisation

Sarah Hudson

Friends of City Gardens



# City Plan 2036 Consultation Comments

## City Response

Noted. If additional resources are needed the City of London will continue to appointment consultants to provide specialist advice. Policy D8 states that “When considering proposed changes to existing lighting levels, the City Corporation will take account of the cumulative effect of development proposals...”. For Policy HIC3 has added the following wording “Lighting proposals should take account of impacts on biodiversity, especially on bats which are very sensitive to light spillage” to take account of bats. The City of London Lighting Strategy states that less light spillage can help biodiversity with many creatures such as insects, birds and bats.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

### Comment

Provide more pleasant seating areas for the summer.

### Contact Name

Sharon Smith

### Contact Organisation

## City Response

Noted. COL produce public realm strategies and area enhancements which may incorporate seating where appropriate.

## Recommendation

No Change

## Recommendation Details

## Paragraph

6.1.33

## Type of Comment

General

### Comment

The encouragement of the incorporation of artworks or integral decorative features (6.1.33) to animate spaces has to be welcomed. However, this should not include the encouragement of graffiti artists, however talented they may be.

### Contact Name

### Contact Organisation

# City Plan 2036 Consultation Comments

Fred Rodgers

## City Response

Noted. Policy D3 does not encourage graffiti artists.

Recommendation No Change

## Recommendation Details

Paragraph 6.1.34

Type of Comment General

## Comment

We welcome the reference within policy D3 to the City's heritage and the need for any public realm proposals to ensure that relevant features are identified and taken into account. Given the important contribution that the City's 27 conservation areas make to the quality of the built environment and their potential vulnerability to inappropriate public realm schemes, we consider that this policy would be further strengthened by an explicit reference to them within the policy wording. We also recommend that relevant conservation area management strategies/SPDs are referred to at 6.1.34 in order to give an accurate picture of the policy context for these areas.

Suggested change - Policy D3: Public Realm – amend fourth bullet point to read: "The City's heritage, including conservation areas and their setting where affected, identifying and retaining ....."

Suggested change - amend paragraph 6.1.34 to read: "Further information on design and requirements for the public realm is available in the City Public Realm SPD and conservation area management strategies or SPDs where appropriate".

Contact Name Contact Organisation

Tim Brennan Historic England

## City Response

Noted. The suggested changes are covered in existing policies and therefore no further wording changes are required.

Recommendation No Change

## Recommendation Details



# City Plan 2036 Consultation Comments

## Policy Number

D4

## Paragraph

## Type of Comment

Support

## Comment

British Land are strongly supportive of Policy D4. Enhanced pedestrian permeability and connectivity is being delivered as part of various approved, consented and schemes under construction at Broadgate.

## Contact Name

## Contact Organisation

British Land Company PLC

## City Response

Support noted.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

The success of investment and development within the Eastern Cluster footprint is generating an ever increasing workforce who are using more pavement space as more pedestrians move through the area. This is combined with a significant increase in cycling, which is now the most popular mode of street transport in the City, as well as an increasing use of rail transport, which will be further increased when the Elizabeth Line opens.

The focus on pedestrian priority is welcomed and will be imperative for the Cluster given the predicted increase in pedestrian flows as a result of the introduction of the Elizabeth Line and the volume of developments in the pipeline. It is clear, even today, that a significant change across the City Cluster is urgently needed to provide a vastly improved pedestrian environment for the central business district that is truly world-class and welcoming.

The City of London has a rich history of providing secondary mid-block pedestrian links, these should be both encouraged and rediscovered given their ability to ease pressure on roads and pavements whilst providing the opportunity for respite from vehicular traffic.

## Contact Name

## Contact Organisation



# City Plan 2036 Consultation Comments

Tenacity

## City Response

Noted.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

While I accept that the City of London is a global financial centre so that role will always take precedence over everything else, do please preserve the labyrinth of narrow lanes, alleyways and small squares which are unique and a marvel to all who are able to explore them.

## Contact Name

## Contact Organisation

Barbara Brownlee

## City Response

These attributes are fundamental to the character of the City and will be preserved through policies including D4 point 2 “Development should .... not lead to the loss of routes and spaces that enhance the City’s function, character and historic interest”. Policy D4 second bullet point also refers to network of characteristic streets, courtyards and alleyways. Please refer to Policy S11 paragraph 6.4.10 that the “The pattern of streets, lanes, alleyways and other open spaces, such as squares and courts, is a distinctive element of the City’s townscape and is of historic significance...”.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

Object

## Comment

The CPA is concerned with the policy requirement to provide new pedestrian routes through buildings and development sites, and providing publicly accessible ground floors. Such routes, where feasible, have a big impact on the design of buildings, including the ground floor layout, access and safety and core position. The provision of pedestrian routes through buildings is therefore not often feasible, practical or viable. The draft Policy should reflect the constraints of providing such routes and take a pragmatic approach to their inclusion.





# City Plan 2036 Consultation Comments

## Contact Name

Charles Begley

## Contact Organisation

City Property Association (CPA)

## City Response

Noted. We have added wording to Policy D4 to point 1, bullet point 2.

## Recommendation

Change

## Recommendation Details

Added additional wording 'where feasible' to Policy D4 point 1, bullet point 2.

## Type of Comment

General

## Comment

TfL requests that the City Plan specifies Legible London as the official wayfinding system in the City.

## Contact Name

Chris Leong - Assistant Planner

## Contact Organisation

Transport for London - Spatial Planning

## City Response

Noted. Additional wording has been added to Policy D4 paragraph 6.1.38. Further information regarding Legible London is set out in the City of London Transport Strategy.

## Recommendation

Change

## Recommendation Details

Following wording added: "The City Corporation has adopted Transport for London's Legible London as a means of improving wayfinding within and through the City of London".

## Type of Comment

Support

## Comment

The requirement that developments should enhance pedestrian permeability and not lead to the loss of routes and spaces that enhance the City's function, character and historic interest is supported, particularly with regard to ensuring that pedestrian routes to riverside areas are not lost as part of future development.

# City Plan 2036 Consultation Comments

## Contact Name

Michael Atkins

## Contact Organisation

Port of London Authority

## City Response

Support noted.

## Recommendation

No Change

## Recommendation Details

## Paragraph

6.1.35

## Type of Comment

General

## Comment

A serious question has to be asked as to why the intensification (6.1.35) has been allowed. Why the potential for conflict between modes of travel, where “most travel in and through the City is on foot” is increased, is a question CoLC must answer, especially as it is responsible for the intensification.

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response

Noted. Policy D4 paragraph 6.1.37 refers to ‘intensification’ which has been permitted because it enables the City to compete with other global financial and business centres. Please refer to the draft London Plan (Policy SD4, paragraph 2.4.5A) which identifies the City of London as a nationally important location for globally-oriented financial and business services. The City of London’s Transport Strategy main is to create pedestrian priority streets for traffic calming and vehicle access restrictions.

## Recommendation

No Change

## Recommendation Details

## Paragraph

6.1.36

## Type of Comment

General



# City Plan 2036 Consultation Comments

## Comment

How will spreading the footfall across a wider area help create a more vibrant and comfortable street network? For instance, re-introduction of highwalks above the City would take pedestrians away from the streets but if that helps create a “vibrant and comfortable street network”, who will be using the street network (6.1.36)?

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response

Noted. It is envisaged with an increased number of pedestrians using the City streets increasing the number of pathways would help create a more vibrant and comfortable street network. The highwalks provide an additional (not replacement) route through the City's medieval street pattern which is already under pressure especially during peak hours. Estimates forecast this will increase yet more with t population growth to the end of the City Plan period.

## Recommendation

No Change

## Recommendation\_Details

## Policy Number

D5

## Paragraph

## Type of Comment

General

## Comment

British Land consider publicly accessible terraces and viewing galleries may not be appropriate in all buildings. British Land request that Policy D5 be revised to reflect the appropriateness of publicly accessible spaces at upper levels and allow flexibility where it may be more appropriate / more appealing to provide publicly accessible spaces at lower levels.

## Contact Name

## Contact Organisation

British Land Company PLC

## City Response



# City Plan 2036 Consultation Comments

Noted. Public access to buildings is important in creating an inclusive City and public access to private open space will be encouraged. Policy S8 point 3 aim to deliver public spaces within the curtilage of the development and by maximising the amount of accessible, inclusive and free to enter roof terraces and spaces, including in tall buidlings. Policy S12 point 4 and Policy D5 point 1 require free to enter publicly accessible areas will be required as part of all tall building developments but this does not state it is required to be a public viewing gallery. Please refer to Policy S12 paragraph 6.5.11 regarding upper levels of buildings.

Recommendation

No Change

Recommendation Details

Type of Comment

Object

Comment

Tenacity is concerned with regard to the proposed blanket policy requirement to provide public access in all tall building developments, particularly as draft policy S12 defines tall buildings as those over 75m. Taking account of the significant number of new, consented and proposed buildings in the City that already incorporate high level publically accessible spaces, we propose that the policy wording is amended to provide greater flexibility and provide opportunities for individual schemes to provide alternative forms of public benefit.

Contact Name

Contact Organisation

Tenacity

City Response

Noted. Public access to tall buildings is important in creating an inclusive City and public access to private open space will be encouraged. Policy S8 point 3 aim to deliver public spaces within the development and by maximising the amount of accessible, inclusive and free to enter roof terraces and spaces. Policy S12 point 4 and Policy D5 point 3 require free to enter publicly accessible areas will be required as part of all tall building developments but this does not state it is required to be a public viewing gallery. Please refer to Policy S12 paragraph 6.5.11 regarding upper levels of buildings.

Recommendation

No Change

Recommendation Details

Type of Comment

Object

Comment



# City Plan 2036 Consultation Comments

The CPA is concerned with regard to the policy requirement to provide public access in all tall building developments, particularly as draft policy S12 defines tall buildings as those over 75m. The CPA seeks an amendment to this policy such that part 2 acknowledges that “publicly accessible areas will be required in appropriate circumstances, where it is feasible, practical and viable as part of tall building developments”.

It is noted that paragraph 6.1.42 seeks publicly accessible areas at upper levels. The CPA contends that where public access is deemed to be feasible in a tall building, this could be provided elsewhere in the building, not necessarily at upper levels, particularly if a more appealing offer might be achievable at a lower level in the building. The policy and supporting text should be suitably flexible to allow an appropriate provision to be made. The CPA welcomes the acknowledgment in the supporting text for other forms of open space provision i.e. retail, leisure or education.

## Contact Name

Charles Begley

## Contact Organisation

City Property Association (CPA)

## City Response

Noted. Public access to tall buildings is important in creating an inclusive City and public access to private open space will be encouraged. Policy aims to deliver public spaces within the curtilage of the building and by maximising the amount of accessible and free to enter roof terraces and spaces. Policy S12 and Policy D5 require free to enter publicly accessible areas will be required as part of all tall building developments but this does not state it is required to be a public viewing gallery. Please refer to Policy S12 regarding upper levels of buildings.

## Recommendation

Change

## Recommendation Details

The wording for Policy S8 point 3 has been amended from ‘...at the upper levels of buildings...’ to ‘...within the building...’ for clarity.

## Type of Comment

General

## Comment

Would like more rooftop gardens and terraces.

## Contact Name

Inma Ferrer

## Contact Organisation

## City Response

Noted. Roof gardens, terraces and viewing galleries are encouraged in Policy D5.

## Recommendation

No Change



# City Plan 2036 Consultation Comments

## Recommendation\_Details

### Type of Comment

General

### Comment

We welcome the policy on roof terraces but would like it strengthened to prevent disturbance to residents. We would like to see the replacement of “significantly adverse” impacts with “adverse impacts” and to specifically mention noise disturbance. Experience in the Barbican with office terraces right across the street from flats has shown that active use of terraces by office workers can cause major disturbances to residents in the evenings.

### Contact Name

Jane Smith

### Contact Organisation

Barbican Association

### City Response

Noted. Policy D5 bullet point 1 point 2 states “There would be no immediate overlooking of residential premises, unacceptable disturbance from noise or other significantly adverse impacts on residential amenity”. Where they are issues which impact on residential amenity developers would be encouraged to install extensive green roofs which would have restricted access to them. Policy H3 states that the amenity of existing residents will be protected by resisting uses which would cause unacceptable disturbance from noise.

### Recommendation

No Change

## Recommendation\_Details

### Type of Comment

General

### Comment

The City should promote more publicly accessible rooftops and roof gardens. These are an important public amenity and might help the City to be livelier at weekends. More green roofs should be open to the public.

### Contact Name

John Sgouros

### Contact Organisation

### City Response

Noted. Policy S8 point 3 promotes free to enter roof terraces and spaces, including in tall buildings and along the river and City landmarks.

### Recommendation

No Change



# City Plan 2036 Consultation Comments

## Recommendation\_Details

### Type of Comment

Support

### Comment

Good. Its about time there was some recompense for the public space at ground level that gets eaten up by developments.

### Contact Name

Peristera

### Contact Organisation

### City Response

Support noted.

### Recommendation

No Change

## Recommendation\_Details

### Type of Comment

General

### Comment

Welcome more public access to roof terraces but the policy should include a presumption that roof areas must include habitats created for Black Redstarts.

### Contact Name

Sarah Hudson

### Contact Organisation

Friends of City Gardens

### City Response

Noted. Many of the free access spaces on the top of the buildings are freely accessible and do not require pre-bookings in advance. Through Policy OS2 we encourage both extensive or intensive green roofs and varying green roof substrate levels will be encouraged to improve rainwater retention and enhance biodiversity. Extensive green roofs would be encouraged where there are issues which impact on residential amenity. Policy D9 states that lighting should be sensitively co-ordinated with the overall design of any new development. Paragraph 6.1.66 states that the 'Avoidance of light spillage onto urban green spaces is crucial for biodiversity in the urban setting'.

### Recommendation

No Change

## Recommendation\_Details

# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

Free public viewing galleries could be accused of being a bit of clever 'bread and circuses' from the Corporation of London. A Section 106 Agreement that obliged the developer of a corporate HQ to pay for truly affordable public housing somewhere else in London would be a lot more useful. I do like the looks of the new building though (Fen Court) and will visit the roof next time I'm in the area.

### Contact Name

Somali Pirate

### Contact Organisation

### City Response

Noted. Affordable Housing Policy requires developers to contribute to affordable housing. Please see Policy S27 for further information.

### Recommendation

No Change

### Recommendation\_Details

## Type of Comment

Support

### Comment

Excellent, there should be more of these in UK cities [referring to Fen Court roof garden]. A common concept in Kuala Lumpur, the best example being the thirty thousand square foot "Secret Garden" on top of the 1 Utama shopping centre. Only open at weekends but free and delightful.

### Contact Name

stevekbk

### Contact Organisation

### City Response

Support noted.

### Recommendation

No Change

### Recommendation\_Details

## Paragraph

6.1.41





# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

“Appropriate safety features should be included to prevent people from jumping or falling” (6.1.41) should extend to preventing people from being pushed. Also, under 6.1.41, if users of roof terraces cannot do so without any risk of pollution emissions from combustion plant, then use should be banned.

### Contact Name

Fred Rodgers

### Contact Organisation

### City Response

Noted. Additional wording has been added to Policy D5 point 2. This wording is sufficient and covers safety and security on roof terraces and gardens.

### Recommendation

No Change

### Recommendation Details

## Paragraph

6.1.42

## Type of Comment

Object

### Comment

The assertion in 6.1.42 is without substance. Viewing galleries, “other forms of open space provision”, even “retail, leisure or educational facilities” are simply used as justification for the folly of permitting tall office blocks. As always in the City residential provision is absent from suggested use, somewhat surprisingly as this would certainly create an inclusive City.

### Contact Name

Fred Rodgers

### Contact Organisation

### City Response

Noted. Please note that the City of London is included in the draft London Plan see Policy SD5 (Part B) CAZ which states that “residential development is not appropriate in defined parts of the City of London...”.

### Recommendation

No Change

### Recommendation Details



# City Plan 2036 Consultation Comments

## Policy Number

D6

## Paragraph

6.1.46

## Type of Comment

Object

## Comment

“The design of new shopfronts should include a signage zone that is consistent across a parade of shops of matching or similar design” (6.1.46)” seems unnecessarily restrictive, denying inspiration and boring. Additionally, such a requirement may persuade retailers to locate in other boroughs instead.

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response

Objection noted. We will remove reference to Paragraph 6.1.46 (Policy D6).

## Recommendation

Change

## Recommendation Details

Removed paragraph 6.1.46 (Policy D6).

## Paragraph

6.1.48

## Type of Comment

Object

## Comment

“Openable shopfronts and large serving openings are not normally acceptable as they create a void at ground floor level that could harm the appearance of buildings and create potential amenity issues” (6.1.48) ignores any historic character of those shops. Also, it could be argued that the policy assertion is, at least open to debate.

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response



# City Plan 2036 Consultation Comments

Noted. It is a point of fact that such shopfronts are not normally acceptable. The phrasing of Policy D6, Paragraph 6.1.48 does not preclude such openings if the historic character of the shop would be enhanced by one.

Recommendation No Change

## Recommendation\_Details

Paragraph 6.1.49

Type of Comment General

## Comment

Presumably “external shutters are not normally acceptable” doesn’t extend to historic shopfronts?

Contact Name

Contact Organisation

Fred Rodgers

## City Response

Noted. Policy D6, Paragraph 6.1.53 has been amended to provide clarity on external shutters.

Recommendation Change

## Recommendation\_Details

The wording in paragraph 6.1.53 has added additional wording regarding external shutters - "External security shutters are not normally acceptable, except where they are a characteristic of historic shopfronts...".

Paragraph 6.1.7

Type of Comment Object

## Comment

Rather than “meeting the highest standards of urban design” CoLC should be aiming to set those standards (6.1.7)

Contact Name

Contact Organisation

Fred Rodgers



# City Plan 2036 Consultation Comments

## City Response

Noted. Policy D6 has been amended to provide clarity on external shutters.

## Recommendation

Change

## Recommendation\_Details

The wording in paragraph X.X.X (currently 6.1.52) has added additional wording regarding external shutters "except where they are a characteristic of historic shopfronts".

## Policy Number

D7

## Paragraph

## Type of Comment

Support

## Comment

We welcome the banning of A boards on pavements and would like to see better enforcement of pavement clutter.

## Contact Name

Jane Smith

## Contact Organisation

Barbican Association

## City Response

Support noted. Enforcement is outside the scope of the Local Plan however please refer to paragraph 1.3.22. The City of London Transport Strategy takes a zero-tolerance approach to A-boards and this is referred to in Policy D7 paragraph 5.1.56.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment



# City Plan 2036 Consultation Comments

We are supportive of the retention of a specific policy for advertisements within the Draft City Plan 2036. Nevertheless, we feel an opportunity has been missed to update the policy to take a more proactive approach at guiding the positive enhancements to the public realm that well-designed advertisements can bring. We feel that this can be achieved whilst also respecting the City's character.

The wording of Policy D7 and approach is retained almost identically from the current adopted Local Plan (2015) Policy DM10.6. It has not been significantly altered in over a decade with a similar wording and approach in the now superseded Core Strategy (2001) Policy CS10 and Unitary Development Plan (2002) Policies ENV30 & ENV31.

Out of Home (OoH) advertising has changed significantly over the past decade, with modern approaches to design providing many new beneficial approaches to the streetscape and public realm as well as achieving improved sustainability outcomes. The current draft policy wording does not reflect this other than via the inclusion of a requirement for advertising to be "of a high standard of design". It is important that policy is updated to reflect this modernisation and to take a more proactive approach to managing and directing high quality advertisement within the City.

The current draft policy D7 notes that advertising must be of a "high standard of design" yet it does not specify what would constitute this, or the benefits that such design could make to the public realm. The Hoarding Advice Note contained within the City Corporation's Design Guidance provides a good example of further guidance on the positive impact of good quality design. It demonstrates a positive approach to guiding high quality design of hoardings in the City, encouraging "an imaginative approach to the design of hoarding displays", recognising that "hoardings can offer opportunities to provide information, to add interest and enhance the street scene whilst sites are developed" and "An attractive eye-catching hoarding in the right location is likely to be more effective than a dull uninspired design". This advice note provides examples of successful and well-designed hoardings as guidance, design elements to be embraced as well as those to be avoided and restrictions.

We would welcome this proactive approach to guiding high-quality design to be reflected in policy, and the guidance extended to cover a wider range of large advertisement space such as building wraps and shroud advertisements. We suggest the following two amendments to the emerging policy:

1. The updating of the Hoarding advice note to a 'Hoardings and Advertisements Advice Note', to deal with other types of advertising and set out key principles for larger scale OoH advertising. The issues that this could address could include, but not be limited to: design; public realm benefits; sustainability; appropriate scales; and timescales.
2. A third point to be included within Policy D7 that acknowledges the positive impact of high quality design and references the Advice Note within the Design Guidance.

## Contact Name

Steven Tokaya

## Contact Organisation

BlowUP Media

## City Response

Noted. Policy states that the display of advertisements on construction site hoardings will be revisited unless directly related to the development site. However it is acknowledged that they may provide some visual interest in the street scene.



# City Plan 2036 Consultation Comments

## Recommendation

Change

## Recommendation\_Details

Include within policy that construction hoardings may provide opportunity to add interest to the street scene by including images and information about the development under construction.

## Policy Number

D8

## Paragraph

## Type of Comment

Object

## Comment

Greater clarity is needed on the operation of the daylight amenity policy to ensure an appropriate balance is achieved between competing interests and that those reading the policy are clear as to what they can expect from planning decisions. In our view the policy as drafted does not provide the flexibility for the delivery of the plan's objectives.

The BRE guidelines set out a 20% reduction in VSC as being noticeable. It then becomes a matter of judgement as to how far below this is unacceptable in a City Centre context. There is no explicit reference to the fact that the BRE Guidelines need to be applied flexibly to allow for the office stock to be replenished.

Further the degree of flexibility applied should be cognisant of the wider planning benefits of the scheme so that the protection of individuals' daylight amenity does not overly constrain development that is in the wider public benefit.

Lastly, the focus of the policy should make it clear that the appropriate test is not to consider the reduction but to consider the levels of light that remain for the occupier and whether those levels are appropriate for an urban location having regard to the need to make best use of land particularly in opportunity areas. It will not be appropriate for development to be constrained (or prevented) by dwellings which have enjoyed unusually high levels of daylight / sunlight, in an urban context.

Sunlight and daylight is perhaps one of the biggest constraints and challenges the city faces when redeveloping sites and if the policy is not explicit about the flexibility needed to deliver the accommodation needed for the plan period then it could undermine the delivery of office accommodation and the plan's objectives.

In summary we would recommend:

- Explicit reference to the need for flexibility against the BRE Guidelines;
- A focus of the policy on the remaining light levels – not the reduction;
- A reference to the need to consider the wider planning benefits of the scheme.

# City Plan 2036 Consultation Comments

## Contact Name

## Contact Organisation

GMS Estates and MacTaggart Third Fund

## City Response

Noted. We will provide further guidance on daylight, sunlight and the cumulative impact of them following the Mayor's indication that guidelines will be produced to support the London Plan.

It is acknowledged that alternative wording may provide greater clarity in the policy.

## Recommendation

Change

## Recommendation\_Details

Amend bullet point 1 of Policy S8 to states that daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards.

Include reference of the City's high density urban environment and acknowledge of developments which may be beneficial to the public.

## Type of Comment

Support

## Comment

The Trust supports part 1 of the policy, which states: "Proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and open spaces is not reduced noticeably to unacceptable levels, taking account of the Building Research Establishment's guidelines."

## Contact Name

## Contact Organisation

London Sephardi Trust

## City Response

Support noted.

## Recommendation

No Change

## Recommendation\_Details

## Paragraph

6.1.59 - 6.1.60

## Type of Comment

Object



# City Plan 2036 Consultation Comments

## Comment

From a resident's point of view and, in particular one who was misled by a CoLC officer on the same, an interpretation of 6.1.60 should be clearly set out. What does "the City Corporation will take into account unusual existing circumstances, such as development on an open or low-rise site and the presence of balconies or other external features which limit the daylight and sunlight that a building can receive" actually mean. Does it mean the interpretation offered on 2 June 2016 or that used by CoLC subsequently, as in 16/00590/FULL, for example?

In any event, it is highly inappropriate that BRE should be paid to act as both judge and jury in assessing changes in daylight and sunlight arising from new development. CoLC in seeking "independent verification of these assessments at the developer's expense" must not instruct BRE. It is notable that City Corporation has instructed Anstey Horne to provide it with specialist compensation advice for the loss of rights of light The Denizen will cause. Getting money in for CoLC is obviously a lot more important than the amenity of its residents.

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response

It's not appropriate to respond to the issue of previous apparent contradictions.

The expert advice of BRE guidelines which use a standard recognised methodology and which are impartial, will be judged accordingly by COL officers.

## Recommendation

No Change

## Recommendation Details

## Paragraph

6.1.60

## Type of Comment

General

## Comment

"Noticeably" to "unacceptable levels" are subjective measures, and residents have not found that subjective assessments have protected levels of daylight and sunlight in the past.

We welcome the commitment in 6.1.10 to take account of the cumulative effect of development proposals and to take account of existing features such as the existence of balconies that limit the amount of daylight and sunlight a building can receive. However, we would like to see some criteria for assessing cumulative impact and a resistance to simply allowing developments that impose "minor" reductions in daylight or sunlight on adjacent residences. It has been a willingness in the past to allow successive developments to reduce the daylight and sunlight reaching residential flats that has resulted over time in substantial losses of daylight





# City Plan 2036 Consultation Comments

and sunlight to many Barbican flats.

We particularly welcome the statement in 6.1.60 that “Where appropriate, the City Corporation will take into account unusual existing circumstances, such as... the presence of balconies or other external features, which limit the daylight and sunlight that a building can receive.” Because of a failure to take account of the Barbican’s balconies in the past many flats have experienced substantial losses of daylight and sunlight from adjacent developments.

## Contact Name

Jane Smith

## Contact Organisation

Barbican Association

## City Response

Noted. We will provide further guidance on daylight, sunlight and the cumulative impact of them following the Mayor's indication that guidelines will be produced to support the London Plan.

The approach to balconies and roof terraces in the Local Plan is consistent with BRE guidance.

It is acknowledged that alternative wording may provide greater clarity in the policy.

## Recommendation

Change

## Recommendation Details

Amend bullet point 1 of Policy S8 to states that daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards.

## **Policy Number**

D9

## **Paragraph**

## **Type of Comment**

General

## **Comment**

Draft policy D9 seeks that major development proposals must consider the lighting strategy early on in the design process. While the CPA recognises this is an important element of design, decision makers should understand it is often not designed up to any level of detail at the application stage. Accordingly, the CPA seeks flexibility in the draft policy such that lighting can be designed at the appropriate stage of a project, and not unduly constrain design approaches at RIBA Stage 2 and 3.

## **Contact Name**

Charles Begley

## **Contact Organisation**

City Property Association (CPA)



# City Plan 2036 Consultation Comments

## City Response

Amendments to the National Planning Practice Guidance in 2019 introduced a requirement to consider lighting issues at the design stage. It is acknowledged the need for lighting schemes to be considered at early stages of the design process and submission with a lighting strategy to accompany a planning application that includes installation of external lighting.

Recommendation Change

## Recommendation Details

Incorporate additional text to have regard to the City of London Lighting Strategy and submission of a Lighting Strategy with planning proposals that include installation of the external lighting.

Type of Comment General

## Comment

Draft policy D9 seeks that major development proposals must consider the lighting strategy early on in the design process. It is important that decision makers understand that elements such as lighting are often not designed up to any level of detail at the application stage. Accordingly, the CPA seeks flexibility in the draft policy such that lighting can be designed at the appropriate stage of a project, and not unduly constrain design approaches at RIBA Stage 2 and 3.

Contact Name Charles Begley  
Contact Organisation City Property Association (CPA)

## City Response

Amendments to the national Planning Practice Guidance in 2019 introduced a requirement to consider lighting issues at the design stage it is acknowledged the need for lighting schemes to be considered at early stages of the design process and submission with a lighting strategy to accompany a planning application that includes installation of external lighting.

Recommendation Change

## Recommendation Details

Incorporate additional text to have regard to the City of London Lighting Strategy and submission of a Lighting Strategy with planning proposals that include installation of the external lighting.

Type of Comment Support

## Comment



# City Plan 2036 Consultation Comments

The Diocese supports the Lighting Policy D9 specifically where it provides for lighting buildings that contribute positively to the unique character and grandeur of the City townscape by night and recognises that within the Square Mile, St Paul's Cathedral is first and foremost in scale and history in this category.

Contact Name

Fr Luke Miller

Contact Organisation

Diocese of London

City Response

Noted.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

UBS, 1 Golden Lane, uses blinds at night to reduce light pollution since its internal lighting switches on and off at regular intervals for security purposes. Fitting and operating blinds is a simple solution to essential light pollution and should be enforced by condition (D9.2).

Contact Name

Fred Rodgers

Contact Organisation

City Response

Noted. Policy D9 states that lighting should be sensitively co-ordinated with the overall design of any new development and Policy HIC3 point 3 states that "Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed...".

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment



# City Plan 2036 Consultation Comments

Item 2. We would like to see more on how this policy would work. We would like to see the City state that it will require developers to install automatic switches to switch off lights between 8 am and 7 pm where offices overlooking residences, and to ensure that such systems are commissioned and operated. Where lighting is needed for late night working the City should require these building operators to install full density blinds and to maintain and operate them, so there is no light spillage between 7pm and 8 am. We would also like to see restrictions on the lighting that contractors may use on their construction sites. These are often the brightest lights in the City at night and are well beyond what is needed for safety.

## Contact Name

Jane Smith

## Contact Organisation

Barbican Association

## City Response

It is acknowledged the need for lighting schemes to be considered at early stages of the design process and submission with a lighting strategy to accompany a planning application that includes installation of external lighting.

## Recommendation

Change

## Recommendation Details

Incorporate additional text to have regard to the City of London Lighting Strategy and submission of a Lighting Strategy with planning proposals that include installation of the external lighting.

## Type of Comment

General

## Comment

Light posts should use renewable energy. Re. dark alleys, develop footpaths that generate electricity.

## Contact Name

Lucy Sandford

## Contact Organisation

The C4ty - City of London Youth Forum

## City Response

New LED lighting is currently being rolled out across the Square Mile. The aim of S7 Smart Infrastructure and Utilities is to minimise the demand for power. The highways team at CoL have looked at used of Pavegen to generate footpath power. The capacity to generate is not sufficient enough to warrant inclusion in the City Plan – in contrast to the impact of the Combined Heat & Power plant for example for energy conservation.

## Recommendation

No Change

## Recommendation Details



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

The intention of policy D9 is supported, but it is considered that part 2 which refers to the need to reduce the potential for light spillage from internal lighting, particularly where it would impact adversely neighbouring occupiers, the wider public realm and biodiversity, must also refer to external lighting. Developments adjacent to the River Thames must ensure that any proposed lighting does not have a detrimental effect on river ecology and navigation.

Lighting in riverside areas is referred to in the City's Lighting Strategy, (2018) and the PLA considers that reference must be given to this within the Local Plan policy.

### Contact Name

Michael Atkins

### Contact Organisation

Port of London Authority

### City Response

Amendments to the national Planning Practice Guidance in 2019 introduced a requirement to consider lighting issues at the design stage. It is acknowledged the need for lighting schemes to be considered at early stages of the design process and submission with a lighting strategy to accompany a planning application that includes installation of external lighting.

### Recommendation

Change

### Recommendation Details

Incorporate additional text to have regard to the City of London Lighting Strategy and submission of a Lighting Strategy with planning proposals that include installation of the external lighting.

For Policy HIC3 paragraph 4.1.31 the following wording have been added to the text "Lighting proposals should take account of impacts on biodiversity, especially on bats which are very sensitive to light spillage" to take account of ecology.

## Type of Comment

General

### Comment

Planning policy should be introduced to improve the lighting of pseudo public spaces at night time.

### Contact Name

Respondent (no details provided)

### Contact Organisation

### City Response

The City Corporation has produced a Lighting Strategy which addresses night-time lighting.



# City Plan 2036 Consultation Comments

## Recommendation

No Change

## Recommendation\_Details

## Paragraph

6.1.63-6.1.64

## Type of Comment

General

## Comment

Point 3: We are concerned that external lighting may adversely impact on bats. Policy should include a proviso that lighting levels must not be increased where buildings are in areas where bats roost and forage or travel between sites, and that the City must explore ways to decrease lighting levels or introduce red spectrum lighting.

6.1.63: Welcome the comment that 'avoidance of light spillage onto urban green spaces is crucial for biodiversity in the urban setting'.

6.1.64: We are concerned about highlighting buildings, particularly bridges which are favoured roosting sites. The type of lighting should only be undertaken after a full survey by a bat ecologist.

## Contact Name

Sarah Hudson

## Contact Organisation

Friends of City Gardens

## City Response

Noted. Policy D9 point 2 states that "Development should incorporate measures to reduce the potential for light spillage from internal lighting, particularly where it would impact adversely neighbouring occupiers, the wider public realm and biodiversity". Policy OS3 paragraph 6.6.26 recognise bats as one of the City's target species. Policy D9 paragraph 6.1.66 states that "The external illumination of buildings, where appropriate, should be carefully designed to ensure visual sensitivity, minimal energy use and light pollution...".

## Recommendation

Change

## Recommendation\_Details

Policy HIC3 paragraph 4.1.31 has been updated to include wording regarding lighting proposals for bats.



# City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S9: Vehicular Transport and Servicing

### Policy Number

### Paragraph

### Type of Comment

Object

### Comment

You must stop excluding taxis from your plans . They are a door to door service for people who often depend on them due to heavy luggage, injuries, disability etc.

### Contact Name

Alex Workman

### Contact Organisation

### City Response

Taxis are included in the Plan and are classed as essential traffic. Policy VT3 addressess private transport for people with access needs.

### Recommendation

No Change

### Recommendation\_Details

### Type of Comment

General

### Comment

How do people get to these new shops and how does the owner get his stock delivered?

### Contact Name

Cabbie67

### Contact Organisation

### City Response

Policy VT2 sets out the policy on freight and servicing.

### Recommendation

No Change

### Recommendation\_Details



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

Please include in this policy that proposals which are contrary to the safeguarding of strategic infrastructure improvement projects will be refused.

The promotion of 'further improvements' to capacity and step-free access is mentioned in section 3. TfL requests more specific details about these plans to be shared with us.

Please clarify in section 4 of this policy that freight trips should also be minimised through encouraging modal shift, promoting sustainable essential freight functions by foot or bicycle for shorter distances.

### Contact Name

### Contact Organisation

Chris Leong - Assistant Planner

Transport for London - Spatial Planning

### City Response

Is not considered necessary to add wording on refusal of strategic infrastructure projects.

Policy includes sufficient wording on step free access.

Wording has been added to part 3 of the policy to clarify maximising the benefit of freight trips, as below.

### Recommendation

Change

### Recommendation Details

Wording has been added to part three of the policy as follows;

"Minimising the impact of freight and servicing trips through such measures as including the provision of on-site servicing facilities, the timing of deliveries outside peak hours, the adoption of area-wide solutions, and the use of freight consolidation and promoting deliveries by foot or bicycle for shorter distances";

## Type of Comment

General

### Comment

Need a reduction in traffic and more pedestrianisation, resulting in less pollution.

### Contact Name

### Contact Organisation

David Sexton

### City Response





# City Plan 2036 Consultation Comments

These are all aims of the Plan.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

We are in support of the requirements for major commercial development to provide for freight consolidation.

Suggested Amendments

This must be clarified to confirm the schemes liable for this on the basis that the practical implications of freight consolidation will vary from occupant size and types, i.e. micro and small the medium sized business occupants. We would suggest that the threshold for freight consolidation be set at 10 000sqm; a reasonable bar above which consolidation would have operational efficiency and ensure that developments are able to meet such requirements.

In respect of the requirement for vehicles to enter and exit the site in forward gear, it is clear that the City (incorporating significant elements of the Eastern Cluster) is characterised in places by narrow lanes, pedestrian routes, and small building footprints. The requirement for servicing vehicles to enter and exit small sites is therefore impractical for some sites and is simply not possible. On this basis, we would propose an exception in relation to sites which feasibly cannot incorporate such a servicing layout.

Contact Name

Contact Organisation

Dr Sophie V Taysom

Merchant Land

City Response

Policy VT2 has been amended to include further guidance on consolidation. It was decided not to set a physical threshold for consolidation, in order to provide flexibility to understand the localised impact of development.

The requirement for servicing vehicles to enter and exit in forward gear is an existing policy requirement due to safety requirements.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

# City Plan 2036 Consultation Comments

1. I have responded in full to CoLC's draft Transport Strategy and wish to stress that the Plan must incorporate a reduction of air pollution through an absolute ban on both diesel and petrol powered vehicles, of all types within the City. Additionally, until such time as that is effective, the City has to be a non-idling engine zone, including taxi ranks, with proper signage and a zero-tolerance to offenders.

2. The need to encourage EVs is such that measures such as free parking – in designated parking areas – and a greater flexibility in the issue of penalty notices - to delivery vehicles illegally parking – where the vehicles concerned are EVs, should be introduced.

Contact Name

Contact Organisation

Fred Rodgers

City Response

The City Corporation is taking action to facilitate electric vehicles including through electric charging ranks.

There is currently a ULEZ within the City and two zero emission zones have been introduced covering Barbican and Golden Lane and the City Cluster by 2022.

The City Corporation will potentially make use of space within the City car parks for last mile hubs which is stated within the policy.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

Too many cabs spewing their acrid smoke on our streets.

Contact Name

Contact Organisation

Green Steve

City Response

Comment noted.

Recommendation

No Change

Recommendation\_Details



# City Plan 2036 Consultation Comments

## Type of Comment

Object

### Comment

Soon the Square Mile will be shut down to all but essential traffic, absolute madness.

### Contact Name

James Savage

### Contact Organisation

### City Response

Comment noted.

### Recommendation

No Change

### Recommendation Details

## Type of Comment

General

### Comment

I am concerned about delays to Crossrail and the fact that no date has been provided for its opening.

### Contact Name

John Sgouros

### Contact Organisation

### City Response

Concern is shared. The delivery of Crossrail is a matter for Crossrail Ltd.

### Recommendation

No Change

### Recommendation Details

## Type of Comment

General

### Comment

# City Plan 2036 Consultation Comments

Having examined the City of London Draft Local Plan and Transport Strategy consultation, we are satisfied that its policies will not materially affect the safety, reliability and/or operation of the Strategic Road Network (the tests set out in DfT C2/13 para 10 and DCLG NPPF para 32). Accordingly, Highways England does not offer any comments on the consultation at this time.

Contact Name

Kayley Smith

Contact Organisation

Highways England

City Response

Comment noted.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

In Chancery Lane traffic speeds are inconsistent and vary between 20 and 30 mph in Camden, City of London and Westminster.

Contact Name

London worker (no name provided)

Contact Organisation

City Response

Comment noted. Speed limits are not a matter for the Plan.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

What's the point of all these nice buildings when the people can't get to them because of traffic?

Contact Name

Contact Organisation

# City Plan 2036 Consultation Comments

Love in Love out

## City Response

The City's Transport Strategy aims to support the continued reduction of motor vehicle traffic on City streets, with targets to reduce the number of motor vehicles in the City by 25% by 2030 and 50% by 2044. The spare capacity unlocked by these reductions will allow for the radical transformation of the City's streets to deliver a healthier, safer and more attractive street environment.

Recommendation No Change

## Recommendation Details

Type of Comment Object

## Comment

How can people reach the buildings when bank junction is still closed to traffic?

Contact Name Contact Organisation

Love in Love out

## City Response

The Local Plan and Transport Strategy seeks to create an environment that is accessible to all, and therefore needs to prioritise the needs of pedestrians and cyclists.

Recommendation No Change

## Recommendation Details

Type of Comment General

## Comment

Transport - cheaper fares would be welcome.

Contact Name Contact Organisation

Lucy Sandford The C4ty - City of London Youth Forum

## City Response

# City Plan 2036 Consultation Comments

Comment noted. Transport fares are not in the remit of the Plan.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

Using private hire vehicles in a City with such great public transport is a very anti-social activity (leaving aside those with mobility difficulties). There must be a way of discouraging this, in order to reduce overall traffic? For example, could the City deploy its own levy on private hire vehicles? Could they be banned from certain streets?

Contact Name

Contact Organisation

Luke Gething

City Response

Private hire vehicles are licensed by TFL and are beyond the remit of the Plan.

Recommendation

No Change

Recommendation Details

Type of Comment

Support

Comment

The PLA supports this policy, particularly part 4 which requires developers to fully consider the use of river transport through Transport Assessments and associated documents.

Contact Name

Contact Organisation

Michael Atkins

Port of London Authority

City Response

Comment noted.

Recommendation

No Change

# City Plan 2036 Consultation Comments

## Recommendation Details

### Type of Comment

General

### Comment

As the air in the City of London is heavily polluted we should follow examples of a no emission zone across the whole of the City of London like many other towns and cities are doing around the world. There is sufficient technology to deliver this goal even right now without any delay, see example of fully electric delivery lorries of FedEx and many other companies. You cannot substitute this with anything else and even if just one life is saved that is already an achievement.

Also, there are huge amounts of unused parking spaces in the Barbican Estate while the city is struggling to have enough parking for cars. This is nonsense! On top of making the whole City of London an emission free zone these parking spaces could be used to encourage use of public transport and or walking and cycling. I hope someone reads this message and actually considers it too.

### Contact Name

Mr Csaba Toth

### Contact Organisation

### City Response

There is currently a ULEZ within the City and two zero emission zones have been introduced covering Barbican and Golden Lane and the City Cluster by 2022.

The City Corporation will potentially make use of space within City carparks for last mile hubs which is stated within the policy.

### Recommendation

No Change

## Recommendation Details

### Type of Comment

General

### Comment

Ban traffic.

### Contact Name

Robert Craighorn

### Contact Organisation

### City Response

# City Plan 2036 Consultation Comments

The Plan and the City of London Transport Strategy have adopted the Mayor's Healthy Streets approach which seeks to make streets attractive and accessible places to walk, cycle and spend time.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

FSB supports the Vision Zero approach to road danger in the capital. The FSB is actively involved with Transport Groups across London and is aware that the freight industry, for example, has been active in investing in safer vehicles, technology and driver training. Proposals to redesign locations should include engagement with freight operators at the earliest stages and on an ongoing basis.

FSB asks that the City of London, with consideration to the impending launch of the ULEZ, undertakes a full impact assessment to ascertain the impact further road charging for London will have on the local economy, jobs and supply of goods and servicing to local businesses and residents, before any road user charging schemes are proposed in relation to 'shaping an outstanding environment'. Small Businesses are already faced with swinging cost increases and we would therefore like to see businesses consulted on any changes in this area.

## Contact Name

## Contact Organisation

Sarah King

Federation of Small Businesses

## City Response

ULEZ and zero emission zones are implemented after consideration of the potential impact on City communities.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

The City of London has been through a period of very considerable intensification and the Draft Plan makes it clear this process will continue. Daytime populations have already expanded greatly, and with further growth envisaged the Plan very rightly introduces policies targeted on improving the public realm and reducing vehicular traffic by 40% over the plan period. Improvements to public transport infrastructure have already impacted on St Paul's, such as the Millennium Bridge





# City Plan 2036 Consultation Comments

and improvements to Peter's Hill which have considerably increased footfall. The published proposals for a Centre for Music show an enhanced pedestrian route from the Tate Modern to the Barbican via St Paul's churchyard. The Elizabeth line at Farringdon will create important new pedestrian routes including those leading to and from St Paul's.

In the Commission's view the time has come to remove vehicular traffic from the West and South sides of St Paul's and to implement a comprehensive landscape/urban design scheme which would enhance the setting of Christopher Wren's great masterpiece and create space for calm and peaceful contemplation at the heart of the City. Ludgate Hill is currently three (and in places four) lanes wide and an unwelcome intrusion into the Cathedral's environs, bringing noise and pollution and disrupting the visual setting of the Cathedral. Traffic could be diverted via Farringdon Road and Queen Victoria Street, a proposal both consistent with the policies outlined in the Plan and feasible in the context of emerging proposals for the growth zones, such as Blackfriars, to cater for displaced traffic.

## Contact Name

Tom Ashley

## Contact Organisation

Cathedrals Fabric Commission for England

## City Response

Comment noted. Future public realm and traffic schemes will consider traffic flows and disruption in this area.

## Recommendation

No Change

## Recommendation Details

## Paragraph

6.2.11

## Type of Comment

General

## Comment

Insert additional text at the end of paragraph 6.2.11 to read: "In particular, alternative arrangements for bus infrastructure, facilities and routes that are currently accommodated within the Liverpool Street bus station will be explored in conjunction with TfL in an effort to deliver significant enhancements to the pedestrian environment and public realm surrounding the station."

## Contact Name

## Contact Organisation

British Land Company PLC

## City Response

Comment noted. The City Corporation will work with TfL to ensure any proposed modification to bus services currently accommodated within the Liverpool Street Bus station will be in alignment with the wider strategic planning for the Liverpool Street area.



# City Plan 2036 Consultation Comments

Recommendation

No Change

Recommendation Details

Paragraph

6.2.9

Type of Comment

General

Comment

If the intent is to increase cycling, a reduction of 50% in motor traffic is good, but that is starting from a high level. 50% of current traffic volumes still represents a lot of traffic, enough to make many people disinclined to cycle.

Contact Name

Contact Organisation

John Ramsey and Jane Northcote

City Response

The Plan and City of London Transport Strategy use the Mayor's Healthy Streets approach to make streets attractive and accessible places to walk, cycle and spend time.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

Unblock the Embankment is a group of business and transport organisations and individual businesses that are adversely affected by the increased traffic congestion on the Embankment (A3211) from Parliament Square to Tower Hill, including Victoria Embankment, and Lower and Upper Thames Streets. The City Corporation's draft Local Plan suggests that the City anticipates further growth in workforce and visitor numbers, and intends to evolve into an evening and 7-day a week destination. We are concerned that this will result in further congestion on one of London's most important roads.

Proposal 6.2.9 states the City's intention to reduce motor vehicle traffic on its streets. Yet reducing vehicle access in the City will further increase congestion on the Embankment, and Lower and Upper Thames Streets, where the removal of a traffic lane to make way for CS3 has already caused well-documented economic damage.



# City Plan 2036 Consultation Comments

East London is poorly served for roads and the A3211 already takes a disproportionate share of traffic. We recently commissioned an economic impact study of Embankment congestion, which found that up to 18,000 businesses in east London are no longer within 30 minutes' drive of Westminster since the construction of CS3. Without mitigating action, the proposals in this draft Local Plan will lead to further deterioration of this position. Just at a time when London needs as much of an economic boost as possible, with the forthcoming uncertainties of Brexit, to reduce further London's business connectivity would be a most unwise step for the City of London to take.

## Contact Name

Tony Halmos

## Contact Organisation

Unblock the Embankment

## City Response

The existing location of CS3 builds on existing strategic cycling network connections in central London and aims to create a network of safe, attractive, and accessible cycle routes across the City. It also allows the existing protected cycleway along the Embankment to continue to provide a relatively quick route for the more than 10,000 people cycling through the City each day that use the route while reducing potential conflicts with the significant volumes of people walking on our streets. Given the high levels of general support for the Transport Strategy and the minimum cycling level of service to all streets proposal it included we do not intend to make any changes to the draft Local Plan in this respect.

## Recommendation

No Change

## Recommendation Details

## Paragraph

Figure 12

## Type of Comment

General

## Comment

TfL requests clarity on the A10/A1213/A3 corridor (Bishopsgate, Gracechurch Street and King William Street) that is part of the Transport for London Road Network (TLRN) not being classed as a "London Access" route in the City's proposed street hierarchy. Workshops are starting in late February for TfL, the City and other affected boroughs including Hackney, Southwark and Tower Hamlets, to define a new long-term vision for this route.

Due to street crowding around Liverpool Street, which will worsen when the Elizabeth Line and new tall buildings open nearby, timed closures with no cars/taxis during peaks and possibly at lunchtime are being investigated/modelled to clarify the red route impacts. TfL looks forward to supporting further work and in collaboration with the City and other affected boroughs to deliver Healthy Streets and Vision Zero along this corridor.

## Contact Name

Chris Leong - Assistant Planner

## Contact Organisation

Transport for London - Spatial Planning



# City Plan 2036 Consultation Comments

## City Response

The City Corporation is committed to working with TfL on the TLRN and deals with this issue in the Transport Strategy.

## Recommendation

No Change

## Recommendation Details

### **Policy Number**

VT1

### Paragraph

### Type of Comment

General

## Comment

At part 3 of this policy it is not clear whether the thresholds apply to total floorspace or unit numbers or net additional floorspace. We assume the latter, but this should be clarified.

It is important that this draft policy also reflects TfL's emerging Transport Assessment Guidance. The draft policy should acknowledge that Construction Logistics Plans will be the subject of planning conditions, as details relating to construction are not usually known at the application stage.

## Contact Name

Charles Begley

## Contact Organisation

City Property Association (CPA)

## City Response

Floors space...net additional?

Agree that wording could be amended to provide clarity as below;

## Recommendation

Change

## Recommendation Details

Wording has been added as follows: "A full Construction Logistics Plan (CLP) will be required by condition with outline details required at the application stage. A CLP Construction Logistics Plan should comply with the measures set out in the City Corporation's Code of Practice for Deconstruction and Construction Sites and with TfL's online guidance. The CLP should show examples of how vehicles will be managed in line with the need to Reduce, Re-time and Re-mode (the three Rs)".



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

Please consider including that Transport Statements should be provided as part of development proposals for land uses listed in section 3 when proposals do not meet the thresholds for Transport Assessments and Travel Plans. These documents should be produced in accordance with TfL's latest online guidance.

Please explicitly state in this policy that Construction Logistics Plans (CLPs) should be produced in accordance with TfL's latest online guidance, incorporating adherence to the Construction and Logistics Community Safety Scheme (CLOCS) and the Freight Operator Recognition Scheme (FORS). Outline CLPs should be provided when it is not possible to provide full CLPs prior to determination of planning applications.

### Contact Name

### Contact Organisation

Chris Leong - Assistant Planner

Transport for London - Spatial Planning

### City Response

It is not considered necessary to require transport statements for proposals under the stated thresholds as the standards reflect the City's specific circumstances.

Agree that Construction Logistics Plans and TfL Guidance should be referenced for clarity.

### Recommendation

Change

### Recommendation Details

Supporting text has been amended as follows;

"Transport Assessments and Travel Plans (incorporating Cycling Promotion Plans) should be used to demonstrate adherence to the City Corporation's Transport Standards. Applicants should discuss the scope of the transport documentation required early in the pre-application stage to ensure that it provides evidence tailored to the City's specific circumstances. Account should be taken of the cumulative transport impacts of other nearby developments. TfL has prepared further guidance for developers on Transport Assessments which is available on the TfL website".

"A full Construction Logistics Plan (CLP) will be required by condition with outline details required at the application stage. A CLP Construction Logistics Plan should comply with the measures set out in the City Corporation's Code of Practice for Deconstruction and Construction Sites and with TfL's online guidance. The CLP should show examples of how vehicles will be managed in line with the need to Reduce, Re-time and Re-mode (the three Rs)".

## Type of Comment

General

### Comment

### Contact Name

### Contact Organisation

# City Plan 2036 Consultation Comments

David Braddick

[City Response](#)

[Recommendation](#)

[Recommendation Details](#)

[Type of Comment](#)

General

[Comment](#)

I want to be able to have full access to the City by taxi. I need to get to the City for meetings and frequently carry heavy documents.

[Contact Name](#)

[Contact Organisation](#)

F Luczyc Wyhowska

[City Response](#)

Taxis are permitted to operate in the City.

[Recommendation](#)

No Change

[Recommendation Details](#)

[Type of Comment](#)

General

[Comment](#)

We support Policy VT1 in terms of its requirements. At present, the datasets and methods used by developers and their consultants to calculate freight and servicing vehicle trip generation rates associated with new developments are unfit for purpose and often result in underestimations of the vehicles trips associated with the operational (and construction) phase of the development. This leads to inappropriate off-street loading and servicing space being incorporated into the site design and, in some cases, loading bay area being insufficient in scale.

This can result in developments receiving approval without the freight infrastructure and operations being included that are required to ensure such operations are sustainable in traffic and environmental terms. Instead, these schemes can lead to vehicle queueing at peak times, more on-street loading and unloading than anticipated and provided for, greater impacts on the public road network within and surrounding the development, and too little emphasis on how sustainable logistics operations can be put in place to reduce total and peak-time vehicle trip generation, and to encourage the use of clean vehicles and fuel sources.



# City Plan 2036 Consultation Comments

We therefore encourage the City of London to review its procedures for assessing the predicted freight and servicing vehicle trip generation rates in planning applications it receives to ensure that applications are not subject to trip generation rate underestimation. We also encourage the City to put in place procedures to ensure any agreements made with developers concerning freight and servicing activities are monitored and enforced once the building is operational (as well as during its construction phase).

## Contact Name

Julian Allen

## Contact Organisation

The Freight Traffic Control 2050 project team

## City Response

Agree that Delivery and Servicing Plans should be referenced for clarity. A new paragraph has been added as below.

Agree that wording could be added to supporting text to provide clarity. Wording has been added to paragraph 6.2.25 as below.

## Recommendation

Change

## Recommendation Details

A new paragraph has been added as follows;

"Delivery and Servicing Plans (DSP) will be required for all major commercial development over 1,000m<sup>2</sup> and any other development or refurbishment that will cause significant transport impacts on the local or wider area through operational deliveries and servicing. For smaller development a DSP is encouraged, and may be required in sensitive areas, as a tool to effectively manage delivery and servicing movements".

Wording has been added to paragraph 6.2.25 as follows;

"...The DSP should set out proposals for monitoring of delivery and servicing arrangements, including the use of consolidation. The City Corporation will work with developers and occupiers to monitor the actual reductions in deliveries achieved through consolidation".

## Paragraph

6.2.15

## Type of Comment

General

## Comment

We are concerned that in the past street trees have been cut down to facilitate access to construction sites. Point 4 mentions Construction Logistics Plans. The economic value of a street tree in terms of shade, carbon capture, biodiversity, storm water attenuation, air quality, aesthetics and well-being should be calculated using CAVAT and/or I-Tree. We would like to see an undertaking that street trees are protected from damage and are never removed to make traffic flows easier for the developer. In the case of damage, the City should be reimbursed by the full economic value of the tree not the present day replacement cost.



# City Plan 2036 Consultation Comments

6.2.15: Street trees should be added to the bullet points.

Contact Name

Sarah Hudson

Contact Organisation

Friends of City Gardens

City Response

The new open spaces policy seeks to ensure that existing trees located on or adjacent to development sites are considered during the planning process and are protected from damage during construction works.

Recommendation

No Change

Recommendation\_Details

<u>Policy Number</u>	VT2
<u>Paragraph</u>	
<u>Type of Comment</u>	General
<u>Comment</u>	British Land supports measures to reduce the dominance and number of servicing and delivery vehicles within the City. However, we would suggest that Part 2 of the policy is amended as follows: "Developments must minimise the need for freight trips and work together with adjoining owners and occupiers to manage freight and servicing on an area-wide basis, where possible. Major commercial development must provide for vehicle reduction methods such as freight consolidation, preferred supplier schemes, common procurement or other appropriate methods of reducing the number of servicing and delivery vehicles. New technologies will be encouraged to enable efficient servicing and deliveries to sites".
<u>Contact Name</u>	<u>Contact Organisation</u>
	British Land Company PLC
<u>City Response</u>	Agree that wording in point 2 of policy can be amended to further clarify the policy. Wording has been added to point 2 as below. The City of London Transport Strategy addresses details such as technology and supplier arrangements.
<u>Recommendation</u>	Change



# City Plan 2036 Consultation Comments

## Recommendation Details

Point 2 of the policy as been amended as follows;

"Developments must minimise the need for freight trips and seek to work together with adjoining owners and occupiers to manage freight and servicing on an area-wide basis. Major commercial development must provide for freight consolidation. New technologies will be encouraged to enable efficient servicing and deliveries to sites"

## Type of Comment

Object

## Comment

With respect to point 4, second bullet of policy S9 we are supportive of the principle of consolidation and improving pedestrian safety. However care needs to be taken to ensure that these do not become onerous in practice and act as a deterrent to businesses occupying premises or to the replenishment of office stock.

Requiring developments to avoid deliveries between 7am-10am, 12pm-2pm and 4pm-7pm is onerous and likely to be unworkable for business needs.

Requiring major commercial development (1,000 sq. m) to sign up to consolidation centres is excessive. Such a scale of development cannot support its own consolidation centre, while it is understood that that there are few, if any, companies offering this requirement on the market. Further clarity is required around Consolidation Centres and when it is appropriate to seek these specifically relating to the size of scheme but also what the approach to the targets and use of the centre is. Consolidation centres are in their infancy and policy needs to be flexible enough to allow for appropriate arrangements to exist for development whilst the providers of such services become established.

## Contact Name

## Contact Organisation

GMS Estates and MacTaggart Third Fund

## City Response

Further explanation on the logistics of the consolidation policy has been added to policy VT2.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment



# City Plan 2036 Consultation Comments

Draft policy VT2 introduces a new focus on sustainability and an obligation for developers to help reduce air pollution by cutting down the number of delivery vehicles. The draft policy also sets out that development should be designed to allow for on-site servicing and that on-site servicing areas must be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded.

In principle, this policy is supported, however it must be acknowledged that there are instances where it is simply not possible to provide full on-site servicing given the logistical difficulties in accommodating a large enough space for this, particularly if the existing building to be redeveloped was never designed for such a space. Provision of measures to improve a building's environmental performance including green roofs and PVs should be encouraged, however as this takes up all of the roof space, this often necessitates locating all of a building's plant within the basement, limiting space for on-site delivery.

Draft policy VT2 should therefore be worded so that in the first instance, every effort should be made to provide on-site delivery for new developments, but where it is simply not feasible to accommodate full on-site servicing, applicants should be able to justify through evidence why this is not feasible. In such instances, there should be an opportunity to explore and devise appropriate and thoughtful measures in conjunction with the City to mitigate any impacts on the City's highways network and residential amenity as a result of deliveries and servicing.

We are aware of the City's ambitious plans for freight and servicing deliveries to be reduced through off-site consolidation through supply chain modifications, as detailed in paragraph 3.4.2 of the draft City Plan 2036 and the City's draft Transport Strategy. It would be useful to understand the logistics of this strategy, and under draft policy VT2, clarify what the specific expectations and requirements of new development will be in order to minimise freight and servicing trips.

## Contact Name

## Contact Organisation

LaSalle Investment Management

## City Response

Policy VT2 and supporting text has been amended in several places to demonstrate that the City Corporation is investigating the creation of centralised consolidation centres which can be utilised by businesses in the City.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

[In response to tweet about delivery vehicles]. It's quite simple, if I can't deliver there when I get there then I don't deliver there. Businesses need their deliveries more than I need their custom.

## Contact Name

## Contact Organisation

# City Plan 2036 Consultation Comments

AnyWhereInLondon

## City Response

Comment noted.

## Recommendation

No Change

## Recommendation Details

### Type of Comment

General

### Comment

Reduce large lorries/deliveries during business hours and increase overnight/Sundays when it is not as busy.

### Contact Name

Carol Van Der Vorst

### Contact Organisation

## City Response

Night-time servicing is not always possible in or near residential areas due to potential disturbance.

## Recommendation

No Change

## Recommendation Details

### Type of Comment

General

### Comment

Please include in this policy that servicing provision, both on-street and off-street servicing, must carefully manage and minimise any potential conflict between servicing vehicles, pedestrians and cyclists passing through or accessing nearby cycle parking.

### Contact Name

Chris Leong - Assistant Planner

### Contact Organisation

Transport for London - Spatial Planning

## City Response

The City of London Freight and Servicing SPD addresses servicing and conflict with pedestrians and cyclists.



# City Plan 2036 Consultation Comments

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

Early morning deliveries are a major source of intrusive noise in residential areas - and growing with the spread of loud reversing alarms and talking vehicles. Deliveries in residential areas should not take place before 7am or after 11pm on weekdays. Restricted hours should be set for weekend deliveries in residential areas - perhaps between 9am and 6pm?

Contact Name

Contact Organisation

David Coleman

City Response

Supporting text seeks to restrict servicing nuisance to residents.

"Out of hours servicing is required, except in residential areas where night-time deliveries should be avoided, and further restrictions may be applied in areas of high footfall. The DSP should set out that a booking system for deliveries and servicing will be implemented, and that deliveries and servicing within the restricted hours of 7am-10am, 12pm-2pm and 4pm-7pm on weekdays will not be permitted. High footfall in areas at other peak times may also require restrictions on deliveries and servicing".

The Delivery and Servicing Plan also seeks to protect residential properties from servicing nuisance.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

[In response to tweet about delivery vehicles] Getting in whose way?? It's only delivery vans, buses, taxis, construction & emergency vehicles and cyclists that theoretically need access to the square mile who may have an issue. Only one of those groups would complain, the rest understand the needs of others to make a living.

Contact Name

Contact Organisation

# City Plan 2036 Consultation Comments

Delboyyyy

## City Response

Comment noted.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

Dedicated bays for deliveries and servicing vehicles should be included in all new schemes, especially residential developments. The developments must include arrangements so that deliveries can be received out of peak hours and if necessary, in the evening or night-time without causing unacceptable nuisance to residents.

FTA supports measures to enable more deliveries to be retimed, to make better use of the road space available and to allow vehicles to travel when roads are less congested. The Association is pleased to see that consideration is to be given to permitting night-time deliveries. These relaxations must be in place from the start of the new schemes that limit deliveries between 7am – 10am, 12pm – 2pm and 4pm – 7pm, to ensure businesses do not experience interruption to servicing and deliveries. However, not all deliveries can be retimed and some, such as express courier collections are particularly time-sensitive.

Mandatory consolidation only works for certain types of deliveries; such facilities may not work for e-commerce deliveries or retail deliveries which already operate very efficiently and where customer/consumer choice is key. Area-wide mandatory consolidation for all deliveries is something FTA would strongly oppose.

Consolidation can play a role in controlling, and potentially reducing, the number of freight vehicle movements in certain circumstances. However, they should be targeted at vehicles which are not full to capacity rather than breaking up fully consolidated loads, as this could lead to more vehicles on the road, not fewer. Many retail operators, for example, will already have heavily consolidated deliveries as part of their supply chain. For other businesses receiving many deliveries to different locations, consolidation and joined up procurement can play a part in minimising movements.

The question of funding is important because adding another link to the supply chain will incur cost, so it is likely there will need to be some ongoing public funding. It is also vital to judge vehicles by what they are doing, to ensure they are being used in the most efficient way. A medium-sized truck will carry the equivalent load of ten vans, and the larger trucks can carry as much as 25 vans. Discouraging the use of heavier vehicles and breaking down loads onto smaller vehicles has the potential to increase congestion, which will result in increased levels of emissions.

## Contact Name

## Contact Organisation

# City Plan 2036 Consultation Comments

Denise Beedell

Freight Transport Association

## City Response

Nw wording has been added to the Plan to require all major commercial development over 1,000m<sup>2</sup> and any other development or refurbishment that will cause significant transport impacts on the local or wider area through operational deliveries and servicing to produce a Delivery and Service Plan. For smaller development a DSP is encouraged, and may be required in sensitive areas, as a tool to effectively manage delivery and servicing movements.

## Recommendation

No Change

## Recommendation Details

### Type of Comment

General

### Comment

1. Use Barbican car parks for storage for freight to allow deliveries and reduce pollution. Offer an incentive to residents to reduce car park provision.
2. Air quality needs improving - be radical and ban daytime deliveries.
3. Elderly and disabled find it harder to get around if journey times are increased because traffic is slowed. They can't use the tube.

### Contact Name

Hamish Robertson

### Contact Organisation

### City Response

Comments noted.

### Recommendation

No Change

### Recommendation Details

### Type of Comment

General

### Comment



# City Plan 2036 Consultation Comments

We support Policy VT2 in terms of its requirements.

1. Freight and servicing issues agreed with applicants should be monitored and enforced once the building is operational, as at present many Delivery and Servicing Plans in the UK go unmonitored and unenforced.
2. Compulsory use of off-site consolidation centres by new major developments can help to reduce commercial vehicle activity within the City, while also being capable of providing value-added services for retail and non-retail users, waste and recycling services, and handling parts and equipment required by service engineers working in the City. Research by the FTC 2050 project team indicates the importance of considering how the costs and benefits are allocated between supply chain partners. Although overall a consolidation centre may result in lower costs, unless the costs and benefits can be fairly allocated between the relevant partners it is unlikely to be adopted. In many consolidation centres implemented to date, costs have often only been applied to freight operators. The receivers also accrue benefits in terms of receiving fewer vehicle deliveries and thereby savings in total reception time, as well as potentially gaining greater control over the timing of vehicle arrivals, and benefitting from off-site storage facilities. Receivers need to be appropriately charged for these benefits.
3. We agree that new developments need to include suitable off-street space and facilities for the goods and servicing vehicle arrivals they are expected to generate. It is necessary to ensure this is monitored and enforced, as in many cases space set aside for loading/unloading is not subsequently made available for this purpose once the building is operational.
4. The 2012 London Olympics demonstrated the potential traffic and environmental benefits of retiming deliveries. However, as the Olympics experience showed, it is difficult to retain delivery retiming in the long term. The use of the planning system to limit deliveries between 7am-10am, 12pm-2pm and 4pm-7pm for appropriate new buildings will play an important role in achieving delivery retiming in the City. However, permitting deliveries to new developments between 10am-12pm and 2-4pm runs the risk of exacerbating freight activity in the City at these times, so requires careful consideration.
5. Research carried out in the FTC 2050 supports the view that last mile deliveries by foot, cycle or zero emission vehicle has an important role to play in reducing the transport and environmental impacts of these activities. Trials of on-foot portering suggests this will be operationally and financially viable for certain product types of a suitable size and weight. The trial demonstrated substantial reductions in kerbside loading time and space, and commercial vehicle driving time and space. The provision of safe, secure storage in the City for goods to be delivered by porters will play an important part in the viability and benefits of the portering solution.
6. FTC 2050 research indicates cargo cycles have an important role to play in providing services and certain categories of goods in a dense urban environment such as the City. However, these vehicles should not be used to convey unsuitable product types and thereby result in vehicle proliferation, and their use should not encourage a growth in same-day and instant deliveries. It is important to consider the training provided to cargo cycle riders, their insurance coverage, and difficulties concerning the enforcement of loading and parking regulations associated with these vehicles.
7. The FTC 2050 research supports the view that new developments have the potential to include last mile logistic hubs. These hubs are likely to be essential to the successful uptake of on-foot portering and cargo cycle operations in the City. Therefore in all major new developments consideration should be given to providing space for such logistics hubs. The provision of logistics hubs which facilitate sustainable last-mile goods delivery and servicing activities are likely to be essential to their operational, financial, traffic and environmental viability.
8. The FTC 2050 project has identified the potential for operational collaboration to achieve substantial reductions in goods vehicle activity. However, many freight operators are reluctant to participate in collaborative schemes due to factors including their views on working with perceived competitors, brand image, customer loyalty, concerns about data handling and security and commercial confidentiality, legal liability and proof of delivery. The City of London could lead the way in encouraging operational collaboration between freight transport operators and their customers and receivers to reduce the total number of goods vehicle collections and deliveries required within the City.



## City Plan 2036 Consultation Comments

9. The FTC 2050 project has shown that up to 25% of all parcel deliveries to businesses in the City take place above the ground floor of the building, via stairs/lifts to the intended recipient. This results in vehicles being parked on-street for longer than otherwise necessary. In the case of large buildings (especially multi-tenanted ones) that permit drivers to deliver to ground floor reception desks or loading bays vehicles spend far less time at the kerbside per delivery, and drivers are able to carry out far more deliveries in a working day, resulting in the need for fewer vehicles. Approaches to encourage and even mandate the use of ground floor deliveries in large buildings in the City should be considered.

10. In terms of personal deliveries received by those living and working in the City, it is important to carry out research to identify the best location for such deliveries to take place and the mechanisms by which this is best facilitated.

### Contact Name

Julian Allen

### Contact Organisation

The Freight Traffic Control 2050 project team

### City Response

Comments noted.

### Recommendation

No Change

### Recommendation\_Details

### Type of Comment

General

### Comment

The City Plan should recognise that City of London is identified as a retain capacity borough in Table 6.2 of the Draft New London Plan. Being located entirely within the CAZ, the City of London should seek to ensure that it has sufficient capacity for industry and logistics including last mile distribution, freight consolidation and other related service functions to sustainably support the needs of businesses and activities within the area. This could be achieved through the protection of existing industrial and distribution functions but also through the provision of space as part of development proposals. See paragraph 6.4.7 and Policy SD4M of the Draft New London Plan.

### Contact Name

Juliemma McLoughlin

### Contact Organisation

Mayor of London

### City Response

The City Corporation is prioritising the re-provision of underutilised assets for logistics purposes, and encouraging last mile distribution.

### Recommendation

Change

### Recommendation\_Details





# City Plan 2036 Consultation Comments

Policy VT2 states in point 5 that developers should provision should be made for the storage of foot, cycle and zero emission vehicles and equipment. The supporting text states opportunities to trial and support freight innovation through new technology will be explored as part of the City Corporation's Future City Streets Programme.

## Type of Comment

General

### Comment

The intent of this policy is to require developers to consider ways to reduce congestion caused by servicing and deliveries, including implementing last mile deliveries. Specific reference to the use of the River Thames to help achieve these aims must be provided either in the policy itself or within the supporting text.

### Contact Name

Michael Atkins

### Contact Organisation

Port of London Authority

### City Response

Agree that wording should be added to clarify the potential for river transport and servicing and deliveries. Wording has been added as below.

### Recommendation

Change

### Recommendation\_Details

Wording has been added as follows.

"Within the Square Mile, DSP's should take account of the City's street hierarchy when considering routeing arrangements and should address the potential for use of the River Thames to reduce congestion caused by servicing and deliveries".

## Type of Comment

General

### Comment

It was highlighted during the presentation (Basinghall Suite 28/1/2019) the need to have sight of the intended plan to minimise disruption during night time and weekend deliveries. For residents this is key. Please do give us sight of these.

### Contact Name

Nicola Bell

### Contact Organisation

### City Response

Comment noted.



# City Plan 2036 Consultation Comments

Recommendation

No Change

Recommendation Details

Type of Comment

Support

Comment

We support the City's proposals to reduce the number of freight vehicles on the City's streets and proposals to consolidate and retime freight coming into the city.

Contact Name

Contact Organisation

Richard Lambert

Living Streets

City Response

Comment noted.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

The requirement for major developments to provide for freight consolidation is a principle that we support. There are numerous ways to achieve this consolidation. For example, our recent planning permission on 21 Moorfields, with Deutsche Bank as the tenant, included a significant amount of consolidation which effectively reduced the amount of deliveries to the building by around 40%. However, these consolidation strategies did not include using a designated consolidation centre, but rather use virtual consolidation strategies. All mail delivered to an out of town location, scanned in and electronically delivered to the building being a good example. There are many ways to reduce the number of deliveries to a building and the property companies and their customers need the flexibility to work creatively to reduce deliveries, without being tied to a designated consolidation centre.

Contact Name

Contact Organisation

Ross Sayers

Landsec

City Response

Policy VT2 and supporting text has been amended in several places to demonstrate that the City Corporation is investigating the creation of centralised consolidation centres which can be utilised by businesses in the City.



# City Plan 2036 Consultation Comments

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

FSB would like to see the Local Plan fully recognise how vital it is that micro and small businesses, both office and retail, can continue to operate easily within the Square Mile; that servicing and deliveries to these businesses can be undertaken efficiently and with ease either directly by them or via other logistic service providers. Whilst we understand the drive for consolidation centres, we are not against these providing they are not at an additional cost to the businesses. Any increased costs to businesses relating to proposed consolidation centres greatly concerns FSB acknowledging the fact that to do business in the Square Mile are already exceptionally high.

The FSB would like to see no net loss in commercial land and see an undertaking to safeguard carparks/garages land in order that this existing land can be protected for 'logistics land' and 'micro consolidation'.

FSB asks that the Local Plan's proposals to reduce the number of freight and servicing trips and re-timing them outside of peak hours fully considers the implications for businesses and that freight consolidation facilities are properly provided for to support last mile deliveries by foot, cycle or zero emission vehicles at no additional cost. Otherwise we do have grave concerns about this, due to already exceptionally high costs of doing business in the Square Mile.

Contact Name

Contact Organisation

Sarah King

Federation of Small Businesses

City Response

Road charging is a matter outside the remit of the Plan.

Consolidation is important to enable the City to continue to thrive and prosper from which all businesses will benefit. COL will potentially make use of underutilised space within City car parks for last mile hubs to facilitate consolidation within the policy.

Recommendation

No Change

Recommendation Details

Type of Comment

Support

# City Plan 2036 Consultation Comments

## Comment

Supports night-time servicing to reduce congestion so more pleasant to cycle.

## Contact Name

Tami Church

## Contact Organisation

## City Response

Comment noted.

## Recommendation

No Change

## Recommendation\_Details

## Paragraph

6.2.23

## Type of Comment

General

## Comment

The recent trend for shredding to take place on-street produces excessive noise and air pollution from the vehicle and from increased congestion.

6.2.23: This point should be strengthened by a prohibition of on-street shredding and lorries should not be allowed to operate in loading bays unless the air pollutants and noise is also contained within the building.

## Contact Name

Sarah Hudson

## Contact Organisation

Friends of City Gardens

## City Response

The last bullet point of Policy VT2 and supporting text addresses shredding operations within servicing bays and states that on-street shredding will not be permitted.

## Recommendation

No Change

## Recommendation\_Details



# City Plan 2036 Consultation Comments

## Paragraph

6.2.24

## Type of Comment

General

## Comment

The general principles and objectives of this policy are supported, subject to the views previously provided by the CPA to the Freight and Delivery SPD consultation. The CPA acknowledges that the largest developments are best placed to provide for freight consolidation; however, it is important that the policy fully embraces “virtual consolidation” methods. The CPA considers this draft Policy should apply to only the largest developments where practicable. The use of a threshold of “major development” would include any proposal over 1,000sqm (which could include changes of use) and this is not considered to be justified or appropriate for freight consolidation.

Virtual consolidation and new technologies should be supported and encouraged by draft policy VT2. The CPA would like to see this highlighted or set out within the policy itself, as this is likely to be the future of freight consolidation. Accordingly, the provision of consolidation centres and last mile logistic hubs are likely to be unachievable except for the very largest developments. Developments are therefore unlikely to be able to manage freight and servicing on an area wide basis.

Paragraph 6.2.24 states that a headroom of 4.75m should be provided for all other vehicle circulation areas. This paragraph should be amended so that “generally” is added. It is clear for example that disabled car parking bays, and service bays capable of handling 6m vehicles i.e. a Luton van of circa 3.3 metres in height, do not need a headroom of 4.75 metres. Consistent headroom of 4.75m is overly onerous and unnecessary. The CPA recommends this paragraph is amended accordingly.

## Contact Name

Charles Begley

## Contact Organisation

City Property Association (CPA)

## City Response

Virtual consolidation is explained in policy VT2. The supporting text of the policy has been amended in several places to explain the Corporation's intentions regarding consolidation. The thresholds for consolidation will be contained in guidance when finalised.

The requirement for servicing vehicles to enter and exit in forward gear is an existing policy requirement due to safety requirements.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

# City Plan 2036 Consultation Comments

Item 4. It would be helpful if this policy could explicitly specify the existing prohibition on deliveries in residential areas between 11 pm and 7 am on weekdays. Indeed, it would be welcome if the policy could be redrawn to specify no deliveries in residential areas between 11 pm and 8am on weekdays or between 6pm and 9am on weekends and public holidays.

Para 6.2.24. We particularly welcome the requirement for service areas to provide enough space for all vehicles to leave and enter in forward gear.

Contact Name

Jane Smith

Contact Organisation

Barbican Association

City Response

Agree that night-time servicing in residential areas should be addressed. Supporting text has been amended as below.

Recommendation

Change

Recommendation Details

Supporting text has been amended as follows;

"Out of hours servicing is required, except in residential areas where night-time deliveries should be avoided, and further restrictions may be applied in areas of high footfall. The DSP should set out that a booking system for deliveries and servicing will be implemented, and that deliveries and servicing within the restricted hours of 7am-10am, 12pm-2pm and 4pm-7pm on weekdays will not be permitted. High footfall in areas at other peak times may also require restrictions on deliveries and servicing".

**Policy Number**

VT3

**Paragraph**

**Type of Comment**

General

**Comment**

British Land broadly supports Policy VT3, however consider the policy should be worded to include flexibility where development is located in close proximity to fully accessible public transport. Therefore, it is suggested the policy is revised to state 'Development in the City should be car-free except for designated Blue Badge spaces. Consideration will be given to car-free development where the proximity of development to a fully accessible transport network would not require a blue badge space.'

**Contact Name**

**Contact Organisation**

British Land Company PLC



# City Plan 2036 Consultation Comments

## City Response

It is considered appropriate to comply with the Mayor's stance on vehicle parking.

## Recommendation

No Change

## Recommendation\_Details

### Type of Comment

General

### Comment

TfL supports this policy stating that all new development in the City must be car-free apart from Blue Badge parking, consistent with the approach of the draft London Plan. Where car parking is provided, the draft London Plan would require submission of Parking Design and Management Plans.

Taxi ranks should also incorporate charging facilities. As parking in the City is limited, we would support the requirement to provide all off-street car parking facilities with 100% active charging infrastructure for electric or other Ultra-Low Emission vehicles.

### Contact Name

### Contact Organisation

Chris Leong - Assistant Planner

Transport for London - Spatial Planning

## City Response

The City Corporation has produced an EV Charging Action Plan, which considers the charging needs of taxis.

## Recommendation

No Change

## Recommendation\_Details

### Type of Comment

Object

### Comment

Don't agree with forcing cars off the road and car free developments. People need cars where public transport is poor.

### Contact Name

### Contact Organisation

Ethel Roberts

## City Response



# City Plan 2036 Consultation Comments

Comment noted. Government guidance at all levels agrees that the reduction of vehicle traffic is appropriate.

Recommendation

No Change

Recommendation\_Details

Type of Comment

Support

Comment

The FTC 2050 project has shown the potential benefits of establishing last-mile logistics hubs for final delivery on-foot and by cargo cycles in terms of reductions in motorised vehicle kilometres travelled, emissions reduction, air quality improvements and reduction in kerbside occupancy by goods vehicles (both in terms of space and time occupancy).

We therefore support the priority use of public car parks for use as last-mile delivery hubs. Without such a policy (and the possible incorporation of last mile logistics hubs into new private developments in the City), given the lack of availability and affordability of land in the City for logistics purposes, it is unlikely that it will otherwise be possible to establish last-mile delivery hubs in the City, thereby preventing the implementation of these more sustainable last-mile delivery solutions.

Contact Name

Julian Allen

Contact Organisation

The Freight Traffic Control 2050 project team

City Response

Comment noted.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

Don't reduce the existing number of parking spaces. I occasionally rent a car but am unable to park near my flat. Everything works against someone who is renting, not owning a car. We need to have a scheme to allow car renters to park, or it forces people into buying a car so they are sure of getting a paid-for space.

Contact Name

Contact Organisation



# City Plan 2036 Consultation Comments

Little Britain resident (no name provi

## City Response

Comment noted. Government guidance at all levels agrees that the reduction of vehicle traffic is appropriate.

## Recommendation

No Change

## Recommendation\_Details

## **Policy Number**

VT4

## **Paragraph**

## **Type of Comment**

General

## **Comment**

As a multi-modal trade association, FTA supports opportunities to move more freight by water. Although it is likely to have a relatively small impact in terms of reducing the amount of overall road freight, there are some potentially large opportunities particularly for the construction and waste sectors. The Thames has capacity to carry more freight, but wharves must be safeguarded from development to enable the transfer of materials and waste at various locations along the river.

## **Contact Name**

Denise Beedell

## **Contact Organisation**

Freight Transport Association

## **City Response**

Comment noted.

## **Recommendation**

No Change

## **Recommendation\_Details**

## **Type of Comment**

General

## **Comment**



# City Plan 2036 Consultation Comments

The PLA broadly supports this policy, which serves as an update of current Local Plan policy DM 16.8, particularly the specific references to the safeguarding and use of Walbrook Wharf. The PLA also welcomes the reference to the City of London's aim to seek the reinstatement of Swan Lane Pier and, as noted under policy S17, the PLA looks forward to working with the City with regard to this proposal. The requirement in the policy for development adjacent to, on, or over the river to consider the use of the river for freight and servicing as well as for the transport of construction and waste materials is also welcomed.

As currently drafted, policy VT4 focuses on the transport of freight by water. If the policy name is to remain, reference must also be made to the transport of passengers by water.

## Contact Name

Michael Atkins

## Contact Organisation

Port of London Authority

## City Response

Agree that policy should mention passenger transport by river. Wording has been added to point 1 of policy as below.

## Recommendation

Change

## Recommendation Details

Point 1 of the policy has been amended as follows;

"The City Corporation will support improvements to river piers, steps and stairs to the foreshore and other river-based transport infrastructure to enable an increase in passenger and freight transport by river. The City Corporation will seek the reinstatement of Swan Lane Pier and development which prejudices this reinstatement will not be permitted".

## Policy Number

VT5

## Paragraph

## Type of Comment

Support

## Comment

We support the prohibition of helipads in the City and would welcome discouragement of helicopters flying over the City, except for emergency/public services purposes. Static helicopters hovering for extended periods are exceptionally disturbing.

## Contact Name

Jane Smith

## Contact Organisation

Barbican Association



# City Plan 2036 Consultation Comments

## City Response

Comment noted. Helicopter use is an issue for the Civil Aviation Authority and is outside the remit of the Plan.

## Recommendation

No Change

## Recommendation Details

# City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S10: Walking, Cycling and Healthy Streets

### Policy Number

### Paragraph

### Type of Comment

Support

### Comment

British Land strongly support the Healthy Streets approach and the City's commitment to improving people's experience of using streets and integrating health and wellbeing into public realm design. British Land considers that there is an opportunity to create an exemplary public realm scheme, incorporating healthy streets principles, to the south and west of Liverpool Street Station. As outlined in our separate response to public realm, British Land would be supportive of the Liverpool Street area being identified as a fourth Healthy Street. The opening of the Elizabeth Line provides an opportunity to promote significant improvement and the delivery of world class public realm surrounding Liverpool Street Station, including connections to the City Cluster, Culture Mile and Tech City.

### Contact Name

### Contact Organisation

British Land Company PLC

### City Response

Further Healthy Street areas are being considered in the North of the City.

### Recommendation

No Change

### Recommendation\_Details

### Type of Comment

General

### Comment

I would like to start travelling by bicycle and I wish you would improve the cycling lanes between Stratford and central London.

### Contact Name

### Contact Organisation

Anna Taylor

### City Response

Comment noted. Outside the scope of the Local Plan.

# City Plan 2036 Consultation Comments

## Recommendation

No Change

## Recommendation Details

### Type of Comment

General

### Comment

Better provision for cyclists and pedestrians is essential. Restrict car use as much as possible.

### Contact Name

Ben Simons

### Contact Organisation

### City Response

Comment noted. The Local Plan policies and related guidance aim to restrict car usage in the City.

## Recommendation

No Change

## Recommendation Details

### Type of Comment

General

### Comment

TfL recommends amending the order of the draft City Plan so that this policy comes before Strategic Policy S9 to emphasise the importance of active travel and reducing vehicle dominance.

The Mayor's Transport Strategy (MTS) includes a target for 80% of all personal trips in London to be walking, cycling or public transport journeys by 2041. This should be mentioned in your draft City Plan. For London to meet the overall 80% target, 95% of personal trips in the City of London will need to be walked, cycled or on public transport by 2041.

### Contact Name

Chris Leong - Assistant Planner

### Contact Organisation

Transport for London - Spatial Planning

### City Response

This reordering is not considered necessary. The Walking, Cycling and Healthy Streets section has appropriate prominence within the structure of the Plan.



# City Plan 2036 Consultation Comments

[Recommendation](#)

No Change

[Recommendation Details](#)

[Type of Comment](#)

General

[Comment](#)

The City should aim to create an entirely segregated pedestrian network combining the existing walkways and sky walkways with any future road conversions to complete a new pedestrian network free of bicycles and motor vehicles. The network would start small and any road pedestrianisation could be coordinated with the network's expansion. A separate cycle network could be created again coordinating with any pedestrianisation of roads that may occur.

[Contact Name](#)

[Contact Organisation](#)

Christopher Anastasi

[City Response](#)

The wholesale segregation of pedestrians is no longer considered appropriate. The Corporation has adopted the Mayor of London's Healthy Streets approach which aims to significantly change the function of London's streets to reduce the dominance and negative impacts of motor traffic and enable walking, cycling and social intergration.

[Recommendation](#)

No Change

[Recommendation Details](#)

[Type of Comment](#)

General

[Comment](#)

My response to CoLC's draft Transport Strategy stresses the importance of pedestrians having absolute preference over cyclists as well as other forms of transport.

[Contact Name](#)

[Contact Organisation](#)

Fred Rodgers

[City Response](#)

Comment noted.

[Recommendation](#)

No Change

# City Plan 2036 Consultation Comments

## Recommendation\_Details

### Type of Comment

General

### Comment

I think you need to be much more ambitious in prioritising pedestrians and severely restricting traffic. Otherwise, the plan will lose relevance in the future and will be obsolete well before 2036. Paris is discussing the banning of vehicular traffic in the city centre. We should consider a similar policy.

### Contact Name

Gary Mclean

### Contact Organisation

### City Response

Policies throughout the Plan seek to reduce vehicular traffic, and prioritise pedestrians in the City.

### Recommendation

No Change

## Recommendation\_Details

### Type of Comment

General

### Comment

With respect to transport, the Mayor welcomes the general direction of the draft Local Plan policies and TfL have issued detailed advice. Your attention is drawn to the need to ensure that the Plan is effective in supporting Good Growth and active travel; the Mayor's Healthy Streets Approach should be embedded where appropriate as should policy to support walking and cycling over motorised transport.

### Contact Name

Juliemma McLoughlin

### Contact Organisation

Mayor of London

### City Response

Comment noted. The Plan supports good growth in the Vision and Design sections and supports active travel and the Healthy Streets approach in several sections.

### Recommendation

No Change

## Recommendation\_Details



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

Cyclists need to be controlled, fined. Cycling on pavement on Upper/Lower Thames St right next to cycle lane. Go thru red lights thru pedestrians who have right of way. Jump lights trying to beat vehicles. Danger to road users. Protect road users & pedestrians from dangerous cyclists.

### Contact Name

London Ranger

### Contact Organisation

### City Response

Comment noted.

### Recommendation

No Change

### Recommendation\_Details

## Type of Comment

General

### Comment

1. Cycling needs to be safer: More cycle lanes in busy City roads.
2. Would like to see more areas pedestrianised, but accept cars are needed. Speed limits would help.
3.  Wearing earphones and use of phones relates to road safety, being aware of your surrounding area.
4.  When leaving school at 4/5pm find it hard to navigate pavements as some pubs / restaurants in the City occupy the whole of the pavement and pedestrians aren't considered, and forced to walk on road where they feel unsafe.
5. Cyclists can be an issue.

### Contact Name

Lucy Sandford

### Contact Organisation

The C4ty - City of London Youth Forum

### City Response

Comments noted. Policies in the Plan and City of London Transport policy seek to improve conditions and opportunities for cyclists and pedestrians and reduce the volume of cars.

### Recommendation

No Change

### Recommendation\_Details





# City Plan 2036 Consultation Comments

## Type of Comment

Support

### Comment

TfL CD welcomes that the City Corporation will work with partners to improve the quality and permeability of the City's streets and spaces to prioritise walking and cycling, improve accessibility and encourage more active modes of travel to, from and within the City. TfL will work with the City to ensure that all development follows the principles of Healthy Streets.

### Contact Name

Luke Burroughs

### Contact Organisation

Transport for London Commercial Development

### City Response

Support noted.

### Recommendation

No Change

### Recommendation Details

## Type of Comment

General

### Comment

The Bank junction improvements are fantastic, and a real improvement for cyclists. But the contrast between that section of road and other areas is stark. For example, when I cycle, I cycle up Bishopsgate past Liverpool Street station. It is a very threatening street for cyclists to cycle on, made worse by the significant volume of heavy goods vehicles. Streets like this need to be radically re-configured to de-prioritise motor vehicles, at least in the 7am - 7pm window. The approach doesn't have to be as radical as Bank junction, but there must be a way to make it more pleasant for cyclists (and pedestrians). For example, could be banned 7am-9am and 4pm-7pm? This would make a huge difference.

### Contact Name

Luke Gething

### Contact Organisation

### City Response

Comments noted. The City of London Transport Strategy seeks to improve conditions and opportunities for cycling, where feasible.

### Recommendation

No Change

### Recommendation Details

# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

You could give cyclist's gold plated lanes but some will still jump lights and ride on pavements. When are you going to start looking out for the pedestrians?

### Contact Name

Pedestrian (no name provided)

### Contact Organisation

### City Response

Policies in the Walking, Cycling and Healthy Streets encourage safe cycling and pedestrian movements.

### Recommendation

No Change

### Recommendation Details

## Type of Comment

General

### Comment

We would like to see the City ensure that either the Healthy Streets Check for Designers or the Healthy Streets survey is used to assess the impact of new developments in the City of all size or perceived impact on the streets.

### Contact Name

Richard Lambert

### Contact Organisation

Living Streets

### City Response

Healthy Streets principles are embedded in Policy S10; Walking, Cycling and Healthy Streets.

### Recommendation

No Change

### Recommendation Details

## Type of Comment

General

### Comment



# City Plan 2036 Consultation Comments

Love cycle lanes - need more and safer routes.

Contact Name

Contact Organisation

Tami Church

City Response

Comment noted. Policies in the Plan and the City of London Transport Strategy seek to provide more and safer cycle routes.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

The City's draft Local Plan includes efforts to improve and expand cycling infrastructure, to promote good health and well-being. Unblock the Embankment welcomes this intention and proposes that, as part of the City's overall plans for new cycle lanes, a detailed scheme is brought forward to implement a new route for the cycle superhighway, CS3, from Blackfriars Bridge through Bank Junction to Aldgate and then Tower Hill, to replace the current route along Lower and Upper Thames Streets.

Contact Name

Contact Organisation

Tony Halmos

Unblock the Embankment

City Response

Comments noted. The City of London Transport Strategy contains detailed policy on cycling in the City.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

Don't like aggressive cyclists going through pedestrian crossings when the lights are green.

Contact Name

Contact Organisation

# City Plan 2036 Consultation Comments

Vicky Stewart

## City Response

Comment noted.

## Recommendation

No Change

## Recommendation\_Details

## Paragraph

6.3.8

## Comment

Suggest an additional Healthy Street Plan relating to Liverpool Street. Text to refer to four Healthy Streets Plan rather than three, with an additional bullet point relating to Liverpool Street as follows:

- Liverpool Street: Responding to the opening of the Elizabeth Line. This will support significant improvements to pedestrian movement and the public realm surrounding Liverpool Street Station, including connections to the City Cluster, Culture Mile and Tech City. The area covered will align with the Liverpool Street Key Area of Change.

## Contact Name

## Contact Organisation

British Land Company PLC

## City Response

Further Healthy Street areas in the North of the City are being considered.

## Recommendation

No Change

## Recommendation\_Details

## Policy Number

AT1

## Paragraph

## Type of Comment

General

# City Plan 2036 Consultation Comments

## Comment

Policy W1 seeks to encourage the provision of new pedestrian routes across private landholdings. Under this policy point 6 states that 'Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary, and it is clear to the public that access is allowed'.

However, we would suggest the wording of the policy be amended to allow for some flexibility as follows: 'Public access across private land will be encouraged where feasible, where it enhances the connectivity, legibility and capacity of the City's street network...'.

## Contact Name

## Contact Organisation

Endurance Land

## City Response

Suggested change is considered to weaken the existing policy.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

Enhance safety of pedestrian crossings. Many mid-street crossings have been removed/levelled, making it more dangerous to cross.

## Contact Name

## Contact Organisation

Carol Van Der Vorst

## City Response

The City of London Transport Strategy seeks to improve the safety of street crossings in the City.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General



# City Plan 2036 Consultation Comments

## Comment

Need better street labelling - many streets are not labelled with their names, making it difficult to find your way. Tube station exit signage is excellent - shows road names and is very useful.

## Contact Name

Charlotte Akhah

## Contact Organisation

## City Response

Comments noted.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

Please amend section 1 to read: "Developers should facilitate pedestrian movement and reduce severance by providing suitable routes through and around new developments."

Please amend section 5 to read: "The replacement of a route over which pedestrians have rights with one to which the public have access only with permission will not be acceptable."

This policy should include that appropriate management and maintenance arrangements should be in place for the public realm, including public spaces that are privately owned. These arrangements should maximise public access and that the rules and restrictions should be in accordance with the Public London Charter, secured through legal agreement or planning condition.

## Contact Name

Chris Leong - Assistant Planner

## Contact Organisation

Transport for London - Spatial Planning

## City Response

Agree that suggested changes would add clarity to policy on pedestrian movement. Wording has been amended in policy AT1 and a new paragraph added as below.

Comment on access to private land is noted.



# City Plan 2036 Consultation Comments

## Recommendation

Change

### Recommendation\_Details

Wording has been amended in the 1st bullet point of policy AT1 as follows;

"Developers should facilitate pedestrian movement and reduce severance by provision of suitable routes through and around new developments. The City Corporation will work with developers and owners to maintain pedestrian routes at ground level and the upper level walkway network around the Barbican and London Wall".

Bullet 5 of policy AT1 has been amended as follows;

"The replacement of a route over which pedestrians have rights with one to which the public have access only with permission will not be acceptable".

A new paragraph has been added as follows;

"Appropriate management and maintenance arrangements for the public realm and pedestrian routes should be agreed, including for public space that is privately owned (in accordance with the Mayor of London's Public London Charter) and secured through legal agreement or planning condition".

## Type of Comment

General

### Comment

A great opportunity lies in enhancing a high-quality walkable network that is integrated with the public realm network, which can be critical to ensure the integration and coordination of City Plan and the Transport Strategy.

### Contact Name

Dr. Manuela Madeddu and Dr. Chia-Li

### Contact Organisation

University of Liverpool in London

### City Response

Walking is encouraged in various policies in the Plan and the Transport Strategy.

## Recommendation

No Change

### Recommendation\_Details

## Type of Comment

General

### Comment



# City Plan 2036 Consultation Comments

The flow of pedestrians is important. Support creating new pedestrian corridors when buildings are being redeveloped. Should try to direct people towards parks and open spaces through the design of streets and alleys. Expand network of highwalks like in New York.

Contact Name

John Sgouros

Contact Organisation

City Response

Comments noted.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

As the draft Plan acknowledges, walking is the primary form of transport - I think pedestrians should have the highest priority. There are plenty of streets from which traffic could be banned between 7am - 7pm so that pedestrians and cyclists could use the full space available (also reducing air pollution).

Contact Name

Luke Gething

Contact Organisation

City Response

The City of London Transport Strategy seeks to improve conditions and opportunities for pedestrian movement in the City.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

This policy is welcomed in seeking to promote and enhance pedestrian routes and the Cathedral would welcome the opportunity to discuss the proposed improvements to the route from Millennium Bridge to Culture Mile, including changes to St Paul's and Newgate Street Gyratory. It seems as if this would be much more effectively done within an overall St Paul's area strategy.



# City Plan 2036 Consultation Comments

## Contact Name

Oliver Caroe

## Contact Organisation

Surveyor to the Fabric of St Paul's Cathedral

## City Response

There are several relevant public realm schemes to improve pedestrian movement and connections in the City, which are awaiting decisions on funding.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

Planned pedestrian routes are I imagine made more specific in the Transport Plan. They were not apparent from my reading of the City Plan.

## Contact Name

Rodney Clark

## Contact Organisation

## City Response

The Transport Strategy contains detailed information regarding planned pedestrian routes. They are too detailed to include in the Plan.

## Recommendation

No Change

## Recommendation Details

## Paragraph

6.3.12-6.3.13

## Type of Comment

General

## Comment

Suggest amending the final sentence of paragraph 6.3.12 to read: "Opportunities will also be explored to introduce pedestrian priority streets around Liverpool Street Station as well as on pavements with a width of less than two metres."

Suggest amending the first bullet point in paragraph 6.3.13 to include "Tech City" as a key destination as well as the City Cluster, Culture Mile and Bank Junction.



# City Plan 2036 Consultation Comments

British Land acknowledge the requirement to achieve a Pedestrian Comfort Level of B+, however due to the significant increase in pedestrian footfall and other competing demands being placed on development, it may not always be achievable. British Land consider that B+ should be identified as an “aspirational minimum” and that each development is assessed on a case-by-case basis as opposed to applying a blanket approach requirement.

Contact Name

Contact Organisation

British Land Company PLC

City Response

Suggested change too detailed.

Recommendation

No Change

Recommendation\_Details

Paragraph

6.3.13

Type of Comment

General

Comment

We welcome the commitment to maintain existing pedestrian routes on the upper level walkways around the Barbican and London Wall. Indeed, we would support further extensions of the Highwalks into surrounding parts of the City.

However, we would not want to see the creation of new pedestrian routes at ground level within the Barbican Estate. This would damage the grade II\* listed landscape of the estate and adversely affect residential amenity. The current highwalks are well designed to minimise disturbance within the flats.

Para 6.3.13. We would welcome some restriction on pavement drinking outside public houses where it impedes pedestrian movement – and in some cases forces pedestrians out in the vehicle carriageway.

Contact Name

Contact Organisation

Jane Smith

Barbican Association

City Response

Comment noted.

Recommendation

No Change



# City Plan 2036 Consultation Comments

## Recommendation\_Details

### Type of Comment

Support

### Comment

Within paragraph 6.3.13 of the supporting text to policy W1, the City of London's draft Transport Strategy is referenced, specifically the number of routes and junctions for pedestrian improvements which includes the Globe View section of the Riverside Walkway / Thames Path. The PLA broadly supports the proposals for the improvements to pedestrian movement as part of this policy.

### Contact Name

Michael Atkins

### Contact Organisation

Port of London Authority

### City Response

Comment noted.

### Recommendation

No Change

## Recommendation\_Details

### Paragraph

6.3.16

### Type of Comment

General

### Comment

Tenacity support the provision of enhanced pedestrian movement in respect of part 1 of this policy. Paragraph 6.3.16 sets out details of the City's proposed minimum pedestrian comfort level of B+. An aspiration to obtain a minimum Pedestrian Comfort Level of B+ is acknowledged. However, given the significant growth in pedestrian numbers (for example within the Eastern Cluster and as a result of the Elizabeth Line), it should be recognised that this may not always be achievable, particularly having regard to the City's street pattern. Therefore, it is suggested the PCL level of B+ be an 'aspirational minimum' with its appropriateness developed on (i) a case-by-case basis, and (ii) to allow for future changes to pedestrian comfort guidance as opposed to a strict requirement for all future developments, some of which will not be able to achieve this level. Improved PCLs can be achieved as the emerging Eastern Cluster Strategy for road closures and dual use of road and pedestrian spaces is developed and implemented.

### Contact Name

### Contact Organisation

Tenacity



# City Plan 2036 Consultation Comments

## City Response

The minimum pedestrian comfort level of B+ is considered appropriate for the City. The supporting text states that if any pavements in the vicinity of a development would fail to achieve a B+ rating, Transport Assessments submitted with planning applications can provide a clear justification as to why the standard can't be met.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

Whilst the CPA supports the provision of enhanced pedestrian movement in respect of part 1 of this policy, it is concerned with the draft policy seeking routes through new developments. The provision of new pedestrian routes through developments can only be contemplated in a very small number of instances having regard to design and security considerations. The provision of such pedestrian routes has a big impact on the design of buildings, including the ground floor layout, access and safety and core position. The provision of new routes through developments is therefore not often feasible, practical or viable. The policy should be amended to allow sufficient flexibility, and only seek routes where practical and viable.

Paragraph 6.3.16 sets out details of the City's proposed minimum pedestrian comfort level of B+. An aspiration to obtain a minimum of B+ is acknowledged, however given the significant growth in pedestrian numbers (e.g. within the Eastern Cluster) this may not always be achievable, particularly having regard to the City's medieval street pattern. Therefore, it is suggested the PCL level of B+ be an 'aspirational minimum' with its appropriateness developed on a case-by-case basis, as opposed to a strict requirement for all future developments. The CPA seeks that this paragraph is amended accordingly.

## Contact Name

Charles Begley

## Contact Organisation

City Property Association (CPA)

## City Response

The intensification of the use of buildings and the increase in the City's working population necessitates methods of increasing capacity for pedestrian movement in the City and maximising appropriate comfort levels on the street.

## Recommendation

No Change

## Recommendation\_Details

# City Plan 2036 Consultation Comments

## Paragraph

Figure 15

### Comment

Suggest amending Figure 15 (Key walking routes to be delivered by 2030) by extending north the area of green shading (Improvements around Moorgate & Liverpool Street stations) to include Sun Street Passage.

### Contact Name

### Contact Organisation

British Land Company PLC

### City Response

The City of London Transport Strategy has defined the areas for key walking routes.

### Recommendation

No Change

### Recommendation Details

## Policy Number

AT2

## Paragraph

### Type of Comment

General

### Comment

The shower, changing, lockers/storage facilities being referred to here should be in accordance with the London Cycling Design Standards (LCDS).

### Contact Name

### Contact Organisation

Chris Leong - Assistant Planner

Transport for London - Spatial Planning

### City Response

Agree that standards for assisting active travel should be included in the Plan. Wording on standards have been included as below.

### Recommendation

Change

# City Plan 2036 Consultation Comments

## Recommendation\_Details

Wording has been added to the supporting text as follows;

"Lockers should be provided at a minimum ratio of 1 locker per 1 cycle parking space. Showers should be provided at a minimum of 1 shower per 10 cycle parking spaces".

### Type of Comment

General

### Comment

The dangers of increased cycle use in the City is mounting; complaints are made by pedestrians that cyclists mount the pavements, shoot red lights and in Greater London there are weekly deaths of cyclists.

### Contact Name

Gerald Hine

### Contact Organisation

### City Response

Safe cycling practices are not a planning matter.

### Recommendation

No Change

## Recommendation\_Details

### Type of Comment

Support

### Comment

Great plans.

### Contact Name

Kapila Perera

### Contact Organisation

### City Response

Comment noted.

### Recommendation

No Change

## Recommendation\_Details



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

Please cross ref the dates on the active travel planning policies (e.g. the delivery dates for the cycle network) with the commitments made in response to the autumn 2018 consultation on the City's draft Transport Policy. I believe the dates for the cycle network have been brought forward.

### Contact Name

M Mann

### Contact Organisation

### City Response

Agree, dates need amending.

### Recommendation

Change

### Recommendation Details

Amended anticipated date of the core cycling network.

## Type of Comment

General

### Comment

There needs to be more segregated cycleways or designated cycle only routes. The current status and this plan doesn't go far enough.

### Contact Name

Mark Faugstad

### Contact Organisation

### City Response

Comments noted. The City of London Transport Strategy seeks to improve conditions and opportunities for cycling, where feasible.

### Recommendation

No Change

### Recommendation Details

## Type of Comment

General

### Comment

# City Plan 2036 Consultation Comments

Cycling in all that concrete and steel is going to be hard work once all the vehicles are banned.

Contact Name

Contact Organisation

Pete

City Response

Comment noted.

Recommendation

No Change

Recommendation Details

**Policy Number**

AT3

**Paragraph**

**Type of Comment**

Object

**Comment**

Draft Policy W3 states "developments must provide on-site cycle parking for occupiers and visitors, complying with London Plan standards". Unite are supportive of the provision of cycle spaces to encourage sustainable travel, however, the proposed standard of 1 cycle space per bedroom unit for student accommodation is unnecessary and unsound.

Student housing is developed at higher densities than conventional housing and in order to provide these levels of cycle parking, large areas of floorspace typically at ground floor level are required which could otherwise be used more efficiently and effectively for living or town centre uses thus reducing the viability of the scheme. A recent survey (Feb 2018) undertaken by Unite demonstrates that the maximum average demand for cycle parking storage is 5% of bed places across the 26 of Unite's sites, which equates to a demand of one space per 20 students.

As an example, Unite were required to provide a minimum of 423 cycle spaces for a scheme in Islington, which translates to a floor area of approximately 465 sqm or 385 sqm based on typical requirements of 1.1sq.m for a Sheffield stand or 0.91sq.m for a dual-stacking system. Based on an average student cluster bedroom size of approx 11sq.m, this would result in the unnecessary loss of approx 35-42 bedroom units.

It has been demonstrated that an increase in cycle parking for student accommodation would not directly result in an increase in cycling patterns amongst students. Firstly, student housing schemes are generally in close proximity of places of study, allowing a majority of journeys to be undertaken on foot, and are in areas with high levels of public transport accessibility providing an alternative means of transport. Secondly, Cycle hire schemes provide an affordable means of



# City Plan 2036 Consultation Comments

transport, which eliminates the need for students to invest in safety, security and maintenance associated with private ownership.

By way of justification for the increase in cycle parking requirements, the GLA's evidence document refers to student accommodation being essentially residential in nature and as such should be consistent with residential standards. The cycle parking requirements for residential development should not be applied to student accommodation, which should be considered on a case by case basis.

Recommendation: We propose to broaden the wording of the policy to ensure a more flexible approach to the requirement is undertaken. Cycle parking requirements for student accommodation shall “be considered on a case by case basis. The level of provision should take into account the location of the development and accessibility to public transportation, but as a maximum the provision should be 25% of the total number of bedrooms”.

The proposed rates for 1 space per bedroom unit is considered unnecessary and unsound. A Unite study found that there is demand of 1 cycle space per 20 students. The influence of cycle hire schemes provide an affordable means of transport. We propose to broaden the wording to ensure a more flexible approach to the requirement is undertaken. Cycle parking requirements shall be considered on a case by case basis. The level of provision should take into account the location of the development and accessibility to public transportation, but as a maximum the provision should be 25% of the total number of bedrooms.

## Contact Name

## Contact Organisation

Unite Students

## City Response

Cycle parking for students must comply with London Plan standards which are considered reasonable e.g 0.75 spaces per bedroom for long-stay provision and 1 space per 40 bedrooms for short stay provision.

## Recommendation

No Change

## Recommendation\_Details



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

Please amend section 2 to read: "All on site cycle parking must be secure, undercover and preferably enclosed conveniently accessible and sheltered, in accordance with the LCDS."

Please state in this policy that visitors/short-stay cycle parking spaces should be near building entrances in publicly accessible spaces whenever possible. We would not want developers to provide short-stay visitor cycle parking alongside long-stay employee parking that is at basement level or within buildings, often only accessible by staff pass.

### Contact Name

Chris Leong - Assistant Planner

### Contact Organisation

Transport for London - Spatial Planning

### City Response

Agree that wording relating to cycling in policy AT3 and supporting text could be amended to aid clarity on cycle parking.

### Recommendation

Change

### Recommendation Details

The 2nd bullet point of Policy AT3 has been amended as follows;

"All long stay on site cycle parking must be secure, undercover and preferably enclosed, in accordance with the London Cycle Design Standards".

Supporting text has been amended as follows;

"All on-site cycle parking must be secure, conveniently accessible and sheltered, in accordance with London Cycling Design Standards".

Supporting text has been amended as follows;

" Short-stay visitor cycle parking should be provided on-site alongside long-stay employee parking at ground floor level. Visitor cycle parking should be near building entrances in publicly accessible spaces wherever possible. Exceptionally, if this is not possible because of the layout and configuration of the site, 25% additional long stay cycle parking must be provided".

## Type of Comment

General

### Comment

The FTC project team agrees it is important to recognise that the use of cargo cycles and hand carts by retailers in the City will require the provision of space at which these vehicles can be stored overnight and where recharging can take place, and that such space should be made available at the retail businesses from which they are operated. It is also important to recognise that cargo cycles and hand carts (and portering bags for on-foot deliveries) necessary for some of the

# City Plan 2036 Consultation Comments

sustainable last-mile logistics solutions laid out in this Local Plan will be used by non-retail operators. It is therefore necessary to consider how the provision of space for the storage of these vehicles and other equipment can also be provided for. The public car parks and other logistics last mile hubs are likely to be the most suitable locations for provision of such space.

Contact Name

Contact Organisation

Julian Allen

The Freight Traffic Control 2050 project team

City Response

Facilities for cargo cycles will be considered in the Cycle Parking Delivery Plan which will be published in 2020.

Recommendation

No Change

Recommendation\_Details

Type of Comment

Support

Comment

Chapter endorses Policy W3 whereby developments are encouraged to provide facilities for public cycle parking, as well as for occupiers and visitors. There is certainly a need for a greater number of publicly available cycle storage facilities in the vicinity of the Cathedral which do not impinge on public open space.

Contact Name

Contact Organisation

Oliver Caroe

Surveyor to the Fabric of St Paul's Cathedral

City Response

Comment noted.

Recommendation

No Change

Recommendation\_Details



# City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S11: Historic Environment

### Policy Number

### Paragraph

### Type of Comment

General

### Comment

Tenacity broadly supports the policy objectives of this draft policy; however, the drafting does not appear to fully address the issues of harm and benefit, and balanced judgement, as set out in the NPPF and related guidance. The draft policy should better reflect the terminology and guidance set out in the NPPF, and should also make the distinction between designated and non-designated heritage assets.

It is also considered there is an opportunity for heritage policy to support significant business, retail, leisure, hotel and cultural growth by recognising that such growth, when it is in support of the Plan's objectives, is in itself a public benefit – and should be treated as such in applying the balanced judgement of harm against benefits set out in the NPPF.

### Contact Name

### Contact Organisation

Tenacity

### City Response

Noted. Please note that Policy HE1 point 2 encourages proposals that would result in appropriate development to heritage assets and point 5 provides further wording regarding non-designated heritage assets.

### Recommendation

Change

### Recommendation Details

Additional wording added to Policy HE1 points 2 and 5.

### Type of Comment

General

### Comment

# City Plan 2036 Consultation Comments

The CPA broadly supports the policy objectives of this draft policy; however, the drafting does not appear to engage fully with the issues of harm and benefit, and balanced judgement, as set out in the NPPF and related guidance. It is considered that the draft policy should better reflect the terminology and guidance set out in the NPPF. The draft policy should also refer to “designated heritage assets”, or certainly make the distinction between designated and non-designated heritage assets.

The CPA considers there is an opportunity for heritage policy to support business growth by recognising that such growth, when it is in support of the Plan’s objectives, is in itself a public benefit – especially in view of the City’s challenging floorspace targets - and should be treated as such in applying the balanced judgement of harm against benefits set out in the NPPF.

## Contact Name

Charles Begley

## Contact Organisation

City Property Association (CPA)

## City Response

Noted. We will not change Policy HE1 wording by removing word 'strengthen' as we consider this appropriate. We agree with additional wording to provide the distinction between designated and non-designated heritage assets .

## Recommendation

Change

## Recommendation Details

Additional wording added to Policy HE1 to provide the distinction between designated and non-designated heritage assets .

## Type of Comment

General

## Comment

There is a need to preserve the remaining history and to keep conservation areas.

## Contact Name

David Martin

## Contact Organisation

## City Response

Noted. The comment you have raised is valid and is addressed in Policy S11.

## Recommendation

No Change

## Recommendation Details



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

We believe that the CoL has a much greater enthusiasm for buying and creating new facilities than maintaining its existing infrastructure. We understand that a city has to renew itself and there are certainly good examples of tired old buildings being replaced by shiny new ones to the good of everyone in the City; workers visitors and residents. However, the City has some outstanding 'older' buildings. We live in one of them, the Barbican Estate.

The Barbican this year reached the age of 50, a cause for celebration. It was listed in 2001 and is recognised world-wide as one of the premier icons of 'brutalist' architecture and we urge the CoL to continue to maintain it. Over the past few years, we have seen some dilapidations creeping in due to sufficient funds for pro-active maintenance not being available. These comments apply to all of the Barbican Estate, not just the residential areas. We note that the CoL is currently promoting its new Centre for Music, while parts of the existing Barbican Arts Centre quietly disintegrate: the Sculpture Court is a destination for students of municipal decrepitude, whilst the Lakeside Terrace continues to crumble despite some welcome recent repairs.

We urge the CoL to look after this outstanding asset at its heart, a world class piece of architecture. Preventative maintenance saves money in the long run.

### Contact Name

Dr Alexander Wilson

### Contact Organisation

Shakespeare Tower House Group

### City Response

Noted. The Barbican Estate is referred to in Policy S11 and point 1 states that the City's heritage assets will be positively managed by conserving and enhancing them.

### Recommendation

No Change

### Recommendation Details

## Type of Comment

General

### Comment

The Diocese considers strategic Policy S11 particularly pertinent at this time in the light of a recent intrusion into the backdrop of St Paul's Cathedral in Newham. As the scale of vertical development increases first in the City and then across London, it is the City people will look to for lead on this matter. So whilst catered for elsewhere (S12 and S13) the suggestion is that the viewing corridors policy is reinforced in Policy S11.

Suggested amendments:

- In part 2, insert "Heritage" before "assets".



# City Plan 2036 Consultation Comments

- Rewording and expanding part 3 as follows: "Seeking improved public access, and enhanced experience and interpretation of the City's Cultural and Heritage assets through the use of CIL neighbourhood Funds and Section 106 Agreements;"
- Add new part 6 to read: "To continue to promote and protect the significant national value, architectural and historic significance, authenticity and integrity of St. Pauls Cathedral and the Monument through the preservation of each viewing corridors."

## Contact Name

## Contact Organisation

Fr Luke Miller

Diocese of London

## City Response

Noted. Added additional wording Policy S11 point 3 regarding heritage assets. There is no requirement to reference St Paul's and Monument as referred to in Policies S12 and S13. The use of CIL and S106 is addressed under Policy S27.

## Recommendation

Change

## Recommendation Details

Added wording to Policy S11 point 3.

## Type of Comment

General

## Comment

Both context and Strategic Policy S11 are welcomed, which makes the abject failure of CoLC to include the whole of its Zones 2, 4 and 5 in the recently created Barbican and Golden Lane Conservation Area all the more hypocritical. Unfortunately, as a result, and taking into account, CoLC's preference for its self-assessed "public benefit" over substantial harm, Policy S11 is likely to be nothing more than space filling.

## Contact Name

## Contact Organisation

Fred Rodgers

## City Response

Noted.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

Support

# City Plan 2036 Consultation Comments

## Comment

Welcome intentions of the Historic Environment policies, particularly the inclusion of thinking about the World Heritage Site at the Tower of London. We welcome that there now seems to be widespread agreement that a responsible approach to its heritage can enhance the City of London in the eyes of commercial and private visitors, and make it an enviable place in which to work and live.

## Contact Name

John Schofield

## Contact Organisation

City of London Archaeological Trust

## City Response

Support noted.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

We submit that the policy drafting misses an opportunity to reinforce and clearly state that the City Local Plan 2036 will back up the re-drafting of NPPF Paragraph 189 which has been revised to clarify that, when considering the impact of a proposed development on a designated heritage asset, decision-makers should give great weight to the asset's conservation irrespective of whether the potential harm to its significance amounts to 'less than substantial harm' or 'substantial harm or total loss' of significance. The City could choose to add a policy which states that no change and no harm will be permitted – providing absolute certainty and therefore total confidence in decision-making.

We have made representations to the City in the past recommending clarity on weighting exercises, the meaning of public benefit and what can materially 'enhance' a heritage asset. In line with NPPF Clauses 137 and 138 we suggest that the City should set out in policies that, to enhance a heritage environment, area, setting or place, an intervention must:

1. Either remove a detracting feature;
2. OR make an improvement or beneficial material change to the heritage asset itself.

## Contact Name

Oliver Caroe

## Contact Organisation

Surveyor to the Fabric of St Paul's Cathedral

## City Response





# City Plan 2036 Consultation Comments

Noted. We have added wording to Policy S11 point 2 with reference to assets on the Heritage at Risk Register. Policy HE1 point 5 has been clarified to add reference to non-designated heritage assets.

Recommendation Change

## Recommendation\_Details

Added wording to Policy S11 point 2 and added wording to Policy HE1 point 5.

Type of Comment General

## Comment

We suggest that the introduction line to Strategic Policy S11 is amended to read: "The City's heritage assets, their significance, environs and settings will be positively managed, by:"

This policy should also additionally reflect the importance of the St Paul's Heights, protected views of the Cathedral, Monument views and The Tower of London World Heritage Site as set out in the LVMF and the City's own Supplementary Planning Document.

Contact Name Oliver Caroe  
Contact Organisation Surveyor to the Fabric of St Paul's Cathedral

## City Response

Noted. Please note the Tower of London World Heritage Site is covered under Policy HE3, and Tall Buildings and Protected Views in Policies S12 and S13 and the Plan should be read as a whole.

Recommendation No Change

## Recommendation\_Details

Type of Comment General

## Comment

Strategic Policy S11 states that "The City's heritage assets, their significance and settings will be positively managed, by: S11.5 - "Preserving and seeking to enhance the Outstanding Universal Value, architectural and historic significance, authenticity and integrity of the Tower of London World Heritage Site and its local setting".



# City Plan 2036 Consultation Comments

Historic Royal Palaces welcomes the inclusion of this policy relating specifically to the WHS, but would like it to embrace the wider, as well as the local, setting of the Tower WHS: only the latter is mentioned. The extent of the Tower's local setting within the City is limited to two small areas, north of Trinity Square Gardens and west of Tower Hill. Potential major development, especially tall buildings, inappropriately located within the wider setting of the Tower WHS currently poses the greatest threat to the Tower's OUV and its continuing status as a World Heritage Site.

Contact Name

Contact Organisation

Ruth Cooke-Yarborough

City Response

Noted. Please note the Tower of London World Heritage Site is already covered under Policy HE3 and the Plan should be read as a whole.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

The heritage of the City is very important for tourism.

Contact Name

Contact Organisation

Tourist (no name provided)

City Response

Noted.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

Heritage is very important in the City to preserve and allow the public to appreciate.

Contact Name

Contact Organisation

# City Plan 2036 Consultation Comments

Visitor (no name provided)

## City Response

Noted.

## Recommendation

No Change

## Recommendation Details

### Paragraph

6.4.15

### Type of Comment

General

### Comment

Para 193 of the NPPF is clear that great weight should be given to the conservation of designated heritage assets in considering development proposals, and all harm to their significance must be justified (para 194). The text should be amended to reflect this.

Suggested change to paragraph 6.4.15 - "Extensions to listed buildings should be of an appropriate scale and character and will be acceptable where the overall impact on the building does not harm its significance ."

### Contact Name

Tim Brennan

### Contact Organisation

Historic England

## City Response

Noted. Please note that Policy HE1 point 3 encourages proposals that would result in appropriate development to heritage assets. We have added further wording regarding the Heritage at Risk Register (see point 2).

## Recommendation

Change

## Recommendation Details

Added wording to point 2 and 3 of Policy S11.

### Paragraph

6.4.2



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

The Trust welcomes policy S11 but requests that the words ‘...and their settings...’ is inserted in part 1 so that it is consistent with the first line of the policy and makes clear that conserving and enhancing the settings of heritage assets is necessary for achieving the intention of part 1.

The Trust also requests that the preceding text in para 6.4.2 is amended to stress the exceptional historic interest and international importance of some of the City’s Grade I listed buildings, citing the Bevis Marks Synagogue as an example.

The Trust requests the following changes to the policy and text:

“The City’s heritage assets, their significance and settings will be positively managed, by:

1. Conserving and enhancing heritage assets and their settings to ensure that the City’s townscapes and heritage can be enjoyed for their contribution to quality of life and wellbeing;...”

6.4.2. Insert additional sentence as follows: "...Listed buildings range from a 17th century home on Cloth Fair to Wren’s iconic St Paul’s Cathedral and churches and to modern buildings by renowned architects, such as the Barbican Estate and the Lloyds Building. Some of the 95 Grade I listed buildings are not only of exceptional historic interest but also of international importance, such as the Bevis Marks Synagogue. As well as listed buildings...”

### Contact Name

### Contact Organisation

London Sephardi Trust

### City Response

Noted. We have amended the text of Policy S11 point 1 to read ‘and their settings’ so it is consistent with first line of policy and wording has been added regarding the Synagogue. Please note Policy S11 wording states that the City has one of the greatest concentrations of architecturally significant places of worship in the country, with 44 listed medieval and Wren churches, Bevis Marks Synagogue and an equally unique collection of over 60 churchyards.

### Recommendation

Change

### Recommendation Details

Amended wording of Policy S11 point 1 ‘and their settings’ to point 1 of Policy S11 and added reference to the Bevis Marks Synagogue in the policy wording.

## Type of Comment

Support

### Comment



# City Plan 2036 Consultation Comments

The over-arching approach to the historic environment set out in policy S11 and in section 6.4 is supported. We particularly welcome the identification of that area of the City that provides a backdrop to the Tower of London World Heritage Site in 6. 4.2. We would suggest that a reference to assets on the Heritage at Risk register would encourage proposals for sympathetic reuse.

Suggested change - Strategic Policy S11: Historic Environment – amend clause 2 to read "Encouraging the beneficial, continued use of heritage assets, including those on the Heritage at Risk register, consistent with their conservation and enhancement".

## Contact Name

Tim Brennan

## Contact Organisation

Historic England

## City Response

Noted. We have added wording to Policy S11 point 2 with reference to assets on the Heritage at Risk register. Policy HE1 point 5 has been clarified to add reference to Historic England's Heritage at Risk Register. The text reflects the City has a rich variety of materials so no further amendments required.

## Recommendation

Change

## Recommendation Details

Noted. Added wording to Policy S11 point 2

## Paragraph

6.4.4

## Type of Comment

General

## Comment

We would suggest that strengthening the reference to traditional materials would enhance the logic behind the policy.

Suggested change - amend paragraph 6.4.4 to read "The City contains a rich variety of architectural styles and materials (predominantly indigenous stone), a medieval street pattern...

## Contact Name

Tim Brennan

## Contact Organisation

Historic England

## City Response

Noted. We have added wording to Policy S11 point 2 with reference to assets on the Heritage at Risk register. Policy HE1 point 5 has been clarified to add reference to Historic England's Heritage at Risk Register. The text reflects the City has a rich variety of materials so no further amendments required.

# City Plan 2036 Consultation Comments

Recommendation

No Change

Recommendation\_Details

**Policy Number**

HE1

Paragraph

Type of Comment

Support

Comment

The Trust supports part 3 of the policy, which states that "Development should conserve and enhance the special architectural or historic interest and the significance of heritage assets and their settings...."

Contact Name

Contact Organisation

London Sephardi Trust

City Response

Support noted.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

Draft policy HE1 does not appear to fully reflect the NPPF in terms of harm and benefits. It is important that the draft policy contains flexibility to allow the public benefits of proposed developments and opportunities for enhancing the significance of heritage assets to be weighed against the loss of significance in line with the NPPF. This draft policy also needs to distinguish between designated and non-designated heritage assets.

Contact Name

Contact Organisation

Tenacity

City Response



# City Plan 2036 Consultation Comments

Noted.

Recommendation

Change

Recommendation\_Details

Response to be updated after speaking to Historic Environment.

Type of Comment

General

Comment

Policy HE1 sets out criteria which development likely to affect heritage assets or their settings should meet. It would be helpful if reference could also be made here to the need for development not to adversely affect the setting of the Tower of London WHS.

Contact Name

Adrian Phillips

Contact Organisation

Historic Royal Palaces

City Response

Noted. Please note the Tower of London World Heritage Site is already covered under Policy HE3 and the Plan should be read as a whole.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

We would welcome an amendment to this policy to be more in line with the NPPF and increase its flexibility of policy to allow public benefit and opportunity to enhance heritage assets to be weighed against loss of significance (as per the NPPF). We also feel the word "strengthens" should be replaced with "conserve and enhance" in paragraph 6.4.11.

Contact Name

Dr Sophie V Taysom

Contact Organisation

Merchant Land

City Response

Noted. We will not change the wording for Policy HE1, as we consider this wording appropriate.

# City Plan 2036 Consultation Comments

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

As Heritage Assets are a defined term in the glossary they have been given a capital letter here for continuity on cross-referencing. Additionally where necessary the inclusion of "experience" has been added in and synonyms removed taking with them their ambiguity.

Suggested amendments:

- In part 1, insert "...maximise both the experience and enhancements;" instead of "...maximise enhancements;"
- In part 3, replace "significance" with "experience" and insert "Heritage" before "assets" in the final sentence.
- In part 5, replace "significance" with "experience".

Contact Name

Contact Organisation

Fr Luke Miller

Diocese of London

City Response

Noted. Added wording change to the policy wording for Policy S11.

Recommendation

Change

Recommendation Details

Added wording 'Experience of...' to policy text (Paragraph 6.4.6).

Type of Comment

Object

Comment

My comments extend to Policies HE1, HE2 and HE3 with the real concern that, by 2036, there will probably be very little of today's historic environment left unharmed. In any event, Policy HE1 seems to be full of contradictions, all adding to that concern, where not even "must" instead of "should" would make much difference.

Heritage Assessments are obviously subjective but, even if impartial, the "public benefit" will always outweigh "substantial harm" (1).



# City Plan 2036 Consultation Comments

The “reinstatement of historic routes and the creation of new routes”, which “will be sought” completely ignores the existing “character and historic interest of the City” (2).

Even if the same could be contemplated surely “should” has to be “must” (3)?

How development can “conserve and enhance the character or appearance of the conservation area” is subjective and unacceptable (4).

Presumably an application for permission to extend the CoLSfG as currently proposed and the 22 antennae atop Barbican Centre will be rejected (5).

## Contact Name

## Contact Organisation

Fred Rodgers

## City Response

Noted. Policy HE1 intention is ensure proposals should meet the criteria set out. The text wording has been altered to clarify this policy on heritage assets.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

We note there continue to be a number of designated heritage assets that are on the Heritage at Risk register. A specific reference to encouraging proposals that would result in the sympathetic refurbishment and reuse of assets that are on the Heritage at Risk register would add a further element of a positive strategy for the historic environment as required by the NPPF. This could be achieved by adding a new clause to policy HE1.

Suggested change - Add new clause 6 to Policy HE1: "Proposals that seek to secure appropriate solutions to assets that are currently on the Heritage at Risk register and would achieve their continued use will be supported."

## Contact Name

## Contact Organisation

Tim Brennan

Historic England

## City Response

Noted. Please note that Policy HE1 point 3 encourages proposals that would result in appropriate development to heritage assets. We have added further wording regarding the Heritage at Risk Register.



# City Plan 2036 Consultation Comments

## Recommendation

Change

## Recommendation Details

Added a new bullet point (6) to Policy S11 regarding the Heritage at Risk Register. Added wording ‘...does not harm its significance...’ to policy text (Paragraph 6.4.15) and removed words ‘is minimised’.

## Paragraph

6.4.11

## Type of Comment

Object

## Comment

Draft policy HE1 does not appear to fully reflect the NPPF in terms of harm and benefits. It is important that the draft policy contains flexibility to allow public benefits of proposed developments and opportunities for enhancing the significance of heritage assets to be weighed against the loss of significance in line with the NPPF. This draft policy also needs to distinguish between designated and non-designated heritage assets. In addition the CPA objects to the use of the word “strengthen” in paragraph 6.4.11 and this should be replaced with “conserve and enhance”.

## Contact Name

Charles Begley

## Contact Organisation

City Property Association (CPA)

## City Response

Noted. We will not change the wording for Policy HE1 as we consider this wording appropriate.

## Recommendation

No Change

## Recommendation Details

## Paragraph

6.4.11; 6.4.13

## Type of Comment

General

## Comment

The proposal in 6.4.11 has to be welcomed, as long as it is adhered to but, in view of CoLC’s assertions in response to local resident associations’ request for the creation of the Barbican and Golden Lane Conservation Area, including Zones 1, 2, 3, 4 and 5, the comment in 6.4.13 – “Many buildings in conservation areas, whilst not being listed, make a significant contribution to the character of these areas” - seems hypocritical, at best.

# City Plan 2036 Consultation Comments

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response

Noted. The wording in Policy HE1 has been amended by removing the following wording: 'whilst not being listed'.

## Recommendation

Change

## Recommendation Details

The words 'whilst not being listed' have been removed from paragraph 6.4.15 (Annie comment).

## Paragraph

6.4.17

## Type of Comment

General

## Comment

Heritage assets such as walls and tombstones are often host to unique and fragile ecosystems. It is important that the conservation or development of these historic environments is not to the detriment or destruction of these ecosystems. Policy HE1 should take account of the biodiversity value of historic assets. Prior to any changes to these assets a full biodiversity survey should be undertaken and mitigation of habitat destruction should be a priority.

6.4.17: We support the aim to assess the effect of overshadowing on historic parks and gardens. Again raise the issue of who will do this assessment and whether there are sufficient ecological resources in-house to achieve meaningful appraisals. Question whether under the City Plan it is possible for the City to seek compensation to restore landscapes affected by development and whether powers exist to refuse development if adverse impacts are identified.

## Contact Name

Sarah Hudson

## Contact Organisation

Friends of City Gardens

## City Response

Noted. The City Plan should be read as a whole and biodiversity is covered in Policy OS3.

## Recommendation

No Change

## Recommendation Details



# City Plan 2036 Consultation Comments

## Paragraph

6.4.9-17

### Comment

We support Policy S11 and HE1 and the reasons for it outlined in 6.4.9-17.

### Contact Name

Jane Smith

### Contact Organisation

Barbican Association

### City Response

Support noted.

### Recommendation

No Change

### Recommendation Details

## Policy Number

HE2

## Paragraph

### Type of Comment

General

### Comment

We would reiterate comments made in respect of policy S11 and HE1 and seek appropriate amendments to better reflect the terminology and guidance in the NPPF in respect of heritage assets.

### Contact Name

Charles Begley

### Contact Organisation

City Property Association (CPA)

### City Response

Noted. HE2 accords with NPPF.

### Recommendation

No Change

# City Plan 2036 Consultation Comments

## Recommendation\_Details

### Type of Comment

General

### Comment

The absence of several historical monuments from the Barbican and Golden Lane Conservation Area probably says all that needs to be said about Policy HE2.

### Contact Name

Fred Rodgers

### Contact Organisation

### City Response

Noted.

### Recommendation

No Change

## Recommendation\_Details

### Type of Comment

General

### Comment

It is suggested that a Deposit Survey of all the historic strata in the City, from the Roman period onwards, is commissioned to produce a 3D-model to be of use when preparing projects.

### Contact Name

John Schofield

### Contact Organisation

City of London Archaeological Trust

### City Response

Noted. Policy HE2 requires an archaeological assessment and evaluation of the site.

### Recommendation

No Change

## Recommendation\_Details

### Paragraph

6.4.18

# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

Paragraph 6.4.18 states that the Corporation will 'enhance archaeological monuments'. Several of the plaques on the City Wall have been removed and should be reinstated.

### Contact Name

John Schofield

### Contact Organisation

City of London Archaeological Trust

### City Response

Noted. Please note that Policy HE2 refers to the 'The City Corporation will preserve, protect, safeguard and enhance archaeological monuments...'. Further wording states that "Developers will be required to provide supporting information describing the significance of any heritage assets whose fabric or setting would be affected...". Therefore, any removal of plaques should be set out in this information in relation to City of London Heritage Plaques.

### Recommendation

No Change

### Recommendation Details

Potential reference to CoL Heritage plaques in the policy? Currently no wording but reference is made to 'blue plaques'.

## Paragraph

6.4.23

## Type of Comment

General

### Comment

Paragraph 6.4.23 mentions the usual requirement that developers pay for all the archaeological work on their sites, including publication of results. Publication is often squeezed for resources and some important projects lie in archive because money ran out.

### Contact Name

John Schofield

### Contact Organisation

City of London Archaeological Trust

### City Response

Noted. Policy HE2 sets out that the requirement of archaeological work for investigation, excavation and recording and publication of the results should be submitted to and approved prior to development.

### Recommendation

No Change

# City Plan 2036 Consultation Comments

## Recommendation Details

### Policy Number

HE3

### Paragraph

### Type of Comment

Support

### Comment

The inclusion of a policy to deal with issues arising from the effects of proposals on the setting of the Tower of London WHS is very much to be welcomed. We have commented elsewhere regarding the identification of 'inappropriate' areas for tall buildings, and in a related point consider that useful clarification could be added in the supporting text of this section to avoid inappropriate proposals coming forward in the area to the immediate north-west of the WHS. This would reinforce the intentions of policy S11 with regard to the Tower. Suggested change - add at the end of paragraph 6.4.24: "Particular care should be taken with any proposals for tall buildings that would appear in the backdrop of the WHS." Suggested change - in the last line of paragraph 6.4.26 substitute "...protecting its Outstanding Universal Value ..." instead of "...protecting its heritage ..."

### Contact Name

Tim Brennan

### Contact Organisation

Historic England

### City Response

Noted. Policy HE2 addresses protected views in its current form, so no further wording required. We agree to additional wording change to Policy HE3 wording.

### Recommendation

Change

## Recommendation Details

Added wording 'Outstanding Universal Value' to policy text (Paragraph 6.4.29) and removed word 'heritage'.

### Paragraph

6.4.24

### Type of Comment

General

### Comment

Perhaps "developments within a wider area [which] may also affect the setting of the Tower" must not be allowed (6.4.24). Hopefully though the embarrassment of the Tower of London losing its UNESCO World Heritage site of Outstanding Universal Value status will be a deterrent.



# City Plan 2036 Consultation Comments

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response

Noted. The current wording in Policy HE2 highlights the potential for impact and the need for consideration.

## Recommendation

No Change

## Recommendation Details

## Paragraph

6.4.26

## Type of Comment

General

## Comment

Policy HE3 states that "Development proposals affecting the setting of the Tower WHS should preserve and seek to enhance the OUV...of the WHS." Historic Royal Palaces welcomes the inclusion of this policy, particularly the useful reference to relevant sources of guidance, including the Tower of London WHS Management Plan 2016, provided in paragraph 6.4.26. It would be helpful if the ICOMOS International Guidance on Heritage Impact Assessments for Cultural World Heritage Properties (2011) could also be mentioned. The final sentence would more appropriately refer to "...protecting its Outstanding Universal Value (rather than heritage), while accommodating change."

## Contact Name

Adrian Phillips

## Contact Organisation

Historic Royal Palaces

## City Response

Noted. We agree both the inclusion of reference to the ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties and to additional wording change to Policy HE3.

## Recommendation

Change

## Recommendation Details

Tom Nanancollas was happy for us to include reference to the ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties and added wording 'Outstanding Universal Value' to policy text (Paragraph 6.4.29) and removed word 'heritage'.



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

Paragraph 6.4.26 under Policy HE3 should add a reference to The Tower of London Conservation Area Character Appraisal and Management Guidelines produced by Tower Hamlets.

### Contact Name

Marissa Ryan-Hernandez

### Contact Organisation

London Borough of Tower Hamlets

### City Response

Noted. Policy HE3 states that the Tower of London is a UNESCO World Heritage Site situated in Tower Hamlets so no need to refer to other local authority's guidance.

### Recommendation

No Change

### Recommendation\_Details

# City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S12: Tall Buildings

### Policy Number

### Paragraph

### Type of Comment

General

### Comment

We note and support the City's positive approach to encouraging new tall buildings under draft strategic policy S12 to accommodate commercial growth. The City Cluster has been identified as the most suitable location for tall buildings (identified as buildings over 75m AOD. It has also been identified that there is limited scope for new tall buildings within the City due principally to conservation areas and views protection considerations, in particular the St Paul's Heights area, St Paul's protected vista viewing corridor and Monument views and setting.

There is an appreciation that the east of the City and in particular the City Cluster is the most appropriate location for new tall buildings, and we would endorse the City of London's continued positive approach to new tall buildings, particularly in light of many successful examples of completed tall buildings that have been both commercially successful and have captured the public's imagination.

Figure 19 highlights areas of the City that are inappropriate for new tall buildings, including in conservation areas. We would advise the City of London against a blanket approach to refusing all new tall buildings within conservation areas. Whilst it is imperative that the character and setting of listed buildings and conservation areas is preserved, there have been a number of recent examples of tall buildings within conservation areas that have been sensitively designed but also manage to be exceptional pieces of architecture.

Prominent examples include New Court completed in 2011 (within the Bank conservation Area), and 150 Bishopsgate currently under construction (within the Bishopsgate conservation area), the latter stepping down in height and massing from the tall buildings to the south and facilitating a transition between the conservation area and the Eastern Cluster to the south. These are instances of tall buildings within conservation areas where they have actually been able to enhance the conservation area. Tall buildings in conservation areas should therefore not be wholly discounted, particularly if the existing building is regarded as having a negative impact on the conservation area.

### Contact Name

### Contact Organisation

LaSalle Investment Management

### City Response

Tall buildings are inappropriate within Conservation Areas.



# City Plan 2036 Consultation Comments

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

The most recent @cityoflondon "Local Plan" is only 4 years old but already they want to replace it .. with their 20 year vision - apparently includes MORE skyscrapers.

Contact Name

Contact Organisation

#LondonTaxi

City Response

Each Local Authority must produce a Local Plan which sets out the future development, what type of development expects to take place and where. It contains a range of topics relevant to the planning and development of the City and must be reviewed every 5 years.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

Islington's preferred approach to tall buildings is a plan-led approach where specific sites are identified as appropriate in-principle for development of tall buildings through a thorough urban design analysis. Our own approach to tall buildings, as set out in our draft Local Plan, reflects this and identifies specific sites where tall buildings are in-principle acceptable; our adopted Local Plan takes a very similar approach. None of the sites in the draft Local Plan are located near to the boundary with the City of London, although there is a suitable location identified in the adopted Local Plan at the borough boundary on City Road.

We note that the Draft City Plan identifies areas where tall buildings are acceptable in principle. The definition of a tall building is over 75m, which differs from our own definition of over 30m, although this is an issue for the City to determine. A number of the in-principle suitable areas are located near to the boundary with the London Borough of Islington. However, we recognise that the City of London's context, in particular its location and function; density of use; and built form with significant clusters of tall buildings; may collectively justify an area based approach. In addition, the significant past delivery of good quality tall buildings and the resistance of inappropriate tall building applications help to satisfy our concerns about a non-site-specific approach to tall buildings.



# City Plan 2036 Consultation Comments

We have reviewed the locations near to the borough boundary where the draft policy would allow tall buildings in principle. We consider that a large number of the locations are unlikely to be redeveloped for tall buildings for a number of reasons, including the presence of listed buildings; and the fact that several have been recently developed or are under construction. However, there remains some locations that potentially could be developed for tall buildings, particularly around Finsbury Square and Golden Lane. Impacts could arise within Islington from tall buildings built in these locations, including impact on local views, townscape, daylight and shadow. Four Islington Conservation Areas directly adjoin the borough boundary (Bunhill Fields and Finsbury Square, Hat and Feathers, Charterhouse Square, and St Luke's) and these areas could be adversely impacted by tall buildings. We seek explicit reference within the policy to recognise that tall buildings may have cross-boundary impacts on locations in Islington and that these impacts must be considered when deciding applications for tall buildings.

## Contact Name

Ben Johnson

## Contact Organisation

London Borough of Islington

## City Response

The City Plan should be read as a whole document as there are many inter-related issues. Design Policy S8 seeks to conserve and enhance the local and wider character and appearance of both the City and potentially affected locations in other local authority areas (as amended)

## Recommendation

Change

## Recommendation Details

Amend policy amplification to include reference to sensitive areas outside the City in other local authority areas.

## Type of Comment

Object

## Comment

The CPA does not consider it should be a prerequisite for tall buildings to provide areas of publicly accessible open space or other facilities at upper levels. A rigid requirement to provide public access may compromise designs and is also not often feasible, practical or viable. The policy should be amended to confirm that "in appropriate circumstances" areas of publicly accessible open space or other facilities at upper levels should be provided where "feasible, practical and viable". In particular, flexibility should be provided where a proposed building is just over 75 metres. A similar comment is made in respect of paragraph 6.5.10, which refers to the need to provide permeable ground floors. We have stated our concerns in respect of this policy objective elsewhere.

Paragraph 6.5.5 refers to policy S20, but we assume that reference to policy S21 is meant.

## Contact Name

Charles Begley

## Contact Organisation

City Property Association (CPA)

## City Response

# City Plan 2036 Consultation Comments

Tall Buildings provide opportunity to provide open spaces at upper levels for amenity. However, in seeking to deliver public space the local plan does not require all upper levels to be able to provide such access. Public space provision need not apply to upper floors/rooftops; it could be provided elsewhere i.e at ground level.

## Recommendation

Change

## Recommendation Details

Amend Point 4 of S12 and policy amplification as necessary.

Amend typo which states 'S20' to S21

## Type of Comment

Object

## Comment

The provision of publicly accessible open space/upper levels by all new buildings of 75m or higher could have adverse impacts on viability and practicality and should be reconsidered to allow a more flexible case by case approach.

## Contact Name

Dr Sophie V Taysom

## Contact Organisation

Merchant Land

## City Response

Tall Buildings provide opportunity to provide open spaces at upper levels for amenity. However, in seeking to deliver public space the local plan does not require all upper levels to be able to provide such access. Public space provision need not apply to upper floors/rooftops; it could be provided elsewhere i.e at ground level.

## Recommendation

Change

## Recommendation Details

Amend Point 4 of S12 and policy amplification as necessary

## Type of Comment

Object

## Comment

Unfortunately Strategic Policy S12 appears to be an open invitation to developers to build tall buildings wherever they can get away with it, as long as these are “of world class architecture and sustainable and accessible design”. The only environment Policy S12 seeks to protect is “the City’s unique environment”, whatever this may mean.

CoLC’s tests are subjective and not objective and there are too many “shoulds” and not enough “musts”. Unfortunately, there is little prospect of any end to the



# City Plan 2036 Consultation Comments

rise of tall buildings and the damage these cause to the City's actual environment.

My concerns regarding the proliferation of roof gardens, terraces and viewing galleries are addressed in other responses. A visit today to Fen Court shows what opening up roof gardens to the public free of charge can achieve. Unfortunately, the only shelter from inclement weather is in the 14th floor restaurant – possibly by design. Decent design and proper scrutiny should, however, have addressed this problem before planning permission was granted but the cult of the hero architect prevailed, although the lack of shelter for the guides who have to work there suggests that this was simply an architect and planning system isolated from reality.

Water saving measures must be introduced for tall buildings, not only because supplies are threatened but because of the power used to pump water to the top of tall buildings.

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response

Noted. Tall Buildings will be provided on suitable sites set out in Figure 19.

The City Plan should be read as a whole document as there are many inter-related issues S15 sets out policies in relation to climate residence and flood risk

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

Strategic policy S12 defines tall buildings as those over 75m in height and identifies areas where buildings exceeding that height would be inappropriate. Inappropriate areas include St Paul's Heights, St Paul's protected vista viewing corridors and Monument views and setting. The City of London may wish to consider if a tall building should be defined as lower than 75m in height in the Thames Policy Area to enable Policy S12 to apply to development that may have a significant impact on the river but is less than 75m in height.

To provide clarity in accordance with Draft New London Plan Policy D8 the City of London should show on a map where tall buildings may be an appropriate form of development (for example this could be parts of the City Cluster) and indicate the general building heights that would be considered appropriate in these locations.

Further work should be conducted to investigate the cumulative impact of tall building development at the eastern edge of the proposed City Cluster Key Area of



# City Plan 2036 Consultation Comments

Change on the setting of the Tower of London World Heritage Site (WHS) and policies should be developed which conserve, enhance and promote its Outstanding Universal Value in accordance with Draft New London Plan Policies HC2 and D8. In addition, the Protected Vista from Queens Walk to the Tower of London (LVMF SPG 2012) should also result in limiting building heights in the background of the vista and this too should be reflected in Figure 19 of the City Plan 2036.

## Contact Name

Juliemma McLoughlin

## Contact Organisation

Mayor of London

## City Response

Within the Thames Key Area of Change development height will be carefully considered to maintain and improve views from the Monument and Strategic Views of St Paul's and the Tower of London. Policy amplification acknowledges that the City Corporation is required to refer applications to the Mayor any buildings that exceed 25m above ground height in the Thames Policy Area.

Policy amplification of S12 states that proposals for new tall buildings should take account of the cumulative impact of the proposed, permitted and existing tall buildings.

Figure 19 sets out areas inappropriate for new tall buildings with relation to policies outlined in the London View Management Framework, St Pauls Heights, Monument Views and conservation areas. This does not imply that every site out with these views as suitable for tall buildings as often there will be other site-specific constraints such as impact upon heritage assets and settings which are covered in other policies within the local plan.

No additional wording re cumulative impact with Policy box as justification suffices.

## Recommendation

Change

## Recommendation Details

Change to map - Further clarity of figure 19 to set out inappropriate areas for tall buildings is required to include the protected strategic view of the White Tower from Queens Walk, the sightline behind the silhouette of St Pauls from Fleet St/Ludgate Hill and the backdrops that are below 75m.

## Type of Comment

Support

## Comment

TfL CD is supportive of Col's approach to tall buildings and will work with the City to bring forward tall buildings on our land holdings in appropriate locations.

## Contact Name

Luke Burroughs

## Contact Organisation

Transport for London Commercial Development

## City Response

# City Plan 2036 Consultation Comments

Support noted

Recommendation

No Change

Recommendation\_Details

## Type of Comment

### Comment

The evidence that supports the tall buildings policy appears unclear. Figure 19 notes which areas are considered inappropriate for tall buildings, but does not clearly explain where this assessment comes from. A Tall Buildings in the City of London report dated 2018 is available and provides some explanation of how these areas were defined (part 1, p21, map 8) – but it is not completely clear whether this map is the assessment that defines the areas in the policy, or whether this map merely represents the findings of another assessment which is presented elsewhere.

There are also discrepancies between map 8 and figure 19 – e.g. the Barbican and an area to the north of it have been defined as inappropriate for tall buildings in figure 19 of the City Plan, but do not appear to be in any of the four designations in map 8 of the Tall Buildings Report. Without a clear explanation of how one diagram maps onto the other, it is difficult to understand why some areas have been defined as inappropriate for tall buildings and others have not. Moreover, the Tall Buildings in the City of London Report is not listed as an evidence base document on the website for City Plan 2036. It is difficult to understand whether this document has been used in the definition of the areas appropriate for tall buildings, and, if it has not, what evidence was used in the definition of these areas. As tall buildings are such a key planning issue in City of London, we would expect a much stronger evidence base for this policy.

Policy S12 and its supporting text do not seem to include a detailed explanation of what is meant in clause 2 by “world class architecture and sustainable and accessible design”. These terms are quite subjective, and more detailed guidance may be needed to ensure developers do not simply use these terms as a justification for inappropriate development. It may also be necessary to add “within appropriate areas” to clause 2, to make clearer the interaction between clauses 2 and 6. In general, Tower Hamlets would be interested in finding out if the City has a more detailed strategy for dealing with tall buildings, or is intending to develop such a strategy – detailed guidance on this issue is particularly important in areas of London like the City, where the scale of tall building development is likely to be particularly large and have particularly significant impacts. Tower Hamlets is in the early stages of producing an SPD on tall buildings and would welcome cross-boundary dialogue with the City on ensuring that both of our boroughs have robust strategies and guidance on the development of tall buildings.

Suggested Changes:

- Provide greater clarity on the evidence base for policy S12.
- In Policy S12, clause 2, add “within appropriate areas” after “suitable sites”.
- Develop Policy S12 and supporting text to provide more guidance on what is expected in the design of tall buildings.

Contact Name

Contact Organisation





# City Plan 2036 Consultation Comments

Marissa Ryan-Hernandez

London Borough of Tower Hamlets

## City Response

Policy amplification states that areas outside of the city may also be sensitive to the development of tall buildings within the City.

Figure 19 sets out areas inappropriate for new tall buildings with relation to policies outlined in the London View Management Framework, St Pauls Heights, Monument Views and conservation areas. This does not imply that every site out with these views as suitable for tall buildings as often there will be other site-specific constraints such as impact upon heritage assets and settings which are covered in other policies within the local plan.

The adopted City Cluster Public Realm vision seeks to manage the project growth to ensure delivery is coordinated with development (check published?)

The City Plan should be read as a whole document as there are many inter-related issues. Policy S8 includes design policies for development

## Recommendation

Change

## Recommendation Details

Amend paragraph of policy amplification to include reference to sensitive areas outside the City in other local authority areas.

Further clarity of figure 19 to set out inappropriate areas for tall buildings is required to include the protected strategic view of the White Tower from Queens Walk, the sightline behind the silhouette of St Pauls from Fleet St/Ludgate Hill and the backdrops that are below 75m.

Amend Point 6 of Policy S12 to include 'All areas in the City are sensitive to Tall Buildings'.

Publication of evidence base on Local Plan web pages regarding Tall building studies, SPD and St Pauls heights, City Cluster vision and pedestrianisation modelling

Additional text within S12 Point 2 is repetition of existing text

## Type of Comment

General

## Comment

Strategic Policy S12 defines tall buildings as "buildings over 75m above Ordnance Datum (AOD) in height". The emerging Tower Hamlets Local Plan 2031, however, defines tall buildings as "buildings of more than 30 metres, or those which are more than twice the prevailing height of surrounding buildings (whichever is less)".

We appreciate that due to the concentration of very tall buildings in parts of the City of London, the conception of what qualifies as a 'tall building' may be different from in Tower Hamlets, and a standard of 30m may be too low. However, a large part of the area defined as appropriate for tall buildings in figure 19 adjoins Tower Hamlets, and a contextual definition of tall buildings that is more in line with the definition in the emerging Tower Hamlets plan would therefore be appropriate.



# City Plan 2036 Consultation Comments

The adopted London Plan refers to tall buildings as “those that are substantially taller than their surroundings” (Policy 7.7). While the emerging London Plan states that the definition of a tall building may vary across London and should therefore be defined individually by boroughs, it also states that “tall buildings are generally those that are substantially taller than their surroundings” (para 3.8.2).

Suggested Change:

- The definition of tall buildings should be altered to “buildings over 75m above Ordnance Datum (AOD) in height, or more than twice the prevailing height of surrounding buildings (whichever is less)”. This is to ensure that buildings in the City of London that are more than twice the height of adjoining buildings in Tower Hamlets are treated as tall buildings in planning policy, and are therefore designed appropriately in line with the tall buildings policy S12.
- An addition to the supporting text to note that Tower Hamlets uses a definition of tall buildings as those of “more than 30 metres, or those which are more than twice the prevailing height of surrounding buildings (whichever is less)”, and that applications which affect Tower Hamlets should take this into account.

Contact Name

Contact Organisation

Marissa Ryan-Hernandez

London Borough of Tower Hamlets

City Response

Policy amplification states that areas outside of the city may also be sensitive to the development of tall buildings within the City.

Figure 19 sets out areas inappropriate for new tall buildings with relation to policies outlined in the London View Management Framework, St Pauls Heights, Monument Views and conservation areas. This does not imply that every site out with these views as suitable for tall buildings as often there will be other site-specific constraints such as impact upon heritage assets and settings which are covered in other policies within the local plan.

The adopted City Cluster Public Realm vision seeks to manage the project growth to ensure delivery is coordinated with development (check published?)

The City Plan should be read as a whole document as there are many inter-related issues. Policy S8 includes design policies for development

Recommendation

Change

Recommendation Details

Amend paragraph policy amplification to include reference to sensitive areas outside the City in other local authority areas.

Further clarity of figure 19 to set out inappropriate areas for tall buildings is required to include the protected strategic view of the White Tower from Queens Walk, the sightline behind the silhouette of St Pauls from Fleet St/Ludgate Hill and the backdrops that are below 75m.

Amend Point 6 of Policy S12 to include ‘All areas in the City are sensitive to Tall Buildings’.

Publication of evidence base on Local Plan web pages regarding Tall building studies, SPD and St Pauls heights, City Cluster vision and pedestrianisation modelling



# City Plan 2036 Consultation Comments

Additional text within S12 Point 2 is repetition of existing text.

## Type of Comment

General

### Comment

All new tall buildings (and ordinary buildings where feasible) should have recessed ground floors back from the kerbside, so as to create wider pedestrian footways. The first floor can overhang back to the property boundary, creating shelter from the elements and maximizing office space. When buildings are demolished, it's a unique opportunity to create wider footways (which are lacking heavily in the City, particularly around the City Cluster on Bishopsgate, Houndsditch, St Mary Axe, and Fenchurch Street). The City Of London Corporation should design in this solution at planning level.

### Contact Name

Mark Chapman

### Contact Organisation

### City Response

Noted. City Cluster Public Realm vision seeks to manage the projected growth to include site specific public realm enhancements and alignment with Transport Strategy to ensure delivery is coordinated with development. Publish City Cluster vision on local plan evidence base  
The City Plan should be read as a whole document as there are many inter-related issues. Strategic Policy S8 and Policies D3 and D4 refers to public realm and pedestrian permeability and internal and external walkways

### Recommendation

No Change

### Recommendation Details

## Type of Comment

General

### Comment

We note that there are many areas within the City where tall buildings are inappropriate because of protected views and conservation areas - these areas could helpfully be included on the Key Diagram. Hackney would welcome the opportunity to work together with the City of London with regards to the development of the tall buildings strategy for the area around Liverpool Street.

### Contact Name

Natalie Broughton

### Contact Organisation

London Borough of Hackney

### City Response



# City Plan 2036 Consultation Comments

Noted. The policies map sets out areas inappropriate for new tall buildings due to policies from London View management Framework, St Pauls Heights, Monument Views and conservation areas.

Recommendation No Change

Recommendation Details

Type of Comment General

Comment

The approach to tall buildings in the draft Local Plan (Policy S12) needs to take greater account of the potentially damaging impact on plant and tree growth associated with overshadowing and sunlight reduction. Policy D8 is helpful here but should be more explicit about these impacts.

Contact Name Contact Organisation

Neil Sinden CPRE London

City Response

Policy S12 seeks the provision of a high-quality public realm at street level.

Recommendation No Change

Recommendation Details

Type of Comment General

Comment

We would suggest that point 6 of Strategic Policy S12 should be strengthened with the addition of: "Local Views and elsewhere where they breach the silhouette of St Paul's".

Chapter would also wish to see included in supporting paragraphs to Strategic Policy S12 a clear requirement that developers should undertake early consultation with St Paul's Cathedral and the Tower of London regarding any proposals that might affect the views or setting of these heritage assets.

We would welcome the addition of policy, here or elsewhere in the Plan, that speaks of artificial lighting and needing to ensure that focal buildings of great public value such as St Paul's are paramount and not lost in overlit secondary structure. The City has made great strides with dynamic street lighting. Policies which can control lighting on buildings and out of buildings under planning rules would be valuable.



# City Plan 2036 Consultation Comments

## Contact Name

Oliver Caroe

## Contact Organisation

Surveyor to the Fabric of St Paul's Cathedral

## City Response

Figure 19 sets out areas inappropriate for new tall buildings with relation to policies outlined in the London View Management Framework, St Pauls Heights, Monument Views and conservation areas. This does not imply that every site out with these views as suitable for tall buildings as often there will be other site-specific constraints.

## Recommendation

Change

## Recommendation\_Details

Further clarity of figure 19 to set out inappropriate areas for tall buildings is required to include the protected strategic view of the White Tower from Queens Walk, the sightline behind the silhouette of St Pauls from Fleet St/Ludgate Hill and the backdrops that are below 75m.

## Type of Comment

General

## Comment

Skyscrapers and tall buildings aren't a bad thing when they are designed properly with creativity and care. It's important for the city to compete with other world cities so building tall buildings is crucial for economic development but continue the tradition of having innovative buildings like the cheese grater, scalpel or gherkin.

## Contact Name

Paul

## Contact Organisation

## City Response

Noted. Policy supports buildings of world class architecture and sustainable and accessible design.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

Object

## Comment

No more tall buildings. They are ugly and heritage should be retained.

# City Plan 2036 Consultation Comments

## Contact Name

Robert Craighorn

## Contact Organisation

## City Response

Policy S12 seeks that tall buildings should have regard to the significance of heritage assets and their settings.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

The plan sets out a clear strategy for the City Cluster as an area of tall buildings which will provide an iconic image of the City. While we support this vision, it is important that tall buildings are not constrained to the City Cluster. The requirements to enhance the public realm at the base of developments, coupled with the need to increase pedestrian routes and widen pavements will constrain the amount of office floorspace at the lower levels of developments. Additional height, in appropriate areas, will help to deliver the amount of office floorspace required in the City.

## Contact Name

Ross Sayers

## Contact Organisation

Landsec

## City Response

Noted. The Local Plan includes Figure 19 which indicates other areas in the city appropriate for tall buildings subject to other policy criteria. Col considers that the provision of open space around the buildings necessary to avoid creation of building canyons, maintaining permeability and adequate servicing.

Building heights are set by ...

The Civil Aviation Authority (CAA) aviation safeguarding policy for central London sets a maximum height limitation of 309.6m AOD.

## Recommendation

No Change

## Recommendation Details

## Paragraph

6.5.1

## Type of Comment

Object

# City Plan 2036 Consultation Comments

## Comment

We would suggest that the penultimate sentence of para 6.5.1 that states "Areas outside of the City may also be sensitive to the development of tall buildings within the City" downplays the potential significant impacts of tall buildings on the setting of the Tower of London World Heritage Site and its Outstanding Universal Value (OUV). As set out, we consider there is potential for inappropriate development proposals to come forward as a result.

Notwithstanding policies elsewhere in the Plan designed to ensure that all new development proposals do not adversely affect the historic environment, we consider that greater clarity is required here, not least to conform with para 16 of the NPPF and its requirement for Local Plan policies to be clearly written and unambiguous. We would suggest that this issue could be addressed by cross-referencing Policy HE3 at an appropriate point - preferably within Policy S12 itself, but if not, then prominently within the supporting text. This would make clear the need for careful consideration of likely impacts of any tall building proposals with the potential to affect the setting of the Tower of London.

Suggested changes:

- Amend Policy S12 Clause 2, bullet point 3 to read: "the significance of heritage assets and their settings, including the Tower of London WHS".
- Amend para 6.5.1 to read: "...Areas outside of the City, for example the Tower of London WHS and its setting, are also sensitive to the development of tall buildings within the City...'

## Contact Name

Tim Brennan

## Contact Organisation

Historic England

## City Response

COL will endeavour that the Local Plan is compliant with Para 16 of the NPPF by ensuring that the policies are clearly written and unambiguous. Policy amplification of S12 states that proposals for new tall buildings should take account of the cumulative impact of the proposed, permitted and existing tall buildings.

Figure 19 sets out areas inappropriate for new tall buildings with relation to policies outlined in the London View Management Framework, St Pauls Heights, Monument Views and conservation areas. This does not imply that every site out with these views as suitable for tall buildings as often there will be other site-specific constraints such as impact upon heritage assets and settings such as the Tower.

COL acknowledge guidance from Historic England as those areas appropriate for tall buildings ought to be annotated.

Policy amplification states that not every site within the City Cluster is suitable which suffices.

## Recommendation

Change

## Recommendation Details



# City Plan 2036 Consultation Comments

Further clarity of figure 19 to set out inappropriate areas for tall buildings is required to include the protected strategic view of the White Tower from Queens Walk, the sightline behind the silhouette of St Pauls from Fleet St/Ludgate Hill and the backdrops that are below 75m.

Amend Point 6 of Policy S12 to include 'All areas in the City are sensitive to Tall Buildings'.

Retitle Figure 19 once amended.

Amend Para 6.5.1 to include reference to sensitive areas outside the City in other local authority areas.

Amend Para 6.5.4 accordingly once Policies map amended.

Amend Para 6.5.5. typo S20 to S21

Amend Para 6.5.5 to remove second 'enhance' sentence from justification

No additional wording re cumulative impact with Policy box as justification suffices.

<u>Paragraph</u>	6.5.1; 6.5.5
------------------	--------------

<u>Type of Comment</u>	Object
------------------------	--------

## Comment

While the deletion of the wording "Permitting tall buildings on suitable sites within the City's Eastern Cluster" (policy CS14 of the CoL Local Plan 2015) is welcomed, the wording of part 2 of the new policy S12 is weaker in relation to the factors to which the City Corporation will have regard in considering suitable sites for tall buildings. The previous wording in part 3 of policy CS14 was clearer that the factors listed were to be used in assessing the suitability of sites.

The Trust therefore objects to the new wording of S12 on these grounds and requests that the phrasing used in Part 3 of policy CS14 of the CoL Local Plan 2015 is reinstated.

The Trust also requests that two additional factors are included in the policy to recognise the importance of assessing the cumulative impacts of tall building proposals when assessing sites and the avoidance of creating building canyons, as identified in para 6.5.9 of the City Plan 2036.

The Trust's suggested re-wording of Policy S12 is:

"2. Tall buildings of world class architecture and sustainable and accessible design will only be permitted on those sites which are considered suitable, having regard to:

...

- the cumulative impact of proposed, permitted and existing tall buildings
- the avoidance of creating building canyons".

The Trust supports the text supporting Policy S12 in paragraphs 6.5.1 and 6.5.5.

Contact Name

Contact Organisation

London Sephardi Trust





# City Plan 2036 Consultation Comments

## City Response

Noted. Policy amplification of S12 states that proposals for new tall buildings should take account of the cumulative impact of the proposed, permitted and existing tall buildings.

S12 seeks that tall building design should have regard to the relationship with existing tall buildings and that design must ensure safe and comfortable levels of wind and daylight and sunlight and permeability which will mitigate against any canyon impression. No additional wording re cumulative impact with Policy box as justification suffices.

## Recommendation

No Change

## Recommendation Details

### Paragraph

6.5.4/Figure 19

### Type of Comment

Object

## Comment

While the objective behind the policy is welcome from the point of view of ensuring that new development avoids any adverse impacts on the historic environment, we consider that clause 6 and the accompanying Figure 19 have the potential to cause some confusion. By specifying certain areas as inappropriate for tall buildings within the policy (i.e. conservation areas, St Paul's Heights area, St Paul's protected vista viewing corridors and Monument views and setting), there is an inference that sites not within these areas will be considered 'appropriate' for tall buildings. This would therefore appear to include areas in the backdrop to the river prospect from viewing location 10.A (Tower Bridge) in the London Views Management Framework, as well as potentially locations 25A 1-3. This conflicts with Policy S13 in the draft Plan. This issue also applies to the final sentence of para 6.5.4 (which should be deleted). Clarifying this issue would help reinforce overall objectives relating to the setting of the WHS – e.g. policy S11 and the final sentence of para 6.5.15.

Suggested changes:

- Amend Policy S12 Clause 6 to read: "New tall buildings will be refused in conservation areas, the St Paul's Heights areas, ....".
- Figure 19 should be retitled: Conservation areas, St Paul's Heights areas, St Paul's protected vista viewing corridors and Monument views and setting.
- Para 6.5.4: Delete final sentence.

## Contact Name

Tim Brennan

## Contact Organisation

Historic England

## City Response



# City Plan 2036 Consultation Comments

Figure 19 sets out areas inappropriate for new tall buildings with relation to policies outlined in the London View Management Framework, St Pauls Heights, Monument Views and conservation areas. This does not imply that every site out with these views as suitable for tall buildings as often there will be other site-specific constraints such as heritage assets and the Tower Universal

Policy S11 HE3 deals sets policy on the setting of the Tower of London World Heritage Site

Policy amplification states that not every site within the City Cluster as suitable which suffices.

Policy amplification of S12 states that proposals for new tall buildings should take account of the cumulative impact of the proposed, permitted and existing tall buildings.

## Recommendation

Change

## Recommendation Details

Further clarity of figure 19 to set out inappropriate areas for tall buildings is required to include the protected strategic view of the White Tower from Queens Walk, the sightline behind the silhouette of St Pauls from Fleet St/Ludgate Hill and the backdrops that are below 75m.

Amend policy amplification to include reference to sensitive areas outside the City in other local authority areas.

Cross reference HE3 in policy amplification.

Amend policy amplification to remove second 'enhance' sentence from justification

No additional wording re cumulative impact with Policy box as justification suffices.

## Paragraph

6.5.5

## Type of Comment

Object

## Comment

Tenacity does not consider it should be a prerequisite for tall buildings to provide areas of publicly accessible open space or other facilities at upper levels. A rigid requirement to provide public access may compromise designs and is also not often feasible, practical or viable. The policy should be amended to confirm that "in appropriate circumstances" areas of publicly accessible open space or other facilities at upper levels should be provided where "appropriate, feasible, practical and viable".

Point 6 of the policy text states that "New tall buildings will be refused in inappropriate areas, comprising conservation areas; the St Paul's Heights area; St Paul's



# City Plan 2036 Consultation Comments

protected vista viewing corridors; and Monument views and setting, as defined on the Policies Map.” (Figure 19) We would suggest adding wording to make clear that proposals for new tall buildings outside the areas marked red on the Policies Map should each be considered on their individual merits, taking into account the other criteria included within this policy.

Paragraph 6.5.5 states that “The City Cluster represents the most appropriate area for tall buildings in the City, but this does not mean that every site within the cluster is suitable.” We suggest adding wording to the following effect: “Conversely, this does not mean either that every site outside the cluster is not suitable. The City Corporation will consider proposals for such sites on a case by case basis and assess whether the criteria in the policy are fulfilled.”

## Contact Name

## Contact Organisation

Tenacity

## City Response

Doesn't have to be open space could be other type of public space. Tall Buildings provide opportunity to provide spaces at upper levels for public space. However in seeking to deliver open space the local plan does not require upper levels to be able to provide such access. open space provision need not apply to upper floors/rooftops; it could be provided elsewhere i.e at ground level.

Proposals for Tall Buildings will be decided on individual merits

Additional wording unnecessary and repetition

## Recommendation

Change

## Recommendation Details

Amend Point 4 of S12 and policy amplification as necessary

## Type of Comment

General

## Comment

We welcome the identification of the City Cluster as the most appropriate location for further tall buildings. Nevertheless, we consider that the text can be strengthened to direct such proposals to the Cluster.

The second sentence in para 6.5.5 states "Any new tall building proposal must meet the criteria set out in the policy to enhance the City's skyline, while minimising the impact on the surrounding area". However, as currently drafted we do not consider Policy S12 contains a requirement to enhance the skyline, as it simply states that tall building proposals should have regard to a number of factors.



# City Plan 2036 Consultation Comments

Suggested changes:

Amend Para 6.5.5 to read: "The City Cluster therefore represents the most appropriate area for tall buildings in the City, and while this does not mean that every site within the Cluster is suitable, development of tall buildings will be directed towards the Cluster. Any new tall building proposal must meet the criteria set out in the policy in order to enhance the City's skyline ...."

Contact Name

Contact Organisation

Tim Brennan

Historic England

City Response

Policy amplification states that not every site within the City Cluster as suitable which suffices.

Recommendation

Change

Recommendation Details

Amend paragraph typo from 'S20' to S21

Amend paragraph in amplification to remove second 'enhance' sentence from justification

Paragraph

6.5.9

Type of Comment

Object

Comment

The cumulative impact of multiple tall buildings referred to in para 6.5.9 should also be referred to in the policy wording.

Suggested change - Amend Policy S12 Clause 2, bullet point 1 to read: "... and historic skyline features, including the cumulative effects of multiple tall building proposals'.

Contact Name

Contact Organisation

Tim Brennan

Historic England

City Response

Policy amplification of S12 states that proposals for new tall buildings should take account of the cumulative impact of the proposed, permitted and existing tall buildings.No additional wording re cumulative impact with Policy box as justification suffices.

Recommendation

No Change



# City Plan 2036 Consultation Comments

## Recommendation Details

### Paragraph

Figure 19

### Type of Comment

Object

### Comment

Strategic Policy S12 defines tall buildings within the City as those over 75m AOD in height. Policy S12.2 confirms that, having regard to a number of criteria, "Tall buildings of world class architecture and sustainable and accessible design will be permitted on suitable sites..." Policy S12.6 states that "New tall buildings will be refused in inappropriate areas..." which are identified as conservation areas, the St Paul's Heights area, protected vista viewing corridors and Monument views and setting. Paragraph 6.5.4 adds that "All of the City of London is sensitive to development of tall buildings, but outside the City Cluster, there is limited scope for new tall buildings due principally to conservation area and views protection considerations." The areas considered to be inappropriate for tall buildings are illustrated in Figure 19.

These interrelated statements are confusing. Taken together, they imply that tall buildings of world class architecture will be permitted in areas other than those specially defined as inappropriate, as illustrated in Figure 19. Figure 19 does not, however, take account of the protected vista of the Tower of London from the South Bank, or the sensitive backdrop to the Tower between the Tower and the City Cluster. The Tower is identified as a Strategically Important Landmark in the Mayor's London View Management Framework illustrated in Figure 20. Areas considered potentially appropriate for tall buildings appear to include the whole of the northern backdrop of the Tower, including the protected vista from LVMF assessment point 25A.1 and the Tower's wider setting to the North-West (LVMF Views 10A.1 from Tower Bridge and 25A.1 from Queen's Walk).

Historic Royal Palaces objects to the inclusion of Figure 19 as presently annotated, which we consider misleading. We therefore ask the City to omit or amend it - particularly since it appears to be contradicted by paragraphs 6.5.12-14. Paragraph 6.5.14 confirms that "The LVMF defines a Protected Vista for the Tower of London. Any development in the Wider Setting Consultation Area in the background of this Protected Vista should preserve or enhance the landmark and appreciate [the WHS'] OUV. City sites have the potential to be intrusive in the view because of their relative proximity to the Tower. Therefore, it is likely...will not be acceptable..."

### Contact Name

### Contact Organisation

Adrian Phillips

Historic Royal Palaces

### City Response

Figure 19 sets out areas inappropriate for new tall buildings with relation to policies outlined in the London View Management Framework, St Pauls Heights, Monument Views and conservation areas. This does not imply that every site out with these views as suitable for tall buildings as often there will be other site-specific constraints such as heritage assets



# City Plan 2036 Consultation Comments

## Recommendation

Change

## Recommendation Details

Further clarity of figure 19 to set out inappropriate areas for tall buildings is required to include the protected strategic view of the White Tower from Queens Walk, the sightline behind the silhouette of St Pauls from Fleet St/Ludgate Hill and the backdrops that are below 75m.

Retitle Figure 19 once amended.

## Type of Comment

Object

## Comment

The residential area to the north of Beech Street and adjacent to the Barbican Wildlife Garden must be designated as NOT suitable for new tall buildings. Strategic Policy S12 – in Figure 19.

## Contact Name

## Contact Organisation

Allison Parkes

## City Response

Figure 19 sets out areas inappropriate for new tall buildings with relation to policies outlined in the London View Management Framework, St Pauls Heights, Monument Views and conservation areas. This does not imply that every site out with these views as suitable for tall buildings as often there will be other site-specific constraints

## Recommendation

Change

## Recommendation Details

Change to map - Further clarity on figures for inappropriate/appropriate areas for tall buildings based on a composite of policy designations.

## Type of Comment

Object

## Comment

Figure 19 designates areas inappropriate for new tall buildings. The Plan designates the Barbican Estate as one such area.

It does, however, appear to omit the current site of the Museum of London and thus sets a development presumption for a tall building on this site. The proposed Centre for Music or a similar tall office block could be constructed little over 100 metres from Mountjoy House and Thomas More House flats. Any development would close off one of the few remaining areas of unimpeded natural light to homes in addition to other concerns of noise and light pollution, and intensification of



# City Plan 2036 Consultation Comments

the use of the site.

I wish to object to this element of the Tall buildings policy which contradicts many of the Local Plan's other policies regarding residential amenity.

Contact Name

Contact Organisation

Barbara Mathews

City Response

Figure 19 sets out areas inappropriate for new tall buildings with relation to policies outlined in the London View Management Framework, St Pauls Heights, Monument Views and conservation areas. This does not imply that every site out with these views as suitable for tall buildings as often there will be other site-specific constraints.

Recommendation

Change

Recommendation Details

Change to map - Further clarity of figure 19 to set out inappropriate areas for tall buildings is required to include the protected strategic view of the White Tower from Queens Walk, the sightline behind the silhouette of St Pauls from Fleet St/Ludgate Hill and the backdrops that are below 75m.

Type of Comment

Object

Comment

The prohibition of tall buildings within Conservation Areas should be extended to consider potential impact on the setting of listed buildings and Conservation Areas. The Eastern side of the Barbican is being progressively walled in by a curtain of tall buildings which is detrimentally affecting the setting, views in and out.

For this reason I object to the inclusion as “appropriate for tall buildings” of the finger of land running up Silk Street to the junction between Chiswell Street and Whitecross Street. This should be set as inappropriate for tall buildings.

Contact Name

Contact Organisation

David Coleman

City Response

Noted. Tall Buildings will be provided on suitable sites set out in Figure 19.

The City Plan should be read as a whole document as there are many inter-related issues S15 sets out policies in relation to climate residence and flood risk

Recommendation

Change



# City Plan 2036 Consultation Comments

## Recommendation Details

Further clarity of figure 19 to set out inappropriate areas for tall buildings is required to include the protected strategic view of the White Tower from Queens Walk, the sightline behind the silhouette of St Pauls from Fleet St/Ludgate Hill and the backdrops that are below 75m.

### Type of Comment

Object

### Comment

Concur with comments from Barbican Wildlife Group that in Figure 19, the residential area to the north of Beech Street and adjacent to the Wildlife Garden to be designated as NOT suitable for new tall buildings.

### Contact Name

### Contact Organisation

Fred Rodgers

### City Response

Figure 19 sets out areas inappropriate for new tall buildings with relation to policies outlined in the London View Management Framework, St Pauls Heights, Monument Views and conservation areas. This does not imply that every site out with these views as suitable for tall buildings as often there will be other site-specific constraints.

### Recommendation

Change

## Recommendation Details

Change to map. Further clarity of figure 19 to set out inappropriate areas for tall buildings is required to include the protected strategic view of the White Tower from Queens Walk, the sightline behind the silhouette of St Pauls from Fleet St/Ludgate Hill and the backdrops that are below 75m.

### Type of Comment

General

### Comment

We welcome the identification of locations where tall buildings are not appropriate and the fact that the map has been updated to include recently designated conservation areas. We understand that the fact an area is not shown as an area inappropriate for tall buildings on the map in figure 19 does not mean that it is deemed "appropriate". That will depend on the individual proposal and how it fits with relevant policies. We suggest that that fact should be made clearer in the plans.

Specifically, we have concerns about: the west side of Aldersgate Street; Silk Street; an area bounded by Beech Street, Golden Lane, and the Golden Lane estate; an area to the south of the Barbican estate bounded by Aldersgate Street; the Museum of London roundabout and London Wall as appropriate areas for tall buildings.





# City Plan 2036 Consultation Comments

We would argue that these sites would be inappropriate for tall buildings, for reasons in line with the major strategic policies S3 and S11:

1. In all cases the fairly small patches of land lie between conservation areas, and tall buildings would damage the settings of the conservation areas.
2. In all cases the surrounding buildings are not tall buildings (with the exception of the three Barbican towers), but have traditionally – and as a matter of policy (cf developments in Aldersgate Street) – remained at a low or medium height.
3. All three sites are bounded by residential flats. Tall buildings next to them will reduce their daylight and sunlight levels and risk other threats to residential amenity (light spillage, noise from terraces). Indeed, the intention in this plan to take account of cumulative effects should ensure that tall buildings are not built on these sites – because the Barbican flats adjacent to these sites have all been affected by a diminution of daylight and sunlight by previous developments.

The clearest way to protect residential amenity is by designating these areas as unsuitable for tall buildings. Given that most of the projected office space in the life of this plan is already under construction, there would seem to be no need for tall buildings in the above areas. Given too that the settings of listed buildings and conservation areas should be taken into account and the designation of “residential areas”, we would urge the City to be bolder and indicate on the map areas where it is highly unlikely that applications for tall buildings would succeed. The eastern side of the Barbican estate has been progressively walled in by tall buildings – to the detriment of residential amenity and the setting of the listed estate (now a conservation area).

## Contact Name

Jane Smith

## Contact Organisation

Barbican Association

## City Response

Figure 19 sets out areas inappropriate for new tall buildings with relation to policies outlined in the London View Management Framework, St Pauls Heights, Monument Views and conservation areas. This does not imply that every site out with these views as suitable for tall buildings as often there will be other site-specific constraints such as heritage assets or residential amenity considerations. Point 2 of S12 refers to character and amenity of the surroundings.

Para 6.5.9 of S12 states that proposals for new tall buildings should take account of the cumulative impact of the proposed, permitted and existing tall buildings. No additional wording re cumulative impact with Policy box as justification suffices.

## Recommendation

Change

## Recommendation Details

Change to map - Further clarity of figure 19 to set out inappropriate areas for tall buildings is required to include the protected strategic view of the White Tower from Queens Walk, the sightline behind the silhouette of St Pauls from Fleet St/Ludgate Hill and the backdrops that are below 75m.

## Type of Comment

Object

## Comment

# City Plan 2036 Consultation Comments

According to Figure 19, it appears that new tall buildings are being proposed for this area. This would have a significantly adverse impact on the existing wildlife corridor between the Barbican Wildlife Garden and Fortune Street Park, particularly on House Sparrows and Pipistrelle bats which move along this corridor every day.

Unfortunately, despite suggestions to the contrary, the exact boundary being proposed for new tall buildings is very unclear and has not been clarified on either of the Policy Maps or on the City of London Interactive Mapping. We therefore request that Figure 19 is changed to designate the entire area to the north of Beech Street, east of Aldersgate Street and west of Whitecross Street as being unsuitable for new tall buildings.

## Contact Name

Joanna Rodgers

## Contact Organisation

Barbican Wildlife Group

## City Response

Figure 19 sets out areas inappropriate for new tall buildings with relation to policies outlined in the London View Management Framework, St Pauls Heights, Monument Views and conservation areas. This does not imply that every site out with these views as suitable for tall buildings as often there will be other site-specific constraints.

## Recommendation

Change

## Recommendation Details

Further clarity of figure 19 to set out inappropriate areas for tall buildings is required to include the protected strategic view of the White Tower from Queens Walk, the sightline behind the silhouette of St Pauls from Fleet St/Ludgate Hill and the backdrops that are below 75m.

## Type of Comment

General

## Comment

Figure 19 under Strategic Policy S12 identifies areas 'inappropriate' for tall buildings – it seems to be inferred (though not explicitly stated) that the remaining area is therefore considered 'appropriate' for tall buildings, and this situation should be clarified in the plan. The area shown as appropriate for tall buildings in Figure 19 includes the area bordering Tower Hamlets directly north-east of the Tower of London, which falls within its local setting boundary.

Strategic Policy S13 notes that the City will “protect and enhance significant City and strategic London views of important buildings, townscapes and skylines by [...] securing an appropriate setting of and backdrop to the Tower of London World Heritage site”. This is accompanied by figure 20, which shows a protected vista that covers part of the area shaded as appropriate for tall buildings in figure 19. Policy HE3 also provides protection for the setting of the Tower. However, Strategic Policy S12 refers only to refusing new tall buildings within the St Paul’s protected vista viewing corridors and the Monument views and setting, and makes no reference to how tall buildings will be treated in relation to the setting and views of the Tower.



# City Plan 2036 Consultation Comments

All development within the protected viewing corridor of the Tower has the potential to have an impact upon the setting of the Tower, and this is especially the case for tall buildings. Figure 19 should therefore be amended to show the area within the Tower of London viewing corridor as inappropriate for tall buildings.

## Suggested Changes:

- The supporting text for policy S12 should clarify whether all areas not identified as inappropriate for tall buildings are therefore considered appropriate for tall buildings.
- Figure 19 should be amended to show the area within the Tower of London viewing corridor as inappropriate for tall buildings, to ensure consistency with Figure 20 and with policies that protect the setting of the Tower.
- Policy S12, clause 6 should make reference to the Tower of London viewing corridor.

## Contact Name

Marissa Ryan-Hernandez

## Contact Organisation

London Borough of Tower Hamlets

## City Response

Policy amplification states that areas outside of the city may also be sensitive to the development of tall buildings within the City.

Figure 19 sets out areas inappropriate for new tall buildings with relation to policies outlined in the London View Management Framework, St Pauls Heights, Monument Views and conservation areas. This does not imply that every site out with these views as suitable for tall buildings as often there will be other site-specific constraints such as impact upon heritage assets and settings which are covered in other policies within the local plan.

The adopted City Cluster Public Realm vision seeks to manage the project growth to ensure delivery is coordinated with development (check published?)

The City Plan should be read as a whole document as there are many inter-related issues. Policy S8 includes design policies for development

## Recommendation

Change

## Recommendation Details

Amend policy amplification to include reference to sensitive areas outside the City in other local authority areas.

Further clarity of figure 19 to set out inappropriate areas for tall buildings is required to include the protected strategic view of the White Tower from Queens Walk, the sightline behind the silhouette of St Pauls from Fleet St/Ludgate Hill and the backdrops that are below 75m.

Amend Point 6 of Policy S12 to include 'All areas in the City are sensitive to Tall Buildings'.

Publication of evidence base on Local Plan web pages regarding Tall building studies, SPD and St Pauls heights, City Cluster vision and pedestrianisation modelling



# City Plan 2036 Consultation Comments

Additional text within S12 Point 2 is repetition of existing text.

## Policy Number

Figure 19

## Paragraph

## Type of Comment

Object

## Comment

Figure 19 appears to suggest that the CoLC is proposing the highly residential neighbourhood between Beech St and Fann St, Aldersgate and Golden Lane, be designated as suitable for tall buildings. It is not possible to ascertain the exact boundaries due to the poor quality of this Figure. Regardless of this, the Corporation should rethink this apparent designation for tall buildings.

This area represents one of the most important wildlife corridors in the City and is used regularly by pipistrelle bats and House Sparrows, target species under the City's Biodiversity Action Plan. Tall buildings would disrupt the corridor and disorient wildlife.

This is a residential neighbourhood, with a high proportion of heritage assets. It is made up predominantly of two post war estates designed by the same architects and with a mostly coherent medium rise building line, punctuated by 3 tall towers which were designed and located as part of a single scheme. To insert new modern tall buildings with no relationship to the existing Estates would fundamentally alter the neighbourhood and damage the setting of a large number of listed buildings. This area does not meet any of the criteria for tall buildings set out in Policy S12.

Figure 19 should be altered to clearly show the entire area between Aldersgate and Golden Lane, to the north of Beech St, as unsuitable for any new tall buildings.

## Contact Name

## Contact Organisation

Ruth Cooke-Yarborough

## City Response

Figure 19 sets out areas inappropriate for new tall buildings with relation to policies outlined in the London View Management Framework, St Pauls Heights, Monument Views and conservation areas. This does not imply that every site out with these views as suitable for tall buildings as often there will be other site-specific constraints such as impact upon residential amenity or existing habitat.

## Recommendation

Change

## Recommendation Details



# City Plan 2036 Consultation Comments

Further clarity of figure 19 to set out inappropriate areas for tall buildings is required to include the protected strategic view of the White Tower from Queens Walk, the sightline behind the silhouette of St Pauls from Fleet St/Ludgate Hill and the backdrops that are below 75m.

# City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S13: Protected Views

### Policy Number

### Paragraph

### Type of Comment

Object

### Comment

If the City remain of the opinion that the use of the [10 Lower Thames Street] site should be as office then the only viable alternative approach would be to relax the Monument view looking south east to allow a larger office building to be developed. The existing building of 10 Lower Thames Street steps down towards Old Billingsgate Market to take account of views from the viewing gallery of the Monument towards HMS Belfast. Relaxation of the Monument view policy would allow for an increase in massing of the building on the 10 Lower Thames Street site and the potential therefore to increase the amount of office floorspace. An increase in massing at the eastern end of site (Old Billingsgate Market) would only result in a minor change to the view of HMS Belfast from the Monument. Depending on the scale of development that could be achieved, additional massing could allow for redevelopment of the site for an office building to come forward in the medium to long term.

### Contact Name

### Contact Organisation

Northern & Shell

### City Response

Monument Views are read in conjunction with the existing SPG on Protected Views. Protected views are complex at the site of Billingsgate as the Greenwich Park Landmark Viewing Corridor and Primrose Hill Background Wider Setting Consultation Area crossing the site. Any increase in massing would require assessment through the planning application process

### Recommendation

No Change

### Recommendation\_Details

### Type of Comment

Support

### Comment

I believe that the view of St Paul's (as seen from Fleet Street) absolutely must be preserved - the area will lose its connection to the City to pretty much all users otherwise, and seem an extension of the Strand and Westminster. St Paul's is, after all, in the Ward of Castle Baynard, as is Fleet Street.



# City Plan 2036 Consultation Comments

## Contact Name

Celine Luppo McDaid

## Contact Organisation

Dr Johnson's House

## City Response

Noted. COL concur that the western approach from Fleet Street and Ludgate Hill that connect the seat of Westminster with the City as a formal ceremonial route makes a very strong contribution to the significance of St Paul's Cathedral

## Recommendation

Change

## Recommendation Details

Amend/insert additional text to include similar wording to amended Protected Views SPD/Statement of Significance within policy amplification to state that the Corporation will protect local views when approaching Ludgate Hill and ensure appreciation of the silhouette of St Pauls.

Views of St Paul's Cathedral from the Processional Route along Fleet Street and Ludgate Hill make a very strong contribution to the significance of St Paul's Cathedral and form a critical part of its setting.

Statement of Significance focuses on the principal, historic approach to the Cathedral's main entrance, along Fleet Street via Ludgate Circus and Ludgate Hill to the west front on St Paul's Churchyard. This will inform the future conservation and enhancement of this approach.

The boundary of the Fleet St Key Area of Change will be amended

## Type of Comment

General

## Comment

Strategic Policy S13 is to be welcomed but, as with all CoLC's policies, strategic or otherwise, in the absence of zero-tolerance implementation are of little value. Again "must" is required instead of "should".

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response

Noted. The Policy incorporates sufficiently strong wording to implement the policy.

## Recommendation

No Change

## Recommendation Details



# City Plan 2036 Consultation Comments

## Type of Comment

Support

### Comment

Protect the views of St Paul's

### Contact Name

Gill Smith

### Contact Organisation

### City Response

Noted

### Recommendation

No Change

### Recommendation Details

## Type of Comment

General

### Comment

Strategic views are taken into account in Strategic Policy S13, which is welcomed and recognises the Mayor's London View Management Framework SPG and the Tower of London World Heritage Site Management Plan (2016).

The consideration in Policy S13 of the view of St. Paul's Cathedral from Fleet Street is welcome but the policy should also take into consideration the impact of proposals on views looking east along Ludgate Hill, as this forms part of the historic processional route from Fleet Street towards St. Paul's Cathedral.

### Contact Name

Juliemma McLoughlin

### Contact Organisation

Mayor of London

### City Response

Noted. COL concur that the western approach from Fleet Street and Ludgate Hill that connect the seat of Westminster with the City as a formal ceremonial route makes a very strong contribution to the significance of St Paul's Cathedral

### Recommendation

Change

### Recommendation Details





# City Plan 2036 Consultation Comments

Strengthen policy amplification to state 'this will inform the future conservation and enhancement of this approach'.

Amend/insert additional text to include similar wording to amended Protected Views SPD within policy amplification to state that the Corporation will protect local views when approaching Ludgate Hill and ensure appreciation of the silhouette of St Pauls.

Views of St Paul's Cathedral from the Processional Route along Fleet Street and Ludgate Hill make a very strong contribution to the significance of St Paul's Cathedral and form a critical part of its setting. Statement of Significance focuses on the principal, historic approach to the Cathedral's main entrance, along Fleet Street via Ludgate Circus and Ludgate Hill to the west front on St Paul's Churchyard.

## Type of Comment

Support

### Comment

Strategic policy S13 is supported, particularly the reference to implementing the Mayor of London's London View Management Framework SPG to manage designated views of strategically important landmarks, river prospects, townscape views and linear views.

### Contact Name

Michael Atkins

### Contact Organisation

Port of London Authority

### City Response

Noted.

### Recommendation

No Change

### Recommendation Details

## Type of Comment

General

### Comment

We note that Local Plan 2036 continues to uphold the vital role played by the St Paul's Heights set out in the current Local Plan. The success of the St Pauls Heights in protecting the setting and views of the Cathedral (and other heritage assets, conservation areas and the scale of many streets) since the late 1930s is widely recognised. The immutability of the Heights policies must be recognised as a critical factor in its success – delivering certainty which is unargued by building owners, applicants and consultees. Certainty of outcome achieved by the Heights policy must also be sought in the application of other new policies which safeguard views, setting and environs as a shared public resource.

The current limits of the St Pauls Heights Policy Area have, however, rendered it ineffective in protecting views, the setting, the background and, to some extent, the environs of the Cathedral. The very existence of the City Cluster as a group of tall buildings including a number in excess of 200m AOD could not have been



# City Plan 2036 Consultation Comments

imagined in the 1930s.

Chapter is immensely impressed by the tools and built-form analysis that have been deployed by City officers in their evidence gathering and it is now clear how valuable these digital means are for informed policy and decision making. We encourage policies which require applicants to test schemes in a shared planning tool – where subtle and important considerations of wind modelling, pedestrian movement, visual navigation and views can be tested.

## Contact Name

Oliver Caroe

## Contact Organisation

Surveyor to the Fabric of St Paul's Cathedral

## City Response

Noted. COL concur that the western approach from Fleet Street and Ludgate Hill that connect the seat of Westminster with the City as a formal ceremonial route makes a very strong contribution to the significance of St Paul's Cathedral

COL are updating guidance in relation to Monument Views

The City of London Corporation has implemented the St Pauls Heights Code since 1937 to protect and enhance the important local views of the Cathedral. It has proved to be a robust and has wide spread support across the City and neighbouring boundaries given its strategic nature. There are no plans to extend the St Pauls Heights Grid at this time.

Para 5.5.16 states that development proposals maintain the clear sky background profile of the dome.

## Recommendation

Change

## Recommendation Details

Amend/insert additional text to include similar wording to amended Protected Views SPD/Statement of Significance within within policy amplification to state that the Corporation will protect local views when approaching Ludgate Hill and ensure appreciation of the silhouette of St Pauls.

Views of St Paul's Cathedral from the Processional Route along Fleet Street and Ludgate Hill make a very strong contribution to the significance of St Paul's Cathedral and form a critical part of its setting.

Statement of Significance focuses on the principal, historic approach to the Cathedral's main entrance, along Fleet Street via Ludgate Circus and Ludgate Hill to the west front on St Paul's Churchyard. This will inform the future conservation and enhancement of this approach.

Amend policy amplification to include reference to the silhouette.

Publication of the Statement of Significance and Amended SPG

## Type of Comment

General

## Comment



# City Plan 2036 Consultation Comments

St Paul's supports the thriving economic development of the City and there is no desire to hinder well-placed and well judged progress. We submit that St Paul's and Monument Views Supplementary Planning Guidance 2002 has not always served the community and public interest in providing a clear definition and robustly applicable method of testing proposals against the highly kinetic nature of the view of St Paul's and the background, setting and environs as the viewer moves along the unfolding historic processional route of Fleet Street and Ludgate Hill. The SPD currently does not provide a sufficiently clear definition of what is valued and to be protected in the view which must include the intangible but vitally important 'history in the view' as well as the living legacy and social good of this route which is recognised by London citizens and people the world over.

With the many advantages of modern 3D modelling techniques to deal with the complex nature of the Fleet Street and Ludgate Hill processional route and its topographical variations, Chapter also urges the City to consider an extension of the St Paul's Heights Policy Area 'grid' as a suitably robust and objective means of limiting the height of tall building developments to the east and background of the Cathedral to achieve the objectives set out above. There is a clear opportunity here for the City and the Cathedral to work proactively with the public to protect the setting and views of this internationally significant place of worship and all it represents to London and the world, whilst also skilfully meeting the City's objectives for growth and challenging targets for the creation of additional commercial floorspace.

## Contact Name

Oliver Caroe

## Contact Organisation

Surveyor to the Fabric of St Paul's Cathedral

## City Response

Noted. COL concur that the western approach from Fleet Street and Ludgate Hill that connect the seat of Westminster with the City as a formal ceremonial route makes a very strong contribution to the significance of St Paul's Cathedral  
COL are updating guidance in relation to Monument Views

The City of London Corporation has implemented the St Pauls Heights Code since 1937 to protect and enhance the important local views of the Cathedral. It has proved to be a robust and has wide spread support across the City and neighbouring boundaries given its strategic nature. There are no plans to extend the St Pauls Heights Grid at this time.

Para 5.5.16 states that development proposals maintain the clear sky background profile of the dome.

## Recommendation

Change

## Recommendation Details

Amend/insert additional text to include similar wording to amended Protected Views SPD/Statement of Significance within within policy amplification to state that the Corporation will protect local views when approaching Ludgate Hill and ensure appreciation of the silhouette of St Pauls.

Views of St Paul's Cathedral from the Processional Route along Fleet Street and Ludgate Hill make a very strong contribution to the significance of St Paul's Cathedral and form a critical part of its setting.



# City Plan 2036 Consultation Comments

Statement of Significance focuses on the principal, historic approach to the Cathedral's main entrance, along Fleet Street via Ludgate Circus and Ludgate Hill to the west front on St Paul's Churchyard. This will inform the future conservation and enhancement of this approach.

Amend policy amplification to include reference to the silhouette.

Publication of the Statement of Significance and Amended SPG

## Type of Comment

General

### Comment

We welcome and support the policy. In particular, we consider that strengthening the protection of the view of St Paul's from Fleet Street (potentially through the St Paul's Heights code) will help conserve the significance of the Cathedral by ensuring an uninterrupted backdrop to its silhouette from the important processional route along Fleet Street, Ludgate Circus and Ludgate Hill. However, we consider that the policy should be further strengthened as the supporting text is solely focused on protecting the dome of the Cathedral only. The policy should protect the entire silhouette and the open sky framing the Cathedral. The definition of the silhouette to be protected needs to be set out clearly.

### Contact Name

### Contact Organisation

Tim Brennan

Historic England

### City Response

Noted. COL concur that the western approach from Fleet Street and Ludgate Hill that connect the seat of Westminster with the City as a formal ceremonial route makes a very strong contribution to the significance of St Paul's Cathedral .

### Recommendation

Change

### Recommendation Details

Amend/insert additional text to include similar wording to amended Protected Views SPD/Statement of Significance within within policy amplification to state that the Corporation will protect local views when approaching Ludgate Hill and ensure appreciation of the silhouette of St Pauls.

Views of St Paul's Cathedral from the Processional Route along Fleet Street and Ludgate Hill make a very strong contribution to the significance of St Paul's Cathedral and form a critical part of its setting.

Statement of Significance focuses on the principal, historic approach to the Cathedral's main entrance, along Fleet Street via Ludgate Circus and Ludgate Hill to the west front on St Paul's Churchyard. This will inform the future conservation and enhancement of this approach.

Amend policy amplification to include reference to the silhouette

Publication of the Statement of Significance and Amended SPG

## Paragraph

6.5.12

# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

Strategic Policy S13 notes that the City will "protect and enhance significant City and strategic London views of important buildings, townscapes and skylines by ...securing an appropriate setting of and backdrop to the Tower of London World Heritage Site", although the meaning of 'appropriate' in this context is not defined.

Paragraph 6.5.12 under Policy S13 refers to "development that exceeds the threshold plane" – however, it is not clear whether this refers to the 75m tall building threshold set in the plan, the threshold for referral to the GLA, a threshold based on the impact on the heritage asset, or some other threshold. This should be clarified.

Suggested Changes:

- Policy S13 or the supporting text should clarify what is considered an 'appropriate' setting and backdrop for the Tower of London - for example, to ensure that development in the area maintains the clear silhouette of the White Tower against the sky.
- Paragraph 6.5.12 should clarify what is meant by "development that exceeds the threshold plane".

### Contact Name

### Contact Organisation

Marissa Ryan-Hernandez

London Borough of Tower Hamlets

### City Response

The development thresholds are set by the Mayoral LVMF as to not compromise the viewer's ability to recognise and appreciate the strategically important landmark and vary according to geographical distance from St Pauls Cathedral. Threshold planes vary across the City. Threshold planes are derived from the line of sight linking the assessment point with the landmark. Development above threshold planes will normally be refused.

### Recommendation

Change

### Recommendation Details

Insert reference to defined LVMF regarding the threshold plane

## Paragraph

6.5.16

## Type of Comment

General

### Comment



# City Plan 2036 Consultation Comments

Chapter notes and warmly welcomes the new inclusion of 'local views from Fleet Street' in the wording of Strategic Policy S13: Protected Views, and paragraph 6.5.16. However, we make a number of observations and requests for re-drafting.

On the need for Policy certainty and Precision:

Whilst we support the spirit of this policy, the drafting is not sufficiently explicit or clear to achieve the desired outcome – long term certainty of expectation and process - given some of the pressures that officers and decision-makers face. Heritage assets are a finite resource and should be enjoyed by everyone, forever. When there are real, harmful impacts to these common resources - which must be stewarded with the greatest of care – we submit they must not be compromised by temporal and short term considerations. The outcome of this policy should be that everyone concerned with the built environment, landowners, designers, applicants, consultees and the public should be certain that incremental change to protections that should be immutable will not be permitted. Greater precision is needed in new primary or supplementary policy which is equally effective and well policed as the St Paul's Heights.

On the need for precisely describing the scope of policy protection:

Although paragraph 6.5.16 is to be welcomed, it is not only the clear and unimpeded silhouette of the dome (the 'clear sky background profile') that the public expect to be protected but that the sky space around the western towers, between them and the dome, is given the same level of protection as the dome silhouette, such that, taking a line from the sloping profile of 122 Leadenhall on the north side of the view, with a corresponding line on the south side of the view, there is a clear 'arc' of protected sky space within which no further proposed buildings are consented to appear including the space between the dome and the Western towers.

We also stress the need to consider both the day time and night time values and significances of this journey – which has an equally strong but different impact – which then suggests lighting policy expectations.

Policy S13 must speak of the dome, the towers, eastern gable and the cohering line of the upper baluster of the Cathedral and the sky-space within and around all these elements. The policy also does not reference Ludgate Hill as a critical part of one of the most exciting City experiences, and this needs to be explicit in new drafting. We would suggest a separate bullet point for Fleet Street/Ludgate Circus approach in Policy S13 as follows:

- "Protecting and enhancing views of St Paul's on the Processional Approach from Fleet Street, Ludgate Circus, Ludgate Hill and St Paul's Churchyard, in accordance with guidance in the Protected Views SPD, ensuring the sky backdrop and silhouette (balustrade, pediments, statues, towers, drum, dome and lantern) of the Cathedral is not breached on this approach."

On the need for an agreed 'Statement of Significance' of the Fleet Street viewing corridor:

We feel there is a very important and overdue exercise in evidence gathering to reinforce this policy – so that the shared, common heritage and public benefit of this dramatic, dynamic urban context is fully recognised. NPPF policy 129 requires proportionate and robust, commonly agreed evidence on heritage significance. We have represented to the City in the past the need for a 'conservation management plan approach' to views and setting – especially of the Fleet Street/Ludgate Hill Processional Route. A skilfully prepared Statement of Significance (SoS) which gathers expertise from national specialists is needed. We would request that the



# City Plan 2036 Consultation Comments

view protection policy in the Local Plan includes a requirement for a SoS to become a material expectation immediately, as the SoS report is generated and consulted upon in the near future.

As a matter of priority Chapter urges the City to carry out an assessment of the type recommended in Part 2 of Historic England's 'The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3' (2nd Edition, 2017) to 'assess the degree to which [these] settings and views make a contribution to its significance or allow significance to be appreciated'. This assessment could form part of the updated SPD to a) ensure there is a published descriptive appreciation of the significance of the setting and views of St Paul's WITH THE BACKGROUND and b) which gives a clear steer to developers that infringement of the protected view and background of the view and ALL elements of the Cathedral's sky profile is not negotiable.

## Contact Name

Oliver Caroe

## Contact Organisation

Surveyor to the Fabric of St Paul's Cathedral

## City Response

Noted. COL concur that the western approach from Fleet Street and Ludgate Hill that connect the seat of Westminster with the City as a formal ceremonial route makes a very strong contribution to the significance of St Paul's Cathedral. COL will be amending the Protected Views SPG and producing a Statement of Significance and boundary of the Fleet Street Key Area of Change

## Recommendation

Change

## Recommendation\_Details

Amend/insert additional text to include similar wording to amended Protected Views SPD/Statement of Significance within within policy amplification to state that the Corporation will protect local views when approaching Ludgate Hill and ensure appreciation of the silhouette of St Paul's.

Views of St Paul's Cathedral from the Processional Route along Fleet Street and Ludgate Hill make a very strong contribution to the significance of St Paul's Cathedral and form a critical part of its setting. Statement of Significance focuses on the principal, historic approach to the Cathedral's main entrance, along Fleet Street via Ludgate Circus and Ludgate Hill to the west front on St Paul's Churchyard. This will inform the future conservation and enhancement of this approach.

Amend policy amplification to include reference to the silhouette.

Amended boundary of the Fleet Street Key Area of Change.

## Paragraph

6.5.18

## Type of Comment

General

## Comment

# City Plan 2036 Consultation Comments

Chapter is heartened to see a recognition in paragraph 6.5.18 of the importance of co-operation with other authorities to avoid further planning failures such as the Manhattan Loft Gardens development at Stratford which is clearly visible in the LVMF protected linear view of St Paul's from King Henry's Mound in Richmond. However we suggest that it is not just strategic views but local views from Southwark, Islington and quite modest glimpses that give local sense of place – so we suggest this paragraph is amended with the addition of 'local views' as well as strategically important ones.

Contact Name

Contact Organisation

Oliver Caroe

Surveyor to the Fabric of St Paul's Cathedral

City Response

Noted. The City Corporation will co-operate through statutory duty to operate regulations.

Recommendation

No Change

Recommendation Details





# City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S14: Open Spaces and Green Infrastructure

### Policy Number

### Paragraph

### Type of Comment

General

### Comment

The plan encourages greenery, which is very welcome, but when spaces are developed in the City they often are very stark and have a lot of hard space. There should be more effort to green these spaces. A good example is the recently completed Aldgate Square.

### Contact Name

### Contact Organisation

Barbican resident (no name provided)

### City Response

Noted. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes. Policy S14 will include additional wording to bullet point 2 to encourage more green space.

### Recommendation

Change

### Recommendation Details

Amended Policy S14 bullet point 2 to read "Seeking the provision of new open and green space through development, public realm or transportation improvements".

### Type of Comment

Object

### Comment

The CPA welcomes the support for City greening and recognises the role that existing open space and biodiversity assets have. Nevertheless, it is important a balanced approach is taken, weighing the value of existing open space, including its biodiversity, amenity and aesthetic value, as well as condition and lifespan of vegetation, against the potential benefits of the proposed development.

In addition, the CPA objects to the suggestion that public access to greening elements should be achieved. In order to maximise the development potential of sites in the City, greening elements are often required to be provided at roof level, using innovative techniques to maximise greening i.e. green roofs and walls. In many

# City Plan 2036 Consultation Comments

instances, public access is not feasible or appropriate.

Contact Name

Charles Begley

Contact Organisation

City Property Association (CPA)

City Response

Noted. Policy S14 states that the City will work to promote a greener City by increasing public access to existing and new open spaces. Policy D5 in the policy text states that public access to tall buildings is important in creating an inclusive City and they should provide accessible areas which are free to enter. In addition, increasing public access to existing and new open spaces should be achieved where possible is set out in Policy S14.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

Need more small green spaces with wild flowers to promote well-being and the environment. Move the winter garden back to Exchange Square, it was much better there.

Contact Name

D. Lyall

Contact Organisation

City Response

Noted. We have strengthened policies from the 2015 Local Plan to deliver more open space. Policy S14 states that the City will work to promote a greener City by protecting existing and open green space and seek the provision of new space through development, public realm or transportation improvements. Policy D3 Public Realm seeks the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

# City Plan 2036 Consultation Comments

## Comment

We thoroughly endorse attempts to 'green' the CoL and make the following points:

- The Barbican Wildlife Garden is an unique area within the northern City providing a natural habitat for flora and fauna which increases biodiversity. It should be protected and funds should be made available for its upkeep and further development.
- Green roofs on new buildings are to be encouraged. The new one at 120 Leadenhall is particularly welcome as it allows free public access. We recommend that all future such schemes should allow free public access as a precondition of planning approval.
- The garden plots on the upper podium are an attractive feature of the Barbican Estate that are well maintained and an asset to the CoL. Long may that continue.
- Barbican residents have access to gardening plots in tubs placed around the estate. Outside Shakespeare Tower on the lower podium, these tubs are wooden and are now rotting and over the next few years several will undoubtedly start to fall apart. We recommend they are replaced by the concrete tubs used elsewhere on the estate.

## Contact Name

Dr Alexander Wilson

## Contact Organisation

Shakespeare Tower House Group

## City Response

Support noted. Public access to tall buildings is important in creating an inclusive City and increasing public access to existing and new open spaces should be achieved where possible. Please refer Policy S27 which will seek appropriate contributions from developers to manage and mitigate the impact of development

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

A more ambitious green infrastructure strategy could be very precious to enhance the quality of life in City of London given its growing high density and hard pedestrian surface. Take Singapore for instance, it has gained its world reputation in vertical green urbanism over the past decade. A strong public policy and incentive that encourages active participations from public and private stakeholders and local communities is fundamental and vital to promote and change the course.

## Contact Name

Dr. Manuela Madeddu and Dr. Chia-Li

## Contact Organisation

University of Liverpool in London

## City Response

# City Plan 2036 Consultation Comments

Noted. It is envisaged through Policy S14 that green corridors and biodiversity links will be promoted. We are working closely with Open Spaces Department through the Biodiversity Action Plan (BAP) to ensure further greening of the City. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes. The evidence base provided by the consultants is set out in the City of London Urban Greening Factor Report (July 2018).

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

Whatever else, the Plan must stress the importance of not merely paying lip service to biodiversity, maintenance of landscape is essential and must be enforced by s106 covenant. This must include requiring the landscaping, particularly trees, to be maintained throughout the life of a building and not just for five years.

Contact Name

Contact Organisation

Fred Rodgers

City Response

Noted. The City recognises that further tree planting is required and the associated benefits to the environment associated with them. This has been reflected in the proposed City of London UGF score (see Appendix 1, Figure 2) in which trees score highly. A new policy on trees will be added and guidance regarding strategy and policies for trees are set out in the City of London Tree Strategy Supplementary Planning Document (SPD).

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

Make better use of the water table for planting of trees and shrubs. Need to use the soil and provide deep enough soil for trees to develop their roots. Too much planting is on shallow soil above concrete. Protect the tree in Finsbury Circus (the oldest one in the City).

Contact Name

Contact Organisation

Gill Smith



# City Plan 2036 Consultation Comments

## City Response

Noted. Policy OS3 states that development should incorporate measures to enhance biodiversity, including: retention and enhancement of habitats within Sites of Importance for Nature Conservation (SINCs), including the River Thames and paragraph 6.6.25 refers to a number of areas along the riverside which have been identified as areas of deficiency in nature conservation. A new policy on trees will be added and guidance regarding strategy and policies for trees are set out in the City of London Tree Strategy Supplementary Planning Document (SPD). Please also refer to the City Public Realm SPD.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

We welcome this policy and its associated policies OS1-3. However, we would like the plan to specify that where residential amenity may be affected by terraces, extensive green roofs (with no or limited access to people) will be preferred over intensive ones. In any case, for the same given area, extensive green roofs are likely to deliver a higher Urban Greening Factor (UGF) than intensive ones.

## Contact Name

Jane Smith

## Contact Organisation

Barbican Association

## City Response

Noted. We would expect any proposed development near to existing residential properties should identify potential impacts on residential amenity and set out measures to mitigate those impacts within their supporting application documents. Policy D5 states that roof terraces will be permitted providing there would be no immediate overlooking of residential premises or significantly adverse impacts on residential amenity. Policy D5 will be amended to include additional wording to point 1, bullet point 2 to encourage extensive green roofs where there are issues which impact on residential amenity.

## Recommendation

Change

## Recommendation\_Details

Additional text added to Policy D5 point 1, bullet point 2 to read "Where there is a potential for a significantly adverse impact, the use of an extensive green roof and a restriction on access should be considered as an alternative".

## Type of Comment

Support

## Comment



# City Plan 2036 Consultation Comments

The PLA broadly supports policy S14, including the recognition of the River Thames as a key environmental asset.

Contact Name

Michael Atkins

Contact Organisation

Port of London Authority

City Response

Support noted.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

We would like to see an emphasis on providing street shade trees, "green" walls, "green" roofs, and also a move towards sustainable urban drainage systems and rainwater harvesting to relieve the "hardening" of the London landscape by the covering over of front and rear gardens to provide parking, barbecue areas etc. This is directing rainwater straight to the sewers where it has the potential to cause flooding, while the associated drying out of the areas around dwellings is provoking subsidence, and altogether it is denying plants and trees the water they need to survive.

Contact Name

Michael Priaulx

Contact Organisation

Swift Conservation

City Response

Noted. It is envisaged through Policy S14 that green corridors and biodiversity links will be promoted. We are working closely with Open Spaces Department through the Biodiversity Action Plan (BAP) to ensure further greening of the City. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes. The City recognises that further tree planting is required and the associated benefits to the environment associated with them. This has been reflected in the proposed City of London UGF score (see Appendix 1, Figure 2) in which trees score highly. In addition a new policy on trees has been added to increase the number of trees. Guidance regarding strategy and policies for trees are set out in the City of London Tree Strategy Supplementary Planning Document (SPD).

Recommendation

No Change

Recommendation Details

Added Policy OS4 on trees

# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

Overlooked loss of street trees – need for more greening

### Contact Name

### Contact Organisation

Resident (no name provided)

### City Response

Noted. The City recognises that further tree planting is required and the associated benefits to the environment associated with them. This has been reflected in the proposed City of London UGF score (see Appendix 1, Figure 2) in which trees score highly. In addition a new policy on trees has been added to increase the number of trees. The City of London through the Tree Strategy aim to increase City of London owned trees by 5% by 2019.

### Recommendation

Change

### Recommendation Details

Added Policy OS4 Trees.

## Paragraph

6.6.24

## Type of Comment

General

### Comment

Paragraph 6.6.24 needs modification to clarify the upgraded SINC status of the Barbican Estate and its three gardens.

Paragraph 6.6.24 also to be modified to reflect the correct name of the “Barbican Wildlife Garden”.

### Contact Name

### Contact Organisation

Fred Rodgers

### City Response

Noted. We note that the Fann Street Wildlife Garden is now known as the Barbican Wildlife Garden so wording has been amended to reflect this.

### Recommendation

Change



# City Plan 2036 Consultation Comments

## Recommendation Details

Re-named Barbican Wildlife Garden in paragraph 6.6.25.

<u>Paragraph</u>	6.6.4
------------------	-------

<u>Type of Comment</u>	Support
------------------------	---------

### Comment

"Mayor of London's ambition to make over 50% of London green by 2050". I wholeheartedly support BioDiverseCity. Remember 1986 and the 'Big Bang'. Well, ignite a green revolution in 2019.

### Contact Name

Barbara Brownlee

### Contact Organisation

### City Response

Support noted.

### Recommendation

No Change

## Recommendation Details

<u>Paragraph</u>	6.6.5; 6.6.7
------------------	--------------

<u>Type of Comment</u>	General
------------------------	---------

### Comment

Would like to see specific mention of the intention to preserve and enhance habitat for Black Redstarts; and the intention to preserve and promote habitat, including green corridors, dark spaces and sympathetically lit areas for bats. We recommend specific reference to protecting City street trees, conspicuous here by their absence.

6.6.5: There is a need for high quality and species interventions as well as more green space for the public. These aims are not always compatible. We question whether there are sufficient resources to monitor and evaluate biodiversity 'benefits' and make sure they are substantive and effective.

6.6.7 should cite the number, variety and in many cases considerable age of the City street trees, over and above those trees already cared for in the City Parks.





# City Plan 2036 Consultation Comments

## Contact Name

Sarah Hudson

## Contact Organisation

Friends of City Gardens

## City Response

Noted. Policy OS3 seeks in the policy text to provide habitats that benefit the City's target species (house sparrows, peregrine falcons, swifts, black redstarts, bats, bumblebees and stag beetles). It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes. Developers will be expected to meet the cost of any assessments carried out on the biodiversity of the site. Additional wording will be added to the implementation part of plan. Further information on the number of trees in the City will be included in the Tree Strategy which will be updated as an SPD. The Lighting Strategy refer to bats.

## Recommendation

No Change

## Recommendation Details

## **Policy Number**

O1

## Paragraph

## Type of Comment

General

## Comment

These policies should be cross-referenced to the policies on public realm.

## Contact Name

David Coleman

## Contact Organisation

## City Response

Noted. The Plan should be read as a whole and there are some cross over on particular policies such as public realm (Policy D3) and green infrastructure (Policy S14).

## Recommendation

No Change

## Recommendation Details

## **Policy Number**

OS1



# City Plan 2036 Consultation Comments

## Paragraph

### Type of Comment

General

### Comment

We support the principle of protecting and improving existing open space within development schemes to contribute to regeneration and greening the City. However, it should be recognised that in certain circumstances within comprehensive redevelopment schemes, there may be a resultant net loss of open space to deliver greater benefits for the development. In such circumstances, this should be taken into account and sufficient flexibility should be provided within the wording of the policy to support these scenarios. As such we suggest Policy S14 and Policy OS1 should be amended accordingly.

We therefore propose that the first bullet point of Policy OS1 be reworded as follows:

‘Existing open space will be protected. Where the loss of existing open space is proposed, it will be replaced on redevelopment by open space of equal or improved quantity on or near the site; unless the loss of any open space can be justified by the improvement to the quality and increasing public access to the space’. This wording could also be included within the supporting text of Strategic Policy S14.

### Contact Name

### Contact Organisation

Endurance Land

### City Response

Support noted however the current wording in the draft policy will remain as set-out.

### Recommendation

No Change

### Recommendation Details

### Type of Comment

General

### Comment

I would like to see Policy OS1 reworded to ensure all existing open space is retained, regardless of commercial pressures.

### Contact Name

### Contact Organisation

Allison Parkes

### City Response

# City Plan 2036 Consultation Comments

Noted. Policy S14 and OS1 both seek the protection of existing open and green space and Policy OS3 seeks the retention and enhancement of habitats within the SINCs with the policy appropriate level of protection. Therefore, the current wording in the draft policy will remain as set-out.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

It has become more difficult to find open spaces in which the public are welcome in the city. I am a single parent on a very modest income, but I adore the beautiful buildings and spaces in London, the aesthetic is not lost on my children and me. However, I find myself not being able to avail of views, vistas and experiences, all integral to mental health, because of the very many demands on my budget. It would be lovely to think that even I, working as I do with children with special educational needs, could enjoy the same beautiful spots that my better-paid well-heeled fellow Londoners do.

## Contact Name

C Cawley

## Contact Organisation

## City Response

Noted. Policy S14 and OS1 both seek the protection of existing open and green space. In the policy text of the vision section 'Shape Outstanding Environments' the City will be a much greener place and new open and amenity spaces will be created including through the creation of new pedestrian routes, accessible and permeable buildings, and the provision of amenity space at upper or roof levels. Public access to private open space will be encouraged. Policy S8 (see point 7 in the policy box) seeks to enhance public access to nature and biodiversity through maximising the provision of green roofs, walls and trees. Policy D5 require free to enter publicly accessible areas and states that public access to the tall buildings is important in creating an inclusive City. Tall buildings should provide publicly accessible areas at upper levels, which are free to enter. These may include public viewing galleries or other forms of open space provision, or features such as retail, leisure or educational facilities. Policy W1 (see point 6 in the policy box) states that public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Policy HIC8 states in the policy text (see paragraph 4.1.48) that the City plans to provide appropriate sensory play areas in the City for children and young people with special educational needs.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

# City Plan 2036 Consultation Comments

Areas such as New Street Square need more seating and ability to have food stalls/TV screens during events like Wimbledon. Provide office workers with the ability to have a sandwich outside and grasp what is happening outside the office.

Contact Name

Contact Organisation

Carol Van Der Vorst

City Response

Noted. New Street Square is operated by Land Securities therefore is a private landlord issue. See Policy C2 regarding encouraging seating.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

Policy OS1 sets out how existing open spaces will be protected. Whilst the CPA supports the principle of this policy, it is felt that the requirement to re-provide open space of equal or improved quality on major redevelopment should be applied flexibly, to ensure that other aspirations of the Plan are not prejudiced, particularly where a development scheme provides other public benefits such as additional permeability or public access. The policy should consider open space requirements on a site-by-site basis.

The CPA queries what is meant by 'public access will be secured wherever possible, to existing and proposed private spaces' and would welcome clarification about the types of spaces this would include. It will not always be appropriate or practical to provide public access to existing private spaces.

It is suggested that the first bullet point of policy OS1 is reworded as follows:

"• Existing open space will be protected, particularly that of historic interest. Where a loss of existing open space is proposed, it should be replaced on redevelopment by open space of equal or improved quantity and/or quality on or near the site where feasible;"

Contact Name

Contact Organisation

Charles Begley

City Property Association (CPA)

City Response

Noted. The Local Plan policies should be read as a whole and each application will be considered on a case by case basis.

Recommendation

No Change

# City Plan 2036 Consultation Comments

## Recommendation\_Details

### Type of Comment

General

### Comment

The City needs more green spaces for relaxation to eat lunch away from the hustle and bustle. My office has no canteen.

### Contact Name

### Contact Organisation

City worker (no name provided)

### City Response

Noted. Many spaces in the City of London are operated by private landlords. Policy S14 states that the City will work to promote a greener City by protecting existing and open green space and seek the provision of new space through development, public realm or transportation improvements. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes. Policy R5 seeks proposals for markets and temporary retail pop-ups where appropriate. Policy C2 states the provision of facilities that meet the needs of visitors in new cultural developments and in nearby open spaces and the public realm, will be encouraged. Policy D2 states in the policy text that the design of buildings must be able to accommodate proposed uses within the curtilage of the development, including provision of tables and chairs.

### Recommendation

No Change

## Recommendation\_Details

### Type of Comment

General

### Comment

The Diocese of London's contribution of open space across the Square Mile is of fundamental importance to all. As the City plans for increased numbers of residents and workers it must equally protect and enhance the provision of these valuable assets. The Diocese would like to see wording in the City Plan 2036 to support the expressed views of officers that provision of open space is best made and preserved at street level. Within the transport section there are references to maintaining provision of "space" at street and walkway level. It would be preferable to have this message reinforced in the open spaces provisions of the Plan as well. This is not to the exclusion of relocating open space or to re-providing it elsewhere provided there is an irrevocable guaranteed free public access to all.

The Diocese asks the question that if public space is ever relocated, should it be re-provided with a larger area elsewhere? Similar to the way on site and off site affordable housing provision is made.



# City Plan 2036 Consultation Comments

Cross-references to the CIL Neighbourhood Fund and more localised S106 Agreements to allow this policy to be achieved successfully without undue cost to the public purse would seem prudent. Achieving this is no small task, as the concept will reappear in several places. For this reason the Diocese has not put forward wording here but would welcome further discussion.

Contact Name

Contact Organisation

Fr Luke Miller

Diocese of London

City Response

Noted. Policy encourages open space at street level and within buildings.

Recommendation

No Change

Recommendation\_Details

Possibility of cross-referencing Policy OS1 and S27?

Type of Comment

General

Comment

Concur with comments from Barbican Wildlife Group which urge that Policy OS1 is reworded to ensure all existing open space is retained, regardless of commercial pressures.

Contact Name

Contact Organisation

Fred Rodgers

City Response

Policy S14 states that the City will seek in 'protecting existing open and green space'.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment



# City Plan 2036 Consultation Comments

Concur with comments from Barbican Wildlife Group which consider it very important that when deciding whether access to private green spaces is appropriate, due account needs to be taken of whether it is to the detriment of residential amenity (if applicable), the potential impact on wildlife and on security and the impact of potential anti-social behaviour. A balanced and measured approach to access is needed to prevent disruption and destruction in vulnerable, precious green spaces and London Wildlife Trust guidance on this matter must be taken into account.

Contact Name

Contact Organisation

Fred Rodgers

City Response

Noted. Please note Policy D5 has been amended to include wording regarding disturbance from noise on residential amenity. Further information has been added to Policy OS3. Please refer to Policy C4 regarding anti-social behaviour.

Recommendation

Change

Recommendation Details

Policy D5 amended to include more information on residential amenity and Policy OS3 further wording on wildlife measures.

Type of Comment

General

Comment

Need more seating/tables in open spaces so that people can have meetings and work outside in the nice weather.

Contact Name

Contact Organisation

Inma Ferrer

City Response

Noted. Many spaces in the City of London are operated by private landlords. Policy S14 states that the City will work to promote a greener City by protecting existing and open green space and seek the provision of new space through development, public realm or transportation improvements. Policy C2 states the provision of facilities that meet the needs of visitors in new cultural developments and in nearby open spaces and the public realm, will be encouraged, including seating and tables. Policy D2 states in the policy text that the design of buildings must be able to accommodate proposed uses within the curtilage of the development, including provision of tables and chairs.

Recommendation

No Change

Recommendation Details



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

1. We urge that Policy OS1 is reworded to ensure all existing open space is retained, regardless of commercial pressures. CoLC's Open Spaces and Recreation Monitoring Report highlights that open space in the City has grown by less than 0.7 ha since 2011, with green space growing by less than 0.5 ha. Most new space is primary or secondary civic space, which is effectively tarmaced area with a high level of pedestrian traffic. In the same period, open space has been lost due to the redevelopment of sites.

Policy OS1 continues to allow for the loss of existing open spaces where there is a development requirement, a direct carryover from the 2015 Plan. Given how little open space there is and the 'lack of opportunity' to create new spaces, the policy should be written to ensure that all existing open space, and particularly all green space, should be unconditionally protected, regardless of perceived development requirements.

The CoLC must not ignore the greater value of well-being, including good mental and physical health and the need for such spaces to help retain existing, and attract new, City workers. It is too easy, at the planning stage, to prefer developer's 'compelling' commercial reasons for open spaces to be lost. Where land is at a premium, it is next to impossible to replace existing open space and habitats with equivalent quality nearby, particularly where trees are lost.

2. We have some concern that Policy OS1 proposes to seek public access to private spaces, without caveats. In many cases, private open space within the City is used by those most vulnerable to the City's negative impacts, such as permanent residents and vulnerable wildlife, and therefore have a pressing need for space away from the more trafficked, congested and polluted areas. Access, even when relatively controlled, can be to the detriment of wildlife and completely uncontrolled access to a SINC would have an increased adverse effect on a sensitive area. The London Wildlife Trust (LWT) advises "Some access is desirable to all but the most sensitive of sites, but direct access to all parts of a site may not be desirable".

When deciding whether access to private green spaces is appropriate, account needs to be taken of whether it is to the detriment of residential amenity (if applicable), the potential impact on wildlife and on security and the impact of potential anti-social behaviour. A balanced and measured approach to access is needed to prevent disruption and destruction in vulnerable, precious green spaces and LWT guidance on this matter must be taken into account.

### Contact Name

Joanna Rodgers

### Contact Organisation

Barbican Wildlife Group

### City Response

Noted. Policy S14 and OS1 both seek the protection of existing open and green space and Policy OS3 seeks the retention and enhancement of habitats within the SINC with the policy appropriate level of protection. Therefore, the current wording in the draft policy will remain as set-out. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes. The policy text (see paragraph 6.6.24) does refer to the upgraded status for the Barbican Estate however have amended the text to



# City Plan 2036 Consultation Comments

make this more explicit. We note that the Fann Street Wildlife Garden is now known as the Barbican Wildlife Garden so paragraph 6.6.24 will be amended to reflect this.

## Recommendation

Change

## Recommendation\_Details

Re-named from Fann Street to Barbican Wildlife Garden in paragraph 6.6.25 and have amended the text to make SBINC status more explicit.

## Type of Comment

General

## Comment

Aldgate Square is a good example of improvements to the pedestrian environment. This approach should be employed elsewhere, including along the riverside if possible. The South Bank benefits from being pedestrianised.

## Contact Name

## Contact Organisation

John Sgouros

## City Response

Noted. We have strengthened policies from the 2015 Local Plan to deliver more open space. Policy S14 states that the City will work to promote a greener City by protecting existing and open green space and seek the provision of new space through development, public realm or transportation improvements. Policy D3 Public Realm seeks the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

The City Plan acknowledges the scarcity of green and open space within the area and draft policies S14 and OS1 seek to promote new open space while protecting and enhancing existing spaces.

The tight urban grain of the City of London can limit the scope for widespread urban greening, and the City Plan should provide policies which protect, enhance and



# City Plan 2036 Consultation Comments

seek opportunities for new tree planting. The important role that trees play in the urban environment should be recognised and include the trapping of air pollutants, providing shade, absorb rainwater and filter noise among others. The benefits provide considerable overlap with other policies in the City Plan, including those which deal with the urban heat island effect, improving air quality, providing natural barriers for vehicle security threats and reducing the risk of flooding. It is the Mayor's ambition to increase the capital's tree canopy cover by 10% by 2050 and for boroughs to realise the benefits and services that the capital's urban forest provides. The City of London is advised to follow the guidance set out in Draft New London Plan Policy G7.

## Contact Name

Juliemma McLoughlin

## Contact Organisation

Mayor of London

## City Response

Noted.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

☑ Would like more green spaces.

## Contact Name

Lucy Sandford

## Contact Organisation

The C4ty - City of London Youth Forum

## City Response

Noted. We have strengthened policies from the 2015 Local Plan to deliver more open space. Policy S14 states that the City will work to promote a greener City by protecting existing and open green space and seek the provision of new space through development, public realm or transportation improvements. Policy D3 Public Realm seeks the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes.

## Recommendation

No Change

## Recommendation Details



# City Plan 2036 Consultation Comments

## Type of Comment

## Object

### Comment

Open spaces are very important to well-being and mental health and to the delivery of air quality improvement. I would also suggest that they are particularly important to those who live in the City and experience the greatest mental and physical health impacts from issues such as air and noise pollution. Therefore, the City's commitments to delivering new open spaces is to be welcomed.

I am disappointed about the level of protection afforded in the Plan for existing open spaces. Policy OS1 clearly leaves the door open for the loss of open space as part of new developments. Given that the Corporation's own monitoring reports makes clear that the growth in open space since 2011 has been minimal, surely this makes it all the more important to protect what we do have? Existing green assets, whether they be parks and gardens or more simply mature trees, need to be given the highest level of protection.

I would urge that Policy OS1 be modified to ensure that all existing green space be unconditionally protected, regardless of development interests. Given how crucial green space is, this should be the minimum level of ambition and is the approach adopted in other London Boroughs. Too often, initial assurances in the early stages of planning fall away and the final development sees existing green space and assets either lost or degraded.

Policy OS1 takes a blanket approach to seeking public access to existing private open spaces and is framed without any caveats. In many cases, private open spaces are used by those who are most vulnerable to the negative aspects of the City (residents and wildlife). Privacy means these spaces remain quieter, less trafficked, less polluted and contribute to improving air quality, protecting residential amenity and biodiversity. Public access to private spaces can lead to anti-social incidents, security issues and inappropriate feeding of wildlife. A more balanced and measured approach is therefore needed in determining a suitable level of access to private open spaces in order to prevent disruption and destruction in small vulnerable spaces and the wording of Policy OS1 should be modified to reflect this.

### Contact Name

### Contact Organisation

Ruth Cooke-Yarborough

### City Response

Noted. We have strengthened policies from the 2015 Local Plan to deliver more open space. Policy S14 states that the City will work to promote a greener City by protecting existing and open green space and seek the provision of new space through development, public realm or transportation improvements. Policy D3 Public Realm seeks the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes. It is envisaged through Policy S14 that green corridors and biodiversity links will be promoted. We are working closely with Open Spaces Department through the Biodiversity Action Plan (BAP) to ensure further greening of the City.

# City Plan 2036 Consultation Comments

## Recommendation

No Change

## Recommendation Details

### Type of Comment

General

### Comment

Often design of public realm is impractical when it comes to cleaning and maintenance. Many are poorly designed with too much hard landscaping, inappropriate planting or mature trees that often fail in the first few years after planting and are difficult to maintain.

### Contact Name

Sarah Hudson

### Contact Organisation

Friends of City Gardens

### City Response

Noted. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes. Policy S14 will include additional wording to bullet point 2 to encourage more green space.

## Recommendation

No Change

## Recommendation Details

### Type of Comment

General

### Comment

Need more recreational facilities in this area and more green space.

### Contact Name

Sharon Smith

### Contact Organisation

### City Response

Noted. We have strengthened policies from the 2015 Local Plan to deliver more open space. Policy S14 states that the City will work to promote a greener City by protecting existing and open green space and seek the provision of new space through development, public realm or transportation improvements. Policy D3 Public Realm seeks the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes.

# City Plan 2036 Consultation Comments

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

Need more green space. For example, New Street Square is very hard with unimaginative public realm and seating. More planting is needed. The City needs more open spaces for lunchtime to sit and relax.

Contact Name

Contact Organisation

Stelios Stephapopolous

City Response

Noted. We have strengthened policies from the 2015 Local Plan to deliver more open space. Policy S14 states that the City will work to promote a greener City by protecting existing and open green space and seek the provision of new space through development, public realm or transportation improvements. Policy D3 Public Realm seeks the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

For such a large and important cathedral, St Paul's has a remarkably modest setting. It consists of a mixture of paved areas, gated garden, private Choir School, highway, and green municipal lawns subdivided by pathways: arguably an incoherent and ad hoc collection of inherited and left-over spaces that do not reach their full potential to provide a setting worthy of the Cathedral.

The great flight of full-width steps which cascades down from the west end of St Paul's is a unique feature for a cathedral in England, and one of the UK's greatest urban set-pieces. Although the view from the Strand is rightly celebrated, arriving up Ludgate Hill by foot allows a wonderful slow reveal – diminished, when the full façade comes into view, by the Ludgate Hill highway which cuts diagonally across the foreground. This is a special space, in which the classical façade of St Paul's is confronted by the slightly asymmetrical, elliptical facades of the buildings which contain the forecourt: in short, a space which is crying out for a simple

# City Plan 2036 Consultation Comments

consistent treatment of the ground plane, allowing the axial position of the statue of Queen Anne to achieve due dignity, and visitors the chance to pause and ponder.

In the Commission's view, the time has come to remove vehicular traffic from the West and South sides of St Paul's and to implement a comprehensive landscape/urban design scheme which would enhance the setting of Christopher Wren's great masterpiece and create space for calm and peaceful contemplation at the heart of the City. The removal of traffic from Ludgate Hill would provide an opportunity to create a larger, undivided expanse of grass which would be unique in the City in terms of its scale, peacefulness and prospects. Additional peripheral tree planting could make a considerable contribution to biodiversity, reducing pollution and emphasise a sense of tranquillity.

## Contact Name

Tom Ashley

## Contact Organisation

Cathedrals Fabric Commission for England

## City Response

Noted. There have been significant improvements to the public realm to the south of St Paul's Cathedral in recent years and this area has not been identified as a Key Area of Change in the emerging Local Plan. However the Fleet Street and Ludgate Key Area of Change has been extended from Ludgate Circus eastwards towards the west end of St Paul's Cathedral preserving St Paul's its status as the defining focal point of the processional route and a key element of the area's character. Additional wording has been added to the Policy S22 regarding St Paul's Cathedral.

## Recommendation

Change

## Recommendation\_Details

Wording added to Policy S22 (Fleet Street and Ludgate). See 7.7.13 St Paul's Cathedral.

## Paragraph

6.6.1

## Type of Comment

General

## Comment

As a resident I welcome the City's intention (6.6.1) to provide further green infrastructure, open space provision and biodiversity within the City, particularly Policy OS1 on maintaining and improving the quantity, quality and accessibility of public open space. I should like to make two comments:

1 The Plan is silent on one important aspect of the quality of our green spaces, namely, the mess. City Gardeners work hard to remove huge quantities of litter left in the City Parks, backed up by the Cleansing people, but so much food is eaten in public, especially in good weather, that the current arrangements are often inadequate. It's difficult to be proud of how well our green spaces are maintained when one sees food-related rubbish everywhere. What about working in partnership with the very many takeaway food outlets in the City to see what can be done to improve this particular scourge.



# City Plan 2036 Consultation Comments

2 Policy OS1 recognises that “Open spaces must be designed to meet the needs of all the City’s communities”. Residents would like to be consulted and considered more often when changes are proposed. We sometimes feel that we are overlooked as, for example, in the sweeping plans for Culture Mile.

Contact Name

Contact Organisation

Mollie Bickerstaff

City Response

Noted. Litter is briefly addressed in the Local Plan but is part of the ongoing consultation for plans to the Culture Mile area.

Recommendation

No Change

Recommendation\_Details

**Policy Number**

OS1-OS3

**Paragraph**

**Type of Comment**

General

**Comment**

The proposed policies on greening (Policies OS1-3) are welcome as far as they go but we are concerned to ensure that as much as possible new green space at ground level is provided to improve the environmental quality and attractiveness of the city as a publicly accessible, walkable and legible place.

We are also concerned at the lack of ambition in relation to tree planting and protecting and enhancing the qualities of the existing small areas of green space in the city, for example by using planting and landscaping to reduce the impact of traffic noise and associated pollution.

Contact Name

Contact Organisation

Neil Sinden

CPRE London

City Response

Noted. Policy S14 states that the City will work to promote a greener City by protecting existing and open green space and seek the provision of new space through development, public realm or transportation improvements. However, the provision of large green space in a high-density environment is difficult to achieve. Policy D3 Public Realm seeks the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors.

# City Plan 2036 Consultation Comments

## Recommendation

Change

## Recommendation\_Details

The inclusion of a policy on trees. See Policy OS4.

## Policy Number

OS2

## Paragraph

## Type of Comment

General

## Comment

British Land broadly supports the aspirations for increased City greening, however, consider the policy should allow flexibility to reflect development constraints and opportunities. An Urban Greening Factor (UGF) of 0.3 as a minimum may not be achievable for major projects, especially where the proposals seek to maximise the site's potential and where full site coverage is required. In City locations, urban greening opportunities may be limited to green walls, roofs and terraces which are not likely to be sufficient to meet 0.3 UGF on their own. The policy requirement for all major development to achieve the minimum UGF of 0.3 is also considered too onerous in relation to the definition of major development within the Plan glossary. Therefore, British Land considers the policy should relate to major development that creates 1,000 sqm of additional floorspace.

## Contact Name

## Contact Organisation

British Land Company PLC

## City Response

Noted. The UGF score target we believe is a realistic target for major development proposals and this is set out in the Urban Greening Factor Study. The London Plan also has its own UGF and we are already receiving schemes which are exceeding the target score.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment





# City Plan 2036 Consultation Comments

I have concerns that The City is placing great emphasis on property developers to provide the biodiversity enhancements it requires and that this will need careful monitoring to ensure implementation. I acknowledge and welcome the City's intended use of a new Urban Greening Factor and I would like to see this system further extended to property owners. All property owners should be required to audit and report their contribution to the City's Biodiversity Plans on an on-going basis. A league table should be made publicly available showing which owners have done the most, and least, towards "Greening the Grey etc" – a monetary penalty should be levied on those who fail to engage or meet specific targets.

## Contact Name

## Contact Organisation

Allison Parkes

## City Response

Noted. We have strengthened policies from the 2015 Local Plan to deliver more open space. Policy S14 states that the City will work to promote a greener City by protecting existing and open green space and seek the provision of new space through development, public realm or transportation improvements. Policy D3 Public Realm seeks the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

More new buildings with green roofs would be great to the extent feasible.

## Contact Name

## Contact Organisation

Carol Van Der Vorst

## City Response

Noted. Policy S14 states that the City will work to promote a greener City by protecting existing and open green space and seek the provision of new space through development, public realm or transportation improvements. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes.

## Recommendation

No Change

## Recommendation Details



# City Plan 2036 Consultation Comments

## Type of Comment

## Object

### Comment

Whilst the CPA is supportive of city greening, it is important that policy is sufficiently flexible to adequately deal with development constraints presented in the Square Mile. The CPA is concerned that the policy is too prescriptive and not realistically achievable in the City for most major developments. This is evidenced by the examples set out in the study prepared by Green Infrastructure.

Whilst it is recognised that an UGF target will improve greening, we have significant concerns with the Green Infrastructure study which makes “sweeping generalisations” without properly understanding the complexities and constraints of the projects. The study outlines how higher UGF might have been achieved for the cited projects, which principally focuses on larger green roofs or green walls. CPA do not believe that additional green roofs or walls would have been appropriate or possible in many instances.

Not all major development proposals will be viably able to meet an UGF of 0.3 as a minimum. This is particularly the case in the City where schemes seek to maximise a site’s potential (which is required by other policies and, frequently, by good design principles), and where full site coverage is proposed. Opportunities for green walls are often restricted in the Square Mile due to the proximity of neighbouring buildings, external walls, and heritage constraints. Similarly, the possibility of incorporating green roofs is limited due to the lack of available space and conflicting policy requirements including PV panels, amenity roof terraces and other design and conservation considerations. Policy OS2 in its current form could prejudice other policies and aspirations of the Plan.

The supporting evidence base document prepared by Green Infrastructure Consultancy Ltd sets out recommendations for how the City could adopt an UGF requirement in policy. Critically, at paragraph 6.1, it states: “Therefore, a UGF should be applied across the City, with the understanding that there may be a few exemptions, for example historic buildings, or projects on sites with particular circumstances, where the application of the UGF scheme would be of limited use.”

The current policy wording does not allow sufficient flexibility to take account of “particular circumstances” on a site-by-site basis and is considered unsound in line with the tests at paragraph 35 part a of the NPPF. The current minimum target score within the New London Plan is still in draft and is subject to examination in public by Inspectors. Therefore, the minimum UGF score of 0.3 cannot realistically be applied in the City, given the high density nature of development, and other policy considerations which need to be incorporated into the design. Our experience indicates that greening elements such as green walls and roofs will not be sufficient to achieve the minimum 0.3 score, yet in the City context it is often not possible to provide further greening.

The requirement for major development to achieve a minimum UGF score is also considered too onerous given the definition of major development in the Glossary. The policy should be applied to major development creating 1,000 sq m of net additional floorspace.

On the basis of the above, part 2 of policy OS2 should be reworded as follows:

“Major development proposals (comprising 1,000 sq m of additional floorspace) will be required to:

- Include an Urban Greening Factor (UGF) calculation demonstrating how the development will meet the City’s target UGF score of 0.3 as a minimum, unless site



# City Plan 2036 Consultation Comments

specific considerations make this undeliverable;”

Contact Name

Charles Begley

Contact Organisation

City Property Association (CPA)

City Response

Noted. The UGF score target we believe is a realistic target for major development proposals and this is set out in the Urban Greening Factor Study. The London Plan also has its own UGF and we are already receiving schemes which are exceeding the target score.

Recommendation

Change

Recommendation Details

Possible re-wording of Policy OS2 point 2 regarding major development proposals.

Type of Comment

General

Comment

Would like more greenery as all I can see from my office window is blank walls and hard surfaces.

Contact Name

City worker (no name provided)

Contact Organisation

City Response

Noted. We have strengthened policies from the 2015 Local Plan to deliver more open space. Policy S14 states that the City will work to promote a greener City by protecting existing and open green space and seek the provision of new space through development, public realm or transportation improvements. Policy D3 Public Realm seeks the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

# City Plan 2036 Consultation Comments

Pollution reducing plants are needed. Greenery in general promotes a sense of wellbeing. Bank Junction looks bleak and unloved and could certainly benefit with 'greenifying'.

Contact Name

Contact Organisation

City worker (no name provided)

City Response

Noted. Policy S14 states that the City will work to promote a greener City by protecting existing and open green space and seek the provision of new space through development, public realm or transportation improvements. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

It is essential that planting schemes that not only reduce air pollution but also encourage water saving are a requirement for any new developments. It is also essential that all planting is properly cared for.

Contact Name

Contact Organisation

Fred Rodgers

City Response

Policy S14 states that planting and habitat creation enhances biodiversity and seek to reduce rainwater run-off. Policy CR3 and SI1 includes information on rainwater harvesting.

Recommendation

No Change

Recommendation Details

Type of Comment

Support

Comment



# City Plan 2036 Consultation Comments

Would like more greenery

Contact Name

Contact Organisation

Inma Ferrer

City Response

Noted. Policy S14 states that the City will work to promote a greener City by protecting existing and open green space and seek the provision of new space through development, public realm or transportation improvements. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes.

Recommendation

No Change

Recommendation\_Details

Type of Comment

Support

Comment

The City Plan's implementation of the Draft New London Plan's urban greening factor (UGF) in draft Policy OS2 is very welcome and should be a useful mechanism in securing green infrastructure where it is most needed. It is noted and welcomed that Draft New London Plan Policy G5, which instructs boroughs to develop their own UGFs tailored more appropriately to reflect local circumstances has been applied by the City of London in supporting their proposed UGF.

Contact Name

Contact Organisation

Juliemma McLoughlin

Mayor of London

City Response

Noted. The City recognises that further tree planting is required and the associated benefits to the environment associated with them. This has been reflected in the proposed City of London UGF score (see Appendix 1, Figure 2) in which trees score highly. In addition a new policy on trees has been added to increase the number of trees. Guidance regarding strategy and policies for trees are set out in the City of London Tree Strategy Supplementary Planning Document (SPD).

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

# City Plan 2036 Consultation Comments

We are pleased to see the inclusion of a policy (OS2) requiring an Urban Greening Factor calculation to be submitted for major development proposals. This policy is included in the emerging London Plan, and has the possibility to deliver significant environmental benefits across London as and when it is included in borough local plans. The emerging Tower Hamlets Local Plan does not include a policy on Urban Greening Factors, as it was developed before the publication of the new London Plan – however, this may be a policy that is considered when the Tower Hamlets Local Plan is next reviewed.

We therefore look forward to seeing how the policy is implemented and how effective it is in the City of London. The emerging London Plan suggests an Urban Greening Factor score of 0.3 for primarily commercial developments and 0.4 for primarily residential developments, while the City Plan 2036 only calls for a score of 0.3 for all major developments. We appreciate that the majority of developments in the City are likely to be primarily commercial, but as some residential development is expected in the City, we suggest that a differentiation be made between residential and commercial development, and the higher score of 0.4 be required for residential development, to bring the City Plan 2036 more in line with the emerging London Plan.

## Contact Name

Marissa Ryan-Hernandez

## Contact Organisation

London Borough of Tower Hamlets

## City Response

Noted. The UGF score of 0.3 for residential development will remain. The evidence base provided by the consultants is set out in the City of London Urban Greening Factor Report (July 2018).

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

There is a danger that the ‘urban greening factor’ promoted in the draft London Plan and adopted in Policy OS2 of the draft Local Plan will be applied mechanically to individual development schemes with no reference to an overall vision for greening the city.

## Contact Name

Neil Sinden

## Contact Organisation

CPRE London

## City Response

Noted. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes.



# City Plan 2036 Consultation Comments

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

London is becoming one of the first globally recognised Park Cities. The Mayor of London is launching this in 2019. How does the City Plan 2036 support this?

Contact Name

Contact Organisation

R Purrmann

City Response

Noted. In July the Mayor of London launched the National Park City and additional wording will be added to Policy S14 wording. Policy S14 states that the City will work to promote a greener City by protecting existing and open green space and seek the provision of new space through development, public realm or transportation improvements. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes.

Recommendation

Change

Recommendation Details

Paragraph 6.6.4 includes reference to the National Park City.

Type of Comment

General

Comment

A target should be set for planting new trees.

Contact Name

Contact Organisation

Respondent (no details provided)

City Response



# City Plan 2036 Consultation Comments

Noted. The City recognises that further tree planting is required and the associated benefits to the environment associated with them. A new Policy has been added to Policy S14 on trees. This has been reflected in the proposed City of London UGF score (see Appendix 1, Figure 2) in which trees score highly. In addition a new policy on trees has been added to increase the number of trees. The City of London through the Tree Strategy aim to increase City of London owned trees by 5% by 2019.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

The Urban Greening Factor is welcome, but I would welcome a measure of ground-level greening as part of this. Linking this to the London National Park City initiative would help raise public awareness and appreciation of your plans. This is an opportunity to present a strategic vision for a greener City and how it fits with the wider city.

Contact Name

Contact Organisation

Rob Yuille

City Response

Noted. Wording has been added to Policy S14 in regard to the National Park City. We have strengthened policies from the 2015 Local Plan to deliver more open space. Policy S14 states that the City will work to promote a greener City by protecting existing and open green space and seek the provision of new space through development, public realm or transportation improvements. Policy D3 Public Realm seeks the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes.

Recommendation

Change

Recommendation Details

Added wording to Policy S14 (see paragraph 6.6.4) "...support London's designation in 2019 as the world's first National Park City".

Paragraph

6.6.10; 6.6.15

Type of Comment

General



# City Plan 2036 Consultation Comments

## Comment

Welcome this policy, particularly with regard to ongoing maintenance throughout the life of the building, but question how that will be enforced?

Public spaces and planters in the City are blighted by takeaway food litter. In paragraph 6.6.10 on maintaining cleanliness, replace 'should' with 'must'.

6.6.15: The creation of habitat specifically for Black Redstarts should be mentioned together with the intention of the City to produce guidelines for developers to achieve this.

## Contact Name

Sarah Hudson

## Contact Organisation

Friends of City Gardens

## City Response

Noted. Policy OS3 seeks in the policy text to provide habitats that benefit the City's target species (house sparrows, peregrine falcons, swifts, black redstarts, bats, bumblebees and stag beetles). Policy S14 states that the City will work to promote a greener City by protecting existing and open green space and seek the provision of new space through development, public realm or transportation improvements. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes. Policy OS2 states in the policy box (point 2) that major developments will be required to submit an operation and maintenance plan to demonstrate that the green features will remain successful throughout the life of the building.

## Recommendation

No Change

## Recommendation Details

## Paragraph

6.6.11

## Type of Comment

Support

## Comment

It is good to see in paragraphs 6.1.12 and 6.6.11, opportunities to incorporate innovative design in new and existing buildings to provide positive environmental outcomes such as the inclusion of blue infrastructure, rain gardens and rainwater harvesting to mitigate against periods of intense rainfall and to reduce water use in this water stressed area.

## Contact Name

Matthew Pearce

## Contact Organisation

Environment Agency



# City Plan 2036 Consultation Comments

## City Response

Support noted.

## Recommendation

No Change

## Recommendation Details

### **Policy Number**

OS3

### Paragraph

### Type of Comment

General

### Comment

I would like to see Policy OS3 reworded to ensure that Sites of Importance for Nature Conservation within The City, the single most important sites for biodiversity and wildlife, are provided with blanket protection from disturbance.

### Contact Name

Allison Parkes

### Contact Organisation

### City Response

Noted. Policy S14 and OS1 both seek the protection of existing open and green space and Policy OS3 seeks the retention and enhancement of habitats within the SINCs. Please note the City of London Biodiversity Action Plan is due to be updated shortly.

## Recommendation

No Change

## Recommendation Details

### Type of Comment

General

### Comment

Green corridors

I encourage The City (Policy OS3) to give priority to creating new and extend existing, green corridors and linkages, in addition to those intended to be introduced through new and currently proposed developments and streetscape works. In particular I would suggest the existing green area that exists around the scheduled WW2 bombed out buildings and the Museum of London, is recognised and protected as such. This corridor



# City Plan 2036 Consultation Comments

has been excluded from the Conservation Area and yet forms an important link for wildlife between the Barbican Estate and its Lakes and the wild area of land running along Noble Street.

Contact Name

Allison Parkes

Contact Organisation

City Response

Noted. It is envisaged through Policy S14 that green corridors and biodiversity links will be promoted. We are working closely with Open Spaces Department through the Biodiversity Action Plan (BAP) to ensure further greening of the City. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

Concur with comments from Barbican Wildlife Group that the Local Plan's good and welcome intentions are both implemented and more importantly, enforced and carried out in tangent with a far-sighted Biodiversity Action Plan and the appointment of an Ecology Officer.

Contact Name

Fred Rodgers

Contact Organisation

City Response

Noted. We are working closely with Open Spaces Department through the Biodiversity Action Plan (BAP) to ensure further greening of the City.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment



# City Plan 2036 Consultation Comments

There are real concerns over the loss of half of our swift population over the last 20 years. The lack of nesting places under eaves due to the replacement of old buildings with new ones, without planners insisting on the use of “Swift bricks” is thought to be a major cause. All new developments in the City should, if not benefitting nature, at least not have an adverse effect on it.

Contact Name

Contact Organisation

Fred Rodgers

City Response

Noted. Additional text has been added to Policy OS3 regarding nest sites for birds and bats on buildings.

Recommendation

Change

Recommendation\_Details

Additional text has been added to Policy OS3 regarding nest sites .

Type of Comment

General

Comment

Concur with comments from Barbican Wildlife Group which urge that Policy OS3 is reworded to ensure that Sites of Importance for Nature Conservation (SINCs) within the City, the single most important sites for biodiversity and wildlife, are provided with blanket protection from disturbance.

Contact Name

Contact Organisation

Fred Rodgers

City Response

Noted. Policy OS3 seeks retention and enhancement of habitats within Sites of Importance for Nature Conservation (SINCs),

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment



# City Plan 2036 Consultation Comments

Concur with following comments from Barbican Wildlife Group:

1. Encourage the CoLC's officers to consider how the Plan can be used to provide a platform for all existing and future biodiversity enhancement efforts and to put into place a system where property owners are required to audit and report their contribution to the City's Biodiversity Plans.
2. Barbican Wildlife Group has the data to show that the Barbican Estate and The Wildlife Garden merit a SMINC status and would welcome further discussions as to how they can assist in making this badge of honour for the City, a reality. Given that the Barbican Wildlife Garden and The Estate are home to so many species that are important, not only in the City, but across London and are thriving in such a heavily built up area, strongly believe the Barbican Estate including the Wildlife Garden, merit consideration for uplift to a SMINC status and would welcome such a review by The London Wildlife Sites Board as soon as possible. (LWT, who carried out the last SINC assessment in Aug 2016, did so without having access to the data base now available).
3. Encourage CoLC to give priority to creating new and extending existing green corridors and linkages, in addition to those intended to be introduced through new and currently proposed developments and streetscape works.

I would add that Fortune Street Park in Golden Lane is an important part of the "Green Corridor" from Bunhill Fields to West Smithfield Rotunda and also an essential public green space enjoyed daily by both City workers and residents. It is also in urgent need of "upkeep and development", which LB Islington cannot commit funds to and is looking to support from CoLC's s106 and CIL reserves. CoLC manages Bunhill Fields on behalf of LB Islington with funding from City Cash. Were Fortune Street Park added to CoLC's management responsibilities, that would assist both councils, as well as protecting and improving an essential public green space, which makes a positive contribution to the City's environment.

Contact Name

Contact Organisation

Fred Rodgers

City Response

Noted. It is envisaged through Policy S14 that green corridors and biodiversity links will be promoted. We are working closely with Open Spaces Department through the Biodiversity Action Plan (BAP) to ensure further greening of the City. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

# City Plan 2036 Consultation Comments

Outside the overall stated objective, in both the Plan and Biodiversity Action Plan (BAP) there is a lack of detailed action points explaining how the CoLC intends to meet its objectives and to have its actions measured and against what criteria. Action Plans 1 and 2 within the BAP limit themselves to Management Plans for SINCS and improving green infrastructure such as green roofs and walls. Action Plan 4 covering data collection and surveying appears to rely on the data collecting activities of others.

Policy OS3 suggests that CoLC intends to rely purely on new developments to deliver biodiversity enhancements in the City, through a range of measures. However, given that CoLC owns and manages over half the trees in the City and many of the open spaces, there is enormous potential to deliver habitat improvements in existing open spaces and to use streetscape improvements to create new and enhance existing green corridors. Even with Policy OS3 requiring new developments to deliver biodiversity enhancements, the Plan makes no linkages with CoLCs own guidance and objectives in the BAP so any enhancements may be isolated and not linked to wider efforts.

Guidance from London Wildlife Trust outlines the responsibility of boroughs "to obtain and maintain up to date data on all land of nature conservation interest that is located within the administrative borough and to be aware of the distribution of priority habitats and priority spaces of wildlife especially those that are legally protected."

Section 5.2 of the BAP acknowledges the role that the CoLC can play in developing green infrastructure: "The City has an established network of ground level open spaces. Both street trees and environmental enhancement projects have the potential to improve the connectivity of green spaces and associated habitats. The Plan acknowledges the importance of enhancement schemes which include trees and soft landscaping that promote biodiversity and link existing green spaces and routes in green corridors. The Tree Strategy also promotes the aim to increase existing stock and encourage green corridors that contribute to the biodiversity of the City."

We would encourage CoLC to consider how the Plan can be used to provide a platform for all existing and future biodiversity enhancement efforts and to put into place a system where property owners are required to audit and report their contribution to the City's Biodiversity Plans.

## Contact Name

Joanna Rodgers

## Contact Organisation

Barbican Wildlife Group

## City Response

Noted. It is envisaged through Policy S14 that green corridors and biodiversity links will be promoted. We are working closely with Open Spaces Department through the Biodiversity Action Plan (BAP) to ensure further greening of the City. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes.

## Recommendation

No Change

## Recommendation Details



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

Policy OS3 provides only for the retention and enhancement of "habitats within SINC". We believe protection should be extended to cover the entire SINC. Habitats are complex environments and any disruption within a SINC would represent a disruption to wildlife habitats there.

In adjoining boroughs a more ambitious level of protection has been adopted, including blanket protection for all green space, both public and private, and protection for all SINC, not just the habitats within them. The CoLC, far from being a leader, is not even meeting the standard being set by its neighbours.

Open spaces often contain hidden habitats for wildlife that may not be immediately apparent, however poor the space may seem. After the 2WW, bomb sites were a haven for wild plants but these have fast disappeared from the City as their habitats were redeveloped and any toeholds achieved were cleared away to remove the unsightly appearance. In 2017, the last site at the southern end of Middlesex Street was sprayed and cleared. This is a sad reflection of our times and a loss to people, insects, birds etc.

The London Wildlife Trust (LWT) provides guidance on the recreatability of habitats. It points out that not only do habitats take long periods of time to be recreated, particularly where mature trees are lost, but usually the replacement habitats never contain the same flora and fauna as those they were meant to be replacing. In the unlikely event that equivalent land were made available for replacement, the premise that a site can simply be 'recreated' is fundamentally flawed. According to LWT, the more difficult it is to recreate a site's habitat, the more important it is to retain it.

We therefore urge that Policy OS3 is reworded to ensure all existing open space is retained, regardless of commercial pressures, and that Sites of Importance for Nature Conservation (SINC) within The City, the single most important sites for biodiversity and wildlife, are provided with blanket protection from disturbance.

### Contact Name

Joanna Rodgers

### Contact Organisation

Barbican Wildlife Group

### City Response

Noted. Policy S14 and OS1 both seek the protection of existing open and green space and Policy OS3 seeks the retention and enhancement of habitats within the SINC. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes. We are working closely with our colleagues in Open Spaces Department through the Biodiversity Action Plan (BAP) to ensure further greening of the City.

### Recommendation

No Change

### Recommendation Details

# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

Green corridors - There is an acknowledged corridor of green space at both ground and roof levels between Bunhill Fields and the Smithfield Rotunda. The greening of balconies on blocks provides vertical linkage for birds, bats and insects in both the Barbican and Golden Lane estates, as well as new residents' planting on the roof of Blake Tower.

There is huge potential to make linkages between all these spaces, not only through green roofs on new developments, but through carefully thought out use of tree and street level plantings. We would welcome such opportunities being considered as an equally important part of the planning process, as the intended uses of developments. We encourage the CoLC to consider how the Plan can be used to create new and extend existing green corridors and linkages, in addition to those intended to be introduced through new and currently proposed developments and streetscape works.

### Contact Name

Joanna Rodgers

### Contact Organisation

Barbican Wildlife Group

### City Response

Noted. It is envisaged through Policy S14 that green corridors and biodiversity links will be promoted. We are working closely with Open Spaces Department through the Biodiversity Action Plan (BAP) to ensure further greening of the City. The City recognises that further tree planting is required and the associated benefits to the environment associated with them. This has been reflected in the proposed City of London UGF score (see Appendix 1, Figure 2) in which trees score highly. In addition a new policy on trees has been added to increase the number of trees. The City of London through the Tree Strategy aim to increase City of London owned trees by 5% by 2019.

### Recommendation

No Change

### Recommendation Details

## Type of Comment

General

### Comment

Biodiversity is not just about isolated SINC's and the opportunities for developers to include pocket parks and green roofs. Biodiversity should enter into all landscaping decisions. Even street trees and tree pits have an important place to play in supporting a healthy urban ecosystem.

I suspect that the City currently presents some of the poorest urban biodiversity in the country. There are few open spaces with native species and the City has some of the lowest densities of street trees in Inner London, especially to the east of Moorgate / King William Street.





# City Plan 2036 Consultation Comments

The recent analysis of global insect populations in the journal Biological Observations brings the problem of biodiversity at the lower level of the urban ecosystem into clearer focus. In my 40 years working and then living in the City I believe I have noticed a decline in small invertebrate populations, from moths and garden snails to the ants which no longer manifest themselves in dramatic summertime 'flying ant' days. To get an objective understanding of the issue I suggest that the City undertake a review of the City from the perspective of small invertebrate populations – insects, snails, etc.

I believe the City's gardening practices, such as the occasional use of glyphosate weed-killers, capping tree pits and clearing leaf litter from under bushes and shrubs, all need to be reviewed to adopt strategies to support healthier invertebrate populations. We may then see a resurgence of other dependent species such as small birds and bats.

## Contact Name

John Whitehead

## Contact Organisation

## City Response

Noted. Policy S14 and OS1 both seek the protection of existing open and green space and Policy OS3 seeks the retention and enhancement of habitats within the SINC. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes. Policy OS3 paragraph 6.6.23 has been reworded from 'can' to 'should'.

## Recommendation

Change

## Recommendation Details

Re-worded Policy OS3 paragraph 6.6.24 from 'can' to 'should' re healthy biodiversity.

## Type of Comment

General

## Comment

We would like to see Policy OS3 extended to incorporate a greater emphasis on riverside habitat creation within and along the river Thames. The creation of intertidal habitat forms part of the aims of our draft TE2100 Riverside Strategy Approach (December 2018) which we hope will come into effect in the coming months.

There is reference to the enhancement of habitats including the River Thames, which we are pleased to see, and we do feel that the City of London is in a position to lead the way in terms of innovative solutions to the urban pressures being placed on city habitats. There is an opportunity to highlight the need for riverside development to consider habitat creation to enhance the biodiversity of the river Thames and encourage innovative design along the city's riverfront. Whilst this may not be applicable to all riverside development, it should be an expectation of the City Plan that habitat creation is considered for all riverside proposals. Where significant opportunities for habitat creation exist, it should then be a further expectation that development proposals should include reasonable habitat enhancement and creation provisions.



# City Plan 2036 Consultation Comments

## Contact Name

Matthew Pearce

## Contact Organisation

Environment Agency

## City Response

Noted. Policy OS3 states that development should incorporate measures to enhance biodiversity, including: retention and enhancement of habitats within Sites of Importance for Nature Conservation (SINCs), including the River Thames and refers to a number of areas along the riverside which have been identified as areas of deficiency in nature conservation.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

Support

## Comment

The statement within policy OS3 that development should incorporate measures to enhance biodiversity through the retention and enhancement of habitats within Sites of Importance for Nature Conservation (SINC), which includes the River Thames is supported.

## Contact Name

Michael Atkins

## Contact Organisation

Port of London Authority

## City Response

Support noted.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

While OS3 in itself is welcome, no amount of green roofs and walls can replace the benefits of being able to walk and sit in green areas.

## Contact Name

Neil Sinden

## Contact Organisation

CPRE London

# City Plan 2036 Consultation Comments

## City Response

Noted. We have strengthened policies from the 2015 Local Plan to deliver more open space. Policy S14 states that the City will work to promote a greener City by protecting existing and open green space and seek the provision of new space through development, public realm or transportation improvements.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

The policy would benefit from being more specific and more robust to be clearer that it will actually happen. For example, in Policy OS3 I would prefer:

- an explicit statement that developers will be required to consider biodiversity;
- a commitment by the Corporation to enhancing biodiversity;
- making the enhancement of biodiversity measurable by stating a target of a net gain in biodiversity.

It could also copy across elements of the London Plan, including statements that:

- Biodiversity enhancement should be considered from the start of the development process.
- The Corporation will identify opportunities for tree planting in strategic locations.

## Contact Name

## Contact Organisation

Rob Yuille

## City Response

Noted. Additional wording has been added to Policy OS3. We are working closely with our colleagues in Open Spaces Department through the Biodiversity Action Plan (BAP) to ensure further greening of the City. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment



# City Plan 2036 Consultation Comments

The Plan places a strong emphasis on using new development to create green corridors, through the use of green walls and green roofs. This is to be commended and has the potential to make an extremely important contribution to health and well-being and to the enhancement of biodiversity. However, without a City-led framework, there is potential for these efforts to be isolated and ineffective.

Green corridors already exist in the City but green spaces such as West Smithfield Rotunda are isolated and vulnerable. There is enormous potential for green corridor improvements throughout the Square Mile if some degree of coordination within the CoLC was implemented. The CoLC owns over half the trees in the City and many of the open spaces. Policy D3 refers to linking up green spaces and routes to provide green corridors. The Biodiversity Action Plan reinforces this idea, supported by the Tree Strategy, but overall, there is little sense of a coordinated approach or any effort to link the various guidance documents into a coherent plan.

The monitoring and understanding of biodiversity and habitats in the City is relatively limited and relies on volunteer groups, and there does not even appear to have been an Open Spaces Audit since 2012. It is suggested that a more overarching and integrated framework be put in place for habitat and green corridor creation and biodiversity enhancement, linked both to proposed streetscape improvements and to measures implemented as part of new developments.

## Contact Name

## Contact Organisation

Ruth Cooke-Yarborough

## City Response

Noted. It is envisaged through Policy S14 that green corridors and biodiversity links will be promoted. We are working closely with Open Spaces Department through the Biodiversity Action Plan (BAP) to ensure further greening of the City. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

## Object

## Comment

The need to afford the highest level of protection for existing green spaces applies, most crucially, to Sites of Importance for Nature Conservation. These are some of the most important open spaces in the Square Mile, offering the highest level of amenity and crucial to the delivery of biodiversity enhancements. It is therefore essential that the highest level of protection be afforded to them. However, the provisions in the Plan are disappointing. Policy OS3 makes allowance only for the protection of habitats within SINCs, not for the entire site. This level of protection is provided in London Boroughs adjoining the City and it is disappointing the City



# City Plan 2036 Consultation Comments

is not showing the same level of ambition. Policy OS3 should be reconsidered to ensure that a maximum level of protection for the entire site is afforded to all SINCs in the City.

The decision to acknowledge the contribution that the Barbican and St Alphage SBINC (including the Barbican Wildlife Garden) makes to biodiversity by upgrading it from Borough Grade 2 to Borough Grade 1 is welcomed, but the wording used to confirm the upgrade is vague and unclear and should be clarified. The Plan incorrectly designates the Barbican Wildlife Garden as Fann Street Wildlife Garden. This name was changed in 2018 and should be amended in the Plan. The Barbican and St Alphage SINC (and the surrounding area) has become a focal point for biodiversity in the north part of the City, indeed for the City as a whole. Improvements in biodiversity in the Barbican Wildlife Garden were cited in the 2016 review as having lifted the entire area. Since then, there have been significant further improvements. It could therefore be argued the Barbican Wildlife Garden is still very undervalued from a biodiversity perspective, particularly given its highly urban location. Its importance should be as fully acknowledged as possible to ensure its protection is guaranteed.

## Contact Name

## Contact Organisation

Ruth Cooke-Yarborough

## City Response

Noted. Policy S14 and OS1 both seek the protection of existing open and green space and Policy OS3 seeks the retention and enhancement of habitats within the SINCs. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes. The City recognise that further tree planting is required and the associated benefits to the environment associated with them. This has been reflected in the proposed City of London UGF score (see Appendix 1, Figure 2) in which trees score highly. Please refer to the City of London Open Spaces Audit which states that 65% of trees within the City of London are located within open spaces; nine sites are subject to Tree Preservation Orders (TPOs). A new policy on trees will be added and guidance regarding strategy and policies for trees are set out in the City of London Tree Strategy Supplementary Planning Document (SPD). The policy text (see paragraph 6.6.24) does refer to the upgraded status for the Barbican Estate however we will amend the text to make this more explicit. We note that the Fann Street Wildlife Garden is now known as the Barbican Wildlife Garden so paragraph 6.6.24 will be amended to reflect this.

## Recommendation

Change

## Recommendation Details

Re-named Wildlife Garden in paragraph 6.6.25 and made more explicit the upgraded status of garden.

## Paragraph

6.6.23

## Type of Comment

General

## Comment

# City Plan 2036 Consultation Comments

The final sentence of point 6.6.23 states that “Healthy biodiversity can be viewed as a sign of a healthy environment and a healthy city”. I earnestly propose that "...can be..." here should be changed to "... should be ..." so this reads: “Healthy biodiversity should be viewed as a sign of a healthy environment and a healthy city”.

## Contact Name

John Whitehead

## Contact Organisation

## City Response

Noted. Policy OS3 wording has been amended from ‘can’ to ‘should’.

## Recommendation

Change

## Recommendation Details

Re-worded Policy OS3 paragraph 6.6.24 from ‘can’ to ‘should’ re healthy biodiversity.

## Paragraph

6.6.24

## Type of Comment

General

## Comment

Paragraph 6.6.24 requires some modification to clarify the upgraded SINC status of the Barbican Estate and its three gardens as there is no definition provided stating the difference between a SINC 1 and a SINC 2 and no indication as to how many SINC levels may exist. It may be preferable to describe the upgrade as “being increased to the highest level available, with regards to a Site of Importance for Nature Conservation.”

Paragraph 6.6.24 also requires modification to reflect the correct name of the “Barbican Wildlife Garden”. This garden is no longer called The Fann Street Wildlife Garden and this change was reflected in the recent Conservation Area Consultation.

Given that the Barbican Estate and its three gardens are home to so many species that are important, not only in the City, but across London and they are thriving in such a heavily built up area, I strongly believe the Estate and its gardens, merit consideration for uplift to a SMINC and would welcome a review by The London Wildlife Sites Board as soon as possible. (LWT carried out the last SINC assessment for The Estate in Aug 2016, without having access to 13 years of weekly recorded wildlife data, which GiGL are back loading into their systems. GiGL commented that the data is of fundamental importance in representing the wildlife in the Barbican Estate Area and for The City as a whole). SMINC status would be an ideal way for The City to celebrate and ensure protection of an existing, important biodiverse area and its intention to seek this status should be reflected in The Local Plan and The BAP review in 2020.

## Contact Name

## Contact Organisation



# City Plan 2036 Consultation Comments

Allison Parkes

## City Response

Noted. Policy S14 and OS1 both seek the protection of existing open and green space and Policy OS3 seeks the retention and enhancement of habitats within the SINC. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes. Policy OS2 states in the policy box (point 2) that major developments will be required to submit an operation and maintenance plan to demonstrate that the green features will remain successful throughout the life of the building. Please note the City of London Biodiversity Action Plan is due to be updated shortly. The policy text (see paragraph 6.6.24) does refer to the upgraded status for the Barbican Estate however we will consider amending the text to make this more explicit. We note that the Fann Street Wildlife Garden is now known as the Barbican Wildlife Garden so paragraph 6.6.24 will be amended to reflect this.

## Recommendation

Change

## Recommendation Details

Re-named Wildlife Garden in paragraph 6.6.25 and made more explicit the upgraded status of garden.

## Type of Comment

General

## Comment

We note the comments in 6.6.24 which confirm the creation of three new SINC and the upgrade of two existing SINC, including the Barbican and St Alphage's Garden, which includes the Wildlife Garden. The uplift to a SBINC 1 is entirely warranted and its formal adoption should reference the Garden's increase in biodiversity quality in the new Local Plan.

The wording of 6.6.24 should be revised to ensure the new status is made clear, by stating: "The Barbican and St Alphage's Garden has been upgraded from a SBINC 2 to SBINC1, reflecting the significant contribution that the Garden and Beech Gardens make, and are making, to the uplift in biodiversity quality". We draw attention to the fact that the Garden has been incorrectly referred to as the Fann Street Wildlife Garden, and request the Plan be amended to refer to Barbican Wildlife Garden (BWG).

As part of the review of the Biodiversity Action Plan (BAP), a review of the current Grade 1 SINC status of the Estate including the BWG should be given further consideration. We believe its designation as a Borough SINC underestimates its importance to biodiversity in the City. The BWG has over two years of formalised weekly data which confirms that to the end of February 2019, 64 species have been identified in the Garden, including a number highlighted by the CoLC as target species in the BAP. Furthermore, we have over 13 years of weekly data for the Barbican Estate as a whole which includes weekly observations of the Peregrine Falcon nest site.

London Wildlife Trust states that Sites of Metropolitan Importance for Nature Conservation can "include sites where there are important populations of species or



# City Plan 2036 Consultation Comments

sites which are of particular significance within otherwise heavily built up areas of London." The Garden and The Estate clearly fall within this definition. We have identified rare species within a City context and a number that are Red Listed nationally. These include the Stag Beetle, the Common and Soprano Pipistrelle bats, the Peregrine Falcon and the Grey Heron, and now also the House Sparrow, a Red Listed bird in the UK.

Given that the Garden and The Estate are home to so many important species and they are thriving in such a heavily built up area, we strongly believe the Barbican Estate including the Wildlife Garden, merit consideration for uplift to SMINC status and would welcome such a review by The London Wildlife Sites Board as soon as possible.

## Contact Name

Joanna Rodgers

## Contact Organisation

Barbican Wildlife Group

## City Response

Noted. Policy S14 and OS1 both seek the protection of existing open and green space and Policy OS3 seeks the retention and enhancement of habitats within the SINC's. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes. Policy OS2 states in the policy box (point 2) that major developments will be required to submit an operation and maintenance plan to demonstrate that the green features will remain successful throughout the life of the building. Please note the City of London Biodiversity Action Plan is due to be updated shortly. The policy text (see paragraph 6.6.24) does refer to the upgraded status for the Barbican Estate however we will consider amending the text to make this more explicit. We note that the Fann Street Wildlife Garden is now known as the Barbican Wildlife Garden so will be amended to reflect this.

## Recommendation

Change

## Recommendation Details

Re-named Wildlife Garden in paragraph 6.6.25 and made more explicit the upgraded status of garden.

## Paragraph

6.6.24; 6.6.26; 6.6.27

## Type of Comment

General

## Comment

We strongly support this policy.

6.6.24: We support the inclusion of these SINC's; we would like to see greater protection for these spaces in the form of management plans incorporated into SPD's, including mechanisms for consultation with landowners and managers prior to any proposed changes that might affect their biodiversity value, including an





# City Plan 2036 Consultation Comments

environmental impact study. The Fann Street Wildlife Garden should be referred to as the Barbican Wildlife Garden.

6.6.26: The City should undertake to provide Habitat Action Plans for these species as SPD and guidance notes for developers, land managers and owners on how best to achieve this policy. The City should prepare an annual report on milestones and outcomes achieved under the BAP.

6.6.27: Environmental impact studies (EIS) are made prior to new developments going ahead. We suggest that an EIS is repeated once the development is completed and outcomes evaluated by independent consultants or suitably ecologically qualified in-house officers at the expense of the developer.

## Contact Name

Sarah Hudson

## Contact Organisation

Friends of City Gardens

## City Response

Noted. Policy OS3 seeks in the policy text to provide habitats that benefit the City's target species (house sparrows, peregrine falcons, swifts, black redstarts, bats, bumblebees and stag beetles). Policy S14 states that the City will work to promote a greener City by protecting existing and open green space and seek the provision of new space through development, public realm or transportation improvements. Policy D3 Public Realm seeks the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes. We note that the Fann Street Wildlife Garden is now known as the Barbican Wildlife Garden so paragraph will be amended to reflect this. Please refer to the City of London Biodiversity Action Plan which covers many of the points you have raised. Please refer to Policy D9 on lighting and paragraph states that avoidance of light spillage onto urban green spaces is crucial for biodiversity in the urban setting. Please refer to the City of London Lighting Strategy which states that natural darkness should be retained in areas such as the river, parks, gardens and churchyards where birds, bats reside.

## Recommendation

Change

## Recommendation Details

Re-named Wildlife Garden in paragraph 6.6.24

## Paragraph

6.6.26

## Type of Comment

General

## Comment

# City Plan 2036 Consultation Comments

On behalf of Hackney Swifts Group, we welcome the City's target species including seriously endangered urban species such as swifts, sparrows and bats. We ask that this clause specifically requires integrated measures such as nesting bricks wherever practical, so that they are designed in from an early stage, have a longer lifetime with no maintenance required, and also because integrated measures have been demonstrated to have better success rates for these species.

Most suitable developments in Hackney are successfully now including such measures in the planning conditions and, consequently, in the completed buildings.

## Contact Name

## Contact Organisation

Hackney Swifts

## City Response

Noted. Policy OS3 seeks in the policy text to provide habitats that benefit the City's target species (house sparrows, peregrine falcons, swifts, black redstarts, bats, bumblebees and stag beetles). In addition, that development should incorporate measures to enhance biodiversity, including: wildlife-friendly features, such as nesting or roosting boxes and beehives. Policy S14 states that the City will work to promote a greener City by protecting existing and open green space and seek the provision of new space through development, public realm or transportation improvements. Policy D3 Public Realm seeks the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes. Please note the City of London Biodiversity Action Plan is due to be updated shortly and the current document promotes nest sites for swifts.

## Recommendation

Change

## Recommendation Details

The draft Plan does refer to wildlife-friendly features (see Policy OS3 policy box bullet point 5), such as nesting or roosting boxes and beehives but should further information in the policy text mention more information about bird boxes/nesting bricks etc?

## Type of Comment

General

## Comment

We welcome that target species include swifts, sparrows, bumblebees, and bats - previously common but increasingly endangered urban wildlife. Swifts are amber-listed in the UK due to their rapid decline (25% in 5 years based on latest BTO statistics), house sparrows are red-listed. These birds are currently found in adjacent Boroughs to the City of London (confirmed by London Bird Atlas, 2018). Loss of nest sites is a significant factor in their decline.

We request that para 6.6.26 includes a specific requirement that integrated nesting and roosting sites such as "swifts bricks" and "bat bricks" should be specified in new development, including refurbishments and extensions, wherever suitable. Integrated bricks for solitary species of bees are suitable for single-storey buildings which have insufficient height for swifts and bats. Integrated measures are



# City Plan 2036 Consultation Comments

known to have better success rates than external measures, and because they are designed in from an early stage they are usually more appropriately sited in the development.

This is in line with the draft London Plan which states: "in developing Development Plan policies, boroughs should... 3) support the protection and conservation of priority species and habitats that sit outside the SIN network... 4)... [include] features such as artificial nest sites, that are of particular relevance and benefit in an urban context" (Policy G6B).

The draft Islington Local Plan provides an ideal model for a clause for this (G4 Biodiversity section 5.27).

## Contact Name

## Contact Organisation

Islington Swifts

## City Response

Noted. Policy OS3 seeks in the policy text to provide habitats that benefit the City's target species (house sparrows, peregrine falcons, swifts, black redstarts, bats, bumblebees and stag beetles). In addition, that development should incorporate measures to enhance biodiversity, including: wildlife-friendly features, such as nesting or roosting boxes and beehives. Policy S14 states that the City will work to promote a greener City by protecting existing and open green space and seek the provision of new space through development, public realm or transportation improvements. Policy D3 Public Realm seeks the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes. Please note the City of London Biodiversity Action Plan is due to be updated shortly and the current document promotes nest sites for swifts.

## Recommendation

Change

## Recommendation Details

The draft Plan does refer to wildlife-friendly features (see Policy OS3 policy box bullet point 5), such as nesting or roosting boxes and beehives but should further information in the policy text mention more information about bird boxes etc? Added BAP text to the Glossary

## Type of Comment

General

## Comment

Swift Conservation would like to see the beneficial species which make up our potentially rich urban biodiversity, and rely on buildings for their survival, to be given higher priority, as these species are becoming seriously endangered as buildings are refurbished and demolished and their habitat is lost without replacement. In particular swifts, house sparrows and starlings, whose numbers have all dropped by 50% or more in the last 20 years, and bats who are also threatened in many areas.



# City Plan 2036 Consultation Comments

Creating new nesting and roosting sites is straightforward, as integrated nest and roost bricks have been proven to be effective and are cheap, almost invisible, easy to install and involve zero maintenance. We would like to see these integrated bricks installed in all new developments that are suitable. Stand-alone combined swifts nest and bat roost towers are now available which are no larger than a mobile phone mast or lamp post, and we would like to see these installed for all major projects.

We would also like to see ecological surveys becoming mandatory for building works in areas known to support the key species mentioned above, and appropriate protection measures taken following the project ecologist's recommendations.

## Contact Name

Michael Priaulx

## Contact Organisation

Swift Conservation

## City Response

Noted. Policy OS3 seeks in the policy text to provide habitats that benefit the City's target species (house sparrows, peregrine falcons, swifts, black redstarts, bats, bumblebees and stag beetles). In addition, that development should incorporate measures to enhance biodiversity, including: wildlife-friendly features, such as nesting or roosting boxes and beehives. Policy S14 states that the City will work to promote a greener City by protecting existing and open green space and seek the provision of new space through development, public realm or transportation improvements. Policy D3 Public Realm seeks the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes. Please note the City of London Biodiversity Action Plan is due to be updated shortly. Policy D3 states that walkways should remain uncluttered and enhance pedestrian permeability therefore the inclusion of additional infrastructure would not be permitted.

## Recommendation

No Change

## Recommendation Details

Potential additional wording to add information on nesting or roosting boxes in the policy text?

## Paragraph

6.6.27

## Type of Comment

General

## Comment

Point 6.6.27 should specifically highlight the importance of native species in supporting biodiversity by adding the following after the second sentence which ends "where possible": "When designing new planting schemes, priority should be given to native species over exotic species, except where other explicit factors militate against this assumption."

# City Plan 2036 Consultation Comments

Contact Name

Contact Organisation

John Whitehead

City Response

Noted. Policy S14 and OS1 both seek the protection of existing open and green space and Policy OS3 seeks the retention and enhancement of habitats within the SINCs. It is envisaged the UGF requirement through Policy OS2 will drive up the amount of greening in the City and provide a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes. Policy OS2 states in the policy box (point 2) that major developments will be required to submit an operation and maintenance plan to demonstrate that the green features will remain successful throughout the life of the building. Please note the City of London Biodiversity Action Plan is due to be updated shortly.

Recommendation

No Change

Recommendation Details

# City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S15: Climate Resilience and Flood Risk

### Policy Number

### Paragraph

### Type of Comment

General

### Comment

Climate Change management should be radical and ambitious for 2036! Cooling without air conditioning. Conserving open spaces. Retrofitting the real estate. At the very least set an example: the refurbishment of Golden Lane and Barbican estates should be aiming for zero carbon retrofitting.

### Contact Name

Elizabeth Wrigley

### Contact Organisation

Core Connections

### City Response

The City Corporation agrees that climate change management should be radical and ambitious. Policy CR1 provides a hierarchy of design solutions to avoid the use of energy intensive air conditioning. Policy OS1 addresses protection and provision of Open Spaces. Policy D1 requires all development to achieve the highest feasible and viable sustainability standards. Paragraph 6.1.15 has been amended to make it clear that this applies to major new development, extensions to existing buildings, major refurbishments and minor development. These policies will apply to any refurbishment at the Golden Lane and Barbican Estates subject to their status as listed buildings.

### Recommendation

Change

### Recommendation\_Details

Paragraph has been strengthened to include reference to major refurbishments and now reads as follows: The Policy applies to all development in the City, including major new development, extensions to existing buildings, major refurbishments and minor development.

### Type of Comment

Support

### Comment

We support this policy and its associated policies CR1-4.

### Contact Name

### Contact Organisation



# City Plan 2036 Consultation Comments

Jane Smith

Barbican Association

## City Response

Support noted

## Recommendation

No Change

## Recommendation Details

### **Policy Number**

CR1

### **Paragraph**

### **Type of Comment**

General

### **Comment**

Whilst Strategic Policy S15 is quite emphatic in its insistence, a very important substitution of “must” for “should” seems to be essential in Policy CR1.2 – “Building designs should minimise any contribution to the urban heat island effect”. At the same time, “global warming” would seem more appropriate for the City than “climate change”.

### **Contact Name**

Fred Rodgers

### **Contact Organisation**

### **City Response**

Across a development there are more opportunities for minimising contribution to the Urban Heat Island Effect through landscaping, building orientation etc. Although building designs should contribute to this it is the development as a whole that must address this issue.

### **Recommendation**

No Change

### **Recommendation Details**

### **Policy Number**

CR2

### **Paragraph**



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

Presumably Policy CR2 doesn't anticipate that the area of the City Flood Risk Area will increase over the next 20 years. However, Policies CR2, CR3 and CR4 all depend on implementation in order to protect the City from flooding and that has to be enforced.

### Contact Name

Fred Rodgers

### Contact Organisation

### City Response

The City Flood Risk Area has been identified taking account of the modelled impacts of climate change as shown in the City of London Strategic Flood Risk Assessment (SFRA) we do not therefore anticipate that this area will change during the life of this plan. The SFRA will be reviewed every 5 years (para 6.7.6) to highlight any changes.

### Recommendation

No Change

### Recommendation Details

## Type of Comment

General

### Comment

Although it is acknowledged that major flooding is not a risk in the City, smaller examples of flooding occur at dropped kerbs suggesting that much of the drainage system cannot cope with this type of localised 'flooding'.

### Contact Name

Gerald Hine

### Contact Organisation

### City Response

Paragraph 6.7.19 includes design measures that can be used to provide resistance to flooding including raised kerbs and altered topography which contains water at a distance from the building.

### Recommendation

No Change

### Recommendation Details



# City Plan 2036 Consultation Comments

Paragraph 6.7.16

Type of Comment General

## Comment

Policy CR2 makes reference to the exceptions test however we note this should be the exception test. The Planning Practice Guidance (PPG): Flood risk and coastal change, states the sequential test should be applied for any development proposed in flood zones 2 or 3, with the exception of: Minor development; Change of use; or sites where the proposed development type has already passed the sequential test as part of a strategic site allocation. Whilst paragraph 6.7.16 explains the need for certain development to pass both the exception and sequential test, it is not made clear that the sequential test will still need to be applied for all development in flood zone 2 and 3 as well as in areas at risk of surface water flooding.

Contact Name Contact Organisation

Matthew Pearce Environment Agency

## City Response

Amend wording in line with Environment Agency comments

Recommendation Change

## Recommendation Details

Correct Typo to read "...exception test..." rather than "...exceptions test..."

Amend paragraph by adding the flowing sentence "...The sequential test must be applied for all development in the City Flood Risk Area which comprises Environment Agency Flood Zones 2 and 3 and areas at risk of surface water / sewer flooding in the City"

Paragraph 6.7.17-6.7.20

Type of Comment General

## Comment

We are pleased to see Policy CR2 has been included in the proposed plan and are in general agreement with its aims. We have some requested additions and amendments to bring this policy in line with expected changes to how flood risk is managed. With respect to the final point of Policy CR2, which states 'flood resistance and resilience have been designed into the proposal', there are imminent changes to the way we respond to some planning applications at risk from tidal flooding in the event of a breach in the Thames tidal defences, which will come into effect prior to adoption of the City 2036 plan. These changes are being



# City Plan 2036 Consultation Comments

made so that, together, we can continue to protect the lives and property of City residents from future tidal flood risk.

We will be requiring all sleeping accommodation to be located above the modelled tidal breach level, unless it can be demonstrated that a permanent fixed barrier at the threshold of the property prevents water ingress in a breach event. This approach follows the conclusion of our latest detailed tidal breach flood modelling for the River Thames in 2018. This modelling highlights that a breach in the tidal flood defences, while a relatively low probability, will have a devastating impact due to the depth and velocity of the flood water, increasing risk to life.

In line with the requirements of the NPPF and the Planning Practice Guidance, we need to ensure that all future development, new build and conversion, is appropriately resilient to future tidal flood risk. Although we have no objections to residential uses being proposed below the modelled flood level, we would object if these proposals were unable to demonstrate that sleeping accommodation will be kept above. In line with this approach, we will no longer accept internal access to higher floors as mitigation for sleeping accommodation where flood water can enter the building.

We will continue to expect any flood risk assessment accompanying a planning application to include the most appropriate data available. This is to reduce risk to life and ensure that developments are kept safe from flooding for their lifetime when climate change is taken into consideration.

Paragraphs 6.7.17, 6.7.18, 6.7.19, and 6.7.20 already go into detail on the expected flood resistance and resilience measures for developments at risk of flooding, which we are happy to see included. We feel our new approach can be incorporated into the 'How the policy works' section of the plan as an extension of the final point of Policy CR2.

## Contact Name

Matthew Pearce

## Contact Organisation

Environment Agency

## City Response

Amend wording in line with Environment Agency comments

## Recommendation

Change

## Recommendation Details

Amend paragraph by adding the following sentence: "All sleeping accommodation must be located above the modelled tidal level breach as shown in the Strategic Flood Risk Assessment"

## **Policy Number**

CR3

## **Paragraph**



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

British Land note that SuDS are required to be incorporated into all development unless there are exceptional circumstances which makes this impractical. British Land consider that the Policy should provide flexibility to allow major development to minimise run-off rates whilst acknowledging that greenfield rates may not always be possible due to associated cost and physical constraints of development sites.

### Contact Name

### Contact Organisation

British Land Company PLC

### City Response

SuDS in new development are an important element of flood protection not only for the development but for the wider area. By reducing the speed and amount of water entering the combined drainage system SuDS will prevent sewer overflow flooding downstream of the development. More intense rainstorms and extreme weather events as a result of climate change will increase the risk of sewer flooding in future. It is therefore essential that all feasible measures are taken to reach “as close as possible” to greenfield run off rates. This can be achieved through a variety of measures which should be discussed at pre application stage as recommended in paragraph 6.7.25.

Greenfield run off rates to be added to glossary

### Recommendation

No Change

### Recommendation\_Details

## Type of Comment

General

### Comment

Policy CR3 represents a step change in the requirement for SuDS to be incorporated into all development unless there are exceptional circumstances which make this impractical. The CPA wish to ensure that this requirement does not prejudice other aspirations of the plan and deliverability of development. Clarity on how minor development could contribute to the reduction in rainwater run off in a demonstrable and meaningful way would be welcomed.

Whilst the merits of SUDS are recognised, the draft policy at part 2 must recognise it is not always possible to achieve run off rates close to greenfield rates without incurring excessive cost and land impact. There is substantial cost and amenity impact of digging large basements solely for attenuation. The CPA is not persuaded that restoring run-off rates to ‘greenfield’ levels (a level that most of the City will not have experienced since before the Industrial Revolution) is necessarily the best use of scarce resources. The draft policy should provide flexibility such that major developments minimise run-off rates whilst adopting sustainability principles.

# City Plan 2036 Consultation Comments

On the basis of this wording, a change of use application would be required to incorporate SuDS and this is not considered to be justified or effective. The first part of the policy should be reworded to state "All applicable development, transportation and public realm proposals must incorporate SuDS principles ..."

Paragraph 7.2.3 refers to policy S16, but we believe this should refer to policy S17.

Contact Name

Contact Organisation

Charles Begley

City Property Association (CPA)

City Response

SuDS in new development are an important element of flood protection not only for the development but for the wider area. By reducing the speed and amount of water entering the combined drainage system SuDS will prevent sewer overflow flooding downstream of the development. More intense rainstorms and extreme weather events as a result of climate change will increase the risk of sewer flooding in future. It is therefore essential that all feasible measures are taken to reach greenfield run off rates. This can be achieved through a variety of measures which should be discussed at pre application stage as recommended in paragraph 6.7.25.

The policy acknowledges that there may be exceptional circumstances which make some SuDS elements impractical and requires that proposals demonstrate that run off rates are "as close as possible" to greenfield run off rates. This provides sufficient flexibility whilst emphasising the importance of SuDS in protecting London from surface water and sewer flooding.

Recommendation

No Change

Recommendation Details

Type of Comment

Support

Comment

We strongly support the policy to incorporate SUDS in all development, transportation and public realm proposals. With particular relevance to the Podium renovation works in the Barbican, but also in other schemes, we would urge the City to make rainwater retention and recycling mandatory wherever it is feasible to do so.

Contact Name

Contact Organisation

Sarah Hudson

Friends of City Gardens



# City Plan 2036 Consultation Comments

## City Response

Support Noted

## Recommendation

No Change

## Recommendation Details

### Paragraph

6.7.23

### Type of Comment

Support

## Comment

It is encouraging to see under Policy CR3, Section 6.7.23 and 7.2.8 that the impact of increased rainfall on foul sewers and the Thames Tideway Tunnel Project have been considered. This area of London is a combined drainage area where surface run-off and foul water waste end up in the same sewer, and there are known capacity issues. Developers would need to discuss their discharge arrangements with the sewage company, Thames Water Utilities Ltd.

## Contact Name

Matthew Pearce

## Contact Organisation

Environment Agency

## City Response

Support noted

## Recommendation

No Change

## Recommendation Details

### Policy Number

CR4

### Paragraph

6.7.31-6.7.33

### Type of Comment

General

## Comment



# City Plan 2036 Consultation Comments

We are pleased to see Policy CR4: Flood protection and flood defences is included within the City 2036 plan, with specific reference to the future raising requirements of the Thames Estuary 2100 (TE2100) plan and the need for riverside development proposals to consider this within paragraphs 6.7.31, 6.7.32 and 6.7.33. The Thames Estuary 2100 Plan promotes a riverside strategy approach “to ensure that future changes to the riverside take place in a planned and integrated way which maximise the potential environmental, social, cultural and economic benefits.”

Another key requirement of the TE2100 plan for the City of London, in addition to future raising, is the need for a 16 metre wide corridor of land along the existing defences to be safeguarded, taken from the most landward part of a tidal defence. With respect to paragraph 6.7.32, we would like this section of the plan strengthened or preferably an addition to the policy itself, to include a specific requirement for development to include an adequate set back from the defences to allow access for future maintenance and raising in line with the TE2100 plan. Having development set further back not only allows for future improvement works but minimises the risk of adverse impacts to the defences during development works and potentially increasing flood risk in the City.

## Contact Name

Matthew Pearce

## Contact Organisation

Environment Agency

## City Response

Support noted. Incorporation of adequate set back for maintenance and future flood defence raising will be incorporated into paragraph 6.7.32

## Recommendation

Change

## Recommendation\_Details

Change the paragraph wording to read “Development adjacent to the flood defences must maintain their integrity and effectiveness for the benefit of the whole City. Development on the riverside should be designed to enable future defence raising without adverse impacts on river views and pedestrian movement along the riverside walk. Constraints may exist where flood defences form part of an existing building. Discussions with the Environment Agency will be required to establish the most effective designs for improved flood defences incorporating adequate set back from the defences to allow for future maintenance and raising in line with the TE2100 Plan”

# City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S16: Circular Economy and Waste

### Policy Number

### Paragraph

### Type of Comment

General

### Comment

On the subject of waste, the need for CoLC to provide more public waste bins, as well as cutting down on its own internal waste is essential. The proliferation of, for example, paper from CoLC is never ending and needs to be urgently addressed.

### Contact Name

Fred Rodgers

### Contact Organisation

### City Response

The provision of public waste bins is a matter for the City Corporation's waste and street cleansing contract taking into consideration the security and safety implications of waste bin provision.

### Recommendation

No Change

### Recommendation Details

### Type of Comment

Support

### Comment

We welcome this policy and its associated policies CEW1-3.

### Contact Name

Jane Smith

### Contact Organisation

Barbican Association

### City Response

Support noted

### Recommendation

No Change

# City Plan 2036 Consultation Comments

## Recommendation\_Details

### Type of Comment

Support

### Comment

Strongly support initiative of a zero waste policy targeting the 'circular' economy.

### Contact Name

John Ramsey and Jane Northcote

### Contact Organisation

### City Response

Support noted

### Recommendation

No Change

## Recommendation\_Details

### Type of Comment

General

### Comment

The Plan mentions targets for Circular Economy and waste moving towards a zero waste City, which is great to see. My question/feedback is: has the City's ambition for world leading digital infrastructure been extended to other infrastructure/waste sectors? Does the Plan set out the City to be a world leader in water or energy efficiency? Setting ambitious efficiency targets for new development and refurbishments would be a logical step and perhaps could set standards higher than other plans have.

### Contact Name

Matthew Pearce

### Contact Organisation

### City Response

Support for Zero Waste City noted.

Policy D1 requires BREEAM "Excellent" for all major development obtaining maximum credits for energy, water, pollution and materials. This is a higher level than most other Local Plans and addresses specific BREEAM credits that will reduce minimise energy and water use, reduce pollution and address construction demolition waste.





# City Plan 2036 Consultation Comments

Recommendation

No Change

Recommendation Details

Type of Comment

Support

Comment

Reference to the safeguarded Walbrook Wharf within this policy, which is in line with relevant London Plan policy is supported.

Contact Name

Michael Atkins

Contact Organisation

Port of London Authority

City Response

Support noted

Recommendation

No Change

Recommendation Details

Paragraph

6.8.13

Type of Comment

General

Comment

According to 6.8.13, CoLC "will continue to safeguard Walbrook Wharf as a waste site and river wharf in line with the London Plan and the Safeguarded Wharves Direction" but it ignores the possibility of the Wharf being extended, including out into the river, in order to manage the City's waste. Although waste reduction, coupled to a greater level of recycling, must be encouraged, emission-free waste disposal at the Wharf is possible and must be encouraged.

Contact Name

Fred Rodgers

Contact Organisation

City Response



# City Plan 2036 Consultation Comments

The London Plan requires the “protecting and facilitating the maximum use of existing waste sites”. The London Plan forms part of the City’s Planning Policy therefore this approach is carried forward into the City Plan 2036 and does not need to be repeated. Policy S17 - Thames Policy Area - advocates "refusing development on or over the River except for structures which specifically require a waterside location for river related use." This would prohibit extension of Walbrook Wharf out into the river. The City of London Waste Arisings and waste management capacity Study 2016 reviewed the potential for additional waste management to be integrated into Walbrook Wharf and concluded that "... engineering and operational costs for relatively small scale facilities (at Walbrook Wharf) are likely to be prohibitive compared to processing at other suitable infrastructure within London."

Recommendation No Change

## Recommendation Details

Paragraph 6.8.20

Type of Comment General

## Comment

As London is the fourth most threatened world city as regards fresh water supply, CoLC should be doing more to encourage water saving measures. Composting toilets, anaerobic digestion and waste consolidation (6.8.20) must be required, as must the use of grey water for plantings, particularly in tall buildings.

Contact Name Contact Organisation

Fred Rodgers

## City Response

These aspects are dealt with elsewhere in the City Plan 2036. Policy D1 Sustainability Standards includes a requirement for all Major development to achieve a BREEAM “Excellent” rating paying particular attention to the BREEAM credits for water. Policy CR3 Sustainable Drainage Systems (SuDS) focuses on water saving measures and reuse of rainwater following the London Plan Drainage hierarchy to reduce surface water flood risk. Policy CEW1 requires facilities for the treatment of waste to be integrated into the design of buildings. The supporting text gives some examples of the type of facilities but allows for innovation by not specifying technologies in the policy.

Recommendation No Change

## Recommendation Details

Paragraph 6.8.25; 6.8.32



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

There seems to be an inconsistency between 6.8.25 - "The City's restricted land area makes the provision of waste facilities within the City problematic and it therefore relies on movement of the waste that is generated in the City to appropriate waste management facilities elsewhere in London and beyond London's boundaries" - and 6.8.32 - "Although the City is unlikely to be able to accommodate large waste management facilities within its boundary, changes in technology and waste transport costs may make small scale commercial facilities viable in the future". Hopefully 6.8.32 will prevail.

### Contact Name

Fred Rodgers

### Contact Organisation

### City Response

Paragraph 6.8.25 states the current situation where the City relies on waste management facilities elsewhere. Paragraph 6.8.32 envisages that technology changes may enable waste management within the City. Such new waste management sites would be supported subject to the requirements of Policy CEW3

### Recommendation

No Change

### Recommendation Details

## Paragraph

6.8.28

## Type of Comment

Object

### Comment

That 6.8.28 states – "Assessment of potential conflicts such as noise, vibration, odour, visual impact, pedestrian access and road or river transport will be taken into account in consideration of proposals. Mitigation may be necessary to allow development to proceed where a potential conflict is identified" is of great concern. CoLC's constant preference for development over the environment cannot be allowed to continue.

### Contact Name

Fred Rodgers

### Contact Organisation

### City Response

Change wording of paragraph 6.8.28

### Recommendation

Change

# City Plan 2036 Consultation Comments

## Recommendation Details

Strengthen wording to read “Assessment of potential conflicts such as noise, vibration, odour, visual impact, pedestrian access and road or river transport will be a key matter in consideration of proposals. Mitigation which minimises the potential conflict may be necessary for development to proceed.

### Paragraph

6.8.9

### Comment

There would seem to be an opportunity for the City to take an initiative for the reduction in the use of plastic in the Square Mile. The reintroduction of clean water drinking fountains in places where people naturally congregate allowing the refilling of bottles would encourage both the reduction in the use of plastics, a reduction in waste and the promotion of healthy lifestyles by avoiding sugar consumption. The Diocese is already exploring with other charities how best to provide for this eventuality.

### Contact Name

Fr Luke Miller

### Contact Organisation

Diocese of London

### City Response

This approach is supported by Policy S16 Circular Economy and Waste policies in the City Plan 2036 which promote a reduction in single use plastics and Policy S1 Healthy and Inclusive City which promotes the provision of publically accessible drinking fountains

### Recommendation

No Change

## Recommendation Details

### Policy Number

6.8.6

### Paragraph

### Type of Comment

General

### Comment

It is deeply concerning that any waste from the City is being sent to Corey’s Incinerator in Belvedere as it emits the second-highest level of polluting particles in the UK. Surely something CoLC should not be encouraging (6.8.6)



# City Plan 2036 Consultation Comments

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response

Paragraph 6.8.6 relates to the waste apportionment agreement between the City Corporation, the London Borough of Bexley and the South East London Waste Planning Group rather than the waste disposal contract that Cory has with the Riverside energy from waste. This agreement assists the City in fulfilling its contribution to provision of sufficient waste management facilities for London as set out in the London Plan.

Pollution levels at the Belvedere energy from waste plant are a matter for the Environment Agency as permitting authority.

The safeguarding of Walbrook Wharf for river-based transport of waste enables sustainable transport of waste to other river-based facilities.

## Recommendation

No Change

## Recommendation Details

## **Policy Number**

6.8.8

## **Paragraph**

## **Type of Comment**

General

## **Comment**

Although you state that a policy for minerals is not required (paragraph 6.8.8), a minerals policy which encourages the recycling of construction and demolition waste on site and the use of recycled aggregate would demonstrate good practice whilst also reducing the need for imported land-won aggregates, especially considering the amount of development proposed in the plan.

## **Contact Name**

Kathryn Dunmore

## **Contact Organisation**

Surrey County Council

## **City Response**



# City Plan 2036 Consultation Comments

The application of circular economy principles through Policy CEW1 Zero Waste City includes

- the re-use and refurbishment of existing buildings, structures and materials to reduce reliance on virgin resources
- Requiring development to be designed to allow for disassembly, reuse, and recycling of deconstruction materials
- Requiring the maximum use of recycled materials in development and offsite construction methods to reduce wastage

The issue of land won aggregates is covered in paragraph 6.8.8 which could be expanded to encourage on site recycling of construction demolition waste (subject to local air quality implications) and the use of recycled aggregates.

Recommendation Change

## Recommendation\_Details

Add the following wording to paragraph 6.8.8 “... Application of circular economy principles encourages the re use and recycling of demolition waste and the use of recycled aggregates in order to reduce reliance on imported materials and retain embodied carbon”

## Policy Number

6.8.9

## Paragraph

## Type of Comment

General

## Comment

Whilst, according to 6.8.9, “it is imperative that the City adopts circular economy and waste hierarchy principles”, CoLC under Strategic Policy S16 only effects to “support businesses and residents in moving towards a Zero Waste City, by applying circular economy principles, the waste hierarchy and the proximity principle at all stages of the development cycle”.

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response

This supporting text recognises that the City Plan 2036 does not control all aspects of circular economy and waste hierarchy. The policy emphasises the contribution that the City Corporation can make as planning authority by applying these principles to the development cycle, thus supporting businesses and residents to minimise their waste and use of resources.

Policy CEW1 Zero Waste City provides more detailed policy as to the application of this approach



# City Plan 2036 Consultation Comments

## Recommendation

No Change

## Recommendation\_Details

### Policy Number

CEW2

### Paragraph

### Type of Comment

General

### Comment

Policy CEW2 – Sustainable Waste Transport – may be well meaning but having had a tour of Veolia’s Reuse and Recycling Centre in Devon Street SE15, I was surprised to see that facility no longer takes any waste from the City. Hopefully that might change when Veolia takes over responsibility for CoLC’s waste and recycling collections.

Certainly, whilst a lot of waste sent to WPAs other than Southwark, is presumably construction waste, CoLC must ensure not only that developers are financially penalised for not using either river or rail waste transportation and, whether Amey or Veolia are its contractors, its own waste and recycling goes to Devon Street. In my reply to 6.1.13 of City of London Local Plan – Issues and Options - I suggested that waste could be transported by rail using the Elizabeth Line from Stratford and that – or a suitable alternative rail route - must be considered as a priority.

### Contact Name

### Contact Organisation

Fred Rodgers

### City Response

The Local Plan has no influence over commercial decisions over the destinations for waste generated in the City. Encouragement to use sustainable modes of transport will be strengthened by including the potential use of rail in the first bullet point of policy CEW2.

## Recommendation

Change

## Recommendation\_Details

Change wording of CEW2 Sustainable Waste Transport to read....”Encouraging the use of rail and waterways for removal of waste, including deconstruction waste and delivery of construction materials

### Type of Comment

Support

# City Plan 2036 Consultation Comments

## Comment

We are supportive of safeguarding Walbrook Wharf and use of River Thames and rail routes as a way of transporting waste.

## Contact Name

Kathryn Dunmore

## Contact Organisation

Surrey County Council

## City Response

Support noted

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

Support

## Comment

The PLA supports the reference to ensuring the maximum use of rail and waterways for the transport of excavation waste particularly from major infrastructure projects, and the encouragement of the use of the River Thames for the transportation of construction materials and waste.

In addition, the PLA welcomes the requirement in paragraph 6.8.30 and 6.8.31 to the need for Construction Logistics Plans (CLPs) and other relevant planning documents to clearly demonstrate how the sustainable transport of waste materials from a site will be addressed and how the potential for the use of the river has been considered.

## Contact Name

Michael Atkins

## Contact Organisation

Port of London Authority

## City Response

Support noted

## Recommendation

No Change

## Recommendation\_Details

## Policy Number

CEW3





# City Plan 2036 Consultation Comments

## Paragraph

### Type of Comment

Support

### Comment

The reference in policy CEW3 to the encouragement of the use of the river for the transportation of waste and recyclables for new waste sites is welcomed.

### Contact Name

Michael Atkins

### Contact Organisation

Port of London Authority

### City Response

Support noted

### Recommendation

No Change

### Recommendation Details

# City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S17: Thames Policy Area

### Policy Number

### Paragraph

### Type of Comment

General

### Comment

The draft Plan does not include an individual diagram showing the boundaries of the Thames Policy Area. This area is also not shown on the Key Diagram and should be included for clarity and consistency with the other Key Areas of Change. The CPA welcomes the promotion of a mix of commercial and cultural uses including office-led development in the Thames Policy Area (part 3) but considers that the policy needs to be amended to include acknowledgement of the identified residential cluster centred on Queenhithe to ensure consistency with other policies of the Plan (namely Strategic Policy S3 and Policy H1). The CPA suggests that part 3, third bullet point of Policy S17 should be amended to read:

“improving the vibrancy of the riverside by encouraging a mix of commercial and cultural uses and promoting office-led commercial development (and housing in or near identified residential areas), while safeguarding heritage assets and biodiversity value.”

The CPA would like to see the sentiment and statement at paragraph 7.4.4, which notes the aim is to achieve a City Riverside which complements that on the Southbank of the Pool of London, also set out in strategic policy S17.

### Contact Name

Charles Begley

### Contact Organisation

City Property Association (CPA)

### City Response

Noted. The boundaries are defined in the Policy Area but will include a diagram of the Thames Policy Area. No need to refer Queenhithe area as this is referred to in Policy S17 and Policy S3 on housing.

### Recommendation

Change

### Recommendation Details

A individual diagram of the Thames Policy Area has been added.

### Type of Comment

General

### Comment



# City Plan 2036 Consultation Comments

What exactly is this area in the City? Whilst there is reference to development, the major section of the City's river frontage – between Millennium Bridge and London Bridge has been omitted from the Key Areas of Change (1).

To what extent would the proposed joint Thames Strategy for the central section of the river, apart from the specific area, differ from the Thames Strategy SPD (2)?

Economic growth can, of course, be achieved without offices, let alone more offices (3):

- Unfortunately, the Riverside Walk at Queenhithe simply seems to be a diversion around the residential block and the failure of CoLC to protect the river bank there, as a public right of way, is regrettable.
- Unless more pedestrian bridges are provided, as at Queenhithe, having to wait at and then cross a major, highly polluted, traffic route discourages access to the river from the rest of the City.
- Despite the poor quality of the same, the riverside residential developments within the City provide a particular need. Additional riverside residential development should be encouraged.
- The decision to support the illuminated river project seems to be unjustified.

Presumably it should be “supporting, and safeguarding land for, the construction of the Thames Tideway Tunnel” (4).

The static mooring of boats which “have a special connection with the City and the River Thames” without needing to be “of national importance”; “be used for a river-related purpose; or “not have a detrimental impact on navigation or the environment” should be encouraged (5).

## Contact Name

## Contact Organisation

Fred Rodgers

## City Response

- 1) Please refer to Policy S17 wording which sets out why we are required to designate a Thames Policy Area. The two Key Areas of Change at Blackfriars and Pool of London have been identified as areas which require improvements through redevelopment.
- 2) Local Authorities producing Riverside Strategies was introduced through the Thames Estuary 2100 Plan (TE2100) to improve flood risk management and improve the riverside environment. Setting the boundary of Thames Policy Areas (TPAs) is set out in the draft London Plan and we will work with the PLA, GLA and our neighbouring boroughs. The City of London will plan for TPAs through joint Thames Strategies and the City of London's Thames Strategy SPD will be updated.
- 3) Aim to deliver commercial development. Policy refers to improvements. Please refer to the Riverside Walk Enhancement Strategy which sets out public realm improvements and access along the riverside.
- 4) In regard, to point 4 of the Policy S17 we will add the two commas for grammatical accuracy.
- 5) As the River Thames is a tidal river and this is a busy stretch of waterway the policy will remain to resist the permanent mooring of vessels.

## Recommendation

Change

# City Plan 2036 Consultation Comments

## Recommendation Details

Minor grammatical change to point 4 of Policy S17. Need to check wording of our response here esp point 2 on Thames Strategy.

### Type of Comment

Object

### Comment

The noticeable absence of the significance and the need for maintenance of the Site of Metropolitan Importance for Nature Conservation from Strategic Policy S17 is of great concern.

### Contact Name

### Contact Organisation

Fred Rodgers

### City Response

Noted. Additional wording added to Policy S17 point 6 regarding River Thames SMINC and additional wording 'to enhance the biodiversity of the River Thames SMINC' in Policy OS3 wording.

### Recommendation

Change

## Recommendation Details

Additional wording added to Policy S17 point 6 regarding River Thames SMINC and Policy OS3 wording to enhance the biodiversity of the River Thames SMINC.

### Type of Comment

General

### Comment

More could be said on encouraging greater use of the Thames, perhaps at the London Plan level, as clearly the City has only 1 mile of river frontage and would need to work in tandem with other boroughs.

The Thames is such a huge resource and asset to London that we believe it deserves its own strategy, which could consider the future of the Thames as a transport medium, an entertainment zone or a sports facility. We support use as a sports facility and look forward to the provision of a lido.

The Strategy should state targets for water quality. The Thames Tideway Tunnel is a major investment. Will it cope with the requirements of London and the City by the end of the Plan? Strategy should state how the quantity and quality of this water will change during the lifetime of the Plan.

### Contact Name

### Contact Organisation



# City Plan 2036 Consultation Comments

John Ramsey and Jane Northcote

## City Response

Noted. Please note further wording has been added to Policy S17 point 3 bullet point 1.

## Recommendation

Change

## Recommendation\_Details

Further wording has been added to Policy S17 point 3 bullet point 1 on 'enhancing' public access to the riverside.

## Type of Comment

General

## Comment

The City of London should agree the boundary of the Thames Policy Area within its area in collaboration with its neighbours following the guidance set out in Draft New London Plan Policy SI14 and paragraph 9.14.5 prior to submitting the Local Plan to the Secretary of State for examination.

## Contact Name

Juliemma McLoughlin

## Contact Organisation

Mayor of London

## City Response

Noted. The boundary as agreed in previous Local Plan but we will be liaising with GLA and our neighbours.

## Recommendation

Change

## Recommendation\_Details

Agreeing boundary regarding TPA's with neighbouring boroughs. See 9.14.5 of draft London Plan.

## Type of Comment

General

## Comment

We would like greater emphasis on riverside habitat creation within and along the Thames (as an aim of draft TE2100 Riverside Strategy Approach). Opportunity to enhance biodiversity of the River Thames and encourage innovative design. Whilst this may not be applicable to all development, it should be considered for all riverside proposals. Where opportunities exist, it should be expected that proposals include reasonable habitat enhancement and creation provisions.

## Contact Name

## Contact Organisation

# City Plan 2036 Consultation Comments

Matthew Pearce

Environment Agency

## City Response

Noted. Addiitonal wording added to Policy S17 wording regarding the TE2100 Plan.

## Recommendation

Change

## Recommendation\_Details

Minor wording added to S17 paragraph 6.7.32.

## Type of Comment

General

## Comment

I did not see any reference to controlling building overhang on the River. I also did not see any reference to control building overhand on the River.

## Contact Name

Rodney Clark

## Contact Organisation

## City Response

Noted. Please refer to Policy S17 wording which states that the City will work with the Port of London Authority (PLA) amongst others to ensure that the strategies and plans for the river are realised. Please refer to point 5 bullet point 4 of the policy which states the City would refuse development on or over the river.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

Point 3: The Illuminated River Project must not adversely impact roosts or flight paths of bats.

## Contact Name

Sarah Hudson

## Contact Organisation

Friends of City Gardens

## City Response



# City Plan 2036 Consultation Comments

Noted. This impact was considered by the applicant's and reference is included in the supporting documents and our policy response.

Recommendation No Change

Recommendation\_Details

Paragraph 7.2.5

Type of Comment General

Comment

The MMO approves of the references to the MMO and the marine plans. We suggest the last bullet point in 7.2.5 is altered to include the 2011 UK marine policy statement. An example is provided below:

- "The emerging South East Marine Plan produced by the Marine Management Organisation, which will provide a wider strategic context. Until the statutory South East Marine Plan has been adopted, the UK Marine Policy Statement, which sets out a framework and UK high level marine objectives, should be used for guidance and licensing on any planning activity in the Tidal Thames."

Contact Name Tom Pavitt  
Contact Organisation Marine Management Organisation

City Response

Noted. We have updated Policy S17 wording to refer to the UK Marine Policy Statement.

Recommendation Change

Recommendation\_Details

Added UK Marine Policy Statement to 7.2.5 bullet point 5.

Paragraph 7.2.8

Type of Comment Support

Comment

It is encouraging to see the City of London are co-operating with neighbouring boroughs to develop a Thames Strategy.

Contact Name  
Contact Organisation



# City Plan 2036 Consultation Comments

Matthew Pearce

Environment Agency

## City Response

Support noted.

## Recommendation

No Change

## Recommendation Details

## Paragraph

7.23; 7.25

## Type of Comment

General

## Comment

The PLA broadly supports policy S17, and the commitment to keep the Thames Strategy SPD (2015) under review, which gives additional guidance on development within the Thames Policy Area.

The aim of the City of London to develop a joint Thames Strategy with neighbouring boroughs for the central London section of the River Thames is supported and the PLA requests to be consulted on this at the appropriate time. The PLA also supports the reference to the Riverside Walk Enhancement Strategy (2015). In the PLA's response to the draft Transport Strategy it was noted that the City proposes to develop and publish an updated Riverside Walkway Enhancement Strategy in 2022. The PLA requests to be consulted on this document at the appropriate time.

Both the Thames Strategy SPD and Riverside Walk Enhancement Strategy make references to the need for appropriate Riparian Life Saving Equipment (such as life buoys, grab chains and escape ladders ) along the riverside walkway. Whilst these references are welcomed it is considered that the need to ensure that this infrastructure is provided to a standard as recommended in the 1991 Hayes Report inquiry into River Safety should be explicitly documented in policy S17, to ensure this is given full consideration as part of relevant planning applications. Reference must also be given in the policy to the need for suicide prevention measures in appropriate locations (such as CCTV and signage with information to access support) as part of new development along the riverside.

The PLA welcomes the specific safeguarding of Walbrook Wharf in policy S17, as well as the general encouragement for the increased use of the River Thames for the transport of construction and deconstruction materials and wastes, which is in line with relevant London Plan policy and the PLA's Thames Vision. As part of the supporting text at paragraph 7.2.5 reference should be made to the GLA's Safeguarded Wharves Review (2018).

The reference to encouraging the reinstatement of Swan Lane Pier and use of the pier for river transport is welcomed. The PLA looks forward to continuing to work with the City to further develop this project.

The reference within policy S17 to refusing development on or over the river, except for structures which specifically require a waterside location for river-related uses is welcome.

Paragraph 7.2.3 refers to policy S16, this appears to be a mistake and should instead refer to policy S17.

## Contact Name

## Contact Organisation



# City Plan 2036 Consultation Comments

Michael Atkins

Port of London Authority

## City Response

Noted. Policy S17 point 5 bullet 6 does refer to health and safety and environmental safeguards regarding access points to the River Thames. The Policy already refers to the PLA's Thames Vision Progress Report (October 2018). Additional wording has been added to Policy S17 regarding the GLA's Safeguarded Wharves Review (2018). Thank you for pointing out the error in paragraph 7.2.3 this will be amended from Policy S16 to Policy S17.

## Recommendation

Change

## Recommendation Details

Additional wording has been added referring to the GLA's Safeguarded Wharves Review.

# City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S18: Blackfriars

### Policy Number

### Paragraph

### Type of Comment

### Object

### Comment

The need is for residential development and not office or commercial (1).

Were Puddle Dock and White Lion Hill from Benet's Hill south to be closed to traffic, there would be an opportunity to provide substantial improvement to the public realm, as well as more effective riverside enhancement. Whilst more pedestrian crossings are needed, a pedestrian bridge over Upper Thames Street, linking Puddle Dock and the riverside would seem to be necessary (2 and 3).

It's unfortunate that Mermaid Theatre is closed (4).

Closing Puddle Dock and part of White Lion Hill completely would reduce pollution. The more stringent emission controls on road traffic, pending the banning of all except EVs, will do the same and more effectively for Upper Thames Street and Queen Victoria Street. In fact, limiting the use of the latter and Castle Baynard Street to ULEVs could be done now. St Benet's Paul's Wharf would benefit from the closing of southern part of White Lion Hill in any event (5).

### Contact Name

### Contact Organisation

Fred Rodgers

### City Response

Noted. Policy does not support residential along the river. Point 3 of policy refers to access. Further detail is set out in the Thames Strategy SPD. Policy S18 acknowledges improving the quality of the public realm and identifying opportunities for urban greening and pollution reduction measures, particularly along Puddle Dock, Castle Baynard Street, White Lion Hill, Upper Thames Street and the churchyard of St Benet Paul's Wharf

### Recommendation

No Change

### Recommendation\_Details

### Type of Comment

Support

# City Plan 2036 Consultation Comments

## Comment

PLA broadly supports policy to enhance pedestrian permeability and accessibility, through improvements to and alongside the riverside.

## Contact Name

Michael Atkins

## Contact Organisation

Port of London Authority

## City Response

Support noted.

## Recommendation

No Change

## Recommendation\_Details

# City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S19: Pool of London

### Policy Number

### Paragraph

### Type of Comment

General

### Comment

Support the inclusion of the Pool of London as one of the Key Areas of Change in Strategic Policy S19 of the draft City Plan. The Pool of London provides a visual gateway to the City from the Thames and to the historic port of London. It has long been a critically important part of London's commercial and cultural activity.

The northern bank of the Pool of London suffers considerably through the disconnection that exists between the City and the river due to the barriers that are created, and the inaccessibility caused by Lower Thames Street; a situation that has deteriorated since the introduction of Cycle Superhighway CS3. City Rivergate seeks to break down the existing hard boundaries to introduce more fluid pedestrian routes, both along the river side and north-south from the river bank into the City. We believe that investment in existing buildings, a diversification of uses and the establishment of active and visitor friendly uses, related to the existing tourist destinations can enliven the river bank and make this part of London a much more vibrant place contributing to the City's tourist and evening economies.

We support the narrative for the Pool of London in the draft Local Plan and concur that it has an opportunity for increased vibrancy arising from greater use of the riverside walk, more leisure, retail and cultural public uses at ground level and the provision of publicly accessible roof terraces and spaces. Commercially the options to encourage inward investment for regeneration rather than redevelopment are limited. Given the importance to the future of the City, the policy framework and/or narrative should, for this area specifically, include some provision for the potential, but limited, loss of existing office floorspace where it can be shown this would enable, either commercially or practically, delivery of the wider vision.

The success of any regeneration and in the creation of a new 'place' will rely on providing a range of land uses including those which attract people to the area, exploit the ground floor active uses, the riverside walk and its associated views. Of all of the buildings within the Pool of London, Custom House is the most appropriate for use as a Hotel. As a Grade 1 Listed Building, it has significant limitations in meeting modern day office requirements. A hotel use would secure its long-term protection and preservation and fits with the City's business function. The City attracts the world's leading investors, entrepreneurs and business champions who seek high end, high quality and well-located temporary accommodation. In this location and in respect to this building, a hotel use would attract business and tourist customers. It would not have a serious impact on the office protection provisions of the plan but would enhance the cultural offer, especially given the limited facilities in the general area.

Policy should allow for alternative uses where this would help deliver the City's aspirations for regeneration of the Pool of London. Such an approach need not be an exception to the City-Wide policy that seeks to protect office floorspace. Applications for an exception, even in this area, should be accompanied by an



# City Plan 2036 Consultation Comments

economic, historic or commercial justification that sets out the wider benefits in terms of tourism, culture and regeneration, or show how it would ensure the delivery of active frontage(s) and contribute to the diversity of London and the vision for the Pool of London.

We consider it unlikely that residential would be suitable in this area, even if significant affordable housing was proposed. However, uses such as a hotel, cultural centre, conference/meeting facilities, museum and world catering within the existing listed structures should be encouraged, especially as these are likely to attract high end investment and lead to the refurbishment and reuse of these key premises. Uses identified and promoted elsewhere in the plan should, where applicable, be encouraged particularly if there is a recognised shortfall and the location is appropriate for the proposed use in the context of its surroundings. These use types would also encourage a 'spilling out' into the public realm, with tables and chairs associated with leisure, restaurant and club uses, helping to create a cosmopolitan feel similar to the southern bank. Existing office buildings to the west would then be identified for redevelopment/refurbishment, having regard to the need to activate the ground floor units and the river frontage, respecting the setting of St. Magnus the Martyr Church and help address the physical barrier created by Lower Thames Street through creation of new and/or improved pedestrian links.

City Rivergate's vision would provide the opportunity to revitalise this historic part of London, replacing inappropriate modern buildings with ones of the highest quality architecture, refurbishing and enhancing existing heritage assets and bringing forward modern uses appropriate to London's World City Status and to this key part of the river. The project will provide greater public access whilst enlivening and enhancing an area that is already a major attractor. It presents the opportunity to complete the north bank pedestrian loop, providing cultural and leisure facilities for Londoners, City Workers and tourists. This can, however, only be achieved through a degree of flexibility in the acceptable land uses in the listed buildings of Custom House and Old Billingsgate Market, where the class B uses are replaced by ones that initiate change, activate the ground floor, encourage spill out on to the riverside and serve as attractors to the full spectrum of possible users; whilst also protecting and preserving these important heritage assets.

## Contact Name

## Contact Organisation

City Rivergate Ltd

## City Response

Noted. Development should be principally office-led and residential development on the riverside would not be supported. Complementary retail, cultural and leisure use can be supported where they do not detract from the primary business function of the City. There should be more, and better, pedestrian crossing points over Thames Street, at grade, to improve accessibility from the City to the Riverside. Development height should be carefully considered to maintain and improve views from the Monument and Strategic Views of St Paul's and the Tower of London.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

# City Plan 2036 Consultation Comments

## Comment

Northern & Shell are supportive of the City's vision, as outlined in paragraph 3.4.4, to regenerate the Pool of London area through redevelopment and refurbishment of appropriate sites. Improvements to the public realm and the provision of more active uses at ground floor level are also supported. The proposed restaurant/bar pavilion on the river in front of 10 Lower Thames Street will make a contribution to activation and public realm improvements on the riverside walkway.

There are three sites within the Pool of London which are critical to achieving the City's vision – 3 Lower Thames Street, 10 Lower Thames Street and Customs House. Customs House is listed and is therefore likely to be subject to a change of use/alterations. The two principal sites for redevelopment are Nos 3 and 10 Lower Thames Street.

Our client has previously engaged with the City on the potential to redevelop 10 Lower Thames Street in the medium to long term. However, the site is subject to planning constraints which limit the ability to significantly increase the level of office floorspace. Consequently, at the current time, redevelopment for an office building which wholly adhered to the strategic and local views (particularly the Monument view), would not deliver the increase in office floorspace required to make redevelopment viable.

It is recognised there is a need to support office floorspace in the core locations of the City in order to protect the City's status as a world financial district. There are locations within the City however that have either already taken on a more mixed-use character or would benefit from becoming more mixed-use in character. The 10 Lower Thames Street site falls within the Thames Policy Area in the current Local Plan, which stretches from Temple in the west to the Tower of London in the east. It therefore represents a significant stretch of the river which is very different in character to the main financial centre of the City to the north of Lower Thames Street. The area includes a mixture of offices, retail, leisure and residential uses reflecting its location next to the river. It is not an area which is dominated by office uses, and indeed has a mixed use character which is typical of other parts of River Thames frontage in Central London. This is evidenced by the recent residential developments and permissions granted by the City at Three Quays and Sugar Quays respectively.

Whilst our client's site is currently in office use, it is not part of the 'commercial core' being physically separated by the heavily trafficked Lower Thames Street and forming part of the river frontage. It is considered that the site, and area between London Bridge and Tower Bridge requires a more tailored approach to land use planning which recognises the different role that this part of the City performs. A more flexible land use approach to this part of the City should be adopted which includes residential, office, leisure and retail at ground floor.

GM Real Estate previously assessed the viability of redevelopment in 2014. Warren Advisors has reviewed the latest position in relation to the viability of developing the site for a new office building and found that it does not result in sufficient levels of return to justify the required level of capital expenditure. In their view, a mixed-use scheme with residential to the river and office to the rear would provide a viable redevelopment. A copy of Warren Advisors letter is included in Appendix A.

The potential to increase the height, massing and scale of the building is limited by virtue of: Monument views (to and from the site); LVMF views, including views



# City Plan 2036 Consultation Comments

to St Paul's and the River Prospect Views; The proximity of the World Heritage Site; The adjacent listed buildings of Billingsgate Market (Grade II) and Saint Magnus the Martyr Church (Grade I), along with Adelaide House (Grade II) and Custom House (Grade I); The poor quality environment of Lower Thames Street which sterilises the northern frontage and acts as a barrier/ boundary to the main City to the north.

Given the above, a mixed-use scheme that includes both residential and office development has the potential to deliver high quality office floorspace to meet modern occupier requirements as well as deliver housing for the City without affecting the core commercial area. The redevelopment could deliver: Removal of buildings of low architectural quality and their replacement with buildings which could positively enhance the townscape and river views; Introduction of ground floor uses which will animate Lower Thames Street and the river frontage to enliven and diversify the area; Improve public realm and open space both along the edges of the site and between the buildings and along the river front; Improve the setting of the Grade II Billingsgate Market and the Grade I listed Saint Magnus the Martyr Church; Provide high quality residential/office and commercial uses, which would have no impact on existing business.

The opportunities and benefits presented by a mixed-use approach and the long term viability of developing Lower Thames Street mean there are sound planning reasons why the current policy approach requires re-consideration.

## Contact Name

## Contact Organisation

Northern & Shell

## City Response

Noted. Development should be principally office-led and residential development on the riverside would not be supported. Complementary retail, cultural and leisure use can be supported where they do not detract from the primary business function of the City. There should be more, and better, pedestrian crossing points over Thames Street, at grade, to improve accessibility from the City to the Riverside. Development height should be carefully considered to maintain and improve views from the Monument and Strategic Views of St Paul's and the Tower of London

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

We remind the Corporation that development in this area and the rest of the City must seek to improve London's air quality in conformity with draft London Plan policy GG3 (Creating a healthy city) and policy SI1 (Improving air quality). Major developments subject to an Environmental Impact Assessment should adopt an Air Quality Positive approach.



# City Plan 2036 Consultation Comments

Development should support the 10 Healthy Streets indicators and public realm at the riverside should be fully public space and designed in accordance with draft London Plan policy D7 (Public realm). We also strongly support part 5 of the policy, especially 'enhancing the Riverside Walk to create a continuous riverside park and walkway free of cars' and 'identifying opportunities for pollution reduction measures'

## Contact Name

Chris Leong - Assistant Planner

## Contact Organisation

Transport for London - Spatial Planning

## City Response

Noted.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

## Object

## Comment

Again, residential development must be preferred to office and commercial. In fact, the latest residential development, Landmark Place, Sugar Quay, isn't even mentioned in 7.4 nor is the older residential block, Cheval, Three Quays (1).

2. Requiring and encouraging increased vibrancy and active frontages at ground floor level, through the provision of publicly accessible retail, leisure and cultural uses on the river frontage ignores that:

- CoLC sold Billingsgate Market and could have determined the subsequent development of the site.
- The only area of the Pool of London river frontage not mentioned includes Adelaide House and St Magnus the Martyr Church – both of which must remain untouched, although both either already provide public green open spaces or scope for the same; the two office blocks, Northern & Shell, which has recently been refurbished, and St Magnus House; and Custom House.
- HMRC is believed to be vacating and selling Custom House in 2020. This already provides some greening and a redevelopment, next to Sugar Quay, will surely be residential.
- St Magnus House, which it seems already contains serviced apartments, should also be redeveloped for primarily residential use (2)

These proposals have to be welcomed but as far as public transport is concerned, CoLC should be objecting to the removal of the RV1 service, especially between Tower Gateway and London Bridge (4).

Likewise these proposals have to be welcomed but there shouldn't be any private cars in this area anyway (5).

## Contact Name

## Contact Organisation





# City Plan 2036 Consultation Comments

Fred Rodgers

## City Response

Noted. Figure 28 will be updated. Development in this area should be principally office-led and residential development on the riverside would not be supported. Complementary retail, cultural and leisure use would be supported where they do not detract from the primary business function of the City. Proposed enhancement of the riverside walk would ensure it is car-free and accessible.

Recommendation No Change

## Recommendation Details

Type of Comment Support

## Comment

We write in broad support of the local plan, in particular as this relates to Lower Thames Street and our interest in St Magnus House, within the Pool of London. In particular, we are keen to see regeneration in this area, including improvement to the public realm.

Contact Name Contact Organisation

Jo Upton Pegasi

## City Response

Support noted.

Recommendation No Change

## Recommendation Details

Type of Comment General

## Comment

Policy S19 on the Pool of London area makes no reference to the fact that this area is adjacent to the Tower of London World Heritage Site and Conservation Area. We are pleased that the requirements of the policy are generally in line with the Tower of London Conservation Area Management Guidelines, in terms of encouraging active frontages, improved pedestrian links, public cultural events, and enhanced public realm including greening and planting. Clause 5 of the policy could also reflect the statement in the Management Guidelines on the importance of high quality surfaces, street furniture and lighting.

# City Plan 2036 Consultation Comments

## Suggested Changes:

- The proximity of the Pool of London area to the Tower of London should be recognised in the policy or supporting text. This should specify the importance of working with Tower Hamlets and Historic England to ensure the setting of the Tower is preserved and enhanced. It should also specify the importance of ensuring that redevelopment proposals in the area take the opportunity to enhance the wider setting of the Tower where possible. Specific reference could be made to the Tower of London Conservation Area Character Appraisal and Management Guidelines, and the World Heritage Site Management Plan.
- Additional bullet point in policy S19, clause 5: “seeking high quality surfaces, street furniture and lighting in landscaping schemes in the vicinity of the Tower of London”.

### Contact Name

Marissa Ryan-Hernandez

### Contact Organisation

London Borough of Tower Hamlets

### City Response

Noted. Additional policy wording has been added to include referencen to the Tower of London World Heritage Site. Further information relating to the Tower of London is set out in Policy HE1, HE3 and S13.

### Recommendation

Change

### Recommendation Details

Additional wording added to paragraph 7.4.11 re Tower of London WHO.

### Type of Comment

General

### Comment

The potential for riverside habitat creation should be assessed as part of the Key Areas of Change for the Blackfriars and Pool of London areas. Many aspects have already been covered in the plan, such as encouraging cultural events, riverside access and public realm improvements, however we feel potential opportunity for ecological enhancement may have been overlooked. Looking at these areas at a strategic level will help identify opportunities and produce a cohesive vision for each area that includes ecological enhancement aims.

### Contact Name

Matthew Pearce

### Contact Organisation

Environment Agency

### City Response

Noted.

### Recommendation

No Change

# City Plan 2036 Consultation Comments

## Recommendation Details

### Type of Comment

Support

### Comment

The PLA broadly supports policy S19 and associated vision, including part 5 of the policy which proposes to enhance the public realm and public spaces in the Pool of London Area, including enhancing the riverside walkway. The references to improving transport connections and pedestrian links to/from the Pool of London area and encouraging more active uses in the area, including the promotion of cultural events and active frontages alongside the riverside path is also supported. This is supported by the PLA's Thames Vision which includes a cultural goal to see more people coming to enjoy the Thames and its banks.

### Contact Name

Michael Atkins

### Contact Organisation

Port of London Authority

### City Response

Support noted.

### Recommendation

No Change

## Recommendation Details

### Paragraph

7.4.4, 7.4.12

### Type of Comment

General

### Comment

The CPA fully supports the aims and objectives of this strategic policy and welcomes the comments at paragraph 7.4.4, which notes the aim is to achieve a City Riverside which complements that on the Southbank of the Pool of London.

Part 2 of draft policy requires the provision of new publicly accessible roof terraces and spaces where they offer good river views and do not impact adversely on the amenity of occupiers or nearby residents. The CPA acknowledges the benefit of publicly accessible roof terraces. However, the provision of public access can only be contemplated in a very small number of instances, and the provision of such terraces has a big impact on the design of buildings, including ground floor layout, access and safety, core position and lift configuration. Further, the heights of buildings on the River are limited by amongst other things London Panoramas, River Prospects and Monument Views. The provision of publicly accessible roof terraces and space will not always be feasible, or viable. The draft policy should "encourage", (where feasible and viable) rather than "require". A similar comment is made in respect of paragraph 7.4.12.



# City Plan 2036 Consultation Comments

The CPA is concerned with the policy proposal seeking the use of shared servicing bays and access points (part 4). This will be extremely challenging and is unlikely to be deliverable, due to ownership and management complications. Large building loading bays and any stock holding areas are designed and sized for that building alone, and there is unlikely to be capacity for other nearby buildings. There are also concerns relating to the viability of providing an oversized loading bay to facilitate servicing for nearby buildings. Then there are issues with security of deliveries and complexities with claims for lost product. The idea of building facilities management teams holding stock on behalf of other buildings is unrealistic. It is important that the Local Plan sets out only realistic and viable measures. The CPA objects to this policy proposal, which is considered unsound.

Contact Name

Charles Begley

Contact Organisation

City Property Association (CPA)

City Response

Noted. It is important the development along the riverside should provide publicly accessible facilities especially in a location where we expect to see an increase in vibrancy. Shared servicing bays would improve transport connections and pedestrian links which could be achievable.

Recommendation

No Change

Recommendation Details



# City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S20: Aldgate and Tower

### Policy Number

### Paragraph

### Type of Comment

Object

### Comment

Positioned in the east of the City, this covers the area immediately to the north (behind) the Tower of London adjoining the boundary with Tower Hamlets and includes the Portsoken, Tower and Aldgate wards; the southern edge of the area is immediately adjacent to the Tower WHS. The whole area lies within the eastern part of the City identified in Figure 19 as appropriate for tall buildings, subject to certain criteria.

However, any new tall buildings located to the south of Aldgate High Street would be likely to appear in the LVMF Landmark Viewing Corridor of the White Tower from the Queen's Walk. New tall buildings to the north of Aldgate High Street could also be visible in the immediate backdrop to the Tower, within the LVMF Wider Setting Consultation Area, depending on their height and location.

Historic Royal Palaces therefore objects to the encouragement of change and development in this area unless the relevant supporting policies make clear that new tall buildings in proximity to the Tower are unlikely to be acceptable.

### Contact Name

### Contact Organisation

Adrian Phillips

Historic Royal Palaces

### City Response

Wording has been added to the supporting text to address this issue, as below.

### Recommendation

Change

### Recommendation\_Details

Wording has been added to the supporting text as follows;

"Tower Gateway lies within the Local Setting Area of the Tower of London World Heritage Site. Development proposals and public realm works in this area should seek opportunities to enhance the immediate surroundings of the World Heritage Site, as set out in Policy HE3".

### Type of Comment

General

### Comment



# City Plan 2036 Consultation Comments

Trenitalia c2c appointed Weston Williamson + Partners to undertake a masterplanning feasibility study of the Fenchurch Street Station area as part of their commitment towards the DfT for their 15 years franchise of the London, Tilbury and Southend Railway Line (2014 – 2029).

The Masterplan sits alongside separate proposals for a Station Transformation and Retail Upgrade at Fenchurch Street Station. The masterplan develops a longer term vision as called for within the Franchise Agreement and this work has been done in full consultation with key stakeholders.

The longer term vision is driven, in part, by rising passenger demand related to planned growth in housing provision within the c2c franchise corridor. One of the key findings is that the existing Fenchurch Street Station will reach capacity in less than 20 years' time due to the constraints of the four platform arrangement. The vision study has considered a scenario which addresses this shortfall by providing a new terminus station to the East at Tower Gateway, within City of London boundary, where it is possible to construct six operational platforms.

Whilst this is likely to be a costly proposal, the work would remove existing railway infrastructure from a substantial area of prime commercial land within the City of London, effectively releasing new land that can support significant commercial development. Existing land, also currently constrained by adjacency to the railway would be liberated creating sizeable new building plots, unlocking the opportunity to substantially improve the quality of the urban realm at street level in terms of permeability and legibility of space. Urban realm improvements are considered a key element for the long term regeneration of the area and as such they have been integrated into the wider master plan vision. Enhanced and safer pedestrian-friendly routes would facilitate and support the new commercial/cultural provision of the area as well as facilitate transport interchange and user experience through the site.

The new station location, together with the repurposing of a portion of existing tracks into an 'elevated cultural/commercial promenade' in the heart of the City would offer dramatic placemaking opportunities that could ensure maximum return from new commercial development. The new station could also act as a catalyst for wider redevelopment opportunities, as recent examples in London such as London Bridge or Paddington station are showing. The existing railway arches, freed from the rail constraints above, could offer new ground level activity to bring this edge of the City to life, together with improvements of the urban realm across the area facilitating pedestrian flows and wayfinding.

The next step would be to develop an outline business case for the long-term vision. Trenitalia c2c have consulted with the DfT on the Fenchurch Street Masterplan and are awaiting further direction from the department before pursuing potential funding for this piece of work based on the broader commercial and placemaking opportunities.

Until the business case work is done the project remains at feasibility stage. However, in relation to your Draft City Plan 2036 the safeguarding of the relevant sites around the station viaduct should be considered as a priority to ensure that the full townscape and development benefits can be realised once the station is redeveloped in the new location.

## Contact Name

Ben Martin

## Contact Organisation

Trenitalia c2c Ltd

## City Response



# City Plan 2036 Consultation Comments

There are several references in the Plan which acknowledge the proposed changes to Fenchurch Street Station. Safeguarding areas in the Plan is considered to be too detailed in the Plan's context.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

The CPA broadly supports this draft policy, but considers the limitation on additional hotel provision unreasonable and unsound. It is unclear whether "limited amount" relates to hotels themselves or number of rooms. If a site can suitably address the "Protection of Existing Office Floorspace", it should be considered suitable for an alternative use, including hotel use. In such circumstances, it would be unreasonable and unsustainable to limit hotel provision, particularly in the light of GLA targets for additional hotel rooms, and paragraphs 5.3.12 and 5.3.13 of the draft Local Plan. We suggest that "a limited amount of" is deleted from part 3 of this policy.

Reference to policy S19 is made at paragraph 7.5.9. This should in fact refer to policy S20.

## Contact Name

Charles Begley

## Contact Organisation

City Property Association (CPA)

## City Response

Agree that wording could be amended for clarity. Part 3, bullet 2 of policy has been amended as below.

## Recommendation

Change

## Recommendation\_Details

Part 3 bullet 2 has been amended as follows;  
"permitting additional hotels on appropriate sites";

## Type of Comment

Support

## Comment

We support section 4 of this policy and look forward to work collaboratively with the Corporation to achieve these aspirations. The congestion and pollution reduction measures mentioned in section 5 of this policy should focus on promoting active travel modes, which is the best way to reduce congestion and pollution.



# City Plan 2036 Consultation Comments

## Contact Name

Chris Leong - Assistant Planner

## Contact Organisation

Transport for London - Spatial Planning

## City Response

Active travel measures which are referenced in Policy AT2 apply to all areas of the City.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

## Object

## Comment

This is a significant residential area, which will be significantly expanded with the completion of the student accommodation at Emperor House, Vine Street and the proposed redevelopment of Mansell Street Estate. Additional “office-led commercial development”, at least not of the sort favoured by CoLC, is unnecessary (1).

2. As regards meeting residents' needs:

- Brexit and its aftershock will mean existing jobs will need filling.
- The failure to ensure the expansion of Sir John Cass’s Foundation Primary School to two-form entry was a disaster of CoLC’s own making. It’s arrogant promotion of CoLPAI provided the Foundation with a political excuse not to agree the proposed expansion. As a one-form entry school, it is now under even more financial threat with the lack of economy of scale two-form entry schools have and its short/medium term future must be in doubt.
- The existing lack of open spaces and, particularly play spaces, has to be reversed. The proposed reduction in play facilities in the redevelopment of Mansell Street Estate, is a negative step.
- The location of the Middlesex Street Community Centre in Little Somerset Street is another negative step (2).

Judging by the room prices currently being quoted by chain hotels, there are more than enough hotels in the area and proposals for more should be refused (3).

The loss of the RV1 service has already been mentioned. The other proposals are welcomed (4).

Again, the proposals are welcomed but CoLC must be more pro-active in tackling air pollution (5).

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response



# City Plan 2036 Consultation Comments

Comments noted. Mixed-use development is considered the most appropriate to balance the residents needs and satisfy demand for commercial-led space.

School class size is not a planning matter.

Current policy encourages open space provision.

Hotel development is restricted by site considerations (the displacement of offices and amenity issues) and the cumulative impact of policies on the whole of the City.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

TfL Commercial Development is broadly supportive of the objectives set out in this policy. TfL CD has identified Aldgate bus station, and adjacent properties in our ownership on the Minories and Aldgate High Street as a potential development site within Aldgate and Tower area. We would welcome discussions with the City of London about the future of this site - both in isolation and in the wider context of adjoining land holdings currently owned by third parties.

The area is also covered by the City Fringe Opportunity Area Planning Framework (2015). This document contains policies which identify that development should support Aldgate as an attractive area to both live and work, and to “promote a mix of residential and commercial development” to ensure the mixed use and vibrant centre is maintained. Policy S20 is focused only on securing commercial led development in the area and to be in line with the City Fringe OAPF, TfL CD believes that an element of residential development should also be promoted in the Aldgate and Tower area through the policy.

We welcome that the policy identifies that there is an opportunity to “improve Aldgate bus station by improving air quality and deliver better access for pedestrians to and from community facilities, housing estates, open spaces and retail facilities;” We believe that redevelopment of the bus station is the best way to secure improvements to air quality and deliver Healthy Streets that can improve pedestrian links in the area. We look forward to working collaboratively with the City to shape the future of the site.

Contact Name

Contact Organisation

Luke Burroughs

Transport for London Commercial Development

City Response

Support noted. There are two identified residential areas in the Aldgate and Tower KAOOC and policies in this section of the Plan seek to meet the needs residents in the area.

Recommendation

No Change

# City Plan 2036 Consultation Comments

## Recommendation\_Details

### Type of Comment

General

### Comment

We welcome the fact that the requirements of Policy S20 are generally in line with the Tower of London Management Guidelines. However, more explicit reference is needed to the importance of preserving and enhancing the setting of the Tower. This area is also adjacent to the Wentworth Street Conservation Area in Tower Hamlets, and reference could be made to the importance of the Conservation Area Character Appraisal and Management Guidelines for developments adjacent to this area.

### Suggested Changes:

- The proximity of the area to the Tower of London should be more explicitly recognised in the policy or supporting text. This should specify the importance of ensuring the setting of the Tower is preserved and enhanced. It should also specify the importance of ensuring that redevelopment proposals in the area take the opportunity to enhance the wider setting of the Tower where possible. Specific reference could be made to the Tower of London Conservation Area Character Appraisal and Management Guidelines, and the World Heritage Site Management Plan.
- New clause added to policy S20: "Seeking high quality surfaces, street furniture and lighting in landscaping schemes in the vicinity of the Tower of London".
- Add reference in supporting text to the Wentworth Street Conservation Area that runs along Middlesex Street, and the importance of considering the setting of the Conservation Area when proposing developments adjacent to it.

### Contact Name

### Contact Organisation

Marissa Ryan-Hernandez

London Borough of Tower Hamlets

### City Response

Agree that wording could be added for clarity. Wording has been added to the supporting text as below. Reference to Wentworth C.A was considered to be too detailed to include.

### Recommendation

Change

### Recommendation\_Details

Wording has been added to the supporting text as follows;

"Tower Gateway lies within the Local Setting Area of the Tower of London World Heritage Site. Development proposals and public realm works in this area should seek opportunities to enhance the immediate surroundings of the World Heritage Site, as set out in Policy HE3".

### Type of Comment

Support

# City Plan 2036 Consultation Comments

## Comment

Although this key area of change does not directly border the river, the PLA supports part 4 of the policy, which seeks to enhance links to the riverside walkway and the Tower of London from this area.

## Contact Name

Michael Atkins

## Contact Organisation

Port of London Authority

## City Response

Comment noted.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

Support

## Comment

I agree with the aim to improve connections between Tower Hill, Tower Gateway and Fenchurch Street; more widely in that area, a route that would benefit from public realm and transport improvements is around Tower Hill: for cyclists, from the East-West cycle superhighway to Aldgate; and for pedestrians between Tower Hill and Aldgate towards Liverpool Street and Spitalfields.

## Contact Name

Rob Yuille

## Contact Organisation

## City Response

Support noted.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment



# City Plan 2036 Consultation Comments

It would be very beneficial if the access between the Minories and Mansell Street is improved for pedestrians. At the moment we use Hayden's Street which is not very accessible, dark at night, can be unsafe and is the only way to go from one street to the other (apart from Portsoken Street which is adjacent). Surely there is a way of opening a pedestrian walkway either through the bus stop near the High Street or Little Somerset Street.

## Contact Name

Rohan Inamdar

## Contact Organisation

## City Response

Agree. Improved access in this area would be beneficial. Policy wording has been amended.

## Recommendation

Change

## Recommendation Details

Wording has been added to Policy S20, section 4 bullet point 4 as follows:

"Encouraging pedestrian routes and permeability through large development sites, particularly the Mansell Street Estate and between Minories and Mansell Street".

## Type of Comment

General

## Comment

The Aldgate Partnership fully supports the Plan but would also like to see further emphasis as below. The area of Aldgate has a confused identity and as such we would like to see more emphasis placed on destination management as an inclusive economy to create a sense of place for all who use the area including residents, staff and visitors.

To achieve this we make the following comments to be considered:

- Cross borough working with Tower Hamlets should take key importance. Focusing on a cross borough retail strategy to highlight key areas of destination such as Petticoat Lane and other heritage aspects.
- A further important cross borough activity is needed in terms of both stations. There needs to be a memorandum of understanding between both boroughs to approach the stations as a joint need, particularly in terms of the growing developments and the impact this has on capacity, safety, accessibility and welcome to the Aldgate area as a whole.
- Recognition and emphasis on the cultural and religious diversity of the area.
- Ensuring economic impact from visitors is adequately recorded.
- A thorough comprehensive Wayfinding Strategy and scheme is needed – not just from key stations, but to include key decision and destination points. There are currently fragmented pedestrian routes and this needs to be taken into account.
- As above, improve walkability and cycle routes need to be enhanced to encourage less vehicular use – improved lighting and pavement widths are of key

# City Plan 2036 Consultation Comments

importance along with removal of physical barriers and decluttering. Assessment and redesign of current crossing points, particularly.

- Through planning, more active frontages need to be developed to enhance both the aesthetics and safety of the area.
- Planning legislation to be more effectively used in enforced development and careful design of currently unused pockets of land. It is vital to look at a greening infrastructure strategy and provide more community play/rest spaces.

## Contact Name

## Contact Organisation

Sarah Nelson

The Aldgate Partnership

## City Response

Agree that links between Tower Hamlets and the City in terms of managing attractions should be further emphasised. Wording has been added to section 3 of the policy as below.

Agree that the religious and cultural diversity should be recognised. Wording has been added to paragraph 7.5.2 as below.

Agree that temporary spaces which can be used for greenery and open space should be emphasised. Wording has been added to paragraph 7.5.8 as below.

Issues raised regarding pedestrian movement, retail frontages, wayfinding, lighting and public realm are dealt with in policies within the Aldgate and Tower KAOC as well as transport and design policies in the Plan.

## Recommendation

Change

## Recommendation Details

Wording has been added to supporting text as follows:

"The area contains a broad range of cultural and religious diversity".

A new bullet point has been added in section 3 as follows:

"Enhancing Petticoat Lane Market, celebrating the character and history of the area and improving the visitor experience by working in partnership with the London Borough of Tower Hamlets, market traders and other stakeholders"

Wording has been added to supporting text as follows:

"With development occurring small pockets of land may be vacant for long periods. Meanwhile uses for such land, including carefully designed green spaces, can help improve local air quality and be utilised by the local community, visitors and workers for leisure and sporting opportunities. Policies O3 (Temporary Use of vacant offices and sites) and HIC7 (Sport and recreation on temporary sites) support this approach".



# City Plan 2036 Consultation Comments

Paragraph

7.5.9

Type of Comment

General

Comment

There is reference in 7.5.9 to Policy S19. Surely this should be S20.

Contact Name

Contact Organisation

Fred Rodgers

City Response

Correct.

Recommendation

Change

Recommendation Details

Reference to S19 has been changed to S20.

# City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S21: City Cluster

### Policy Number

### Paragraph

### Type of Comment

Support

### Comment

We support the content of Policy S21, which seeks to provide for a well - functioning City Cluster and in particular, we endorse the principle of delivering tall buildings on appropriate sites, including Regeneration Opportunity sites; enhancing the streets, spaces and public realm to improve connectivity into and through the Cluster, and improving access to retail, leisure, cultural, health and educational facilities and services by encouraging a range of complementary land uses, ensuring active frontages at ground level.

### Contact Name

### Contact Organisation

Endurance Land

### City Response

### Recommendation

### Recommendation\_Details

### Type of Comment

Object

### Comment

Part 2 of the policy does not make clear that tall buildings should conserve the settings of heritage assets as well as the assets themselves. The Trust therefore objects to the policy and requests that part 2 is re-worded to:

"Delivering tall buildings on appropriate sites, including Regeneration Opportunity sites. These should make a positive contribution to the City's skyline, conserving heritage assets and their settings, and taking account of the effect on the wider London skyline and protected views."

### Contact Name

### Contact Organisation

London Sephardi Trust

### City Response



# City Plan 2036 Consultation Comments

Noted

## Recommendation

Change

## Recommendation Details

Insertion of 'and their settings' into the policy text point 2

## Type of Comment

Object

## Comment

This area has the highest density of business activity in the City and contains a rapidly growing cluster of very tall buildings. Several new tall buildings are under construction and further significant tall buildings have been consented, but not yet started. Protected views considerations, mainly relating to St Paul's Cathedral and the Monument within the City, would allow for the construction of additional tall buildings on appropriate sites within the Cluster area. Strategic Policy S21 states the City Cluster "...will accommodate a significant growth in office floorspace and employment...", and S21.2 that this will be achieved by "Delivering tall buildings on appropriate sites, including Regeneration Opportunity sites. These should make a positive contribution to the City's skyline, conserving heritage assets and taking account of the effect on the wider London skyline and protected views."

The reason for the policy paragraph explains that "The City Cluster has been identified as the area within the City that is most suitable for tall buildings because of the opportunity sites and the relative lack of constraints. The spatial extent of the Cluster has been informed by technical work undertaken to develop the City's 3D modelling, which shows that there is scope for further tall buildings, although not every site within the Cluster will be suitable" (para 7.6.4); and that "The Regeneration Opportunity sites have potential to accommodate an uplift in floorspace in new tall buildings of an appropriate design and height..." (paragraph 7.6.5).

Not explicit in the text is the fact that the City's 3D modelling is not publicly accessible: it should not, therefore, be quoted as part of the evidence base for the statement '...that there is scope for further tall buildings' within the Cluster. Also, the Cluster area shown in Figure 30 differs from the existing Eastern Cluster area identified in the Local Plan 2015, extending the area to the south of Fenchurch Street, encompassing 20 Fenchurch Street, and to the north west of Bishopsgate, south of Liverpool Street station. This latter area and part of the Fenchurch Street southern extension are also identified as new 'Regeneration Opportunity' areas, i.e. areas where new tall buildings can be accommodated.

Extending the Cluster to include 20 Fenchurch Street might not affect the setting of the Tower of London WHS in the protected LVMF view 25A.1-3 from City Hall, but it could certainly have a detrimental visual impact on LVMF view 10A.1 from Tower Bridge and, particularly, from the Inner Ward of the Tower looking west. Further tall buildings alongside 20 Fenchurch Street, peering over the inner curtain wall into Tower Green, would finally destroy any sense of enclosure within the Inner Ward, a key characteristic of the Tower that contributes to its OUV. They would also extend the envelope of the Cluster to the south west, adding to its overall bulk and dominance in relation to the WHS. Historic Royal Palaces therefore objects to this proposed extension southwards to include 20 Fenchurch Street, a building which the City have always previously considered an 'outlier'.





# City Plan 2036 Consultation Comments

## Contact Name

Adrian Phillips

## Contact Organisation

Historic Royal Palaces

## City Response

Figure 19 sets out areas inappropriate for new tall buildings due to policies from London View management Framework, St Pauls Heights, Monument Views and conservation areas. This does not imply that every site out with these views as suitable for tall buildings as often there will be other site-specific constraints. Any visual impact upon the Tower from within the City Cluster will be assessed under S11 Protected View policy.

## Recommendation

Change

## Recommendation\_Details

Change to map. Further clarity of figure 19 to set out inappropriate areas for tall buildings is required to include the protected strategic view of the White Tower from Queens Walk, the sightline behind the silhouette of St Pauls from Fleet St/Ludgate Hill and the backdrops that are below 75m.

## Type of Comment

General

## Comment

Whilst we do not want to seem against change and welcome a thriving City, we feel that there is too little regard given for businesses already operating in the City when new sites are planned. Traffic increases as lanes are requisitioned for bays to be installed to offload trucks, banksman step out in rush hour to stop traffic to let their own vehicles in and out; prioritising their needs over everyone elses. Trucks park where they like creating hazards for people crossing the road and detritus on the pavement/road as they trundle off and on site - that splashes on your clothing, workers on these sites litter (we've had a problem with this as the rear of our office was next door to Mace's project office), noise and vibrations disturb us at our desks and there are countless other issues I could go on to tell you about. It's not fair on us, existing City tenants. The number of sites being worked upon recently in EC3 alone is staggering. We implore you to take in to account the impact on us.

## Contact Name

Andy Thornley

## Contact Organisation

## City Response

Noted. A Construction and Logistics Plan would be required for new development under Policy VT2 Freight and Servicing of Strategic Policy S9 Vehicular Transport and Servicing.

## Recommendation

No Change

## Recommendation\_Details



# City Plan 2036 Consultation Comments

## Type of Comment

Support

### Comment

[In response to image of future City Cluster]. Looks beautiful. Finally London will get a modern look. Though I would hope for a little bit more original architecture for such an important city. But still, its a good start.

### Contact Name

Brian Carl Bahr

### Contact Organisation

### City Response

Noted. Policy S8 seeks to promote innovative, sustainable and inclusive high-quality buildings, streets and spaces and deliver world class sustainable buildings.

### Recommendation

No Change

### Recommendation Details

## Type of Comment

General

### Comment

The draft policy is fully supported. It is important however that it is applied flexibly to ensure that all potential future tall building sites can be brought forward with appropriate policy support. In this vein we note that the Eastern Cluster has been extended to bring in “known” development sites or regeneration opportunities, including 60 Gracechurch Street, 10 Fenchurch Street and the development site centred around 33 Old Broad Street. The CPA considers that the Cluster could and should be extended further to include other potential future development sites. By reference to Figures 19 and 20, and mindful of constraints presented by the Fleet Street processional route, the CPA considers that the Cluster Area should also take in a greater extent of Bevis Marks to the North and Fenchurch Street to the south (a number of completed and pipeline tall buildings are clearly identified immediately adjacent to the southern and north-eastern fringes). Figure 30 highlights a number of Tall Buildings Completed and in the Pipeline to the north and south of the currently drawn Cluster Area and the CPA considers that a slight widening of the area would be reasonable and supportable by reference to 3D modelling analysis, and would ensure a coordinated approach to existing and future tall buildings in accordance with the requirements of draft Policy S21.

The draft Plan should be ambitious and not look to constrain tall building development in the City Cluster or in other areas where the case for a tall building could be made. The Cluster area should be recognised as notional, and the policy should give support for taller buildings outside of the Cluster area where appropriate. The CPA considers that the Plan should explicitly provide policy support for tall buildings within the Square Mile, subject to heritage and townscape considerations. This will enable the entire City to reinforce the principal function of the Square Mile as a national and international centre for business and commerce.

### Contact Name

### Contact Organisation



# City Plan 2036 Consultation Comments

Charles Begley

City Property Association (CPA)

## City Response

It is not the Local Plans intention to extend these areas further.

The City Cluster has been identified as the most suitable for tall buildings due to policy constraints in other parts of the City.

COL will publish evidence base on key areas in due course.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

The draft Plan proposes a modest expansion of the City Cluster tall buildings area which could happen quickly as developers are acquiring relevant sites, such as south of Liverpool Street arcade. We are very concerned about the capacity of local footways and public spaces to accommodate further growth due to existing high levels of crowding. This crowding is likely to intensify in the near future due to the opening of Elizabeth Line at Liverpool Street station and completion of new tall developments.

The draft Plan acknowledges that it should emerge 'alongside' the draft City Transport Strategy, which aims to significantly reduce traffic and gradually reallocate road space away from vehicles across the square mile. However, due to this Policy it is possible that the Corporation may face pressure to approve poor quality, overcrowded pedestrian environments around the final few cluster tower buildings, further pressuring local streets and public transport interchanges. As a result, robust traffic reduction projects should be implemented as soon as possible and supported by local CIL funding, ideally before more high density growth occurs.

## Contact Name

## Contact Organisation

Chris Leong - Assistant Planner

Transport for London - Spatial Planning

## City Response

The City of London Corporation will continue to use Vu City as a 3D modelling tool to assess planning applications and City Cluster Public Realm vision to manage the projected growth through site specific public realm enhancements and alignment with Transport Strategy to ensure delivery is coordinated with development. Ensure draft City Cluster Public Realm Strategy on website

## Recommendation

No Change

## Recommendation Details



# City Plan 2036 Consultation Comments

## Type of Comment

Object

### Comment

[In response to image of future City Cluster]. No I don't want to see more skyscrapers. But I know my opinion will mean nothing when I'm up again some gargantuan multinational property developer based somewhere in the Far East.

### Contact Name

Cupie Doll

### Contact Organisation

### City Response

Comment do not relate to a draft policy.

### Recommendation

No Change

### Recommendation\_Details

## Type of Comment

Object

### Comment

Don't like the tall building cluster - prefer history.

### Contact Name

David Martin

### Contact Organisation

### City Response

Noted. Policies seek to ensure positive management of the City's heritage assets.

### Recommendation

No Change

### Recommendation\_Details

## Type of Comment

General

### Comment

Suggests a name for the City Cluster of the Baltic District. This would be a way of remembering the Baltic Exchange, a much loved building, now lost.



# City Plan 2036 Consultation Comments

## Contact Name

Dr Peter Sozou

## Contact Organisation

London School of Economics and Political Science

## City Response

Noted

## Recommendation

No Change

## Recommendation Details

## Type of Comment

Support

## Comment

We fully support this draft policy. We recognise that the area will need to accommodate a significant growth in office floorspace and employment, together with complementary land uses, transport, public realm and security enhancements, going forward.

We agree with the policy as outlined on increasing the provision of world class buildings that are sustainable and offer a range of office floorspace accommodation to cater for the needs of varied office occupiers. This is particularly relevant given the growing needs of micro businesses and SMEs. Enhancements to the area will need to focus on an active, attractive, and as far as possible, biodiverse public realm to offset the lack of green and community spaces. This will be further enhanced by active frontages.

## Contact Name

Dr Sophie V Taysom

## Contact Organisation

Merchant Land

## City Response

Support welcomed. Policy seeks to accommodate significant change, complementary land uses, public realm enhancements and activate frontages.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

Careful consideration should be given to the ground floor and public realm of the tall building cluster.



# City Plan 2036 Consultation Comments

## Contact Name

Dr. Manuela Madeddu and Dr. Chia-Li

## Contact Organisation

University of Liverpool in London

## City Response

Noted. City Cluster Public Realm vision seeks to manage the projected growth to include site specific public realm enhancements and alignment with Transport Strategy to ensure delivery is coordinated with development. Publish Draft City Cluster Vision .

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

Object

## Comment

[In response to image of future City Cluster]. More cold, ugly steel and glass labelled as “progress”

## Contact Name

Eloi Rehab

## Contact Organisation

## City Response

Noted. Policy S8 seeks to promote innovative, sustainable and inclusive high-quality buildings, streets and spaces and deliver world class sustainable buildings.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

The Diocese recognises that the City Plan 2036 intends to modify the Key Areas of Change. Advancing the boundary of the City Cluster towards Broadgate narrows the clear air space behind the backdrop of St Paul's Cathedral. This ought not to be accepted without further reassurances that the Cluster will rise to a central peak approximating to the established height but stepping down uniformly to a more respectful scale at its perimeter. This will help ensure that the view of St Paul's does not become 'blinkerred' over time diminishing its international status as a City landmark. The effect will also be felt at the World Heritage Site and Monument but the change may have less impact from their vantage points.



# City Plan 2036 Consultation Comments

## Contact Name

Fr Luke Miller

## Contact Organisation

Diocese of London

## City Response

The City Plan should be read as a whole to understand if development will be acceptable. Policy S13 Protected Views is relevant and interrelated and will factor in any consideration of development sites at this location

## Recommendation

No Change

## Recommendation Details

## Type of Comment

## Object

## Comment

CoLC's failure to create and respond to a Design Review Panel leaves "world class" buildings, whatever they may be, to CoLC's subjective opinion (1).

The delivery of any more tall buildings is both unnecessary and unacceptable (2).

Why anyone should determine that only one part of the City should have this benefit is astonishing (3).

A policy that has to be mitigated as proposed would seem to be a defective policy (4).

Again, the favouring of one part of the City over the others is astonishing (5).

Whilst welcome, implementation has to be seen to be believed (6).

Where is the green open space in this area? If it is to be atop tall buildings, sustainability, as well as public access, will be a major problem (7).

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response

It is acknowledged that views on tall buildings are subjective. There is significant experience on design matters within the City Corporation and through internal and external consultation COL will undertake assessments of planning applications against adopted policy to ensure that the policy criteria are met.

# City Plan 2036 Consultation Comments

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

[In response to image of future City Cluster]. London will look like every other city in the world.

Contact Name

Contact Organisation

Full Metal Luddite

City Response

Noted. Policy S8 seeks to promote innovative, sustainable and inclusive high-quality buildings, streets and spaces and deliver world class sustainable buildings.

Recommendation

No Change

Recommendation\_Details

Type of Comment

Object

Comment

[In response to image of future City Cluster]. I thought it was London for a minute then realised it's New York! Leave us our identity not copy others mistakes.

Contact Name

Contact Organisation

Gary Smith

City Response

Noted. Policy S8 seeks to promote innovative, sustainable and inclusive high-quality buildings, streets and spaces and deliver world class sustainable buildings.

Recommendation

No Change

Recommendation\_Details

Type of Comment

Object



# City Plan 2036 Consultation Comments

## Comment

[In response to image of future City Cluster]. The ugliest skyline ever? These buildings going up are in general quite good looking but no thought seems go into what they look like next to each other...Like putting a pair of wellies on with a tuxedo.

## Contact Name

Jeffrey Rumney

## Contact Organisation

## City Response

Noted. Para 6.5.9 of S12 states that proposals for new tall buildings should take account of the cumulative impact of the proposed, permitted and existing tall buildings. The City Plan should be read as a whole document as there are many inter-related issues. Policy S13 refers to the protection of the skyline.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

The City will grow by 115,000 people by 2036. Elsewhere the calculation is that 70,000 will be in the City Cluster around Bishopsgate and Fenchurch Street, with 14 tall buildings in planning within this area. What sort of pressures will need to be considered in neighbouring areas e.g. Liverpool Street?

## Contact Name

John Ramsey and Jane Northcote

## Contact Organisation

## City Response

It is acknowledged that the impacts of land uses diffuse into neighbouring areas. The City of London Corporation will continue to use Vu City as a 3D modelling tool to assess planning applications and City Cluster Public Realm vision to manage the projected growth through site specific public realm enhancements and alignment with Transport Strategy to ensure delivery is coordinated with development. COL will publish further evidence base on Local Plan web pages in due course.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

Object

# City Plan 2036 Consultation Comments

## Comment

[In response to image of future City Cluster]. They're eyesores... the City of London used to look so pretty before the glass towers.

## Contact Name

Kalkaur

## Contact Organisation

## City Response

Noted. The City Plan should be read as a whole document as there are many inter-related issues. Policy S13 does have regard to the potential effect on the City skyline and Policy S8 seeks to promote innovative, sustainable and inclusive high-quality buildings. It is acknowledged that views on tall buildings are subjective.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

[In response to image of future City Cluster] Are these for homes or just offices? If it's offices, I suppose it means more people spending hours on commuting in on our poor rail system?

## Contact Name

Lisa Wright

## Contact Organisation

## City Response

Noted. Policy S8 seeks to promote innovative, sustainable and inclusive high-quality buildings, streets and spaces and deliver world class sustainable buildings.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

Object

## Comment

[In response to image of future City Cluster]. Thank you for keeping the national collection of s\*\*t architecture out of other cities.



# City Plan 2036 Consultation Comments

Contact Name

Contact Organisation

Patrick Mackie

City Response

Noted. Para 6.5.9 of S12 states that proposals for new tall buildings should take account of the cumulative impact of the proposed, permitted and existing tall buildings. The City Plan should be read as a whole document as there are many inter-related issues. Policy S13 refers to the protection of the skyline.

Recommendation

No Change

Recommendation\_Details

Type of Comment

Object

Comment

[In response to image of future City Cluster]. It's already lost it's identity

Contact Name

Contact Organisation

Warren Cresdee

City Response

Noted. Policy S8 seeks to promote innovative, sustainable and inclusive high-quality buildings, streets and spaces and deliver world class sustainable buildings.

Recommendation

No Change

Recommendation\_Details

Paragraph

7.6.3-7.6.4

Type of Comment

Object

Comment

The current lack of clarity around tall buildings in the draft Plan has implications for the City Cluster and how Policy S21 envisages this area should develop over the Plan period. We would welcome precise detail on the revised boundaries as represented on page 178 on the draft Plan in order to be clear on which redevelopment sites will be within the Cluster, any potential effects on individual heritage assets and the wider historic environment and protected views.

# City Plan 2036 Consultation Comments

While the reference to heritage assets within the Cluster in para 7.6.3 is welcome, the lack of any reference to the potential impact of tall buildings on the Tower of London and its setting gives cause for concern. We note that the revised boundary now means that the Cluster takes in 20 Fenchurch Street and, notwithstanding the indication at para 7.6.4 that not all sites within the Cluster will be suitable for a tall building, we consider that Policy S21 should take the opportunity to offer clearer parameters as to what would be considered acceptable in terms of tall buildings proposals.

We consider that further detail on the overall massing and building heights envisaged in future within the Cluster would remove the existing ambiguity in the draft policy, and help to ensure high quality development that would avoid adverse impacts on the historic environment, and in particular respect the setting of the Tower of London. This would ensure the Plan reflects not only para 16 of the NPPF but also the requirements of policy D8 in the draft London Plan. It would also help avoid the possibility of proposals coming forward that conflict with policies elsewhere in the Plan (notably HE3 Setting of the Tower of London and S13 Protected Views).

We note the reference to the 3D modelling data that has been used to inform the draft policy on the City Cluster. We would be keen to understand the process involved in this, how the data sits with the evidence base for the draft Plan and how it will be used to shape further detailed design guidance.

We would stress the potential impacts of extremely tall building proposals in this location, and therefore the merit of further work to develop a vision for building heights, the future shape and skyline of the Cluster and the individual pre-eminence of particular buildings.

## Contact Name

Tim Brennan

## Contact Organisation

Historic England

## City Response

Policy HE3 sets out criteria for development proposals affecting the setting of the Tower of London World Heritage Site. The City Plan will reflect NPPF para 16 and D8 London Plan to be clearly written and unambiguous. COL will continue to use VuCity as a 3D modelling tool to assess the massing and heights of planning application proposals.

## Recommendation

Change

## Recommendation Details

Amend point 2 policy text reference regarding the impact on the significance of heritage assets and their settings

## Paragraph

7.6.4; 7.6.6

## Type of Comment

General

## Comment

# City Plan 2036 Consultation Comments

City of London's ambitions to accommodate significant growth in office space and employment within the City Cluster is noted and welcomed. It is considered, however, that further analysis of the cumulative impacts of tall buildings in the City Cluster in relation to some of the nation's most valuable and treasured heritage assets, including the Tower of London, is required. The City of London should follow the advice set out in Draft New London Plan Policy HC1 and take a more proactive approach towards the protection and conservation of its heritage assets.

Work to develop the City's 3D modelling is welcomed (paragraph 7.6.4) and should be regarded as an early step in the evolution of a more proactive strategic approach in actively managing the cumulative impact of tall buildings on heritage assets. While paragraph 7.6.6 puts the onus on developers to take into account the cumulative impacts of tall buildings, Draft New London Plan Policy HC2 sets out that development plans should include policies which conserve, promote, actively protect and interpret the Outstanding Universal Value of World Heritage Sites and City of London should follow this guidance. In accordance with Draft New London Plan Policy HC2, any development proposals with the potential to affect World Heritage Sites or their setting should be supported by Heritage Impact Assessments.

Figure 30 which illustrates the City Cluster Key Area of Change is diagrammatic, making it difficult to ascertain the extent of its precise boundary. The image should be improved, or the boundary set out more clearly in an updated policies map so that its boundary is represented accurately.

TfL broadly support the City of London draft Local Plan but have expressed a need for a co-ordinated approach to the delivery of growth within the City Cluster. The capacity of local footways and public spaces in the area is very limited and should be prioritised so that development can be delivered alongside the emerging City Transport Strategy, which aims to reduce traffic and gradually reallocate road space away from vehicles across the square mile.

## Contact Name

Juliemma McLoughlin

## Contact Organisation

Mayor of London

## City Response

Para 6.5.9 of S12 states that proposals for new tall buildings should take account of the cumulative impact of the proposed, permitted and existing tall buildings.

The City of London Corporation will assist deliverability of the planned office floorspace through 3D modelling of the City and City Cluster Public Realm vision to manage the project growth to include site specific public realm enhancements and alignment with Transport Strategy to ensure delivery is coordinated with development.

Details of pedestrian movement is included within Figure 14 of Policy S10 Walking, Cycling and Healthy Streets

The City Plan should be read as a whole document as there are many inter-related issues. Strategic Policy S8 and Policies D3 and D4 refers to public realm and pedestrian permeability and internal and external walkways

## Recommendation

No Change

## Recommendation Details



# City Plan 2036 Consultation Comments

## Paragraph

7.6.4-7.6.5

## Type of Comment

General

## Comment

Tenacity support the policy objective for the City Cluster to accommodate a significant growth in office floorspace with world class buildings that are sustainable and offer a range of accommodation to meet the needs of diverse office occupier groups.

Paragraph 7.6.4 states that the spatial extent of the City Cluster has been informed by technical work undertaken to develop the City's 3D modelling, which shows that there is scope for further tall buildings. Paragraph 7.6.5 states that the City Corporation will use 3D modelling of the cluster to better understand opportunities for development. The 3D model is not currently available to view and does not form part of the evidence base for the new draft City Plan. It is requested that full unfettered public access to the 3D model be provided so that its role in shaping the City Cluster can be better understood. Tenacity submit that the suitability of a site for a tall building is dependent on a wide range of factors, including the overall design quality of an individual proposal.

## Contact Name

## Contact Organisation

Tenacity

## City Response

The City of London Corporation will assist deliverability through 3D modelling of the City and City Cluster Public Realm vision to manage the project growth to include site specific public realm enhancements and alignment with Transport Strategy to ensure delivery is coordinated with development.

COL will continue to use VuCity as a 3D modelling tool to assess planning applications. Need for developers to provide 3D modelling to COL for planning applications to assess the impacts of proposed development.

The City Cluster is an indicative boundary and it is not the Local Plans intention to extend these areas further?

## Recommendation

No Change

## Recommendation\_Details

## Paragraph

Figure 30

## Type of Comment

Object

## Comment

# City Plan 2036 Consultation Comments

Figure 30 comprises the 'City Cluster Key Area of Change' Key diagram, which appears to show the 55 Gracechurch Street site included as part of a wider Regeneration Opportunity allocation but only marginally within the revised City Cluster boundary. Both 55 and 70 Gracechurch Street are substantial regeneration opportunities with significant potential to contribute to the delivery of the policy aspirations to provide more floorspace and to enhance vibrancy and viability, extending to weekends and to diversify the City, its economy and community. Tenacity submit that the Eastern Cluster boundary should be extended to incorporate a wider area including 55 Gracechurch Street for a number of reasons as outlined below:

- Pedestrian survey counts undertaken by Momentum Transport in 2018 and 2019 show that almost 5,000 pedestrians per hour utilise the section of Gracechurch Street between Talbot Court and Fenchurch Street in the morning peak (8am to 9am).
- The City of London Draft Eastern Cluster Strategy identified that by 2026 Gracechurch Street & Bishopsgate will need to accommodate significantly more pedestrians per hour at peak times. Increasingly crowded streets and the need for improved safety and walking routes were specifically identified as some of the key challenges and opportunities for the Eastern Cluster proposals moving forward.
- The 55 and 70 Gracechurch Street sites present an extremely rare opportunity to create a new pedestrian route linking Gracechurch Street with Fenchurch Street and through to Leadenhall Market as shown in Figure 1 (plan attached). The new route would make a significant contribution towards alleviating pedestrian related congestion on Gracechurch Street and Fenchurch Street, thereby ensuring that appropriate pedestrian comfort levels can be maintained.
- Such a proposal would re-open the historic link between Gracechurch Street and Brabant Court and create a new north south link between Fenchurch Street and the Pool of London via Eastcheap and Monument.
- The new pedestrian link could also be animated by complimentary ground floor uses and form an integral part of an enhanced network of pedestrian friendly quiet routes linking up with Leadenhall Market to the north. This approach would meet the requirements of draft Policy R1 which seeks to enhance the Leadenhall Market PSC as a visitor and retail destination.
- The 55 Gracechurch Street site is situated in a prominent location at the southern gateway to the City Cluster. Its position on the curving eastern street frontage can be a distinct marker for the start of the Cluster, when approached via London Bridge from the south.
- Tenacity submit that the City Cluster boundary should be soft not sharp and should embrace a broader and linked area to include Eastcheap and Monument to the south and eastwards over to Fenchurch Street station. As a major commuter feeder point and potential growth it is simply inconceivable how this could be excluded. All these areas feed off each other and as such are in fact intrinsic parts of the cluster.

## Contact Name

## Contact Organisation

Tenacity

## City Response

The City of London Corporation will assist deliverability through 3D modelling of the City and City Cluster Public Realm vision to manage the project growth to include site specific public realm enhancements and alignment with Transport Strategy to ensure delivery is coordinated with development.

COL will continue to use VuCity as a 3D modelling tool to assess planning applications. Need for developers to provide 3D modelling to COL for planning applications to assess the impacts of proposed development.

The City Custer is an indicative boundary and it is not the Local Plans intention to extend these areas further?



# City Plan 2036 Consultation Comments

[Recommendation](#)

No Change

[Recommendation Details](#)



# City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S22: Fleet Street

### Policy Number

### Paragraph

### Type of Comment

General

### Comment

We agree with the seven key areas of change, especially along the Northbank and Fleet Street and suggest that more dialogue should be facilitated between stakeholders to develop a masterplan approach to ensure a holistic regeneration strategy is identified and delivered. This is especially in relation to Fleet Street where there is over 2m sq ft of known floorspace impending expiry and will require significant planning support to ensure the real estate market is incentivised to redevelop and reposition the street and surrounding locality, especially in regards to upgrading the public amenity and realm. Increased pedestrianisation should be encouraged, especially around the Courts Site.

### Contact Name

### Contact Organisation

City Property Association NextGen Steering Group

### City Response

Agree. Policy promotes public realm improvements.  
Partnership working to deliver the aims of the policy is welcomed.

### Recommendation

Change

### Recommendation\_Details

Add reference to the potential to widen and increase pavement accessibility.  
Add reference to potential joint/partnership working between occupiers in the area to deliver improvements.

### Type of Comment

General

### Comment

I write in particular respect of the Fleet Street/Ludgate Hill area of the City. The area was up until the early 1990's predominantly occupied by the national newspaper industry. Upon relocating, the buildings were redeveloped or substantially refurbished to provide new accommodation for the professional services sector and US banking industry. Some 25-30 years later these buildings are due to become vacant again giving rise to concern as to the area's future but also

# City Plan 2036 Consultation Comments

providing great opportunity for the future. The Local Plan should provide for the following points:

- Fleet Street Key Area of Change has tremendous future potential which needs to be reflected fully in the evolving Local Plan
- Scope to recognise more strongly and enhance the importance of the Fleet Street/Ludgate Hill spine which forms part of the historic processional route between Westminster and the City.
- Need to provide a policy context which will encourage beneficial change at key sites which have become or are likely to become vacant in the foreseeable future.
- Scope to recognise the aspiration among several owners to form a business partnership that could include the City Corporation to promote the area.

## Contact Name

Alistair Subba Row

## Contact Organisation

Farebrother

## City Response

Noted. Policy acknowledges that the area will undergo significant change over the course of the plan period. The importance of the Processional Route and its historical importance is recognised. Policy recognises the need to support retail and business activity in the area.

## Recommendation

Change

## Recommendation Details

Strengthened policy wording of the Processional Route and extend the Key Area of Change through Ludgate Hill to St Pauls Cathedral. Strengthen policy wording to retain retail provision within Fleet Street Principal Shopping Centre and Retail Link towards Cheapside PSC. Reference key sites within policy amplification which require public realm and street environment improvements.

## Type of Comment

Object

## Comment

Planning permission appears to be a given (1).

A meaningless generalisation hardly seems to be policy (2).

Although the Plan's graphics are suspect, the suggestion that the housing cluster is between Fetter Lane and Dunstan's Court ignores the 100 units in Clifford's Inn and the 75 units in St Dunstan's House on the western side of Fetter Lane, for instance (3)?

What is the reason for the extension of retail activity (4)?

Widening pavements – a little used word in the Plan – will be at the cost of the road and this will need TfL consent. Also greening in an area which has little



# City Plan 2036 Consultation Comments

possibility of providing sustainability is simply box-ticking (5).

Contact Name

Contact Organisation

Fred Rodgers

City Response

Noted. Protection can be in the form of resisting change of use. While the point on flexible space and complementary uses is general it does send a signal to the market about what would be looked at more favourably.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

Should consider a small Business Improvement District (BID) area around Chancery Lane.

Contact Name

Contact Organisation

London worker (no name provided)

City Response

Noted. There is a Business Partnership in proximity to Chancery Lane.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

I work in Fleet Street (Red Lion Court). I have a disability and am a wheelchair user. Currently about 50% of shops in Fleet Street are not wheelchair accessible. Pavements and crossings are in places dangerous for wheelchair users due to steep gradients or difficult kerbs and poor quality pavements. The lack of accessibility limits the potential spending power within high street shops and restaurants. Accessibility should be key within any regeneration scheme.

Contact Name

Contact Organisation

# City Plan 2036 Consultation Comments

Natasha Davies

## City Response

Noted.

## Recommendation

Change

## Recommendation Details

Amend Bullet point 5 of the Policy to include accessibility of the pavements.

## Type of Comment

General

## Comment

We would repeat the aspiration expressed in our 2017 consultation responses for a comprehensive programme of environmental and public realm enhancement around the Cathedral and an holistic Area Strategy. The west steps of St Paul's, its precinct and churchyard are a prime part of the City's public realm and cityscape and a focal point for Londoners, workers and for visitors to London from all parts of the globe. Approximately 7 million visitors per year cross the Thames and arrive in the City on the south side of St Paul's, an area that would surely be further enhanced by full pedestrianisation to create a 'World Square' around the cathedral building that is worthy of the significance of Wren's masterpiece and the public enjoyment of these spaces.

Changes to traffic circulation would also have wider benefits for air quality, reducing soiling of the cathedral and the effects of pollution on sensitive receptors, including the pupils and staff of the Cathedral School.

Thus Chapter would propose the re-branding of current Strategic Policy S22: Fleet Street into a newly named policy S22: Fleet Street and the Processional Approach to St Paul's. This area would incorporate the Processional Route of Fleet Street, Ludgate Hill, St Paul's, and The Cathedral environs and should include policies for the holistic improvement of the processional approach in addition to the aspiration for a World Square around the Cathedral. It should also cover street lighting, lighting of buildings, excellent external lighting of the Cathedral, street furniture, signs, and public realm.

## Contact Name

Oliver Caroe

## Contact Organisation

Surveyor to the Fabric of St Paul's Cathedral

## City Response

Noted. Policy promotes public realm improvements and acknowledge the importance of such to the Cathedral. It is acknowledged that there is heavy traffic and associated poor air quality in the area.

## Recommendation

Change

# City Plan 2036 Consultation Comments

## Recommendation Details

Strengthen reference to public realm and open spaces improvements to Ludgate Hill and the appearance of the processional route view towards St Paul's. Reference to the junction improvements at Ludgate Circus and necessity for significant transportation improvements in the immediate vicinity of the Cathedral.

### Type of Comment

General

### Comment

Fleet Street area is not very good for shopping or eating out at lunchtime. I have to go to other areas of the City. Need to improve the area to make people want to stay to use shops etc.

### Contact Name

Sally Thompson

### Contact Organisation

### City Response

Strategic policy S22 of the draft City plan is aimed at strengthening the retail offer.

### Recommendation

Change

## Recommendation Details

Strengthen Bullet Point 4 of Policy to retaining retail provision within the Fleet Street Principal Shopping Centre and Retail Link.

### Type of Comment

General

### Comment

Fleet Street and alleyways coming off it need to be improved - make more lively e.g. with coffee carts, greenery, seating and artwork. Its dull when walking through.

### Contact Name

William Taylor

### Contact Organisation

City Worker

### City Response

Policy promotes public realm improvements along Fleet Street and surrounding alleyways

### Recommendation

No Change

# City Plan 2036 Consultation Comments

[Recommendation\\_Details](#)

# City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S23: Smithfield and Barbican

### Policy Number

### Paragraph

### Type of Comment

General

### Comment

Support the principle of this location as a key area of change. The London Plan identifies the location as an intensification area. The policy should cross reference to the objectives set out in the London Plan, namely;

“This is an Area with potential for intensification on a number of sites and broader improvements to the public realm and mix of uses. These will be supported by Crossrail and the Thameslink programme at Farringdon. The scale of additional development capacity is dependent on operational rail requirements, the degree of station renewal and improvements to transport and interchange capacity. The potential for bridging over the railway cutting to expand development capacity and public space provision should be explored. Development should be set in the context of the long term consolidation of London’s wholesale markets. Further opportunities for intensification are presented at Mount Pleasant. The Mayor encourages collaborative working between the three boroughs to refine the extent, opportunities and potential capacity of this Area.” The plan should make it clear as to how it aligns with these objectives and the approach to be taken to additional development capacity.

We would recommend the word ‘enhancement’ is reconsidered in the third bullet point of Policy S23. It could state ‘enhancement where appropriate and practicable’ or set out specifically which aspects of amenity are to be improved. This policy would otherwise be at odds with the flexibility required from a sunlight and daylight perspective as set out in Policy D8 referenced earlier in the Plan. It could also be at odds with other policy objectives, when seeking to optimise the use of sites.

We also note that there is not a reference in the policy to how servicing is to be approached. Specific recognition needs to be given to the fact that businesses need to continue to have appropriate servicing arrangements. There is a clear need to balance the proposed increase in retail in this area, and increased density and the resultant servicing requirements with the public realm improvements.

Lastly, we note that within Policy S23 new hotels and other visitor accommodation will be considered more favourably in the Culture Mile. We support this policy provision.

### Contact Name

### Contact Organisation

GMS Estates and MacTaggart Third Fund

### City Response



# City Plan 2036 Consultation Comments

It is not considered necessary to repeat London Plan policy in detail in this policy section.

Adding "where appropriate" to bullet point 3 would weaken the point unnecessarily.

Policy on servicing in S9 applies to the whole City.

Recommendation No Change

Recommendation\_Details

Type of Comment General

Comment

I would like to see the entire area to the east of Aldersgate Street between the Barbican and Golden Lane estates declared residential and any proposals to increase nightlife and tourism be accompanied by measures such as road layout changes to keep traffic out of residential streets and careful zoning be applied to ensure minimal impact on residents and, of course, wildlife.

Contact Name Contact Organisation

Allison Parkes

City Response

Policies in the Plan, and related guidance and strategies seek to minimise traffic, noise and disturbance to wildlife.

Recommendation No Change

Recommendation\_Details

Type of Comment General

Comment

The proposals for this KAOC are generally welcomed. I consider, however, that the broad policy objectives in the Local Plan need some type of Supplementary Planning Documents or Planning Briefs at the KAOC level to guide the detailed development. By doing so a number of objectives can be achieved:

1. The Local Planning Authority can set out what uses are appropriate and criteria to ensure the policies set out in the Local Plan can be met at a sub strategic level.
2. It will provide a mechanism for residents and businesses to be formally consulted upon and at an early stage.



# City Plan 2036 Consultation Comments

3. It will obviate a 'developer-led' approach where existing residents and businesses are put into an adversarial role of objecting to plans at application stage rather than a more meaningful engagement at the conceptual stage.

Your assurances that the development of detailed plans for all KACs will follow a rigorous process of local authority led planning briefs and engagement with residents and businesses would be welcomed.

Contact Name

Contact Organisation

Barbara Mathews

City Response

The supporting text of Policy S25 states that if the decision in principle to consolidate the wholesale markets is confirmed, a planning brief or Masterplan Supplementary Planning Guidance will be prepared, setting out further guidance on potential future uses for the Meat Market buildings.

Recommendation

No Change

Recommendation\_Details

Type of Comment

Support

Comment

The CPA wishes to reiterate its strong support for the Culture Mile initiative.

Contact Name

Contact Organisation

Charles Begley

City Property Association (CPA)

City Response

Support noted.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment



# City Plan 2036 Consultation Comments

It is clear that the Barbican and Golden Lane Estates area (hereafter, Estate) is a major residential enclave with over half of the residential population of the City. For this reason, we believe the Estate should be spared development of new night-life facilities such as restaurants and bars (and also be exempted from “externalised” cultural events). We suggest that a cordon sanitaire is established around the Estate in which such developments will not be permitted.

Any such restrictions will not unduly affect the ability of the Barbican Centre to attract a suitable clientele for its arts programmes as it is well served by its 3 restaurants, café-bar and several bars in the various theatre foyers. In addition, there are plenty of others surrounding the Estate. Smithfield seems particularly suited to additional entertainment venues as it is already a focus of eating/drinking establishments and will be adjacent to the new Museum of London and perhaps other arts/events venues.

## Contact Name

Dr Alexander Wilson

## Contact Organisation

Shakespeare Tower House Group

## City Response

Comments noted. Policies in the Smithfield and Barbican Key Area of Change recognise potential disturbance which may arise from increased cultural activities and seek to minimise adverse impacts where possible.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

Suggest adding a reference to "Culturally significant Objects and Places" in bullet point 2 so as to read: "...whilst preserving privacy, security and noise abatement for Culturally significant Objects and Places, residents and businesses;"

## Contact Name

Fr Luke Miller

## Contact Organisation

Diocese of London

## City Response

Not considered necessary to add suggested wording to bullet point 2.

## Recommendation

No Change

## Recommendation Details



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

Concur with comments from Barbican Wildlife Group which request that the entire area to the east of Aldersgate Street between the Barbican and Golden Lane estates should be declared residential and any proposals to increase nightlife and tourism be accompanied by measures such as road layout changes to keep traffic out of residential streets and careful zoning be applied to ensure minimal impact on residents and, of course, wildlife.

### Contact Name

Fred Rodgers

### Contact Organisation

### City Response

Policies in the Plan, and related guidance and strategies seek to maximise greenery, reduce traffic and protect wildlife, where appropriate, in the North of the City.

### Recommendation

No Change

### Recommendation\_Details

## Type of Comment

Object

### Comment

How will the Plan “improve” the Smithfield and Barbican area since:

- Culture Mile initiative is simply a reaction to the Central Markets censure;
- There is not a public right of way over Golden Lane Estate, although lessees there would probably welcome CoLC taking over responsibility, including the cost of maintenance, of the Estate’s external areas;
- The needs of residents in the north of the City didn’t include the Denizen nor the Culture Mile but do include the provision of more affordable housing and community facilities;
- The volume of traffic, and hence air pollution, could be reduced overnight without the need to improve Beech Street, so this policy seems to be about the commercial exploitation of the Culture Mile than concern for residents and other pedestrians;
- Surely CoLC is “requiring improvements to pedestrian and cycle routes, including for disabled people”, throughout the City; and
- The extension of the CCHP network is to be welcomed but not as a carte blanche approval for development?

### Contact Name

Fred Rodgers

### Contact Organisation

### City Response



# City Plan 2036 Consultation Comments

Comments noted.

Agreed, pedestrian and cycle routes should be improved for all.

## Recommendation

Change

## Recommendation Details

Bullet point six of Policy S23 has been amended to read as follows:

"requiring improvements to pedestrian and cycle routes for all, within and through the north of the City".

## Type of Comment

General

## Comment

Policy S23, second bullet point – any increased permeability through the Market cannot impact on the Market's operations. Likewise, it must be recognised that there is noise associated with Market activities.

Policy S23, fourth bullet point – Beech Street is an important east-west route and any attempt to limit traffic along it must be considered alongside what will happen at the Museum of London roundabout if/when the Centre for Music is constructed.

## Contact Name

Greg Lawrence

## Contact Organisation

Smithfield Tenants Market Association

## City Response

Comment noted.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

Vehicular access is needed for deliveries/emergencies at Beech Street, and for businesses and residents in the area - even if its restricted hours and emergency only access.

## Contact Name

## Contact Organisation

# City Plan 2036 Consultation Comments

J H Poymer

## City Response

Plans for the Beech Street Tunnel will take into account the need for essential access and servicing through the transport policies in the Plan, and related transport guidance and strategies.

Recommendation No Change

## Recommendation Details

Type of Comment General

## Comment

We welcome that the area has a specific plan as an area of change. However, we worry about the variety of types of development that are to be encouraged, the ill defined nature of the Culture Mile, and about the protection of residential amenity within that.

We support the retention of pedestrian permeability through the Barbican, especially via the Highwalks. However, we do not support the insertion of new pedestrian routes, especially at ground level. This would spoil the inherent character of this listed estate (designed as a residential area and inward looking) and risk residential amenity.

We support the improvement of Beech Street and reduction of air pollution.

Contact Name Contact Organisation

Jane Smith Barbican Association

## City Response

Culture Mile will require additional pedestrian movement through the Barbican Estate. Policies in the Plan and relevant guidance and strategies seek to minimise disturbance to residents from Culture Mile activities.

Recommendation No Change

## Recommendation Details

Type of Comment General

## Comment



# City Plan 2036 Consultation Comments

The Barbican Wildlife Garden lies within the Smithfield and Barbican Key Area of Change. We broadly welcome the proposals to improve this area, in particular the commitments in Strategic Policy S23 to enhance residential amenity, improve Beech Street, reduce pollution levels, increase green infrastructure, enhance the public realm and improve pedestrian routes. However, we would like to voice our concerns on a number of fronts.

The Smithfield and Barbican area is vulnerable to negative impacts that may arise from the scale of the CoLC's planned development of new cultural facilities and its envisaged ensuing increase in tourism. To the east of Aldersgate Street, not only is the area primarily residential, it has a relatively high level of wildlife and biodiversity. This includes Pipistrelle bats and one of the largest populations of House Sparrows in the City. It is therefore extremely sensitive to the impact that CoLC's proposals will inevitably have on this area.

It is difficult to see how increased tourist footfall and nightlife can be achieved without an increase in night time light and noise pollution, more incidents of antisocial behaviour, increased litter, and increased traffic. Currently Fann Street suffers from heavy congestion because of its use 24 hours a day as a vehicle "turn around" with air pollution from engines, a pedestrian hazard and night time light pollution not only for bats, but also for nearby residents. Fann Street is also used by drivers waiting for fares or refreshment. It is common practice for them to dispose of their food litter, cigarette ends, and urine filled bottles over the Garden fence. These activities are only going to get worse with increased night time footfall in the area.

While it is admirable to rely on Crossrail and hope that tourists will all use public transport, we believe this may very well be unlikely, given a number of contrary factors. Firstly, TfL is proposing to reduce bus services in the area; secondly the Barbican Underground Station is in a very poor state; and thirdly there is an increasing tendency for young people to use Uber rather than night time public transport. The Barbican Underground Station lacks step free access and the exit steps and footbridge from the Station to the Barbican highwalks are uninviting and badly signposted.

We therefore request the entire area to the east of Aldersgate Street between the Barbican and Golden Lane estates should be declared residential and any proposals to increase nightlife and tourism be accompanied by measures such as road layout changes to keep traffic out of residential streets and careful zoning be applied to ensure minimal impact on residents and, of course, wildlife.

## Contact Name

Joanna Rodgers

## Contact Organisation

Barbican Wildlife Group

## City Response

Policies throughout the Plan, and in related guidance strategies, seek to reduce the impact on residents and wildlife of increased leisure and cultural activities, as well as improving the public realm through greening and reduced pollution.

## Recommendation

No Change

# City Plan 2036 Consultation Comments

## Recommendation\_Details

### Type of Comment

General

### Comment

The overall design of the Barbican Estate is great and I like the greenery, the walkways and the lake. It could be further improved to make it more inviting, e.g. through more greenery and better lighting.

### Contact Name

John Sgouros

### Contact Organisation

### City Response

Policies in the Plan and related guidance and strategies seek to improve both greenery and lighting on the Barbican Estate.

### Recommendation

No Change

## Recommendation\_Details

### Type of Comment

General

### Comment

We note proposed Policy S23 and suggest an amendment to the sixth bullet point to add reference to: "North/South connectivity with St Paul's Cathedral environs and to and from the Tate";

In this context we would repeat the aspiration expressed in our 2017 consultation responses for a comprehensive programme of environmental and public realm enhancement around the Cathedral and an holistic area strategy. The west steps of St Paul's, its precinct and churchyard are a prime part of the City's public realm and cityscape and a focal point Londoners, workers and for visitors to London from all parts of the globe. Approximately 7 million visitors per year cross the Thames and arrive in the

City on the south side of St Paul's, an area that would surely be further enhanced by full pedestrianisation to create a 'World Square' around the cathedral building that is worthy of the significance of Wren's masterpiece and the public enjoyment of these spaces. We commend the letter from the Cathedral Fabric Commission for England

(CFCE) dated 22 February 2019, which elegantly exhorts a similar level of aspiration.

Changes to traffic circulation would also have wider benefits for air quality, reducing soiling of the cathedral and the effects of pollution on sensitive receptors, including the pupils and staff of the Cathedral School.



# City Plan 2036 Consultation Comments

## Contact Name

Oliver Caroe

## Contact Organisation

Surveyor to the Fabric of St Paul's Cathedral

## City Response

Suggested wording too detailed. Text supporting the policy references the north-south axis of Culture Mile.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

I support the 7 strategic components set down in Strategic Policy S23. If executed sensitively, they have the potential: (i) to enhance the City's standing as a cultural and artistic, as well as a commercial and financial, centre; and (ii) to improve the environment for both residents and visitors by measures such as the proposed, much-needed Beech Street improvement.

There are, however, certain clear risks associated with the proposals, which need to be acknowledged:

1. If their views and wishes were not to be taken properly into account, the quality of life and morale of the Area's existing residential communities could be seriously impaired and a feeling of alienation result;
2. Unless carefully planned and managed, the increase in pedestrian and vehicular traffic could seriously affect residents' health and well-being, with all the attendant consequences;
3. Any increase in other forms of pollution, notably noise and light pollution, would similarly threaten the comfort and health of the residential population;
4. Experience shows that pressure to secure the social and cultural cachet which can come with 'landmark' projects like the Centre for Music can lead to a local community's reasonable detailed consultation responses being side-lined, nuisance-generating design features overlooked and long-term calls from residents for Council intervention.

It is essential that detailed proposals of all types - environmental improvements, development proposals, changes to traffic and pedestrian routeways - be widely communicated to residents and their views sought and given due weight when decisions are taken. Proposals for changes to 'people' and 'vehicle' flows should take into account the potential effect on established neighbourhoods. Detailed professional studies of existing pedestrian and traffic movements should be carried out and used as a starting-point for impact assessments to inform option appraisals.

## Contact Name

Philip Doidge

## Contact Organisation





# City Plan 2036 Consultation Comments

## City Response

Comments noted.

## Recommendation

No Change

## Recommendation Details

### Type of Comment

Object

### Comment

I note with concern your proposals to drive all new developments to connect to the area wide Citigen CCHP. As a resident I have been forced by lease requirements imposed by the CoLC to sign a 25 year contract to take hot water and heat from this system.

From experiences of residents to date, the system has many disadvantages. Firstly, forcing buildings onto Citigen means they have no right to change provider for 25 years, which is highly anti-competitive. Secondly, it is exorbitantly expensive with a standing charge of more than 6 times the charge for taking gas. Thirdly, the system is very unreliable and the service level provided poor. In the last 12 months we have had at least 12 outages, on at least one occasion lasting over a weekend.

Other developments should not be forced onto the Citigen network unless you are able to bring down the cost and make it more reliable.

### Contact Name

### Contact Organisation

Ruth Cooke-Yarborough

## City Response

Comments noted.

## Recommendation

No Change

## Recommendation Details

### Type of Comment

Object

### Comment

# City Plan 2036 Consultation Comments

Beech Street has poor air quality and is an unpleasant place for pedestrians. Given that it has been designated as the spine of the Culture Mile, significant changes to the tunnel and to vehicle movements are essential.

The Local Plan makes statements about reducing volumes of traffic in Beech Street but there is little substance on how that it is to be achieved. A far higher level of intervention is needed if the Policy statements - including preserving and improving amenity, improving air quality and reducing noise - is to be achieved.

There seems to be an implicit assumption that tourists arriving in the area will travel by public transport and not by car. While this may be a reasonable daytime assumption, it is questionable whether it will apply for night-time footfall. Various factors work against this assumption, including a decrease in bus services to the Barbican, the unwelcoming condition of Barbican Underground Station and the recent trend towards private hire services, especially at night.

Furthermore, Policy C3 suggests that hotels will be encouraged in the Barbican and Smithfield area, where there is little demand for them. More hotels will attract more vehicle movements due to guest movements and hotel servicing requirements, which will work against the CoLC proposals to reduce vehicle movements in the area.

## Contact Name

## Contact Organisation

Ruth Cooke-Yarborough

## City Response

It is not possible to include detailed implementation plans for improvement schemes in the format of the Local Plan. Documents specific to Culture Mile include details of proposed improvements to the Beech Street Tunnel. Policies throughout the Plan seek to reduce levels of traffic and consequent disturbance.

## Recommendation

Change

## Recommendation\_Details

Policy SB1 has had wording added to reduce the impact of traffic from Culture Mile activities as follows:

"managing the highway network to minimise traffic disturbance and to maintain access to existing premises for essential servicing".

## Type of Comment

General

## Comment

- We would like to see reference to the Culture Mile strategy as a guiding factor in relation to the objectives covered here, as well as an acknowledgment of Culture Mile's ambition to become a hub of creativity, enterprise and innovation.
- We would like to ensure the map visualises the connection up to LSO St Luke's via Whitecross Street Market.

# City Plan 2036 Consultation Comments

- Could City Point Plaza be added?
- Could Moorfield and Moorgate junction be included in the area of change (with white background colour)?
- Could a “key ped improvement route” (red arrow) be added on Aldersgate Street (from Barbican tube station to existing MoL rotunda) and on Warwick Lane (currently signified as a grey line)?
- There is a proposal to include Golden Lane in the Key Area of Change – we would welcome this.

## Contact Name

Tim Jones

## Contact Organisation

Culture Mile

## City Response

It is considered that the policy and supporting text adequately references Culture Mile objectives.

Agree that the role of Culture Mile as a hub of creativity, enterprise and innovation could be strengthened. Wording has been added to supporting text as below.

An arrow representing a key pedestrian route to St. Lukes LSO has been added to the KAOC map as well as along Aldersgate Street between Barbican Tube Station and the MOL Rotunda.

## Recommendation

Change

## Recommendation Details

Suggested pedestrian routes have been added to KAOC Map.

Wording has been added to supporting text as follows;

"The City Corporation and partners have commissioned research to consider published research that highlights the contribution made by creative industries in and around Culture Mile to the City's economy and the potential for growth of this sector as part of the Culture Mile initiative. The research identified the significant social and economic value that can be derived from the growth of creative enterprises and made four key recommendations which are addressed in part through this policy:

- Create a strong sense of place;
- Secure the area's distinctive ecology, including encouraging investment in the creative sector, developing new creative workspaces and protecting and encouraging formal and informal performance space;
- Attract talent, create new jobs and support social mobility; and
- Drive inward investment."



# City Plan 2036 Consultation Comments

Paragraph

3.4.1

Type of Comment

Object

Comment

There are some very welcome suggestions concerning traffic reduction in Beech Street in Strategic Policy S23 and paragraph 3.4.1. We agree with reducing traffic and improving air quality in Beech St as this will improve one of the most polluted sites in the City. We recommend making the CoL, including the 'tunnel', an Ultra-Low Emission Zone (ULEZ) with penalties for all emitting vehicles, and if all through traffic could be eliminated from the 'tunnel' we would commend any such plan. [Residents would need access for their personal vehicles but resident traffic is a small percentage of current usage.]

The next part of the vision (3.4.1) taken at face value implies that shops and venues might be allowed within the tunnel, presumably only if pollution was reduced to "normal" street levels. We may be reading the statement too broadly and that the "focus for a variety of shops and restaurants" would be Long Lane. But it is ambiguously phrased. We would object to such use of Beech St on grounds of noise and fumes:

- We already have experience of noise when the Barbican Centre used the 'tunnel' for a music and light show in Feb 18. They blocked the ends of the tunnel with sound absorbing curtains but sound leaked out through the vents that link the tunnel to the upper podium on the Barbican Estate. Being in February residents' windows were closed and leakage was just bearable, but if it had been summer it would be unacceptable.
- Food venues would likely also produce noise from extraction and air conditioning systems. It is hard to imagine how that could be done without venting either into the 'tunnel' or into the upper podium area. In addition to noise, there would be cooking smells venting to the upper podium.
- Our perception is that commercial ambition almost always overrides promises made to residents. If promises could be kept then we might welcome 'tunnel' developments subject to cast-iron guarantees on noise, smells/fumes and crowd management. Rather than make Beech St a locus of entertainment venues, we recommend it becomes the primary pedestrian route between the Barbican Centre and the Barbican-Farringdon stations. This would minimise the need to use the upper podium level for routine access/egress and thus would be welcomed by residents.
- The use of the walls for art installations would be a way of converting the currently dreary 'tunnel' into an entertaining walk. We suggest it might be an ideal venue to create a mural detailing the history of the CoL and that this could be an interesting project on which the City, the Museum of London and the Barbican Centre could collaborate. What better way to channel people through Culture Mile than an uplifting reminder of the history and culture of the CoL?

Contact Name

Contact Organisation

Dr Alexander Wilson

Shakespeare Tower House Group

City Response

Comment noted. Plans for the Beech Street Tunnel will carefully consider noise and pollution issues and seek to minimise disturbance to residents.

Recommendation

No Change

# City Plan 2036 Consultation Comments

## Recommendation\_Details

Paragraph 7.8.1

Type of Comment General

### Comment

7.8.1 - You describe Smithfield Market as 'a' major London wholesale meat market – can you name any others?

### Contact Name

Greg Lawrence

### Contact Organisation

Smithfield Tenants Market Association

### City Response

Agree. Smithfield is London's major wholesale meat market. Wording of introductory context, 4th bullet point has been amended as below.

### Recommendation

Change

## Recommendation\_Details

Wording of introductory context has been amended as follows;  
"Smithfield Market, London's major wholesale meat market".

Paragraph 7.8.4

Type of Comment Support

### Comment

This policy seeks to improve the Smithfield and Barbican area and this is fully supported by the MoL. In particular, the first part of the policy which states "implementing the Culture Mile initiative, including delivering art and cultural attractions and public realm improvements through the Culture Mile Look and Feel Strategy" is fully supported. The Museum moving to Smithfield will assist with realising the objectives of the Culture Mile. As a significant, international cultural attraction the relocation of the Museum to Smithfield will create a key feature in Culture Mile. This move will draw thousands of visitors to the area as well as encouraging investment and providing opportunities for future and existing businesses and cultural uses.

Paragraph 7.8.4 states that "the Smithfield and Barbican area contains a very diverse range of uses, including commercial offices, retail, market, cultural, hospital and residential, which attract large numbers of people to the area." This is supported as the MoL will integrate well into the area. Given the Museum are seeking to

# City Plan 2036 Consultation Comments

propose retail units and some ancillary uses such as offices and a restaurant, the MoL proposals will not only compliment but enhance the Culture Mille as a cultural destination.

Contact Name

Contact Organisation

Museum of London

City Response

Comment noted.

Recommendation

No Change

Recommendation\_Details

Paragraph

Figure 32

Type of Comment

General

Comment

The Culture Mile project is aiming to transform the north west of the City into a strategic cultural area of National and International stature. It is reflected spatially within the Smithfield and Barbican Key Area of Change, with key visitor attractions outside the City's border reflected on the main policy map. We share the City's enthusiasm for developing the areas cultural infrastructure. Hackney is working with developers establishing a major cultural attraction at the Stage development, the Shakespearian theatre site in Curtain road in Shoreditch. We would very much like to see the Stage reflected on this map and welcome further discussion on how the Cultural Mile can be integrated into Shoreditch through the emerging Area Action Plan.

It is anticipated in the City Plan 2036 that growth in the Culture Mile will generate additional visitors and subsequent demand for hotels and other services including night-time entertainment. Hackney welcomes the opportunity to integrate the Cultural mile into future plans for Shoreditch, and would particularly welcome further discussion on the policy approach to entertainment, leisure and night time uses to ensure a coordinated policy approach.

Contact Name

Contact Organisation

Natalie Broughton

London Borough of Hackney

City Response

The suggested addition is too detailed to be included on the KAOC map. Discussion welcomed.



# City Plan 2036 Consultation Comments

Recommendation

No Change

Recommendation Details

Paragraph

Section 7.8

Type of Comment

Object

Comment

Given the high contribution the Barbican area makes to biodiversity in the City, I was surprised to find not a single mention in Section 7.8 of the need to ensure that the increased footfall and night-time light pollution does not have a negative impact on the significant wildlife populations generally, and more specifically on some of the City's target species which use the area.

Culture Mile events also have potential to negatively impact on the area's open spaces unless there is specific planning to prevent it. For example, damage was done to the central statue, trees and vegetation at West Smithfield Rotunda in summer 2017 during the construction and deconstruction of a Culture Mile 'pop up' performance area.

Given that Policy S6 projects an increase in the night-time use of open spaces for cultural events moving forward, it is imperative that a formal policy of active and timely maintenance provision after events is implemented.

Contact Name

Contact Organisation

Ruth Cooke-Yarborough

City Response

Policies OS1 and OS3 deal with the protection of biodiversity, and references the the large areas of open space and areas of importance for biodiversity on the Barbican and Golden Lane Estates.

Recommendation

No Change

Recommendation Details

Policy Number

Figure 32

Paragraph



# City Plan 2036 Consultation Comments

## Comment

1. While Section 7.8 acknowledges that Barbican and Smithfield has a sizeable residential population, Figure 32 suggests that the Barbican Estate effectively finishes at Beech Street and is quite separate to the Golden Lane Estate and in between is a zone that is non residential. This is not the case. The Barbican Estate runs all the way to Fann St, meeting the Golden Lane Estate. To the north of Beech St and east of Aldersgate, there are only 3 non residential buildings. One of those one is a church and another is a listed heritage asset. Figure 32 should be redrawn to better reflect the predominantly residential land use and ensure that Culture Mile decisions are not based on erroneous assumptions.

2. The entire Barbican and Fann St corridor has one of the highest levels of biodiversity in the City and contains many of the City's significant open spaces from a biodiversity perspective. However, most of these have been omitted from Figure 32, including most of the Barbican and St Alphage SBINC, Grade 1. Figure 32 should be amended to ensure that all important open spaces and green corridors are shown and that biodiversity is taken into account when formulating policy for the Barbican and Smithfield Area.

## Contact Name

Ruth Cooke-Yarborough

## Contact Organisation

## City Response

The representations of residential areas in the Plan are indicative of concentrations of residential development in the City , and are not intended to illustrate all residential development. The Key Area of Change diagrams are not intended to include all detail pertaining to policies but rather give a general overview of land use and potential change in the area. The absence of detail on the diagram does not diminish the importance or implementation of policies in the Plan.

## Recommendation

No Change

## Recommendation Details

## Policy Number

SB1

## Paragraph

## Type of Comment

Object

## Comment





# City Plan 2036 Consultation Comments

Due to its highly residential nature, the Barbican area is particularly sensitive to significant expansion of nightlife activity. While Policy SB1 claims that residential amenity impacts will be considered when granting planning applications, it is difficult to see how an increase in night-time activity can be consistent with Policy H3 which limits uses in residential areas which cause noise disturbance, fumes and smells.

Policy H3 also limits uses in residential areas that may generate vehicle movements likely to cause disturbance. Fann Street already suffers from congestion, night-time noise, light pollution and poor air quality from delivery vans, private hire vehicles and other professional transport.

Furthermore, with the closure of public conveniences in the area, it is common for night-time visitors to use open spaces and trees as urinals. These activities are only going to increase as Culture Mile is developed unless there is active intervention by the CoLC and night time activities are well thought out and limited in nature.

## Contact Name

Ruth Cooke-Yarborough

## Contact Organisation

## City Response

The policies in the Plan as a whole seek to deal with the requirements of different uses and communities as best as possible in a heavily built up area with many varied and competing needs.

## Recommendation

No Change

## Recommendation Details



# City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S24: Culture Mile Implementation

### Policy Number

### Paragraph

### Type of Comment

Support

### Comment

Welcome the increased focus on the Culture Mile within the Square Mile and initiatives which support enhanced cultural activation across all levels of affordability and accessibility.

### Contact Name

### Contact Organisation

City Property Association NextGen Steering Group

### City Response

Support noted.

### Recommendation

No Change

### Recommendation\_Details

### Type of Comment

Support

### Comment

This policy is welcomed and supported by the Museum who look forward to working closely with the City of London to achieve the aspiration to "promote and protect Culture Mile as the City's main cultural centre and world class cultural destination". Relocating the MoL to Smithfield will be an integral part of the implementation of Culture Mile.

### Contact Name

### Contact Organisation

Museum of London

### City Response

Comment noted.



# City Plan 2036 Consultation Comments

## Recommendation

No Change

## Recommendation Details

### Type of Comment

General

### Comment

We note the significant changes anticipated as part of the Culture Mile initiative, in particular the relocation of the Museum of London to Smithfield, the potential development of a new Centre for Music on the site of the existing Museum of London, and the potential moving of the Smithfield Meat Market from its current location. This change will occur close to the boundary of Islington and development on the north side of Smithfield Market will be key to the success of the Culture Mile. Cultural uses developed in the City may have cross boundary impacts on the London Borough of Islington. Particular impacts may arise from night-time economy uses including noise and anti-social behaviour. We suggest that a requirement to mitigate/prevent these cross boundary effects as part of relevant cultural/night time economy proposals be explicitly referenced in the City Plan.

Islington has designated the Clerkenwell/Farringdon Cultural quarter, where development of cultural and creative uses should be focused. This designation could complement the Culture Mile and support growth of cultural uses across this part of central London. Islington also proposes introducing a new Local Shopping Area in the vicinity of the Culture Mile, extending from Smithfield Market to Farringdon Station along Cowcross Street. This designation will support development of retail and food, drink and entertainment uses, which could also complement the Culture Mile.

### Contact Name

Ben Johnson

### Contact Organisation

London Borough of Islington

### City Response

Agree that wording could be added to clarify cross boundary issues between the City and Islington. Wording has been added in a new paragraph in the supporting text as below.

## Recommendation

Change

## Recommendation Details

A new paragraph has been added to the supporting text as follows;

"The London Borough of Islington has designated the Clerkenwell and Farringdon area as a Cultural Quarter, where development of cultural and creative uses should be focused. It also proposes introducing a new Local Shopping Area extending from Farringdon Station to Smithfield Market along Cowcross Street, which will support development of retail and food, drink and entertainment uses. While these initiatives will complement the Culture Mile, cross-boundary impacts may arise from cultural and night-time economy uses on either side of the boundary between the City and Islington. Proposals for such uses in Culture Mile will be expected to mitigate any cross-boundary impacts as well as any impacts on City residents and businesses".

# City Plan 2036 Consultation Comments

## Type of Comment

Support

### Comment

This policy is strongly supported in principle, including the aspirations to increase pedestrian flows, improve wayfinding and strengthen connections with the rest of the City.

### Contact Name

Chris Leong - Assistant Planner

### Contact Organisation

Transport for London - Spatial Planning

### City Response

Support noted.

### Recommendation

No Change

### Recommendation\_Details

## Type of Comment

General

### Comment

Public realm improvement is paramount to support the Culture Mile. In the City of London most public spaces are small and the improvement of this public-realm network not only would benefit the Culture Mile but would also have wider benefits for the local community, including the working community.

A more active involvement of the network of universities, including the University of Liverpool in London, would strengthen the educational aspect of the Culture Mile; for example, our Campus could host some of the Culture Mile events.

A collaborative relation with the creative clusters already existing in Shoreditch and Tech City, would strengthen the case for the creation of a creative cluster within the City. Consideration should be given to the opportunities for design-related creative incubators connected to universities (e.g. the Design Lab within the University of Liverpool in London, which includes the disciplines of architecture, geography and planning, and industrial design).

### Contact Name

Dr. Manuela Madeddu and Dr. Chia-Li

### Contact Organisation

University of Liverpool in London

### City Response

Comments noted.

# City Plan 2036 Consultation Comments

## Recommendation

No Change

## Recommendation Details

### Type of Comment

General

### Comment

Suggested amendments:

- In bullet point 3, refer to "experience of" cultural enrichment so as to read: "...through improved access to and experience of cultural enrichment, education, skills and employment opportunities;"
- In bullet point 4, insert "stand alone" before "cultural facilities and uses"

### Contact Name

Fr Luke Miller

### Contact Organisation

Diocese of London

### City Response

Agree that suggested wording to bullet point three adds clarity to the policy.

Not considered necessary to specify that cultural facilities or uses are "stand alone".

## Recommendation

Change

## Recommendation Details

Bullet point three of Policy S24 has been amended to include "and experience of" cultural enrichment, as suggested.

### Type of Comment

Object

### Comment

1. In 2015, CoLC announced its Barbican and Golden Lane Strategy, prepared at, no doubt, significant cost by Publica. Before that strategy has even begun to be implemented, CoLC announced its grandiose Culture Mile initiative as a result of its decision to relocate the Museum of London to Smithfield General Market, following the rejection of Henderson Global Investors' redevelopment proposals by the then Planning Minister.

2. Now, even before Culture Mile from Liverpool Street/Moorgate to Smithfield has become a significant reality, it is undergoing a swing in direction as CoLC presses ahead with its so-called Centre for Music. In its architect's plans, Culture Mile evolves from Tate Modern northwards, to become the creation of Culture Square Mile? Interestingly, the architect was inspired by the Barbican highwalks only after a resident pointed them out to her.



# City Plan 2036 Consultation Comments

3. That the Culture Mile is both “the City’s main cultural centre and world class cultural destination” seems contradictory, unless the City’s lesser culture centres are not world class. However:

- the relocation of the Museum of London to Smithfield is a reaction to an event and not an efficient use of financial resources.
- “Potential” could be applied to any development, anywhere.
- It is a pity that the “shared working with the London Borough of Islington” doesn’t extend to improving existing public green space and adding more.
- Why should the amenity of surrounding uses be compromised at all?
- Where is there any evidence of need for additional retail outlets and hotels in particular?
- CoLC should be providing the spaces and not relying on others but it must offer the same at subsidised rates against an investment in those businesses for the benefit of the community.
- It shouldn’t take 20 years to strengthen lighting and signage but what does it mean in respect of routes and wayfinding?
- Why should there be increased pedestrian flows and visitor numbers “to, from and within Culture Mile”? And in what way would public realm improvements provide a specific identity for Culture Mile?

Contact Name

Contact Organisation

Fred Rodgers

City Response

Comments noted. It is inevitable that additional development and visitors to the Culture Mile will affect the amenity of residents. However, policies in this section and elsewhere in the Plan seek to minimise disturbance to residents. The additional attractions and visitors will create increased pedestrian flows and numbers to the area.

The development of retail units and hotels is a response to market demand in the City for these uses.

Public realm improvements in the Culture Mile will employ consistent elements so that people recognise the 'palette' and understand that they are in the Culture Mile.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

The importance of the Cultural Mile in improving mental health has not been emphasized and we would like to see the development of plans to improve health through the work of the Barbican, the Guildhall School of Music and the Museum of London.

Contact Name

Contact Organisation



# City Plan 2036 Consultation Comments

Gail Beer

Healthwatch City of London

## City Response

Mental health and the built environment is dealt with in other policies in the Plan. Culture Mile strategies address the importance of art, culture and mental health.

## Recommendation

No Change

## Recommendation Details

### Type of Comment

General

### Comment

There is no publicly owned nightclub in the City - would like to see this provided. The Centre for Music should include spaces for public gatherings as the plaza outside will be very noisy. Cater for different residents' needs in music/concert hall development.

### Contact Name

Hamish Robertson

### Contact Organisation

## City Response

Comments noted.

## Recommendation

No Change

## Recommendation Details

### Type of Comment

General

### Comment

1. The development of a cultural centre is thrilling. The area already offers heritage sites and cultural world class events. Naming the area brings them all together under an umbrella term. The Culture Mile offers a way to coordinate the wonderful events organised in heritage sites with the more formalised events in the Barbican Centre etc.

2. I like the idea of shop fronts for artisans along Beech Street as well as the development of a vital digital creative community to include video, images, sound etc. I have always liked to think of exhibition hall 2 as a missed opportunity that could be a great space for digital installations. I am hoping that Beech Street will be opened up to include contemporary media.



# City Plan 2036 Consultation Comments

3. Under the exhibition hall there is a carpark which could be made into an active space for youth such as a skate boarding area. It would be lovely to encourage a physically active presence for youth in the City. There should be opportunities for all ages to participate in creative activities.

4. I believe the area between Smithfield and Barts could be opened up like the area recently opened at Kings Cross where there is a building designed by Thomas Heatherwick. I am excited by Diller, Scofidio and Renfro design for the Sir Simon Rattle concert hall.

Concerns:

The Culture mile must continue to support cultural excellence.

Greening of the Culture Mile at street level is essential to help reduce all pollution.

Contact Name

Contact Organisation

Jane Bickerton

City Response

Support and comments noted. The issues raised regarding noise, air and light pollution are dealt with in the relevant policies in the Plan.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

The Culture Mile needs a stronger definition and commitment to compete with offices and provide a significantly better environment for the western edge of the Barbican, as well as future proofing against the likelihood that Smithfield will itself become a target for massive office development. Such a move would fit with the proposals as it supports the concept of an improved economy through tourism.

Barbican residents broadly support the Culture Mile policies. However, there should not be a presumption in favour of all culture related development. It is not sufficient (as in Policy SB1) simply to "Consider the impact of noise-generating uses ... on residents ... and require mitigation measures where appropriate". This is inconsistent with policy H3, which asserts that "existing residents will be protected by resisting uses which would cause unacceptable noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause undue disturbance".

If the Centre for Music is built, it would be inappropriate to hem it in with tall commercial buildings to the north of it on Aldersgate Street and east of it on the Bastion House site (as allowed by the tall buildings policy Strategic Policy 12 and figure 19). If, on the other hand, the Centre for Music is not built, the available site





# City Plan 2036 Consultation Comments

abuts a conservation area and a residential area. Overdevelopment is a real risk, and what development there is needs to fit in with the nature of this key area of change and the Culture Mile. The logic would be to develop this site for residential use.

## Contact Name

Jane Smith

## Contact Organisation

Barbican Association

## City Response

Comments noted. Wording has been amended and added to policy S24 as below to outline the importance of this area of change, and that further guidance will be produced to ensure the satisfactory development of the area.

## Recommendation

Change

## Recommendation\_Details

Wording has been added to the supporting text of the policy as follow:

"The Local Plan therefore continues to protect the existing location and operation of the Market in its current location, but also makes provision for possible future movement of the Market and provides guidance on requiring future potential uses of the market buildings which to enhance their historic interest maintain the historic character of the existing Grade II\* and Grade II listed market buildings. Future uses should ensure the legacy of these buildings through world class design and innovation which supports the growing evening and weekend economy, complements the City Corporation's aspirations for Culture Mile and is fully inclusive whilst protecting local amenity. If the decision in principle to consolidate the wholesale markets is confirmed, then a planning brief or Masterplan Supplementary Planning Document will be prepared setting out further guidance on potential future uses for the Smithfield Market buildings".

## Type of Comment

General

## Comment

The City of London's ambition to develop Culture Mile as the City's main cultural offering is welcome and is in line with Draft New London Plan Policy HC5 which encourages boroughs to identify, protect and enhance strategic clusters of cultural attractions. To support creative industries, the City of London is encouraged to do so by following the guidance set out in Draft New London Plan Policy E3, securing planning obligations towards affordable workspace provision where this is for a specific social, cultural or economic purpose.

## Contact Name

Juliemma McLoughlin

## Contact Organisation

Mayor of London

## City Response

Comment noted.

# City Plan 2036 Consultation Comments

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

The proposals to relocate the Museum of London to Smithfield and to create a Centre for Music on the museum site are sound in principle. The present concept drawing for the Centre for Music does imply a structure that would seriously dominate, dwarf and overshadow the surrounding buildings. I recognise that the development of this project still has a long way to go.

The related, recently-announced proposal to abolish the roundabout at the lower end of Aldersgate Street and to pedestrianize St. Martin's Le Grand, adjusting traffic flows accordingly, could greatly enhance the 'feel' of this area. Clearly, the sensitive integration of the Centre for Music into this locality will be critical to the proposal's success. The recently-published concept work on the Centre for Music envisages St. Martin's le Grand pedestrianisation, whereas the Transport Strategy does not. Early clarification on this point is needed.

More broadly, I welcome the Local Plan proposals relating to provision of mixed uses within buildings and the public realm and along the Culture Spine (bullet points 4-6 of S24), with the proviso that the areas in question should not be swamped with high-density, medium- and high-rise structures which impair the distinctive character of the district by overwhelming existing historic low-rise buildings and excluding daylight from both residential and commercial premises. Conversely, light pollution is a significant problem in the area surrounding the Barbican, especially as many office blocks have their strong interior lighting on throughout the night. Presumably it would be feasible to attach conditions aimed at prohibiting light pollution to Planning Permissions.

Contact Name

Contact Organisation

Philip Doidge

City Response

Comments noted.

Recommendation

Change

Recommendation\_Details

Wording has been added in the supporting text of Policy HL3 as follows;

"Careful planning and design are required to ensure proper consideration of key issues where lighting has an impact such as movement, safety, security as well as the reduction of energy use and light pollution. Light pollution is a particular problem where large commercial buildings have lights on during the night, which can impact residential amenity".



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

- Under “encouraging the provision of spaces and premises suitable for start-ups, digital and creative industries”, we would like to add "cultural organisations and artists".
- We would request an extra bullet point reference be added: “the commissioning of temporary and permanent artworks, and involvement of artists in design processes around public realm design projects, where appropriate and supportive of the Culture Mile strategy and Content Principles”.
- We would like to add: “Encouragement of a diverse retail, food & beverage offer, particularly along the ‘Culture Spine’.” Where possible we would like to see active frontages (outdoor seating, window displays etc.) that support on-street animation and vibrancy. Note that diverse, in this context, refers to a curated mix of independent retail/F&B alongside established brands, and ensuring that retail/F&B offers are at a range of price points, from genuinely affordable upwards.
- Transport infrastructure, and the ability to manoeuvre outside broadcast trucks around the main roads of Culture Mile will be important.
- Under Reason for the policy, the Culture Mile Look and Feel Strategy (7.8.9) has been approved by Committee, and research into creative industries (7.8.10.), now termed “Creative Enterprise and Innovation research”, already has significant findings which are publicly available. For the latter we suggest the following wording: “The City Corporation and partners have commissioned research which has shown the contribution made by creative industries in and around Culture Mile to the City’s economy and the potential for significant growth of this sector as part of the Culture Mile initiative”.

### Contact Name

### Contact Organisation

Tim Jones

Culture Mile

### City Response

Agreed that additional wording could provide clarity to the 6th bullet point. Wording has been added as below;

Comment noted. The policy on C5 on public art offers sufficient guidance on commissioning art throughout the City.

Agreed. Bullet point 5 could be amended to emphasise the food and beverage offer of the Culture Spine. Bullet point has been amended as below.

Comment noted. Transport policy in the Plan and in the City of London Transport Strategy deals with traffic movement adequately.

Agree that wording could be added to emphasise results of the work into creative enterprise uses. Wording has been added to paragraph 7.8.10 as below;

### Recommendation

Change

### Recommendation Details



# City Plan 2036 Consultation Comments

Wording has been added at the end of the 6th bullet point as follows:

"encouraging the provision of spaces and premises suitable for start-ups, digital and creative industries and cultural organisations and artists";

Wording has been added to bullet point 5 as follows:

"Encouraging, and a diverse leisure, retail, food and beverage offer, particularly along the Culture Spine key route".

Wording has been added to paragraph 7.8.10 as follows:

"The City Corporation and partners have commissioned research to consider published research that highlights the contribution made by creative industries in and around Culture Mile to the City's economy and the potential for growth of this sector as part of the Culture Mile initiative. The research identified the significant social and economic value that can be derived from the growth of creative enterprises and made four key recommendations which are addressed in part through this policy:

- Create a strong sense of place;
- Secure the area's distinctive ecology, including encouraging investment in the creative sector, developing new creative workspaces and protecting and encouraging formal and informal performance space;
- Attract talent, create new jobs and support social mobility; and
- Drive inward investment.

## Type of Comment

Support

## Comment

We are supportive of this policy, and encourage that the Trust is consulted on any relevant proposals which might come forward.

## Contact Name

Tom Clarke

## Contact Organisation

Theatres Trust

## City Response

Support noted.

## Recommendation

No Change

## Recommendation Details

## Paragraph

7.8.4

## Type of Comment

General



# City Plan 2036 Consultation Comments

## Comment

A few observations on the Pedestrian Movement Model final report:

1. The report doesn't include the Centre for Music in its 2026 model. Clearly this is going to bear on pedestrian usage of the surrounding streets and highwalks. It is interesting that included in future modelling is the Museum of London at Smithfield.
2. It is imperative that modelling be undertaken in respect of a future Centre for Music. This should model morning, lunchtime and evening peaks; the report doesn't cover the evenings, which is when a lot of people would use the Centre for Music.
3. Will modelling be undertaken in respect of the Centre for Music as currently envisaged (noting that the current design is at odds with the Transport Strategy as it provides for a pedestrianised St Martin's le Grand)?
4. I note that morning and lunchtime peaks around Barbican station are envisaged to increase 2,500-5,000. Under the 2026 forecast, there appears not to be an increase in highwalk traffic (0-100 per hour). How are you going to maintain current levels (which are acceptable from my perspective)? What measures to guarantee this will be undertaken, including as part of the Centre for Music development?
5. The Centre for Music must be designed in such a way as to prevent further people from using the highwalks through what is a residential area. Pedestrians should be routed through commercial thoroughfares (Aldersgate Street, London Wall, Beech Street and St Martin's le Grand) to access public transport and cultural centres.
6. My concern is rooted in noise pollution and I ask the City to undertake a noise pollution test in apartments immediately below Podium to get a clear understanding of the noise impact of footfall on the highwalks.

## Contact Name

## Contact Organisation

Matthew Doidge

## City Response

A model for the Centre for Music would be too detailed to include in this Plan. Careful consideration and modelling will be carried out on pedestrian usage relating to the Centre as appropriate, with consideration of amenity issues.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

Whilst saddened by the prospect of the Museum of London leaving its present site, I understand that will result in its being a more dynamic resource. Whatever replaces it should be cultural (not commercial, residential etc) and so I tentatively endorse the idea of a Centre of Music, on condition that this:

1. Does not extend beyond the existing site of the MoL.



# City Plan 2036 Consultation Comments

2. Is not taller than the existing MoL building.
3. Is soundproofed to avoid noise pollution.
4. Does not have any features (e.g. windows, terraces) that would enable visitors to look at/into dwellings.
5. Does not bring about increased footfall on the highwalks surrounding Thomas More House. There should be appropriate signage and lighting to support this. This is a security concern.
6. Does not result in increased traffic along Aldersgate Street. Would like to see this pedestrianised or the subject of a scheme like Exhibition Road in South Kensington. This will help avoid increased traffic on the highwalks.
7. Preserves Thomas More car park and it's current access points; does not bring about an increase in traffic using the access ramp to the car park and current MoL site.
8. Includes as much greenery as possible.
9. Encourages wildlife.
10. Is eco-friendly (i.e. minimises light pollution).
11. Is aesthetically pleasing and in-keeping with the neighbourhood. This is a landmark site surrounded by landmark buildings. The architects should be world renowned, able to deliver something really special that enhances the reputation of the CoL and the Culture Mile.
12. Preserves Ironmongers' Hall (both building and site).
13. Is sensitive to the needs of the disabled.

The tranquility, integrity and character of the Barbican Estate needs to be preserved. This is a residential development and respect must be paid to those who live here. This is also a development of historical significance.

Contact Name

Contact Organisation

Matthew Doidge

City Response

Comments noted.

Recommendation

No Change

Recommendation Details

Paragraph

7.8.6

Type of Comment

General

Comment

# City Plan 2036 Consultation Comments

It is noted in the drafting that Culture Mile runs from Farringdon to Moorgate on its east-west axis and from St Luke's London Symphony Orchestra Centre to St Paul's Cathedral on its north-south axis. Chapter would welcome the opportunity to be involved in the development of plans to strengthen "routes, way finding, lighting and signage throughout the area and links with the rest of the City" set out in Strategic Policy S24: Culture Mile Implementation.

## Contact Name

Oliver Caroe

## Contact Organisation

Surveyor to the Fabric of St Paul's Cathedral

## City Response

Comment noted.

## Recommendation

No Change

## Recommendation Details

## **Policy Number**

SB1

## **Paragraph**

## **Type of Comment**

General

## **Comment**

We generally support this policy and note that businesses need to continue to have appropriate servicing arrangements. Policy SB1 references that the Corporation will protect the flow of traffic and access to premises for service vehicles affected by Culture Mile. However, the following bullet points in the policy do not consider the impacts on the servicing of existing premises from alterations to the public realm. This needs to be made explicit.

## **Contact Name**

## **Contact Organisation**

GMS Estates and MacTaggart Third Fund

## **City Response**

The final bullet point of Policy SB1 addresses essential vehicle movement. This includes servicing movements.

## **Recommendation**

No Change

## **Recommendation Details**

# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

Of major concern is the aim articulated in Appendix I of the 'Look and Feel' strategy for the Culture Mile (CM), thus "Externalising world-class cultural activity by dissolving barriers and embedding content into the streets". We do not, as yet, know what this fully implies but fear that the streets near residential areas and adjacent to the Barbican Centre will be flooded by noisy events. This would be unacceptable to the residents and we recommend that any such "externalised" events be kept well away from residential areas.

We believe that the CM initiative is, in part, driven by a view that the CoL is underpopulated in the evenings / weekends and that there are insufficient attractions to encourage more visitors during these times coupled with a view that there is a need to stimulate the Night-Time Economy. We do not agree with this viewpoint noting that we can already access a rich array of arts venues, independent galleries, restaurants, bars and night-life in the area, all within easy walking distance from the Barbican. We are concerned that many of the likely adjuncts to increased cultural activities will be more restaurants and bars with the concomitant increase in postclosing- time rowdy behaviour from revellers. We urge the CoL to clarify its CM thinking and recommend that by-laws applying to the Estate are upheld and that cultural events are confined to within the Barbican Centre's buildings and not permitted on the public highways.

### Contact Name

Dr Alexander Wilson

### Contact Organisation

Shakespeare Tower House Group

### City Response

Policy SB1 recognises the potential disturbance to residents from increased pedestrian movement and cultural activities and seeks to minimise these impacts.

### Recommendation

No Change

### Recommendation Details

## Type of Comment

General

### Comment

Suggested amendments:

- In the opening paragraph, add reference to protecting "cultural centres and occupiers".
- In bullet point 1, add reference to considering the impact of noise-generating uses on "cultural centres".

### Contact Name

Fr Luke Miller

### Contact Organisation

Diocese of London





# City Plan 2036 Consultation Comments

## City Response

It is considered that it is generally understood that the policy implicitly includes "cultural centres and occupiers".

## Recommendation

No Change

## Recommendation\_Details

### Type of Comment

Object

### Comment

CoLC, which has an absolute obligation to do so anyway, would best "protect the amenity of residents and occupiers, the integrity of historic and listed buildings and structures and the flow of traffic and access to premises for service vehicles affected by Culture Mile" by abandoning the project. However:

- CoLC has to consider impacts of noise-generating uses as a local authority in any event.
- Again, CoLC obligations as a local authority require imposing noise mitigation measures.
- Again, preserving and enhancing historic integrity is part of CoLC's obligations as a local authority.
- "Suitable" is subjective and no architectural lighting is required by, or acceptable to, residents.
- It would be an incredibly uncaring and blindfolded local authority that carried out public realm improvements to the detriment of pedestrians.

### Contact Name

### Contact Organisation

Fred Rodgers

## City Response

Comments noted.

## Recommendation

No Change

## Recommendation\_Details

### Type of Comment

General

### Comment

We welcome the statement in this policy that the City will protect the amenity of residents, the integrity of historic and listed buildings and structures. But, since Strategic Policy S23 states (2nd item) "ensuring the retention and improvement of pedestrian permeability and connectivity through large sites such as Smithfield Market, Golden Lane and Barbican while preserving privacy, security and noise abatement for residents and businesses" we do think you need to spell out how that can be done for Golden Lane and Barbican (which are residential areas and are particularly sensitive to noise and privacy issues).



# City Plan 2036 Consultation Comments

At the moment it sounds as though the Plan wants to have its cake and eat it – and we seriously doubt that both aims can be met. We are not saying that pedestrian routes through the estate should not be used – or not used by more people than use them at the moment – but new routes would damage the design of the estate, and considerably more pedestrians, particularly in the evening and night, seriously threaten residential amenity. It is not appropriate to allow the Barbican Estate to become like the South Bank in terms of crowds of residents and street entertainment.

We would like to see a stronger wording to prevent noise generating activities, particularly night time activities – ie to refuse applications rather than simply mitigating their effects.

Contact Name

Contact Organisation

Jane Smith

Barbican Association

City Response

Culture Mile will require additional pedestrian movement through the Barbican Estate. Policies in the Plan and relevant guidance and strategies seek to minimise disturbance to residents from Culture Mile activities.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

Pleased to see this policy makes considerable reference to noise resulting from the developments envisaged in the Plan. This aspect is fundamental to the Plan's success, particularly as far as local acceptance is concerned.

I am very concerned about the impact upon residential communities such as Barbican and Golden Lane of noise resulting from dramatic increases in pedestrian numbers and the pressure this will put on existing pedestrian routeways. These estates feature traditional construction using mass concrete, blockwork and brickwork, which do not cope well with structure-borne sound. For example, noise from footsteps, wheeled suitcases, trollies etc. along the Barbican Highwalks is transmitted to the interiors of the flats immediately below. There is potential for dramatic increases in footfall, and consequently the transmission of structure-borne noise, arising from the proposed new cultural facilities, in many cases at night. The use, for example, of the Barbican Highwalks as a shortcut between the new Centre for Music and Moorgate/Liverpool Street stations would almost certainly give rise to serious nuisance.

Pedestrians visiting, moving around and leaving this area should be routed through commercial and not residential areas. The existing main thoroughfares - Aldersgate Street, St. Martin's le Grand, London Wall and Beech Street- offer reasonably direct, quick, completely level and step-free routes to public transport



# City Plan 2036 Consultation Comments

connections. They avoid quiet residential areas and therefore pose no risk of adding to the structure-borne noise problem. Routing pedestrians around, rather than through, residential estates would safeguard residents' privacy and security.

I would therefore ask that serious consideration be given to inserting into the Plan:

- (i) specific provisions relating to early measures being taken to identify likely noise 'hotspots' resulting from both the implementation of the Local Plan's proposals and from specific proposed developments;
- (ii) a commitment to commissioning independent impact assessments in appropriate cases, to enable the impact of development proposals to be objectively assessed;
- (iii) a strong commitment to controlling pedestrian movements through these estates by comprehensive signage and, where necessary, exclusion measures;
- (iv) a commitment to making appropriate planning conditions designed to direct patrons leaving the buildings in question to routeways to public transport and car parks which avoid these estates.

## Contact Name

## Contact Organisation

Philip Doidge

## City Response

Policies in the Plan and related guidance and strategies address the issues raised, and seek to minimise disturbance to residents from increased pedestrian movements, leisure and catering developments (particularly night-time activities) and to guide pedestrian movements through appropriate signage.

## Recommendation

No Change

## Recommendation Details

## Type of Comment

General

## Comment

Bullet point 4: Architectural lighting must not adversely impact the ability of bats to access roost sites. Prior to any proposal being made there should be a full independent ecological survey.

## Contact Name

## Contact Organisation

Sarah Hudson

Friends of City Gardens

## City Response

The City of London Lighting Strategy addresses lighting and wildlife and Policy OS3 states that development should include appropriate lighting schemes to minimise impacts on biodiversity.



# City Plan 2036 Consultation Comments

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

“requiring development and cultural activities to preserve and enhance the existing historic integrity of historic buildings, structures and spaces and conservation areas”

This is in line with Culture Mile’s aspirations, though we would prefer it if the phrase "where appropriate" is added after "cultural activities", so that not all cultural activities in the area are expected to support this objective.

☑ We have an expectation that car parks in Culture Mile will be used less in the future, so providing opportunities to look at other forms of cultural use.

Contact Name

Contact Organisation

Tim Jones

Culture Mile

City Response

It is considered that the suggested wording "where appropriate" would weaken the intention of the policy.

Policy on the use of car parks is addressed in the transport section of the Plan.

Recommendation

No Change

Recommendation Details

Paragraph

7.8.11

Type of Comment

General

Comment

I broadly support the Culture Mile policies. However there should not be a presumption in favour of all culture related development. It is not sufficient to “Consider the impact of noise-generating uses ... on residents ... and require mitigation measures where appropriate”. This is inconsistent with policy H3 which asserts that "existing residents will be protected by resisting uses which would cause unacceptable noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause undue disturbance”.



# City Plan 2036 Consultation Comments

Contact Name

Contact Organisation

David Coleman

City Response

Due to the intensity of conflicting interests in the City, the City Corporation can not ensure there is no impact from noise and other disturbances.

Recommendation

No Change

Recommendation Details

# City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S25: Smithfield

### Policy Number

### Paragraph

### Type of Comment

Support

### Comment

The last point of this policy states that "The City Corporation will protect and enhance the distinctive mixed use and historic character of Smithfield by providing for, and supporting, improved pedestrian permeability and public realm enhancements across the area to accommodate increased pedestrian flows arising from the Elizabeth Line and the Museum relocation". The MoL support this policy objective and are committed to working with the City of London to achieve this.

### Contact Name

### Contact Organisation

Museum of London

### City Response

Comment noted.

### Recommendation

No Change

### Recommendation Details

### Type of Comment

General

### Comment

Because of the nature of the wholesale market, the area currently doesn't have any strong relation with its surroundings; however Smithfield Market presents a unique opportunity to become a lively and vibrant important centre for the City and for London. Other cities are using design competitions to garner ideas around regeneration opportunities and we believe that a strategic design competition for Smithfield Market would be a good platform to raise awareness of the importance and history of the area and to widen the debate of its possible future to stakeholders, local communities, practitioners, students and academics. We also believe that a key point in the regeneration of the area is that it should be planned for Londoners and not with the mere aim of attracting tourists.

### Contact Name

### Contact Organisation

Dr. Manuela Madeddu and Dr. Chia-Li

University of Liverpool in London



# City Plan 2036 Consultation Comments

## City Response

Noted.

## Recommendation

No Change

## Recommendation\_Details

### Type of Comment

Object

### Comment

Protection and enhancement are contradictory in the way CoLC seems to interpret both words:

- The continued presence of St Bartholomew's Hospital is not within CoLC's individual remit.
- Whilst moving Smithfield Meat Market – an anachronism in the second decade of the 21st Century, as well as an inner-city harbour for polluting meat wagons - must come sooner rather than later.
- How on earth is retaining existing buildings compatible with encouraging any sort of new development?
- The area is already 24-hour, 7 day a week.
- Any new activities and developments must not affect operation of businesses or amenity of residents and, to avoid ambiguity, traffic movements must be decreased, if not eliminated, in any event.
- Providing for “improved pedestrian permeability and public realm enhancements” should have been a condition of the Farringdon East Station planning permission and must be a condition for any planning permission for the proposed Museum of London building. Any increased use of Smithfield Rotunda Car Park must be limited to EVs.

### Contact Name

### Contact Organisation

Fred Rodgers

## City Response

Comments noted.

## Recommendation

No Change

## Recommendation\_Details

### Type of Comment

Object

### Comment



# City Plan 2036 Consultation Comments

Policy S25, second bullet point - we object to the change in wording from the 2015 plan. Smithfield Market is entitled to remain in its current location by Charter as long as it is required and we would expect that the City would support it remaining there in the longer term, not just the short to medium term.

Contact Name

Greg Lawrence

Contact Organisation

Smithfield Tenants Market Association

City Response

The City Corporation is seeking to vitalise the City's cultural offer and consolidate market operations in more suitable locations.

Recommendation

No Change

Recommendation Details

Type of Comment

General

Comment

Plans for Smithfield should

- a)  Respect the architecture
- b)  Be sensitive to the fact that it is near the City's biggest residential areas
- c)  Be sensitive to its position in the Culture Mile. Do we really need another shopping area or a concentration of night time economy?
- d)  Boost the Culture Mile

A suggestion for the Smithfield site

The local plan sets out the future for a thriving economy with the City recognised for its world class cultural and creative facilities and seeing increasing tourists. However, the Culture Mile does not have the draw of Exhibition Road, or the status of St Paul's or The British Museum. Popular tourist routing directs tourists from St Paul's along the river to Westminster. There is an opportunity to redress this if the Smithfield Market buildings took on a cultural significance to boost the attraction of the proposed Museum of London site. If the Culture Mile is to succeed this key building needs to take on a significant interest.

An involvement as a venue to work in combination with several of the current London Museums to showcase many of the exhibits they currently hold in store and in remote sites could create a significant lift to the plans for the area. Significantly, the introduction of the Crossrail service also provides one stop links to Tottenham Court Road (British Museum), two stop links to Bond Street (Shopping) and three stop links to Canary Wharf for the Greenwich museums. Such a move would also fit with residential amenities, as most museum activity is focussed on daytime activity and the pattern of tourist travel is likely to be between Smithfield and St Paul's or Smithfield to other London attractions via Crossrail. There are also a number of museums with overflow issues, whether it is the London Transport museum - showcasing within the former railway tunnels under Smithfield; The British Museum; or the Museums along Exhibition Road.



# City Plan 2036 Consultation Comments

The Culture Mile needs a core and a series of attractions if it is not to dissipate and disappoint. The current Local Plan needs an associated drive to achieve a vision which is not just street entertainment.

## Contact Name

Jane Smith

## Contact Organisation

Barbican Association

## City Response

Comments noted. Wording has been amended and added to policy S24 as below to outline the importance of this area of change, and that further guidance will be produced to ensure the satisfactory development of the area.

## Recommendation

Change

## Recommendation\_Details

Wording has been added to the supporting text of the policy as follow:

"The Local Plan therefore continues to protect the existing location and operation of the Market in its current location, but also makes provision for possible future movement of the Market and provides guidance on requiring future potential uses of the market buildings which to enhance their historic interest maintain the historic character of the existing Grade II\* and Grade II listed market buildings. Future uses should ensure the legacy of these buildings through world class design and innovation which supports the growing evening and weekend economy, complements the City Corporation's aspirations for Culture Mile and is fully inclusive whilst protecting local amenity. If the decision in principle to consolidate the wholesale markets is confirmed, then a planning brief or Masterplan Supplementary Planning Document will be prepared setting out further guidance on potential future uses for the Smithfield Market buildings".

## Type of Comment

General

## Comment

I use Smithfield Market and it would be a shame to see it move. The Smithfield Market buildings are beautiful and should be kept. If the Market has to move, would prefer to see it become something like Borough Market or Old Spitalfields rather than another office development. There is scope for improvement of the general area around Smithfield and Farringdon.

## Contact Name

John Sgouros

## Contact Organisation

## City Response

Development plans for Smithfield Market will consider, and seek to protect the historical nature of the buildings and the improvement of the public realm as well as a mix of appropriate uses. Policies in the Plan and relevant guidance and strategies consider these issues.

# City Plan 2036 Consultation Comments

## Recommendation

No Change

## Recommendation Details

### Type of Comment

General

### Comment

As this is a 20 year plan more detail on the development of Smithfield following the relocation of the central meat market (Smithfield Market) to another site is important. Presumably Covent Garden would be a possible model with pedestrianisation of surrounding roads and a mixture of shops, restaurants and bars at ground level with residents above. With the Museum of London at the west end this development should complement the concept of the 'Cultural Mile'.

### Contact Name

Peter Savage

### Contact Organisation

### City Response

Agree that more detail regarding changes to Smithfield would be beneficial. Additional wording has been added to the supporting text of Policy S25.

## Recommendation

Change

## Recommendation Details

Additional wording has been added to the supporting text as follows:

"Future uses should ensure the legacy of these buildings through world class design and innovation which supports the growing evening and weekend economy, complements the City Corporation's aspirations for Culture Mile and is fully inclusive whilst protecting local amenity. If the decision in principle to consolidate the wholesale markets is confirmed, then a planning brief or Masterplan Supplementary Planning Document will be prepared setting out further guidance on potential future uses for the Smithfield Market buildings".

### Type of Comment

Object

### Comment

Leave Smithfield Market as it is - it will be ruined by museum development.

### Contact Name

Robert Craighorn

### Contact Organisation

### City Response

# City Plan 2036 Consultation Comments

Comment noted.

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

Amend third bullet point to read: "further enhancing the distinctive character of the Smithfield area by retaining existing buildings, and encouraging appropriate new development, suitable for accommodating a mix of uses in line with the wider Culture Mile vision and priorities for the area".

We would like to see a point re. support for independent retail/F&B which further retains the existing character of the area.

Contact Name

Contact Organisation

Tim Jones

Culture Mile

City Response

The suggested addition to the third bullet point would create unnecessary detail. The policy and supporting text include sufficient references to Culture Mile.

Planning policy can not influence the type of retail use in terms of the nature of ownership.

Recommendation

No Change

Recommendation\_Details

Paragraph

3.4.1

Type of Comment

General

Comment

"Relocation of City of London's wholesale markets onto a single site will potentially allow re-use of Smithfield Meat Market for other uses compatible with its heritage status".

Don't turn the iconic Smithfield Meat Market into just another Covent Garden/Shopping Mall with wine bars attached. I observed a lot of drunken behaviour at



# City Plan 2036 Consultation Comments

Covent Garden last summer - please don't allow this to escalate in the Smithfield area. The Cultural Mile initiative is all very well but how about expanding the concept of the 'Urban Village' from the Barbican to Smithfield? In line with the City of London's commitment to greener streets, how about greening up the Smithfield area? And the area around the Smithfield Meat Market could be pedestrianised, which would benefit workers, visitors and residents alike.

However, I fear the need for revenue will dictate decisions so that the likelihood is 'Goodbye Chops, Hello Shops'. Some flexible thinking may result in something special. How about building an Aquarium into part of the vacated meat market, like the amazing basement Aquarium at the Horniman Museum?

The Smithfield Meat Market infrastructure needs to be preserved and an area designated to the history of the meat traders. There are posters already hanging along the main avenue which provide a starting point and please can we keep the 6 red telephone boxes in situ? They are wonderful and part of the heritage.

## Contact Name

## Contact Organisation

Barbara Brownlee

## City Response

Comments noted. Policies in the Plan, and related guidance and strategies, seek and plan for the greening of the public realm around Smithfield, the reduction of motorised traffic and preservation of the history and character of the area, where appropriate.

## Recommendation

No Change

## Recommendation\_Details

## Paragraph

7.8.15

## Type of Comment

General

## Comment

1. The Rotunda garden is one of the few green spaces in this area. Given the increased footfall expected in this area once the Elizabeth line opens and the Museum of London relocates to the General market on West Smithfield, FOCG is concerned to make sure the garden continues to be protected. The Culture Mile 'Look and feel strategy' indicates a possible intent to make the Rotunda Garden into a thoroughfare by installing a bridge on the Giltspur Street side of the garden, allowing pedestrians to walk through rather than around the Rotunda. FOCG opposes any such plan to open up this garden to increased pedestrians throughput. The garden is a newly designated SINC and as such should be protected from night time disturbance and intrusive new infrastructure.

2. We question the conclusion in para 7.8.15 that the NCP car park in West Smithfield will be used more intensively. Instead we suggest the Local Plan should contain an intent to encourage visitors to arrive by means of the enhanced public transport links that will be available in this area, helping to improve air quality by reducing vehicle use.



# City Plan 2036 Consultation Comments

## Contact Name

Sarah Hudson

## Contact Organisation

Friends of City Gardens

## City Response

Comment noted. Policies in the open space section of the Plan, as well as Policy SB1 seek to ensure development and cultural activities conserve and enhance historic spaces.

Agree that paragraph 7.8.15 should not encourage car usage in Smithfield Rotunda. Para has been deleted.

## Recommendation

Change

## Recommendation Details

The final paragraph of the supporting text has been deleted.

# City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S26: Liverpool Street

### Policy Number

### Paragraph

### Type of Comment

General

### Comment

British Land fully supports the strategic policy to enhance the area around Liverpool Street Station and the initiatives within the policy which are aligned with the Broadgate Vision. Some amendments to Policy S26 are suggested as follows:

In the opening paragraph, refer to "remodelling of Broadgate and other surrounding developments by...".

In the final bullet point, add Tech City as a key destination.

Add a new bullet point at the end to read: "• Opportunities to deliver world class public realm, including pedestrian prioritisation around Liverpool Street Station will be supported. A review of kerbside uses will be undertaken and alternative arrangements for bus infrastructure, facilities and routes that are currently accommodated within the Liverpool Street bus station will be explored in conjunction with TfL. Any proposed modification to bus services currently accommodated within the Liverpool Street bus station will be subject to adequate provision of alternative bus infrastructure and facilities which maintain or enhance customer experience and operational functionality, and which provide flexibility for future evolution of the bus network."

### Contact Name

### Contact Organisation

British Land Company PLC

### City Response

COL acknowledge the opportunity presented by the redevelopment of the Broadgate estate

COL occur that additional pedestrian linkages would better demonstrate movements in this key area of growth

COL acknowledge the importance of a high quality public realm within Liverpool Street KAO

Policy does support the transport improvements of the Moorgate-Liverpool Street area

Policy implies support of key destinations surrounding Liverpool Street KAO

### Recommendation

Change

### Recommendation Details



# City Plan 2036 Consultation Comments

Insert additional text re the refurbishment of the Broadgate estate in policy

Amend illustrations on key diagram re pedestrian linkages and insert additional bullet point in policy to support delivery of a high quality public realm

Strengthen policy text to support transport accessibility and improvements to Liverpool Street station

Strengthen policy text to specifically refer to Tech City.

## Type of Comment

General

### Comment

We support the content of Policy S26. The policy states that the City Corporation will enhance the Moorgate-Liverpool Street area to take advantage of the opportunities presented by the opening of the Elizabeth Line and the redevelopment of the Broadgate Estate by promoting a range of initiatives. We particularly endorse supporting additional retail provision in the Moorgate/Liverpool Street Principal Shopping Centre and encouraging the extension of retail and leisure activities into the evenings and weekends and improving the safety and capacity of pedestrian routes around Moorgate and Liverpool Street Elizabeth Line stations, and between the stations and key destinations, including Culture Mile and the City Cluster.

In addition, Policy S26 should be amended to include and promote the following development principle 'To deliver tall buildings on appropriate sites, including Regeneration Opportunity sites to optimise development'.

Under Policy S26, references are made to enhancing the Highwalk network around the City. This aspect of the policy should be amended as this may not be appropriate or feasible to do so on all sites and development opportunities. We suggest that Policy S26 should be amended to read 'enhancing links to the Highwalk network where appropriate' to provide more flexibility around this matter.

### Contact Name

### Contact Organisation

Endurance Land

### City Response

Policy does support the transport improvements of the Moorgate-Liverpool Street area

COL acknowledge the opportunity presented by the redevelopment of Broadgate

Policy supports retailing provision in this Key Area of Change.

### Recommendation

Change

### Recommendation Details

Strengthen policy text to support transport accessibility, improvements to Liverpool Street station and pedestrian routes and permeability.

Insert additional text re the refurbishment of Broadgate in policy.

Additional retail links extending towards Petticoat Lane Market



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

TfL is working collaboratively with the Corporation, British Land and Network Rail to redesign this area so people are prioritised over vehicles. While TfL is open to participating in the joint masterplanning process and understands significant changes are needed around Liverpool Street, we cannot support any loss of bus capacity in principle (i.e. fewer stops, stands, and driver facilities etc.)

### Contact Name

Chris Leong - Assistant Planner

### Contact Organisation

Transport for London - Spatial Planning

### City Response

Policy seeks public realm and transportation improvements.

### Recommendation

Change

### Recommendation\_Details

Strengthen policy text to support transport accessibility and improvements to Liverpool Street station

## Type of Comment

Object

### Comment

1. The specific wrap around Bishopsgate Institute on the graphic is obviously intentional but there is no reference to it in Strategic Policy S26. Why is the Grade II\* building included in a Key Area of Change, especially when the, soon to be closed, nearby unlisted Bishopsgate Police Station isn't?
2. There is no reference, anywhere to green public open spaces, and the absence of the same is noticeable.
3. All three markets – Petticoat Lane, Whitecross Street and Spitalfields are all outside the City. How CoLC will be able to “enhance the environment of” these, in particular needs explanation.

### Contact Name

Fred Rodgers

### Contact Organisation

### City Response





# City Plan 2036 Consultation Comments

It is acknowledged that there has been an omission with reference to Bishopsgate Institute.

The plan as a whole supports increased greenery through the urban greening factor and additional accessible open space.

The plan and policy encourages improvements to links with Petticoat Lane, part of which is in the City boundary.

## Recommendation

Change

## Recommendation Details

Amend boundary of the Key area of change to omit Bishopsgate Institute.

Additional bullet point to support deliver of high quality public realm with additional publicly accessible open space and increased greenery

Amend bullet point reference to the environment of Petticoat Lane and replace with public realm and walking and acknowledgement of partnership with London Borough of Tower Hamlets.

## Type of Comment

General

## Comment

Brick Lane is a major draw for tourists and London residents alike from the Liverpool Street area, and reference to Brick Lane as a destination could be made in Policy S26 in the bullet points referring to enhanced pedestrian routes, as well as the need to work with adjoining boroughs on the delivery of improved routes to locations outside of the City of London's boundaries. Reference to the City Fringe OAPF, which surrounds the Liverpool Street area on three sides, could also be included in the context paragraphs. This area also adjoins the Elder Street Conservation Area and the Spitalfields Neighbourhood Planning Area, and reference could be made to these designations in the context paragraphs or supporting text – both designations run along the eastern side of Bishopsgate and Norton Folgate, and developments on the western side may need to consider this context.

Suggested Changes:

- Include references to Brick Lane in Policy S26, bullets 6 and 7.
- Include references to the City Fringe OAPF, Elder Street Conservation Area, and Spitalfields Neighbourhood Forum in the context section for Policy S26.

## Contact Name

Marissa Ryan-Hernandez

## Contact Organisation

London Borough of Tower Hamlets

## City Response

The plan and policy encourages improvements to links with Petticoat Lane, part of which is in the City boundary and links to Spitalfields Market and fringes. Brick Lane is further removed from boundaries for the City Corporation to have influence over this environment. For this policy there is no need to refer to specific forums or conservation areas outside the City boundaries.

## Recommendation

Change



# City Plan 2036 Consultation Comments

## Recommendation\_Details

Amend bullet point reference to the environment of Petticoat Lane and replace with public realm and walking and acknowledgement of partnership with London Borough of Tower Hamlets.

### Type of Comment

General

### Comment

The area around the Broadgate Estate is identified as a Key Area of Change to be enhanced in the Plan, taking advantage of improvements in public transport accessibility brought by the opening of the Elizabeth Line. We are particularly interested to be kept updated with regards to office and retail development activity around Liverpool Street Station and Broadgate, and the Liverpool Street/Moorgate Principle Shopping Centre, particularly if the City wishes to promote intensification of business and employment in this area. The retail link on Bishopsgate adjoins the Hackney border. This approach is considered to complement the approach to retail set out in the draft Future Shoreditch AAP, which also defines key frontages along Bishopsgate/Shoreditch High Street for retail, culture, entertainment and leisure uses in recognition of the London Plan's designation of Shoreditch as a Central Activities Zone (CAZ) Specialist Cluster for arts, culture and entertainment uses. We would welcome clarification on what is meant by the term 'other retail uses' referenced in Policy R2: Retail Links.

### Contact Name

Natalie Broughton

### Contact Organisation

London Borough of Hackney

### City Response

The Policy encourages office space and additional retail provision in this Key Area of Change and acknowledges the proximity to other key destinations such as Tech City, Culture Mile and the City Cluster.

Other retail uses (than shops) within the Use Classes Order would be A2 Professional services like banks; A3 food and drink; A4 drinking establishments or A5 hot food and takeaways.

### Recommendation

No Change

## Recommendation\_Details

### Paragraph

Figure 33 and 7.9.2, 7.9.4, 7.9.5

### Type of Comment

General

### Comment

# City Plan 2036 Consultation Comments

Suggest amendments to Figure 33 (Liverpool Street Key Area of Change):

Red arrows (key pedestrian routes/potential improvements) should be added to Liverpool Street (East and West) and Sun Street Passage to west of Liverpool Street Station. Red arrow running north from Eldon Street to be aligned with submitted proposals for 1-2 Broadgate.

At end of paragraph 7.9.2, add reference to "delivery of improvements to the surrounding public realm."

Suggest various minor amendments to paragraph 7.9.4, including referring to the Broadgate Campus rather than Estate, and rephrasing the final sentence to read: "The Broadgate Campus is currently being transformed into a world class, mixed use, seven-day, central London destination including improvements to public realm and pedestrian permeability."

Add reference to Tech City as a key destination at the end of paragraph 7.9.5.

Contact Name

Contact Organisation

British Land Company PLC

City Response

COL occur that additional pedestrian linkages would better demonstrate movements in this key area of growth. COL acknowledge the importance of a high quality public realm within Liverpool Street KAOC.

COL acknowledge the opportunity presented by the redevelopment of Broadgate

Policy implies support of key destinations surrounding Liverpool Street KAOC

Recommendation

Change

Recommendation\_Details

Amend illustrations on key diagram re pedestrian linkages and insert additional bullet point in policy to support delivery of a high quality public realm.

Insert additional text re the refurbishment of Broadgate in policy

Strengthen policy text to specifically refer to Tech City.

# City Plan 2036 Consultation Comments

## Strategic Policy

## Strategic Policy S27: Planning Contributions

### Policy Number

### Paragraph

### Type of Comment

General

### Comment

This Policy requires updating to reflect the introduction of MCIL2 which will be in place by the time the City Plan is adopted. As worded, the policy suggests that additional contributions over and above CIL will be required towards Crossrail which will not be the case following the introduction of MCIL2.

### Contact Name

### Contact Organisation

British Land Company PLC

### City Response

### Recommendation

### Recommendation Details

### Type of Comment

General

### Comment

We suggest policy amendments 'requiring s106 planning obligations where appropriate, having regard to the impact of the obligation on the viability of development'.

### Contact Name

### Contact Organisation

Endurance Land

### City Response

### Recommendation

### Recommendation Details



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

For the avoidance of doubt, the CPA would like to see part 3 specifically relate to Mayoral CIL2 which will have been adopted and will take effect from April 2019. As currently drafted the policy lacks clarity and suggests additional contributions may be required in respect of Crossrail, which is not the case by reference to the London Plan. Part 3 of the policy should accordingly be deleted.

### Contact Name

Charles Begley

### Contact Organisation

City Property Association (CPA)

### City Response

### Recommendation

### Recommendation Details

## Type of Comment

General

### Comment

Unlike other transport mitigation, additional bus capacity is not classed as infrastructure and therefore not covered by local CIL. It would be helpful if it could be specified in part 2 (recognising that it is also subject to the three tests).

On 1 April 2019, Mayoral CIL 2 (MCIL2) will supersede the current MCIL and the associated planning obligation/section 106 scheme applied to Central London and other areas. The reference in the policy and text should be altered accordingly.

### Contact Name

Chris Leong - Assistant Planner

### Contact Organisation

Transport for London - Spatial Planning

### City Response

### Recommendation

### Recommendation Details

## Paragraph

8.1.2

# City Plan 2036 Consultation Comments

## Comment

FSB notes that the draft Plan identifies a need for investment in new infrastructure and new facilities to support development.

## Contact Name

Sarah King

## Contact Organisation

Federation of Small Businesses

## City Response

## Recommendation

## Recommendation\_Details

## Policy Number

PC1

## Paragraph

## Type of Comment

General

## Comment

Part 2 of the policy addresses proposals that are potentially “not compliant” or that are “non-compliant”. By reference to the national Planning Practice Guidance, it is clear that any proposals that fall short of a policy target are not “non-compliant”, and national policy allows for such circumstances. Accordingly, it is considered that part 2 of draft policy PC1 should be updated and reworded to make reference to proposals falling short of policy targets or objectives.

## Contact Name

Charles Begley

## Contact Organisation

City Property Association (CPA)

## City Response

## Recommendation

## Recommendation\_Details

## Type of Comment

General



# City Plan 2036 Consultation Comments

## Comment

Schemes in the City have extraordinary gestation period and equally protracted implementation times. Some schemes span entire economic cycles. Wisely the City has provision in the Plan for reviewing developer contributions to make sure up swings in the economy do not leave the City short changed in receipts. However, there appears to be no counter measures for developers putting forward applications that reduce net planning obligations during economic down turns. The Diocese has observed this elsewhere in the capital and would like to see measures to protect the City occupiers from similar circumstances in the Square Mile. In short it is believed recipients of planning gain packages or CIL contributions should be signatories to the documentation and therefore any subsequent change process. The Diocese would like to see wording that provides greater resilience on this before it is tested by the next economic down turn.

## Contact Name

Fr Luke Miller

## Contact Organisation

Diocese of London

## City Response

## Recommendation

## Recommendation Details

## Type of Comment

Support

## Comment

We welcome this policy.

## Contact Name

Jane Smith

## Contact Organisation

Barbican Association

## City Response

## Recommendation

## Recommendation Details



# City Plan 2036 Consultation Comments

## Strategic Policy

## Other Comments

### Policy Number

### Paragraph

### Type of Comment

General

### Comment

1. To show that The City is taking the environment seriously and really intends to put “Greening the Grey” at the heart of all its policies, I would like to suggest a change of name for the “Department of The Built Environment,” to “Department of the Built and Green Environment.” This would start to level the playing field in hearts and minds and give “greening” in all its forms, at least an equivalent status to “building,” which has undoubtedly been the past priority.
2. Another step The City could take, which would also help to facilitate its stated intention of “Shaping Outstanding Environments,” would be to immediately move the current Manager of its Parks and Gardens and his team into the same physical location as the “Dept of The Built and Green Environment.” It is inexplicable that at a point of so much change as advocated by The Plan, this Manager and his team are not at the heart of the Department, where they could work more closely to deliver the benefits The City desires for its businesses, visitors and residents.
3. A further step must be The City’s whole-hearted endorsement of London as A National Park City. It is interesting to note that only two Wards have declared their support, these being Portsoken and Vintry – a position which hardly underlines The City’s commitment to the environment as stated in The Draft Local Plan. The City must take a leading role in this venture. This commitment should be included within the Local Plan.
4. The City must not rely solely on its property developers to fulfil the “greening role,” as the lead for this must be taken by The City and it needs to set an example in the care and enhancement of its Pocket Parks and other existing green spaces. The City must therefore be held to account and I look forward to contributing to a review of the Biodiversity Action Plan, which must lie across all departments and also seeing the appointment of an independent Ecology Officer to ensure this is the case.

### Contact Name

Allison Parkes

### Contact Organisation

### City Response

### Recommendation

### Recommendation Details





# City Plan 2036 Consultation Comments

## Type of Comment

Support

### Comment

Generally think the City of London has done a lot to make the City more liveable / enjoyable.

### Contact Name

Carol Van Der Vorst

### Contact Organisation

### City Response

Comment noted.

### Recommendation

No Change

### Recommendation Details

## Type of Comment

General

### Comment

We are pleased that the CoL has asked for comment on CP2036. The current Plan is a starting point and will presumably be developed over time. It would be sensible if residents were kept informed and had an ongoing forum to contribute to the plan's development. You may wish to consider setting up a consultative body involving, but not limited to, City Officers, the CoL Police and residents to ensure that all parties are aware of residents' concerns and can be kept up to speed with developments.

### Contact Name

Dr Alexander Wilson

### Contact Organisation

Shakespeare Tower House Group

### City Response

Comments noted. There are already regular meetings between the City Corporation planning service and the Barbican Association. The City Corporation will continue to engage with the Association and other residents groups across the City as the Local Plan develops and is happy to meet with residents groups within or outside of the formal consultation processes.

### Recommendation

No Change

### Recommendation Details



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

There seems to be no track of policy to bring about localism activities at all within your boundaries. Is this because the residents are not encouraged to take local action? No Assets of Community Value, no Right to Build, no Neighbourhood Planning show up on your web site.

### Contact Name

Elizabeth Wrigley

### Contact Organisation

Core Connections

### City Response

### Recommendation

### Recommendation Details

## Type of Comment

General

### Comment

Monitoring and implementation

The last Biodiversity Audit was carried out in 2012 and given the fast pace of change within the City, to have had no review shows a lack of commitment. It is essential that adequate resources are provided, including the involvement of property owners.

We propose the appointment of an Ecology Officer who would have responsibility for carrying out a regular Open Space Audit and should be independently enforcing the implementation of approved biodiversity and greening proposals. Far too many parts of the City have been expected to support thriving trees and other plantings but the necessary care and attention, especially sufficient irrigation, has been woefully inadequate. An example of this are the dying panels of ivy on the vertical walls of the high walks near and above St Alphage Gardens. Developers and building owners must be held responsible if there is a lack of care and attention regarding greening. The CoLC should not be approving inappropriate plantings and acquiescing in the removal of thriving trees.

The City has a duty to lead in making the City of London a greener place where it is more pleasant to live and work. In particular the intentions to improve the public realm, improve air quality, enhance biodiversity, create new open spaces, and improve the quality of existing spaces are laudable aims but there is no point in the Plan's good and welcome intentions unless these are both implemented and, more importantly, enforced. We believe these to be essential objectives if the City is going to continue to compete on the world stage as a place where people want to live and work.

### Contact Name

Joanna Rodgers

### Contact Organisation

Barbican Wildlife Group



# City Plan 2036 Consultation Comments

## City Response

### Recommendation

#### Recommendation\_Details

#### Type of Comment

General

#### Comment

Are there any unused underground spaces that could be put to beneficial uses? A good example of such uses is the underground farm in Clapham which has vegetable gardens and is being used for commercial food production.

#### Contact Name

John Sgouros

#### Contact Organisation

### City Response

### Recommendation

#### Recommendation\_Details

#### Type of Comment

General

#### Comment

Why are all the consultation sessions bar one 12-2pm when many City residents will be unable to attend due to work commitments.

#### Contact Name

Natasha Curran

#### Contact Organisation

### City Response

An email reply to this comment was sent which pointed out additional consultation events taking place at other times, including early evenings.

### Recommendation

No Change

#### Recommendation\_Details

# City Plan 2036 Consultation Comments

## Type of Comment

Object

### Comment

Better consultation practises are required. Why invite people to a public consultation and refer them to a website and document? Lazy and ill considered. Need to take account of 'The UK's Changing Democracy: The 2018 Democratic Audit'. www.democraticaudit.com

### Contact Name

### Contact Organisation

Respondent (no details provided)

### City Response

Comment noted. The City Corporation is continually looking for new and improved ways to consult and engage and will bear in mind any comments and suggestions for future consultations.

### Recommendation

No Change

### Recommendation\_Details

## Type of Comment

General

### Comment

Many residents are very keen to play a positive and constructive role and hope that this new plan will usher in a period of cooperation between COLC and residents. It is important, moving forward, that the CoLC and its Committees are honestly seen to be making decisions in the interests of all parties, not just those of business and developers. It is all very well to have a Local Plan with ambitious objectives and policies, but it is the "on the ground" decision-making that will determine whether there is meaningful change.

### Contact Name

### Contact Organisation

Ruth Cooke-Yarborough

### City Response

Comment noted. The City Corporation also looks forward to ongoing liaison and co-operation with residents, as well as with workers, businesses and residents. It is acknowledged that the policies in the Local Plan need to be implemented in decision-taking to be fully effective.

### Recommendation

No Change

### Recommendation\_Details



# City Plan 2036 Consultation Comments

## Comment

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England have no comments to make on this consultation.

## Contact Name

Sharon Jenkins

## Contact Organisation

Natural England

## City Response

Noted.

## Recommendation

No Change

## Recommendation Details

## Policy Number

Glossary

## Paragraph

## Type of Comment

General

## Comment

The Diocese proposes that the glossary wording explaining "Heritage and Cultural Experience" is extended to read: "any activity which encourages the use and access to and appreciation of buildings, spaces and other heritage assets that are of architectural, cultural or historic importance".

This should be coupled with an enhancement of the definition of a "Culturally Significant Object" so that it includes places: "Objects and places which people identify and value..." This allows both objects and places associated with beliefs and traditions to be included in the policy.

## Contact Name

Fr Luke Miller

## Contact Organisation

Diocese of London

## City Response

## Recommendation



# City Plan 2036 Consultation Comments

## Recommendation Details

### Policy Number

New policy

### Paragraph

### Type of Comment

General

### Comment

Policies R4 and C1 are drafted to provide generic guidance in respect of a range of specialist retail uses, not solely the Silver Vaults (SV), so it is not possible/appropriate to specifically tailor their wording to exactly that which we consider is required in respect of the SV.

Therefore, in addition to proposing some tightening of the wording of R4 and C1, it is proposed that a separate Special Policy Area for the Chancery Lane SV be added to the plan in a similar fashion to those contained within the Westminster City Plan protecting specialist uses such as Saville Row and Harley Street. The Westminster Plan explains it is necessary to provide specific protection for the unique clusters of specialist uses which are central to London's character and ensure these clusters are not eroded by pressure from other uses. The same principles and justification clearly apply in respect of the SV, which is recognised as an important element of the character of the City. The history, cultural and economic benefits of the SV are highlighted in an attached paper. The City's Chancery Lane Conservation Area Appraisal already recognises the value of the SV and states that the use makes a 'notable contribution to the life of the area'.

Based on the general Westminster approach, the following is our suggested wording:

'Policy XX London Silver Vaults Special Policy Area

1. Development in the London Silver Vaults Special Policy Area will complement and enhance its role as an international centre for excellence for the trading and sale of silver. (For the purposes of this policy silver shall be taken to include silver and gold associated products and services).
2. Existing specialist silver retail uses will be protected.
3. New silver uses will be allowed at lower ground and ground floor levels, and will be secured by legal agreements.
4. New specialist A1 retail will only be permitted within the vaults and at lower ground and also at ground floor level, subject to the following criteria, to be secured by legal agreement where appropriate:
  - a) No silver uses being lost;
  - b) each retail unit being no larger than 300sqm;
  - c) the retail use should sell bespoke, unique, limited edition or one of a kind products; and
  - d) the retail function should be complementary to the character and function of the Special Policy Area.
5. Land use swaps will only be acceptable within the Special Policy Area where other criteria within this policy are met, and where:
  - a) there is no net loss of silver uses, outside of necessary minor alterations to facilitate the land use swap; and
  - b) the accommodation offered provides higher quality or larger silver retail space.



# City Plan 2036 Consultation Comments

6. New residential use is not generally appropriate within the Special Policy Area and will not be permitted at lower ground floor or ground floor levels.

Suggest that the SV site is highlighted on the Policies Map.

Contact Name

Contact Organisation

London Silver Vaults

City Response

Noted. The Silver Vaults (SVs) are recognised in Policy R4, paragraph 5.2.25 for as a specialist retail uses along with the Royal Exchange as uses which contribute to the City's visitor economy, its cultural distinctiveness and should be retained and promoted. Although the SVs are unique other sites in the City due to their historic context could also be classified as such. Although the SVs should be recognised as a specialist retail use in the City of London it should not be given the same status as City of Westminster's Saville Row mainly due to the location (underground) and it is not recognised on the same scale internationally. However, we recognise that the occupiers of the SVs are specialist traders who operate in a similar way to the tailors of Saville Row.

Recommendation

No Change

Recommendation\_Details

**Policy Number**

Sections 6.2 - 6.8

**Paragraph**

**Type of Comment**

General

**Comment**

The well-being of our environment is all important and must be the pre-condition of any planning application. My manifest criticism of CoLC's Department of the Built Environment (DBE), both in my responses to the plan and elsewhere, aside, CoLC's Court of Common Council needs to adopt an environmental pre-condition policy on a zero-tolerance basis.

An amalgamation of the greater part of DBE, the Parks and Gardens Division of Open Spaces and the Environmental Health section of the Port Health and Public Protection Division of the Markets and Consumer Protection Department into a Department for the Environment, where that pre-condition was the manta would be preferable but probably cause too much empire breaking.

Even if the three departments were to be housed in the same building, that would be progress and, whether or not any quick progress was to be made in an amalgamation, there should be a joined-up IT system which enabled the use of emails to be replaced by direct online comment. Officers in the various



# City Plan 2036 Consultation Comments

departments should be able to view planning applications online together, discuss issues and post comments. Applicants and affected could even join in on those real time discussions not only to inform consideration but to make the process pro-active and shorter.

Contact Name

Contact Organisation

Fred Rodgers

City Response

Recommendation

Recommendation\_Details



# City Plan 2036 Consultation Comments

## Strategic Policy

## Vision and Strategic Objectives

### Policy Number

### Paragraph

### Type of Comment

Support

### Comment

City Rivergate's vision is to deliver a similar step change to the northern riverbank of the Pool of London as has occurred on the South Bank in recent years, and accordingly they support the three strategic aims which underpin the draft City Plan and recognise the importance of maintaining and continuing to grow London; promoting its world city status, its culture, and its focus for tourism. With current regeneration projects in London including Battersea Power Station, Brent Cross, the continuous redevelopment of London's South Bank, and major development of the City's infrastructure including the expansion of Heathrow Airport and Crossrail, it is fundamental that the City of London continues to grow and develop.

### Contact Name

### Contact Organisation

City Rivergate Ltd

### City Response

### Recommendation

### Recommendation Details

### Type of Comment

### Comment

There are too many competing issues in the City, i.e. encouraging development but reducing pollution and providing more greenery.

### Contact Name

### Contact Organisation

Hamish Robertson

### City Response



# City Plan 2036 Consultation Comments

## Recommendation

### Recommendation\_Details

#### Type of Comment

Support

#### Comment

The PLA supports the draft City Plan vision, which anticipates that the use of the River Thames by commuters and for freight and servicing will significantly increase as the Thames becomes a major corridor for the movement of people and the transport of materials including construction materials, waste, freight and general goods. This aligns with the PLA's Thames Vision which includes specific goals to increase the use of the River Thames for both passengers and freight by 2035. The PLA welcomes the reference to the Thames Vision as an evidence base document for policy S17 (Thames Policy Area) and also the specific references in the draft City Plan vision to the continued safeguarding of Walbrook Wharf in line with the extant Direction and London Plan.

#### Contact Name

Michael Atkins

#### Contact Organisation

Port of London Authority

#### City Response

## Recommendation

### Recommendation\_Details

#### Type of Comment

Support

#### Comment

I support the City's 10 key proposals since I think that they'll have a positive and big impact on improving the walking environment and pedestrian experience and tackling climate change.

#### Contact Name

Patrik Ewe

#### Contact Organisation

#### City Response

Comment noted.

## Recommendation

No Change

# City Plan 2036 Consultation Comments

## Recommendation\_Details

### Type of Comment

General

### Comment

Concerned about impacts on residential amenity from the additional pedestrians and vehicles generated by the growth in workers and visitors envisaged in the Plan.

### Contact Name

Resident (no name provided)

### Contact Organisation

### City Response

Comment noted. Policies in the Plan seek to protect residential amenity.

### Recommendation

No Change

## Recommendation\_Details

### Type of Comment

Support

### Comment

The direction of the Draft Local Plan, in encouraging urban greening and improved public realm and cycle routes, is welcome - both for City workers and residents, and because of the symbolic importance of iconic City buildings and spaces. There are some excellent recent examples like Aldgate Square, Trinity Square Gardens and the roof garden on 10 Fenchurch St, and I'd like to see public realm and green space improvements become the norm in large developments.

### Contact Name

Rob Yuille

### Contact Organisation

### City Response

### Recommendation

## Recommendation\_Details

### Type of Comment

Support



# City Plan 2036 Consultation Comments

## Comment

We are committed to London, and the City in particular. We own and manage buildings such as One New Change, Dashwood House, 1&2 New Ludgate and 155 Moorgate. We are also delivering Deutsche Bank's new headquarters at 21 Moorfields, constructed over Moorgate station.

The vision for your draft City Plan 2036, to contribute to a flourishing society, to support a thriving economy and to shape outstanding environments, align perfectly with our philosophy and we fully support this vision.

As we enter a new programme of property development within London, with 21 Moorfields our first development of this new programme to start on site, we are focused on many of the issues that are set out in your Draft City Plan. Health and wellbeing is becoming increasingly important to our customers and to the communities that we serve. Providing the right mix of retail and office space to create a place where people want to spend time is going to be critical in future. And enhancing the public realm within and around our developments alongside world class architecture will ensure the City continues to thrive as a global destination for business.

## Contact Name

Ross Sayers

## Contact Organisation

Landsec

## City Response

## Recommendation

## Recommendation Details

## Paragraph

3.1

## Type of Comment

General

## Comment

Contribute to a flourishing society

The CPA fully supports the intentions of these policies in principle which seek to create a more positive environment for residents and workers within the Square Mile. The CPA have made some suggestions to details within the policies to ensure they remain sufficiently flexible and appropriate for development within the Square Mile.

It is considered that the thresholds within the relevant policies for Health Impact, Air Quality Impact, Security Risk Assessments and Dispersal Management Statements need to be revised to ensure the need for these documents is proportionate and necessary to development, of which a large portion within the Square Mile falls under the "major development" category. The CPA also seek additional clarification in relation to public and private social/community and sport and



# City Plan 2036 Consultation Comments

recreation uses to ensure that the policy is effective.

Contact Name

Charles Begley

Contact Organisation

City Property Association (CPA)

City Response

Recommendation

Recommendation\_Details

Paragraph

3.1.1-3.1.3; 3.1.8

Type of Comment

Support

Comment

The Diocese believes the opening three paragraphs and concluding paragraph of this section largely captures the laudable aspirations of The Corporation of London as a whole. The Diocese is pleased to support from the outset the direction of travel proposed.

Contact Name

Fr Luke Miller

Contact Organisation

Diocese of London

City Response

Recommendation

Recommendation\_Details

Paragraph

3.1.2

Type of Comment

General

Comment

Would like to see the word 'green' inserted before open. It is not good enough for good health to have open space if it is sterile, hard landscaping.

Contact Name

Contact Organisation

# City Plan 2036 Consultation Comments

Sarah Hudson

Friends of City Gardens

[City Response](#)

[Recommendation](#)

[Recommendation Details](#)

[Paragraph](#)

3.1.4

[Type of Comment](#)

Support

[Comment](#)

We support the need for affordable housing (including social housing) in the City (3.1.4).

[Contact Name](#)

[Contact Organisation](#)

Jane Smith

Barbican Association

[City Response](#)

Support noted.

[Recommendation](#)

No Change

[Recommendation Details](#)

[Paragraph](#)

3.1.4; 3.1.6

[Type of Comment](#)

General

[Comment](#)

We do not think that good design and good management (3.1.6) on their own are enough to reduce the potential for anti-social behaviour and adverse impacts on residents in mixed used areas. We therefore support the concept of identifying and strengthening residential areas and keeping housing out of commercial zones (3.1.4)

[Contact Name](#)

[Contact Organisation](#)



# City Plan 2036 Consultation Comments

Jane Smith

Barbican Association

[City Response](#)

[Recommendation](#)

[Recommendation\\_Details](#)

[Paragraph](#)

3.1.6

[Type of Comment](#)

Object

[Comment](#)

This is plain wrong. Spatial planning has a crucial role in reducing the impact of night time entertainment on residents. Not all impacts can be mitigated sufficiently by good design and management. Experience shows that these will be enough in many cases, but there are some situations where the only satisfactory solution, for operators as well as residents, is to refuse planning permission for night time entertainment venues in close proximity to residential areas. The alternative can be a lengthy (the case I was involved in took five years) and expensive (in my case, licence review, appeal and judicial review) process for all parties.

The wording of the vision here should reflect policy H3.

Perhaps: "New noise-generating uses will be sited away from residential uses where possible. Good building design and effective management of night time entertainment, combined with a broad mix of uses, will reduce the potential for anti-social behaviour, adverse impacts on residents and help to maintain residential amenity."

[Contact Name](#)

[Contact Organisation](#)

David Coleman

[City Response](#)

[Recommendation](#)

[Recommendation\\_Details](#)

[Paragraph](#)

3.2

[Type of Comment](#)

General

# City Plan 2036 Consultation Comments

## Comment

Support a thriving economy

The continued success and dominance of the Square Mile as a world centre for commerce is fully supported by the CPA. As working patterns change and market demands adapt, the built environment and the planning system will need to be responsive.

The CPA recognise that offices will continue to be the primary use within the Square Mile, and have recommended some changes to policies to ensure that flexibility is provided for decision making. A viability based approach to a loss of offices is preferred by the CPA as opposed to a marketing led approach, which should be part of a wider case to be made on a site-by-site basis.

It is considered that the policies around retailing, visitor infrastructure, cultural and night time uses could be better integrated to take account of the changing role of shopping to ensure that the City can evolve into a 7-day a week retail, leisure and cultural destination. The CPA believes that the proposed approach to new hotels is too restrictive and greater flexibility is necessary.

## Contact Name

Charles Begley

## Contact Organisation

City Property Association (CPA)

## City Response

## Recommendation

## Recommendation Details

## Paragraph

3.2.1

## Type of Comment

General

## Comment

No mention is made of the thousands of small businesses that create the majority of jobs in the city and the importance of that work and income to households and in holding communities together. It's not glamorous like financial or creative industries but is essential to the stability and well-being of the majority of ordinary people. Part of supporting this critical network is to ensure that suitable small commercial / light industrial spaces are available at sensible prices. Please do not focus on office space.

## Contact Name

Angela Pingram

## Contact Organisation





# City Plan 2036 Consultation Comments

## City Response

### Recommendation

#### Recommendation\_Details

#### Paragraph

3.2.3

#### Type of Comment

Support

#### Comment

British Land strongly support the City's vision to be open to new businesses, new ideas and new ways of working by creating adaptable and flexible office workspace for a range of occupiers and providing complementary commercial, cultural and leisure uses, as stated at paragraph 3.2.3. This is aligned with British Land's vision to turn Broadgate into a world-class mixed use, 7 day a week destination. British Land also strongly support increasing the quality and quantity of retail facilities, especially within Liverpool Street and Moorgate Principal Shopping Centre, to create an evening and 7 day a week destination.

#### Contact Name

#### Contact Organisation

British Land Company PLC

## City Response

### Recommendation

#### Recommendation\_Details

#### Type of Comment

General

#### Comment

We value the recognition of the essential role that SMEs play in the City's success. These businesses are attracted by the prestige, dynamism, and the opportunities it has on offer. There is an urgent and real need to supply high quality office accommodation, with floorspace that is flexible and adaptable, to meet the demands of different types of business occupiers. Essential here too, as noted, is that office space will be complemented by other commercial, cultural and leisure uses adding vibrancy and animation to the City's streets.

#### Suggested Amendments

We propose a change to the definition of major development, which in turn triggers many of the draft policies within the Plan, as the current threshold of 1000



# City Plan 2036 Consultation Comments

sqm may impact on the viability of smaller schemes that sit within this definition of a major development. In addition, in reviewing the threshold levels, we would suggest the City consider incentives for smaller (say sub 5000 sqm schemes) making measurable contributions towards the objectives these policies set out to achieve.

## Contact Name

Dr Sophie V Taysom

## Contact Organisation

Merchant Land

## City Response

## Recommendation

## Recommendation Details

## Type of Comment

General

## Comment

We welcome the emphasis on flexible adaptable office designs (3.2.3). The current habit of rebuilding offices every 25 years is wasteful and unsustainable (as recognised in Policy CEW1), and it contributes (through the number of construction sites) to much of the unpleasantness of the City's streets.

How robust is this plan to changes in the forecasts for the growth of the economy, the workforce, and the need for office and retail space?

## Contact Name

Jane Smith

## Contact Organisation

Barbican Association

## City Response

## Recommendation

## Recommendation Details

## Paragraph

3.2.5

## Type of Comment

Support

## Comment



# City Plan 2036 Consultation Comments

I am pleased to see, and strongly support, the removal of references to 24/7 night time entertainment in the vision. The formulation "evening and 7-day a week" is right.

Contact Name

David Coleman

Contact Organisation

City Response

Comment noted.

Recommendation

No Change

Recommendation\_Details

Paragraph

3.3

Type of Comment

General

Comment

Shape outstanding environments

The CPA agree that the City must remain a place of world class architecture and public realm. While the approach is broadly supported, there are concerns in relation to the feasibility of creating internal pedestrian routes within sites, and the use of a blanket urban greening factor, zero waste and other sustainability requirements when taken together. While we should absolutely strive towards all of these goals, it is considered that within the context of the Square Mile that a more flexible approach is needed at a detailed policy level to ensure that development viability is not prejudiced.

Contact Name

Charles Begley

Contact Organisation

City Property Association (CPA)

City Response

Recommendation

Recommendation\_Details

Paragraph

3.3.10

# City Plan 2036 Consultation Comments

## Type of Comment

Support

## Comment

Support initiatives to include SUDS in both public realm and commercial developments.

## Contact Name

Sarah Hudson

## Contact Organisation

Friends of City Gardens

## City Response

## Recommendation

## Recommendation\_Details

## Paragraph

3.3.11

## Type of Comment

Support

## Comment

Support the objective to make the City a Zero Waste City.

## Contact Name

Sarah Hudson

## Contact Organisation

Friends of City Gardens

## City Response

## Recommendation

## Recommendation\_Details

## Paragraph

3.3.5

## Type of Comment

Object

## Comment



# City Plan 2036 Consultation Comments

The vision for this section, includes a statement (paragraph 3.3.5) that "...Further tall buildings will be encouraged where they can make a positive contribution to their surroundings and the skyline, adding to the tall buildings cluster in the east of the City". Taken with subsequent objectives for the eastern cluster and tall buildings generally, this statement is of considerable concern to Historic Royal Palaces, because of the potentially damaging visual effect inappropriately located tall buildings could have on the setting of the WHS and its OUV. High-quality design, 'world class architecture' as it is described, can do little to mitigate the impact of very tall buildings in the wrong place. We would ask that this statement is qualified to make clear that the potential cumulative impact of 'adding to the tall building cluster' on the setting of the WHS must be taken into account when such development is proposed.

## Contact Name

Adrian Phillips

## Contact Organisation

Historic Royal Palaces

## City Response

## Recommendation

## Recommendation\_Details

## Paragraph

3.3.5-3.3.6

## Type of Comment

Support

## Comment

Strongly support the vision of the City Corporation and the strategic policies within the Plan. A dynamic, modern international business and multi-faceted district within the Square Mile with a 24/7 vibe aspiring to be the 21st Century Financial Centre leading the post Brexit London is something that is supported. Both individually and cumulatively the sites at 55 and 70 Gracechurch Street have the potential to contribute to the City's vision. Tenacity is also supportive of the visions for the Key Areas of Change, particularly in view of the proximity of both sites to the traditional definition of the City Cluster, and also to Aldgate and the Tower, and the Pool of London together with the other related strategies to secure transformational public realm enhancements. Tenacity also particularly welcome the City's intention to 'Shape Outstanding Environments' through world class architecture, including both high quality public realm and additions to the Eastern Cluster of tall buildings. These should make a positive contribution to their surroundings and the skyline (para 3.3.5), while maximising opportunities to conserve and enhance the significance of the archaeological and architectural heritage, adding to the rich character of the City (para 3.3.6).

## Contact Name

## Contact Organisation

Tenacity

## City Response

## Recommendation



# City Plan 2036 Consultation Comments

## Recommendation Details

Paragraph 3.3.6

Type of Comment General

### Comment

Although not in the league of the Tower and St Paul's, the Barbican is an enormous listed complex and Conservation Area making a major contribution to the character of the City. It is essential that its setting is respected and it should be added here.

### Contact Name

David Coleman

### Contact Organisation

### City Response

### Recommendation

## Recommendation Details

Type of Comment Object

### Comment

This paragraph as set out suggests that all historic buildings are capable of re-purposing, and takes no account of their sensitivity to change, the type of use that this might involve or the effects on their significance.

Suggested change - 'Historic buildings will be sympathetically adapted to new uses where this is appropriate, enabling them .....

### Contact Name

Tim Brennan

### Contact Organisation

Historic England

### City Response

### Recommendation

## Recommendation Details

# City Plan 2036 Consultation Comments

Paragraph 3.3.9

Type of Comment Support

Comment

"The City will be a much greener place...."; "Biodiversity will be increased by the inclusion of wildlife-friendly features in new and existing open spaces and buildings". I support this objective 100%.

Contact Name

Barbara Brownlee

Contact Organisation

City Response

Recommendation

Recommendation\_Details

Type of Comment Support

Comment

Support the objective to make the City a much greener place.

Contact Name

Sarah Hudson

Contact Organisation

Friends of City Gardens

City Response

Recommendation

Recommendation\_Details

Paragraph 3.3; 3.3.6

Type of Comment General

# City Plan 2036 Consultation Comments

## Comment

We see nothing in this plan that will ensure that the built environment will be “outstanding.” Current new development in the City varies from the outstanding, through interesting, dull, to truly ugly and disproportioned – and there is no attempt to ensure that new buildings respect the architecture of those around them. The existing buildings surrounding the Tower of London are a good example of the results of a laissez faire approach to development. We suggest that the City should have a design panel to help ensure outstanding new building.

We would like to see mention of the City’s 20th century heritage in 3.3.6 – ie “The City’s rich architectural and archaeological heritage (including its twentieth century heritage) will continue to be conserved and enhanced.” As the Barbican is a large development of note, with a specific purpose, it might be mentioned too as an area whose setting should be respected, along with that of St Paul’s and the Tower of London.

## Contact Name

Jane Smith

## Contact Organisation

Barbican Association

## City Response

## Recommendation

## Recommendation Details

## Paragraph

3.4

## Type of Comment

General

## Comment

Key areas of change

The CPA welcome the aspirations for these key areas and welcome their identification as important areas for growth. The introduction of the Cultural Mile is strongly supported. The CPA consider that there is further scope for an enlarged City Cluster and that the Corporation should be more ambitious to ensure that the development of tall buildings is not constrained. It is important that the City Cluster is understood as a notional zone and that tall buildings beyond the identified zone may be appropriate.

## Contact Name

Charles Begley

## Contact Organisation

City Property Association (CPA)

## City Response





# City Plan 2036 Consultation Comments

## Recommendation

### Recommendation Details

#### Paragraph

3.4.1

#### Type of Comment

General

#### Comment

"Evening and night-time activities will expand and will be well-managed to protect residential amenity". I hope the influx of visitors and associated activities/behaviour will be well managed as I am concerned about more visitors and increased likelihood of anti-social behaviour. Careful thought needs to be given to new facilities at Smithfield to enhance rather than detract from the local community.

#### Contact Name

Barbara Brownlee

#### Contact Organisation

#### City Response

## Recommendation

### Recommendation Details

#### Type of Comment

General

#### Comment

I broadly support the proposals for the Culture Mile. However when it comes to night time entertainment, there is a serious spatial planning issue concerning concentration. LB Islington has designated the area North of Chiswell St the "Bunhill Cumulative Impact Area", reflecting the significant increase in late night licensed premises over the last 10 years and the expected growth in this sector which needs to be carefully managed to avoid conflicts with residents. This surely also applies to the City side of the road?

Clustered around the base of Cromwell Tower are 16 licensed venues, subject to 8 premises licenses issued by two licensing authorities. Several venues operate to 2am and one is licensed to 4am. Interactions between departing guests are common.

This section and the policies in section 7.8 should:

- recognise the intense concentration of night-time entertainment venues in this part of the Culture Mile;
- give planning permission/change of use for new venues only in the most exceptional circumstances;



# City Plan 2036 Consultation Comments

- commit to working jointly with LB Islington on planning, licensing, management and mitigation.

Contact Name

Contact Organisation

David Coleman

City Response

Policy SB1 recognises the impacts that the night-time economy can have on residents and businesses, and seeks to minimise these effects in the Culture Mile area. A new paragraph has been added to the Plan which recognises the potential conflicts in the Culture Mile area.

" The London Borough of Islington has designated the Clerkenwell and Farringdon area as a Cultural Quarter, where development of cultural and creative uses should be focused. It also proposes introducing a new Local Shopping Area extending from Farringdon Station to Smithfield Market along Cowcross Street, which will support development of retail and food, drink and entertainment uses. While these initiatives will complement the Culture Mile, cross-boundary impacts may arise from cultural and night-time economy uses on either side of the boundary between the City and Islington. Proposals for such uses in Culture Mile will be expected to mitigate any cross-boundary impacts as well as any impacts on City residents and businesses".

Recommendation

No Change

Recommendation\_Details

Type of Comment

General

Comment

Smithfield and Barbican

The change in this area results from two stimuli – Crossrail and the Culture Mile. However, the Culture Mile remains ill defined (and much of it is activity within buildings), and with the opening of Crossrail and the closure of Smithfield market there is a risk of more office development. Without a defined future use Smithfield market itself may end up as offices. We would like to see an assessment made of the options for the use of Smithfield Market, and we make a suggestion for a use for Smithfield market that would fit with the Culture Mile under Strategic Policy S25.

We remain concerned, however, at the potential for conflict between the aspirations for the Culture Mile – more visitors, more evening and night time activities – and we are sceptical about relying on good management to resolve this conflict.

Contact Name

Contact Organisation

Jane Smith

Barbican Association

City Response

Recommendation

# City Plan 2036 Consultation Comments

## Recommendation\_Details

### Type of Comment

Support

### Comment

“...the Beech Street/Long Lane axis will be the focus for a variety of shops and restaurants...” We welcome proactive encouragement of new retail and F&B offers along what is referred to in the Culture Mile Look and Feel Strategy as the ‘Cultural Spine’.

### Contact Name

Tim Jones

### Contact Organisation

Culture Mile

### City Response

### Recommendation

## Recommendation\_Details

### Paragraph

3.4.7

### Type of Comment

General

### Comment

Amend paragraph 3.4.7 to refer to remodelling of 'Broadgate' rather than 'the Broadgate Estate' in the first sentence and insert additional sentence after ...improvements delivered to the public realm around Liverpool Street Station: "In particular, opportunities to deliver world class public realm, including pedestrian prioritisation around Liverpool Street Station will be supported".

### Contact Name

### Contact Organisation

British Land Company PLC

### City Response

### Recommendation

## Recommendation\_Details

# City Plan 2036 Consultation Comments

## Paragraph

Section 3.1

## Type of Comment

Object

## Comment

We are sorry to see little here on encouraging walking.

## Contact Name

Sarah Hudson

## Contact Organisation

Friends of City Gardens

## City Response

## Recommendation

## Recommendation Details

## **Policy Number**

3.1

## Paragraph

3.1.1

## Type of Comment

General

## Comment

Chapter fully supports the City's aspirations set out in its Vision generally. We would suggest in addition to the "health, employment, education, leisure and housing needs of the variety of people who work, live and visit the City" (para 3.1.1), the spiritual needs of the people should be recognised and added.

Places of worship (not only the Christian faith) are a key feature of the City of London and should not only be recognised as an important part of the historic environment but also as active places of community (many of which also offer access to important green spaces), dedicated to sustaining and spiritually nourishing people of all faiths and none, as a key contributor to their wellbeing.

## Contact Name

Oliver Caroe

## Contact Organisation

Surveyor to the Fabric of St Paul's Cathedral

## City Response



# City Plan 2036 Consultation Comments

## Recommendation

### Recommendation\_Details

<u>Paragraph</u>	3.1.8
------------------	-------

<u>Type of Comment</u>	General
------------------------	---------

### Comment

We would suggest that Strategic Objective: 3.1.8 should be amended to include "a flourishing society where people are safe and feel safe, enjoy good health, physical and both physical and spiritual wellbeing..."

This should also be reflected in the relevant policies and supporting paragraphs in Section 4 Contribute to a Flourishing Society including 4.1 Healthy and Inclusive City.

### Contact Name

Oliver Caroe

### Contact Organisation

Surveyor to the Fabric of St Paul's Cathedral

### City Response

## Recommendation

### Recommendation\_Details

<b><u>Policy Number</u></b>	<b>3.3</b>
-----------------------------	------------

<u>Paragraph</u>	3.3.6
------------------	-------

<u>Type of Comment</u>	General
------------------------	---------

### Comment

We would suggest that the City's Vision should read under paragraph 3.3.6 that: "New development will enhance the City's character and add value to the wider character and quality of London, whilst respecting the setting, backdrop and views of St Paul's Cathedral and the Tower of London."

### Contact Name

### Contact Organisation

# City Plan 2036 Consultation Comments

Oliver Caroe

Surveyor to the Fabric of St Paul's Cathedral

[City Response](#)

[Recommendation](#)

[Recommendation Details](#)

**[Policy Number](#)**

Key Diagram

[Paragraph](#)

[Type of Comment](#)

General

[Comment](#)

The colours on the Key Diagram are confusing. The Principal Shopping Centre colour is almost the same as Smithfield Market. It needs a road base as it is hard to orientate i.e. junction improvements. It is too diagrammatic.

[Contact Name](#)

[Contact Organisation](#)

City worker (no name provided)

[City Response](#)

Noted. We will consider improving Figure 4 (Key Diagram) but is intended to be diagrammatic in accordance with regulations.

[Recommendation](#)

Change

[Recommendation Details](#)

Potentially change Figure 4 (Key Diagram)



# City Plan 2036 Consultation Comments

## Strategic Policy

## Key Areas of Change

### Policy Number

### Paragraph

### Type of Comment

General

### Comment

City Cluster and Liverpool St Key Areas of Change Plans

The site is an existing building at 55 Old Broad St which comprises retail use at ground and basement level and office space above, providing a total of 100,774 sq ft. The property comprises a main 11 storey tower and a side wing which has 5 floors with plant enclosures on the roof. The site also comprises the Bath House at 7-8 Bishopsgate Courtyard and the expansive public space to the rear.

The site is considered to be a strategic development opportunity as it is located within an area where a significant level of change is proposed. However, in the emerging Draft Local Plan, the site is not shown to form part of any development and regeneration proposals for the area. It is currently shown as strategically placed between the City Cluster and Liverpool Street Station Key Areas of Change as shown in Figures 30 and 33.

Given that the site is located between these two Key Areas of Change, it should also be shown to form part of the regeneration proposals and should be designated as part of the regeneration zone. We therefore request that the site and its surrounding public realm should be allocated as a 'Regeneration Opportunity' and that this should clearly be shown on the Key Area of Change Plans in Figure 30 and Figure 33. The new designation should also be shown on any other relevant plans such as Figure 4 which shows the strategic aspirations for the City of London.

The site also has potential to be redeveloped to provide a much taller and wider building. As such we consider it should be shown on the Key Area of Change Plans as suitable for a tall building to reinforce this position. A tall building on the site will make a positive contribution to the surroundings and the skyline, adding to and reinforcing the edge to the Tall Buildings Cluster in the east of the City. We therefore request that the site be shown to be suitable for a tall building by extending the City Cluster to the north to include the site or by providing a Tall Buildings marker over the site. Again these changes should be shown on Figures 30 and 33.

Due to the strategic location of the site between Liverpool St Station and the wider City Cluster, it has the ability to transform this part of the City through its redevelopment potential by becoming a new exciting urban quarter with offices, retail and leisure active uses on the ground floor and an attractive public realm. The comprehensive development of the site could improve the connectivity between these two areas and provide a more attractive environment creating a new and much needed Gateway to Liverpool Street Station. Paragraph 7.9.2 identifies that the increase in passengers and pedestrians in this area facilitated by the Elizabeth Line brings challenges in terms of additional people on already heavily used streets, and opportunities in terms of increased accessibility for businesses and greater demand for the growing retail and leisure sector. The site could unlock this potential and should be shown as a 'Gateway Site' to Liverpool St Station on

# City Plan 2036 Consultation Comments

the Key Area of Change Plans in Figure 30 and Figure 33.

Contact Name

Contact Organisation

Endurance Land

City Response

Recommendation

Recommendation\_Details

Type of Comment

General

Comment

Reflecting the origins of the City's success, consider a more experimental approach to development of one or some of the areas designated as 'Regeneration Opportunity': more granular, parcelling land into smaller plots (perhaps connected through alleyways), encouraging a more entrepreneurial, imaginative, innovative, human-scale approach to counteract the overwhelming presence of the many corporate glass towers. Would fit in well with the three 'strategic themes'. Copenhagen's 'Freetown Christiania' could be a model.

Contact Name

Contact Organisation

Benjamin Woolley

City Response

Recommendation

Recommendation\_Details

Type of Comment

General

Comment

We welcome this chapter's reinforcement of wider strategic policy outcomes on permeability and enhancing the provision and quality of open space in the City. However, the wording should perhaps be more specific and ambitious in order to unlock sites and areas with particular spatial issues. For example it could mention how future development at both Blackfriars and the Pool of London will need to address the TLRN and should be expected to deliver improved permeability, connectivity and open space enhancements in those areas.



# City Plan 2036 Consultation Comments

The Corporation may also wish to commit to publishing more detailed guidance on how a vision for each of the Key Areas can be delivered, working in partnership with key stakeholders such as TfL and relevant local landowners. This would send a clear signal to potential developers in the Key Areas of Change about the kind of strategic transport involvement and improvements the Corporation will expect as part of new planning proposals in them, and highlight the need for especially sensitive approaches to walking, cycling, highway safety, and public realm.

## Contact Name

Chris Leong - Assistant Planner

## Contact Organisation

Transport for London - Spatial Planning

## City Response

## Recommendation

## Recommendation\_Details

## Type of Comment

General

## Comment

Almost without exception in the Key Areas of Change the Diocese has a central presence and will look to be creative in its response to change. It has a track record of contributing to solutions for changes in land use and urban design around places of worship.

## Contact Name

Fr Luke Miller

## Contact Organisation

Diocese of London

## City Response

Comment noted.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment



# City Plan 2036 Consultation Comments

Chapter notes the shift in emphasis from the Key City Places set out in the current Local Plan to the Key Areas of Change in Local Plan 2036. Whilst we recognise that things move on and that the new Local Plan looks further into the future and thus might be expected to shift its focus, the policy relating to Cheapside and St Paul's in Local Plan 2036 is more fragmented. What is currently covered by a single Policy CS6 which expresses an overall vision for the area in terms of retail provision, pedestrian links, promoting visitor attractions, providing visitor information and enhancing the physical environment is now spread across a range of policies and it is difficult to gain the same sense of a cohesive approach, whilst there still remains a need for improvement.

As currently drafted, the public realm and environs of St Paul's feels somewhat overlooked in the plan in terms of the great potential that exists to improve the quality of its immediate surroundings and the experience of approaching the building from the south and west. We continue to hope that the idea of a 'world square' might catch on in the City's aspirations and long term plans and can be expressed in policy terms. We are very mindful that Culture Mile and the ambitious proposals for the Centre for Music for which there are strongly supportive policies, does not follow through with the linking public realm improvements which will support North/South connectivity from Tate, through the St Paul's precinct. The same also applies to the Processional Route of Fleet Street/Ludgate Hill, which leads into St Paul's precinct.

## Contact Name

Oliver Caroe

## Contact Organisation

Surveyor to the Fabric of St Paul's Cathedral

## City Response

## Recommendation

## Recommendation\_Details

## Type of Comment

Support

## Comment

Welcome the importance given to additional, accessible greening and improving air quality in all seven key areas of change.

## Contact Name

Sarah Hudson

## Contact Organisation

Friends of City Gardens

## City Response

Support welcomed.

## Recommendation

No Change

## Recommendation\_Details

# City Plan 2036 Consultation Comments

Paragraph

7.1.1

Type of Comment

General

Comment

Why seven areas, including the whole of the City's riverside, should be identified, when each area has been artificially and arbitrarily determined requires explanation. Won't other areas "experience significant change" over the next 20 years? And, in any event, should there be any specific policy focuses (7.1.1)?

Contact Name

Contact Organisation

Fred Rodgers

City Response

Recommendation

Recommendation Details

Paragraph

7.1.2

Type of Comment

General

Comment

What is "beneficial change" and to whom is it "beneficial"? Why should there be a "strategic" or any other "context for development of projects and funding bids by a range of [CoLC] departments and external partners" (7.1.2)?

Contact Name

Contact Organisation

Fred Rodgers

City Response

Recommendation

Recommendation Details



# City Plan 2036 Consultation Comments

## Policy Number

## Key Areas of Change

## Paragraph

## Type of Comment

General

## Comment

While we note the evidence base documents compiled during the preparation of the draft Plan, we also note the lack of up-to-date evidence in relation to the historic environment. This is of direct relevance in relation to the draft policies for a number of the identified Key Areas of Change. We consider that the emerging policies designed to guide the form of new development in these Areas of Change should be more closely aligned to relevant evidence. An exercise to clearly understand the nature of the existing built and historic environment would then enable greater clarity as to how new development could successfully integrate with and enhance the Areas of Change. For example, relevant conservation area management strategies and/or Supplementary Planning Documents can add a further layer of detail and provide a starting point for future development proposals.

## Contact Name

Tim Brennan

## Contact Organisation

Historic England

## City Response

## Recommendation

## Recommendation Details

# City Plan 2036 Consultation Comments

## Strategic Policy

## Whole Plan

### Policy Number

### Paragraph

### Type of Comment

General

### Comment

The committee fully supports the City Transport Strategy and wish to ensure that it is aligned with the Plan.

### Contact Name

### Contact Organisation

City Property Association NextGen Steering Group

### City Response

### Recommendation

### Recommendation\_Details

### Type of Comment

Support

### Comment

We understand that the Draft City Plan 2036 is largely similar in approach to the current City of London Local Plan. It is however acknowledged that a number of policies have been updated to reflect an ambitious approach to significantly increase office supply in order to serve the City's role as a global financial centre. There is a renewed emphasis within the draft plan on improving workers and residents' health and wellbeing and enhancing the City's environmental credentials that include improving air quality, reducing congestion, and making buildings more sustainable – all ambitions endorsed by LaSalle Investment Management.

### Contact Name

### Contact Organisation

LaSalle Investment Management

### City Response

### Recommendation

### Recommendation\_Details



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

Christopher Hayward's opening remarks to the Draft Local Plan state "It is more important than ever to future-proof the City for the next generation of workers, residents and visitors." This is a laudable aim but must be informed and progressed on several levels if The Plan's good intentions are to come to fruition. Mr Hayward's further comment that "businesses are making location decisions based on the quality of the buildings, local amenities and public realm that they can offer their employees," can also be looked at in the light of increased competition from foreign cities, many of whom appear to be way ahead of The City in their attitude to the environment and greening, which are playing a more crucial role than ever before in where we chose to live, work and play.

In 2016 The State of the UK Nature Report concluded that of 1800 species of invertebrate, 42% were in moderate or severe decline. Other statistics were equally grim. A report released by the Institute for Public Policy Research earlier this month further underlined the gravity of the situation with regards to environmental breakdown and the consequences this will bring. The Local Plan provides an opportunity to start to correct the imbalances and change behaviours which have led to the imbalance. Perhaps never before in its long history, has it been so necessary for The City and its policy makers to lead by good example to "Shape the Future City – Sustainably."

### Contact Name

Allison Parkes

### Contact Organisation

### City Response

### Recommendation

### Recommendation Details

## Type of Comment

Support

### Comment

We welcome ongoing engagement on planning matters to fulfil Duty to Co-operate requirements. For the majority of policy areas, the approach proposed in the Draft City Plan aligns with Islington's approach and is supported. We have provided some specific comments on certain elements of the Draft City Plan where there are potential cross boundary implications.

### Contact Name

Ben Johnson

### Contact Organisation

London Borough of Islington

# City Plan 2036 Consultation Comments

## City Response

### Recommendation

#### Recommendation\_Details

#### Type of Comment

Object

#### Comment

I cannot understand how you can be serious trying to go ahead with a plan when we have no idea what our working arrangement will be with the EU in 6 months, never mind 20 years. If we remain in the EU then indeed significant growth will need to be planned for. If we don't, then growth is totally dependant on the manner of our departure, and there are a number of scenarios in which the City of London will be in significant decline for the coming decade. Can I respectfully suggest you postpone your plans and consultation until after the Brexit situation has been clarified.

#### Contact Name

#### Contact Organisation

Bob Tyley

## City Response

### Recommendation

#### Recommendation\_Details

#### Type of Comment

General

#### Comment

Cumulative impact

The CPA welcome the aspirations of the majority of the Plan and have commented on the detailed development management policies to consider deliverability of development. The CPA wish to ensure that when taken together, the cumulative effect of these policies will not have an impact on development viability. Many of the draft policies are centred around a "Major Development" threshold of 1,000sqm which captures a great deal of development within the Square Mile and where this has been considered to be inappropriate we have suggested amendments to policy accordingly. The CPA are also mindful of the emerging draft Transport Strategy, which will place additional pressures on development and that taking all of this together could impact delivery. The CPA have suggested amended policy wording to enable the decision maker to apply policies in a manner which meets the objectives of the Plan without compromising continued growth and economic dominance of the Square Mile.

#### Contact Name

#### Contact Organisation



# City Plan 2036 Consultation Comments

Charles Begley

City Property Association (CPA)

[City Response](#)

[Recommendation](#)

[Recommendation\\_Details](#)

[Type of Comment](#)

General

[Comment](#)

It is inevitable that the vision will contain mutually exclusive ambitions - or at the least, ambitions which can potentially conflict. More needs to be done in the sections which follow to show how those tensions/conflicts will be resolved.

For example, there is strong support in S1 for reducing noise pollution and protecting the more tranquil parts of the City. As the Open Spaces Strategy makes clear, the riverside is exceptional in the City for its tranquility. Yet 3.4.4 commits to improving the “vibrancy” of the riverside by allowing more retail, leisure and cultural public uses at ground level. You can’t have your cake and eat it! Permission should not be granted for outdoor retail/seating and noise generating events along the riverside.

[Contact Name](#)

[Contact Organisation](#)

David Coleman

[City Response](#)

[Recommendation](#)

[Recommendation\\_Details](#)

[Type of Comment](#)

General

[Comment](#)

The City Plan 2036 clearly indicates that residents are third on the agenda of the City of London (CoL), after business and the retail economy (24/7 destination, Culture Mile, etc). We understand why this is so but feel that residents deserve to be considered sympathetically.

Residents have a right to a level of tranquillity in their homes especially out of working hours. Today residents are beset by a continuous barrage of construction





# City Plan 2036 Consultation Comments

noise from major infrastructure programmes and commercial developments. Weekends should be particularly protected and Saturday morning working curtailed. In addition, contrary to what many would have us believe, the CoL continues to experience an increasing footfall from visitors outside working hours. This brings with it a level of noise and anti-social behaviour. Management of visitor influx into residential areas needs to be given priority in the plan.

Recent developments including some CoL initiatives give cause for concern that residential amenity is already being eroded and that some of the new proposals, including those broadly outlined in the City Plan 2036, could accelerate such erosion so that the Barbican would become a much less attractive place to live. We like living in this vibrant, exciting location and would look forward to extending the cultural and commercial offers in the vicinity of our neighbourhood only if promises to respect the rights of residents to their reasonable expectations of a peaceful environment could be upheld. Sadly, that has not always been our experience and we are greatly concerned that commercial ambitions within the CoL will override any promises made to residents.

## Contact Name

Dr Alexander Wilson

## Contact Organisation

Shakespeare Tower House Group

## City Response

## Recommendation

## Recommendation Details

## Type of Comment

## Object

## Comment

1. The standard of mapping and other illustrations is unacceptable and, for a world leading City, inexcusable. It is a significant, regrettable and unacceptable failing of the Plan that the “Key Diagram” and the “individual diagrams” are of such poor informative quality.
2. In addition, the text is too repetitive and verbose. Were “how the policy works” to be substituted for “how the policy will be implemented” should be more illustrative of the Plan’s adoption.
3. It would have been helpful if different background colours were used were to identify Strategic Policies from other policies.

## Contact Name

Fred Rodgers

## Contact Organisation

## City Response

## Recommendation

# City Plan 2036 Consultation Comments

## Recommendation Details

### Type of Comment

General

### Comment

No doubt the preparation of the Plan has taken a considerable amount of officer and consultant time and effort, with the consequential cost impact. Despite the Plan being "to 2036", a lot of its content is based on the current Local Plan and a lot of time and cost could have been saved by concentrating on the proposed changes by way of addendum.

### Contact Name

Fred Rodgers

### Contact Organisation

### City Response

### Recommendation

## Recommendation Details

### Type of Comment

General

### Comment

1. One of the problems with the way the Plan has been produced is an inconsistency in editing, which has resulted in an inconsistency of descriptions in particular. For instance, in the case of "pavements", this is evidenced by the use of "walkways", "walking routes", "pedestrian routes", "pedestrian connections", "pedestrian permeability", "pedestrian desire lines", "pathways" and "footways".

2. There are also references to "City of London" (6.1), "City" (6.2) and "Square Mile" (6.1.2) but perhaps the worst offender is the use of "should" throughout when "must" is required.

3. Despite the subject matter of the Plan, there are references to "townscape" instead of the more appropriate "cityscape". Descriptions such as "world class" and "high quality" are meaningless unless there is a comparator.

### Contact Name

Fred Rodgers

### Contact Organisation

### City Response

# City Plan 2036 Consultation Comments

## Recommendation

### Recommendation\_Details

#### Type of Comment

General

#### Comment

Conclusion on the Plan. Unfortunately, the Plan's ethos is changing all that which needs to be kept and keeping all that needs to be changed.

#### Contact Name

Fred Rodgers

#### Contact Organisation

#### City Response

## Recommendation

### Recommendation\_Details

#### Type of Comment

General

#### Comment

Overall the policy recognises the main contributors to poor health. However it is difficult to see how the City will manage its commitment to improving health and managing the impacts of developing a thriving economy and increasingly large and complex construction and building programme together with an increase in day time population density.

The primary aim of the City is to increase its capacity for business together with an increase in night time and weekend footfall as it makes the City a "go to" destination. Many of the priorities compete for the same attention and limited space. Exactly how the City would make provision to meet all the objectives in Flourishing City whilst meeting its primary objectives is unclear. The plan lacks detail on how these competing objectives will be met.

Whilst its commitment is obvious, we feel there needs to be more detail on how this will be achieved and the impacts on those who work and live here. The plan does not give confidence that the health considerations are primary and neither does it feel to us that it sufficiently capitalises on the synergy that can be gained from communities working together. The vast number of smaller business and those in the construction industry appear to receive limited attention.

The use of new technologies has limited reference and we would like to see greater use of these technologies both in terms of achieving the benefits described and keeping people informed. For example, Westminster Council has a Tap the App for supporting homelessness and a robust approach to engagement on planning.



# City Plan 2036 Consultation Comments

We would welcome the City exploring the good practice in other similar boroughs. We are aware of the Street Link service within the City, however in our experience the resources are not there to support it.

## Contact Name

Gail Beer

## Contact Organisation

Healthwatch City of London

## City Response

## Recommendation

## Recommendation\_Details

## Type of Comment

General

## Comment

Handling conflicting policies within the plan

The vision, and this plan, contains ambitions that potentially conflict, and there is little guidance on how those conflicts will be resolved. It would be helpful if the plan contained a statement of how strategies are prioritised and how conflicts will be resolved.

We understand that Strategic Policies carry the most weight, and it is for that reason we would like to see S3 on Housing amplified to say more about protecting the amenity of existing residents in the residential areas. Without that, we are left thinking that the many helpful phrases in this plan about protecting residential amenity will end up as warm words lost in a contest with strategic policy S24, for example.

As an example of a potential conflict in the plan itself there is strong support in S1 for reducing noise pollution and protecting the more tranquil parts of the City. As the Open Spaces Strategy makes clear, the riverside is exceptional in the City for its tranquillity. Yet 3.4.4 commits to improving the “vibrancy” of the riverside by allowing more retail, leisure and cultural public uses at ground level. Yet that will destroy its tranquillity. Permission should not be granted for outdoor retail/seating and noise generating events along the riverside.

Similarly, the City’s Noise Strategy acknowledges that the Barbican Estate is another area of the City that is tranquil, something that is appreciated by residents and visitors alike. Yet the Culture Mile (S24) supports more retail, hotel, and leisure uses. The Plan needs to be more specific on zones in the Culture Mile where such activity is appropriate and allowed and zones (ie residential areas) where it is not.

## Contact Name

Jane Smith

## Contact Organisation

Barbican Association

## City Response



# City Plan 2036 Consultation Comments

## Recommendation

### Recommendation\_Details

#### Type of Comment

General

#### Comment

Management of potential nuisance rather than spatial planning

In many places the Plan relies on “good management” of the activities within and around a building to ensure that conflicting activities do not cause disturbances to residents. However, “management” is a weak tool compared with spatial planning. Moreover, “good management” is also not in the gift of the Planning Committee. The developer of a building may not be the operator, and operators change over time. Plans are forgotten or ignored. The nuisance may end up imposing years of disturbance on residents and result in more work for the City’s environmental health team.

The Local Plan is about spatial planning and we would like to see a commitment in this plan that activities incompatible with residential amenity (licensed premises, clubs, late night activity) will be dealt with by at the very least design restrictions and not simply reliance on the production of a management plan. What we mean by design restrictions is, for example, that entrances and windows should not open onto a street or area opposite residences. If this is not enough to protect residential amenity (for example even though an entrance to a night club might be obscured by a building the natural dispersal route would be down a residential street or area) then we would like to see applications refused.

Where a developer is required to produce a management plan to protect residential amenity we would like to see some clarification of how subsequent operators of the building can be bound by it. The planning condition needs to specify the contents of the management plan. If a management plan has to be relied on we would be looking for elements such as: Doors and windows placed away from residential streets; Double doors to ensure that noise did not leak beyond the premises; A requirement that noise inside the premises should not be heard outside the premises; A requirement that taxis should not wait outside the premises in a residential street; Dispersal routes for clients away from residential areas; Stewarding of clients entering or leaving.

#### Contact Name

Jane Smith

#### Contact Organisation

Barbican Association

#### City Response

## Recommendation

### Recommendation\_Details



# City Plan 2036 Consultation Comments

## Type of Comment

General

### Comment

Cumulative effects

There need to be clear standards for doing cumulative impact assessments, so they are done consistently and to a high standard. The cumulative impact assessments need to take into account the effects of all existing and approved developments that have an impact on the site in question, regardless of when they were approved. So we think the City needs to specify a methodology otherwise the issue will be “gamed” by developers and lead to inconsistent assessments.

The area to be covered should be defined by the developments that have an affect on the site in question. The assessment of cumulative effect needs to go back far enough so that it is not just seen as tokenism. The average life of a commercial building in the City is we understand about 25 years, so assessments involving commercial buildings should go back at least that far.

In this respect see report (link provided) for some helpful definitions of CIA, including that a cumulative impact is “an impact on the environment (that) results from the incremental impact of the action (under review) when added to other past, present and reasonably foreseeable future actions”. The Environmental Statement prepared by AECOM for the Stamford Bridge Ground Redevelopment deals with the cumulative impact on “sensitive receptors” (include residential) in London and offers a practical way to deal with the methodological challenges.

We would also commend, in relation to residential areas, that residents themselves are a resource because some of them will have lived in their residences for some decades and will remember the building preceding the ones that are to be redeveloped.

We understand that the City now has a digital model of all the buildings in the City. Removing and inserting models of buildings could be used to assess the effects on, for example, daylight and sunlight to nearby residences. We understand that the model does not show fine detail, such as individual windows, for most areas of the City – but one approach would be to add that detail as developments were proposed as part of doing a cumulative assessment.

### Contact Name

Jane Smith

### Contact Organisation

Barbican Association

### City Response

### Recommendation

### Recommendation\_Details

## Type of Comment

General



# City Plan 2036 Consultation Comments

## Comment

There is much that we welcome in this plan. We welcome the recognition of residential areas, where protection of residential amenity should be stronger than it has been in the past. We welcome the commitment to examine the cumulative effect of development on residential amenity – particularly daylight and sunlight and noise and light pollution. But we would like to see more specific proposals on how cumulative impact assessments will be done.

We have one major concern. The plan seems to rely heavily on “management” to deal with conflicts between policies – eg to manage the potential disturbance caused by late night economy activities on residential amenity. We do not think this is anywhere near as effective as spatial planning to ensure that noise-generating uses are not sited next to residential areas, and we would like to see more commitment to spatial planning to protect residential amenity.

The vision, and this plan, contain ambitions that potentially conflict. The Plan is silent on how these may be resolved.

We would like to see more resources and effort go into enforcing the policies in this plan.

We would like to see some statement in this plan on how it can be monitored and that the monitoring should be ongoing.

## Contact Name

## Contact Organisation

Jane Smith

Barbican Association

## City Response

## Recommendation

## Recommendation Details

## Type of Comment

General

## Comment

Maps and figures

1. We understand the figures in the Plan are meant to be purely illustrative but given that some policy areas are not dealt with on more detailed maps, we feel that the overall standard of those (including Figures 19 and 32) must be improved.
2. On Figure 32 which shows zones within the proposed Smithfield and Barbican Key Area of Change, the residential sphere to the north of Beech Street is misleadingly small, given the area includes the entire North Barbican, Golden Lane Estate, Bridgewater House, Tudor Rose Court, The Cobalt Building and will include The Denizen. There are only three non-residential buildings in the entire neighbourhood. The sphere should be increased to better reflect the balance of land use.



# City Plan 2036 Consultation Comments

3. Policies Map B appears to show incorrect boundaries for the B&SA's Garden SBINC. As drawn, it appears to include half of Tudor Rose Court, a development adjacent to the Garden on the corner of Fann Street and Viscount Street, although in the CoLC's support it was built on a former part of the Garden in 1997.

Please review and amend accordingly the maps etc to ensure greater accuracy and clarity with regard to these points.

Contact Name

Joanna Rodgers

Contact Organisation

Barbican Wildlife Group

City Response

Recommendation

Recommendation\_Details

Type of Comment

Object

Comment

The City strategy states there will be a lot more people in the City over the planning period, visitors, residents and workers. We would like to see clear statements of how the needs of these people will be supplied.

The only NHS GP practice in the City is the Neaman Practice, which is used by residents, City workers and visitors. Given the predicted 20% increase in workers can we expect to see a 20% increase in the provision of GP services, policing and post offices? And where will the 4,00 extra overnight visitors (page 75) obtain services? By far the largest number of people to be considered are the roughly 18m visitors to the City. These day-visitors will increase by a number we can't find in the Plan, but it will be large.

There are currently queues at both the GP and the post office on a regular basis. To support a flourishing society, a significant uplift in these critical services is required. It is not addressed at all in the document. This is a serious omission.

Contact Name

John Ramsey and Jane Northcote

Contact Organisation

City Response

Recommendation





# City Plan 2036 Consultation Comments

## Recommendation Details

### Type of Comment

General

### Comment

1. The plan clearly states that this is a City for business, and that residents are a small but important part of it, which we accept.
2. There is reference to a wider London Plan and it would be useful if the City Plan could provide a summary of the key proposals within the structure of the London Plan, and how they flow through into local plans. The proposals focus heavily on the Square Mile and there is very little comment on how the plans align with those of neighbouring boroughs.
3. It would also be helpful to know how the plan differs from the previous plan, and what progress has been made to deliver on those proposals?
4. In addition, we would welcome a simple table of numbers that shows what changes are expected and planned for. The images on pages 12 and 13 are pretty but not very easy to read. It is also not possible to tell from these pages if these numbers are expected to go up or down, and by how much.

### Contact Name

### Contact Organisation

John Ramsey and Jane Northcote

### City Response

### Recommendation

## Recommendation Details

### Type of Comment

General

### Comment

Since the consultation on the first stage of City of London's Local Plan (2016), the Draft New London Plan was published in December 2017 and is now at examination. It is recognised that while the earlier version of the City Plan was aligned to the current London Plan this latest version has taken into consideration the policies and implications of the Draft New London Plan.

Figure 2 of the draft City Plan, setting out the wider context for the City of London and how it relates to the Central Activities Zone (CAZ) and the City Fringe Opportunity Area (OA) is very welcome. So too are the City Plan's clear overarching strategic objectives, set out at the very start of the Draft Local Plan, including: Contribute to a flourishing society; Support a thriving economy; and Shape outstanding environments. The City of London's position in the CAZ is well recognised



# City Plan 2036 Consultation Comments

and the City Plan largely follows the guidance set out in Draft New London Plan Policy SD4.

However, in general, the plan needs to take a more proactive approach in several strategic areas, including those for housing and office development, demonstrating that identified needs can be met over the plan period and to provide more certainty and clarity for potential developers. The City of London should follow the guidance set out in Draft New London Plan Policy GG2 to proactively seek opportunities to make the best use of its land. While Key Areas of Change are identified and largely supported by broad strategic themes, site level work should be conducted to identify potential development sites and associated capacity evidenced to establish whether the City Plan can meet its housing target, including its small sites target, and whether it is able to meet the demand for office space growth of 2 million sqm over the plan period.

## Contact Name

Juliemma McLoughlin

## Contact Organisation

Mayor of London

## City Response

## Recommendation

## Recommendation Details

## Type of Comment

General

## Comment

While we welcome the emphasis in the plan on health and wellbeing and associated policies to tackle air, noise and light pollution and promote healthy streets, we are concerned that there is insufficient emphasis on protecting, enhancing and extending green spaces in the city as central to achieving these objectives.

Overall we believe that the Local Plan should be underpinned by a stronger strategic vision to make the City a greener and more tranquil space for people to visit, work and walk.

## Contact Name

Neil Sinden

## Contact Organisation

CPRE London

## City Response

## Recommendation

## Recommendation Details



# City Plan 2036 Consultation Comments

## Type of Comment

Support

### Comment

Welcome the strong emphasis in the Plan on making the City a greener and more pleasant place to live and work, particularly the proposals to improve the public realm, increase the amount of green space, improve air quality, protect heritage assets, and protect residential amenity. This emphasis will be welcomed by many residents who have long argued that decision-making purely on economic and business grounds, ignoring the social and environmental ramifications, is not in the long term interests of the Square Mile.

### Contact Name

Rodney Clark

### Contact Organisation

### City Response

### Recommendation

### Recommendation\_Details

## Type of Comment

General

### Comment

Each individual policy, when read alone, sets a clear vision and aspiration for what is expected of the property and development community. However, it is important that these policies are applied in an appropriate manner on a site by site basis. There will be some sites that lend themselves to rooftop gardens, some that lend themselves to improved pavement widths and pedestrian routes through the development at ground floor and some may have the potential to provide public facilities such as drinking water and toilets within the ground floor space. The ability to apply these policies flexibly and appropriately will ensure they do not have a critical impact on development viability. We look forward to the further development and adoption of the draft City Plan 2036 and to continuing our working relationship in the future.

### Contact Name

Ross Sayers

### Contact Organisation

Landsec

### City Response

### Recommendation

### Recommendation\_Details

# City Plan 2036 Consultation Comments

## Type of Comment

## Object

### Comment

1. I understand the figures in the Plan are meant to be purely illustrative but given that some policy areas are not dealt with on more detailed maps, such as locations for tall buildings and residential neighbourhoods, the overall standard (including Figures 8, 19 and 32) must be improved.
2. Policy Map B appears to show incorrect boundaries for the Barbican and St Alphage's Garden SBINC. As currently drawn it appears to include half of Tudor Rose Court, a development adjacent to the Garden on the corner of Fann Street and Viscount Street.
3. Suggests various changes to the City's Interactive Mapping tool, including the addition of a label for the Barbican Wildlife Garden; the addition of all sites of Borough Importance for Nature Conservation; the addition of land taken from Bridgewater Square in 1965; and the addition of the green corridor from Bunhill Fields to West Smithfield Rotunda.

### Contact Name

### Contact Organisation

Ruth Cooke-Yarborough

### City Response

### Recommendation

### Recommendation Details

## Type of Comment

## General

### Comment

The new City Plan 2036 is well written, clear and easy to navigate. It addresses some of the significant issues that concern members of FoCG, namely commitment to:

- improve air quality
- promote sustainable cycling and walking transport options
- pedestrian priority
- creating more high quality green open spaces
- creating green corridors, preserving habitats
- recognising the importance of SINC's
- improving sustainability.

# City Plan 2036 Consultation Comments

However, there are some significant omissions:

1. Black redstarts: a rare breeding bird on the red list for Birds of Conservation Concern. Annual bird surveys over the last 4 years have confirmed that the City hosts up to 44% of the UK breeding population. The Black redstart habitat is extensive green roofs. The City Plan should reference this important population and provide measures to protect and enhance its habitat, which might take the form of an SPD setting out conservation measures and guidance.
2. Bats: 2018 surveys established the existence of up to 3 bat species in the Barbican, Golden Lane, Postman's Park and Bunhill Fields area. Bats are a target species of the City's Biodiversity Action Plan and nationally are a highly protected species. Bats are extremely sensitive to light spillage. We would like the Plan to recognise the presence of bats and the need to preserve dark spaces and corridors. The City should recognise the presence of bats requires special measures of lighting and habitat protection, meaning that in areas where bats are known to exist lighting levels on construction sites and subsequent buildings are no higher than previously. Street lighting should not be increased in intensity and should be in the red end of the spectrum.
3. Green Corridors: The City Plan should be more explicit or an SPD should be undertaken where certain routes are designated and mapped as green corridors and biodiversity initiatives are coordinated in these areas.
4. Enforcement, monitoring and evaluation: We are concerned the City does not have sufficient resources to adequately evaluate, monitor and enforce high ecological standards either on its own public realm interventions or those in new/refurbished developments. The City Plan should include mechanisms to ensure policies are rigorously applied, which might be achieved by appointing consultants at the cost of the developer or recruiting an in-house ecology officer. The City has a poor record on enforcement generally, e.g. 20mph is ignored or motorists are unaware of the limit; littering is not enforced and is a blight on the City; idling engines are not enforced, contributing to poor air quality. There is no point in having good intentions if they are not carried through and enforced.
5. Maintenance of the public realm and assets: although design looks fine when newly installed, often it is impractical when it comes to cleaning and maintenance. Many street scene public realm interventions are poorly designed with too much hard landscaping and inappropriate planting of mature trees that often fail in the first few years after planting and are difficult to maintain.

## Contact Name

Sarah Hudson

## Contact Organisation

Friends of City Gardens

## City Response

## Recommendation

## Recommendation\_Details

## Type of Comment

General

## Comment

# City Plan 2036 Consultation Comments

Reading this draft overall strategy for the future of the City, the recurring mention and consideration given to accessibility is welcomed. Inclusive environments do not happen by accident, so seeing references at this high level to specifics such as the types of accessible toilets (e.g. 'disabled' and 'Changing Places'), wheelchair accessible hotel room volumes as well as broader policy statements is encouraging. However, at this high strategic level, there are no guarantees and constant vigilance will be needed to ensure that the City remains accessible to all, irrespective of personal mobility and ability to conform to 'healthy' lifestyle choice definitions that all-too-often have a strong able-ist bias both in terms of infrastructure/service provision and policy language (e.g. favouring walking/cycling over other transportation options, accessing community recreational sports/leisure facilities). Transportation links and personal mobility (vehicle access and safe pedestrian environments) are important for all and present unique challenges for City users with accessibility needs. As the Local Plan notes, the City's Transport Strategy covers this in greater detail, as too does CoLAG's already submitted response.

## Contact Name

Sarah Morgan

## Contact Organisation

City of London Access Group

## City Response

Comments noted.

## Recommendation

No Change

## Recommendation\_Details

## Type of Comment

General

## Comment

The Plan needs to be flexible. No-one knows what will happen in the future as ways of doing things are rapidly changing. The City Corporation is constrained - if the Mayor doesn't like the Plan he will withdraw funding.

## Contact Name

Simon Taylor

## Contact Organisation

## City Response

## Recommendation

## Recommendation\_Details

## Type of Comment

General



# City Plan 2036 Consultation Comments

## Comment

We note that much of the content of the current City of London Local Plan has been retained and taken forward in the consultation draft. Taken with the amendments relating to the historic environment, we consider there is much to be welcomed in the version out for consultation, including the specific provision of a policy to deal with the potential impacts of new development on the setting of the Tower of London. As a result, our general comments relate on the whole to the requirements in the National Planning Policy Framework (NPPF) for local plans to contain policies to conserve and enhance the historic environment (para 20), set out a positive strategy for its conservation and enjoyment (para 185) and that they should be underpinned by relevant and up-to-date evidence (paras 31 and 187).

Clearly, the built environment in the City of London is dynamic and subject to significant ongoing development pressure. Given the concentration of heritage assets, including St Paul's Cathedral and the proximity of the Tower of London World Heritage Site, we would stress that it is therefore critical that the emerging Local Plan is fit for purpose in conserving and enhancing the historic environment.

## Contact Name

Tim Brennan

## Contact Organisation

Historic England

## City Response

## Recommendation

## Recommendation Details

## Type of Comment

## Object

## Comment

The City Plan contains a range of proposals and policies applicable to the whole of the City and specific proposals for growth zones generally around the periphery of the City. While there is reference to the Tower of London as a World Heritage Site there is only passing reference to St Paul's, in the context of the importance of protecting long range views of the dome and respecting the setting of the Cathedral when designing new buildings. The plan has nothing to offer on the significance of St Paul's to the City, such as providing a focal point, a sense of historical continuity, a reference point of architectural scale or a physical manifestation of the spiritual by way of contrast to a more general preoccupation with the material. Nor does it dwell on the nature and quality of the Cathedral's immediate surroundings and consider the current and potential future purpose, function and uses of these spaces.

## Contact Name

Tom Ashley

## Contact Organisation

Cathedrals Fabric Commission for England

## City Response



# City Plan 2036 Consultation Comments

[Recommendation](#)

[Recommendation\\_Details](#)