



Representations on behalf of Barbican and Golden
Lane Neighbourhood Forum

to the City of London Corporation

Regulation 19 Consultation

City Plan 2040

June 2024

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Supporting Evidence: supplied as a separate set of documents

1 Introduction

- 1.1 The Barbican & Golden Lane Neighbourhood Forum (“the Forum”) is designated to represent the planning and infrastructure aspirations of community organisations, businesses and residents in the north-west of the City of London. The Neighbourhood Area is within the proposed Barbican & Smithfield Key Area of Change (KAOC).
- 1.2 The Forum welcomes the City Plan 2040 and supports its ambitions to make the City a more sustainable place, and one where culture and amenity for the people who live and work here is improved. Environmental quality is an important foundation for strong economic growth and merits improvement to keep the City competitive globally.
- 1.3 The Forum was designated¹ in 2023, as the first Neighbourhood Forum in the City. Our Neighbourhood Plan is in preparation; the Forum considers it appropriate that this should be explicitly acknowledged and accommodated within City Plan 2040, particularly as the Barbican & Golden Lane Neighbourhood Plan is being prepared to be in conformity with City Plan 2040 when it is made. Work on the Neighbourhood Plan will continue after this submission to the City Plan 2040 Reg 19 consultation, and we look forward to presenting Inspectors with our most recent evidence and draft policy direction when the City Plan 2040 reaches the Inspection stage. In the meantime, our Housing Needs Analysis was published and provided to the City of London’s Local Plans team in March 2024 and discussions with them are ongoing.
- 1.4 We acknowledge that the NPPF (para 132) says that; *“Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers”*.
- 1.5 The Forum proposes;
- a) that the Barbican & Golden Lane Neighbourhood Area should be mapped in Figure 1: Key Diagram, as it is material to planning decision-making; and
 - b) that the Barbican & Golden Lane Neighbourhood Area should be referred to in the Spatial Strategy by adding a sub-paragraph 2.1 (12) to say *“a detailed Neighbourhood Plan for the Barbican & Golden Lane Neighbourhood Area will be brought forward in conformity with City Plan 2040.”*

¹ under the Localism Act 2011

- 1.6 We propose recognition of the Barbican & Golden Lane Neighbourhood Forum Area and anticipated Neighbourhood Plan; both should be acknowledged and allowed for in policy and policy maps, as we explain in detail within this response. It would also be helpful for the role and status of Neighbourhood Plans and Forums to be set out at least in the Glossary of the Plan, especially as the Barbican & Golden Lane Neighbourhood Forum is the first to be designated in the City and the addition of a Neighbourhood Plan to the existing planning hierarchy is relatively novel to applicants and decision-makers alike here.
- 1.7 The Forum supports the analysis that both Smithfield and Barbican are Key Areas of Change for the reasons set out by the City such as the anticipated moves of the Museum of London and Smithfield Market. The boundary of impact, in the main, is both justified and appropriate (S23 and policy maps [Figures 31 and 32]). It would be preferable, in the interests of clarity and consistency of policy, if the “Barbican” part of the KAOC was extended to be co-terminus with the designated boundary of the Barbican & Golden Lane Neighbourhood Area at its south-west corner (see Forum boundary map provided separately) to the west of Aldersgate Street and the south of London Wall.
- 1.8 The Forum questions, however, whether the City has provided any evidence to justify denying “Barbican” the same detailed policy consideration that “Smithfield” gets (S24) within the “Smithfield & Barbican” KAOC. The weight of evidence recognising the Barbican & Golden Lane Neighbourhood’s separate special character together with evidence of the scale of change affecting the whole KAOC means that denying it a sufficiently detailed policy framework to ensure that change is guided appropriately cannot be justified.
- 1.9 We therefore propose a strategic policy (S23B) to address the unmet requirements of the Barbican & Golden Lane, to provide greater clarity in guiding significant change, to avoid confusion and in so doing create more effective policy.
- 1.10 Within the Smithfield and Barbican KAOC, “Smithfield” is undefined which is neither justified nor effective. Aldersgate Street/Goswell Road (A1)² is a busy road running north/south and bisecting the KAOC. It a long-established dividing line between Smithfield and the Barbican & Golden Lane, and for this reason is also a boundary of the Barbican & Golden Lane Neighbourhood Area. We therefore propose that Aldersgate Street/Goswell Road (A1) is the obvious boundary dividing the two distinct parts of the KAOC.

² One road, two names – Aldersgate Street becomes Goswell Road at the junction of Fann Street

- 1.11 The Forum supports the City's aim of delivering more homes, including affordable and specialist homes. London's housing crisis threatens the City's ability to deliver economic growth by undermining its attractiveness as place to live, work, invest and thrive.
- 1.12 The supply of affordable housing in the Barbican & Golden Lane Neighbourhood, and housing for older people and those with support needs, is a concern for the Forum. In preparation for our Neighbourhood Plan, our own professionally sourced Housing Needs Assessment from housing consultants (see our supporting evidence) concludes that the Area needs both affordable private rented dwellings, and specialist accommodation for older people and those with support needs.
- 1.13 Our evidence provides justification for amendments to the City Plan 2040 to;
- a) Recognise, map, explain and welcome the Barbican & Golden Lane Neighbourhood Area and Plan;
 - b) Extend the "residential area" to include the whole of the Forum Area boundary, as this was accepted by the City of London as a cohesive residential neighbourhood on designation;
 - c) Designate sites for housing;
 - d) Extend the Smithfield & Barbican KAOC boundary to be co-terminus with the Barbican & Golden Lane Neighbourhood Boundary at its south-west corner, in the interests of clarity and consistency;
 - e) Recognise the predominantly residential character of the Barbican & Golden Lane Neighbourhood by adding a Strategic Policy for Barbican & Golden Lane in the Smithfield & Barbican KAOC;
- 1.14 The Forum finds City Plan 2040 to be unsound with regard to Health, Offices, Heritage, Open Space and Climate policies, and has also set out suggested policy amendments in this response.
- 1.15 The Forum supports the broad strategy of the Plan and would welcome more robust evidence and clearer policy to identify the range of needs and balance the means of meeting them in this very crowded and congested place. Policy ambiguity encourages "gaming" of the planning system (always a risk where underlying asset values are amongst the highest in the UK) and with it an incremental weakening of protections that are essential to preserving a high quality sustainable environment. More should be done to reduce ambiguity in the City Plan 2040, in the interest of effective policy implementation.

- 1.16 The Forum takes the view that clarity of policy in the City Plan 2040 is needed, particularly regarding key social, environmental and economic outcomes such as making the City a world class place to live, work and play, reducing Whole Life Carbon, protecting heritage and achieving effective resilience in the face of climate change. Without a world-class environment, the City's status as a centre for international finance will weaken, as firms these days have great choice of locations globally. The Forum's suggested policy changes, in the interests of soundness, consistency, clarity and above all effectiveness of the Plan are summarised in an index later in this submission.
- 1.17 The Forum wishes to participate in Examination Hearing Sessions. As the designated Forum we are in the midst of preparing a Neighbourhood Plan for the Barbican & Golden Lane Neighbourhood Area, and we look forward to presenting our latest draft Plan to Inspectors in due course.
- 1.18 The Forum thanks the City for extending the consultation beyond the statutory minimum six week period, as we were advised against running any consultation events of our own during the pre-election period for the July 2024 election, limiting debate with our membership. We have done our best to examine the complex issues in the draft Plan as comprehensively as possible. As an entirely voluntary organisation this has been particularly challenging, even with the extended deadline, and it may be necessary for the Forum to provide supplementary evidence or analysis in advance of the Examination in Public.
- 1.19 The Forum looks forward to conforming with the City Plan 2040, once made, with a Neighbourhood Plan for the Barbican & Golden Lane Area. We would welcome the opportunity to clarify and discuss our suggestions for the City Plan 2040 with the City of London Corporation once our representations have been considered by them.
- 1.20 We are fortunate in having a membership with extremely high levels of local and specialist expertise. Thanks are due to all the professional planners, lawyers, health experts, architects, cultural specialists, historians, urban designers, teachers, transport planners, landscape and other "subject matter experts" whose input has helped to shape this submission and all the 150 Forum members whose combined forensic knowledge of our Area is invaluable.

2 Barbican & Golden Lane Character Study

2.1 Predominantly Residential Character

The Barbican and Golden Lane Neighbourhood Forum Area is a cohesive, predominantly residential, community clustered within and around the listed Barbican and Golden Lane Estates. It is a closely packed, tightly-defined part of the City of London. The residential communities and most businesses within this area all self-define themselves to be part of the Barbican and Golden Lane Neighbourhood and there is a strong and vibrant community attachment. This existing community network includes groups based in the residential blocks and estates, such as Roman House, the Barbican, Golden Lane, London House, Little Britain, the Heron, Monkwell Square, Bridgewater Square and Tudor Rose Court. In this Area residential, business, heritage and cultural interests come together within a highly populated footprint. Population density will increase with further residential development, reinforcing its status as a predominantly residential area, and with it a need to consider supportive social and community and health facilities, as well as open space and trees.

Although the Area scores above average on many quality-of-life indices, it is worth noting that according to the Living Environment Deprivation Indicators (which measure the quality of the local Environment both ‘indoors’ i.e. quality of housing and ‘outdoors’) Golden Lane is within the 20% most deprived small area zones (LSOAs) in England, while Barbican West and Barbican East are within the 40% most deprived in England³

2.2 The City’s main Residential Area (half the City’s population live here)

The Barbican and Golden Lane Neighbourhood Area is all primarily residential, containing;

- a) The whole of the Golden Lane Estate and neighbouring housing such as Clarendon Court, Tudor Rose Court, the Denizen and Bridgewater House.
- b) The whole of the Barbican Estate, including the original residential blocks as well as the converted Frobisher Crescent (top three floors) and Blake House, various offices and other uses on/in the estate, Barbican Arts Centre, Guildhall School of Music and Drama, City of London School for Girls, St Giles Cripplegate – along with the

³ City of London – Indices of Deprivation (2019) - <https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-emp-and-pop-stats-indices-of-deprivation-2019.pdf>

adjoining, often interlocking, homes and other buildings such as the Museum of London/Bastion House, Ironmongers' Hall, Cripplegate Institute, Monkwell Square, Barber-Surgeon's Hall, and 45 Beech St.

- c) The Silk Street area immediately adjoining the Barbican, including the residential Heron tower, Milton & Shire House, the entire area of the Brewery Conservation Area and Milton Gate which adjoins the Heron within the Coleman St ward boundary.
- d) The Roman House area immediately adjoining the Barbican, including Roman House, Salters' Hall and Garden, part of London Wall Place garden and Bassishaw Highwalk – but excluding the office developments of London Wall Place 1 & 2.
- e) The Little Britain area immediately adjoining the Barbican, including the residential grouping of London House, Little Britain and the church of St. Botolph's-without-Aldersgate, together with Postman's Park.

The Barbican and Golden Lane Neighbourhood Forum's own analysis using the ONS nomis system, is that 4,194 people or 49% of the City's total population live within the Barbican and Golden Lane Neighbourhood Forum Area. The Barbican has 2,140 residential units and Golden Lane 559.

2.3 **The Post-War and Modern Heritage and Character of the Area**

The importance of the Area's modern architectural heritage, its gardens and green infrastructure, as well as its historical significance is key to the area's character. The Forum recognises the significance of nationally-designated heritage assets which all fall within the Barbican and Golden Lane Neighbourhood Forum Area. The entire Neighbourhood Area, devastated by heavy bombing during WWII, was subject to grand post-war planning from the late 1940s onwards. Today the Area consists largely of C20 architecture and is dominated by the Golden Lane and Barbican Estates. Designed by the architectural practice Chamberlin, Powell & Bon the mixed-use housing estates are two distinct, self-contained developments which greatly vary in scale, character and appearance.

GOLDEN LANE ESTATE

The Modernist Golden Lane Estate lies in the north of the Neighbourhood Area. The Estate was conceived in 1951 and completed in 1962. Here the general building height is low-rise and consistent with that of the surviving pre-war built environment surrounding the Estate. The original plan comprised seven four- to six-storey high

residential slab blocks, geometrically arranged on an orthogonal grid, and at its centre one high-rise block, Great Arthur House. A further four-storey block, Crescent House, was later added to the west of the site. The volumes and elevations are formed by distinct components, including slim aluminium and timber window frames, primary-coloured spandrel panels, brick cross walls and piers, concrete floor slabs, concrete balconies and balustrading. While each building type has its individual architectural expression, unit size and unit typology, together they read as a homogeneous whole. The influence of Le Corbusier is clear throughout the Estate, from the ribbon windows, pilotis, expressed structural details, the fine and simple design of the leisure centre to the pick-hammered concrete of Crescent House. The latter is distinct through architectural language and form: its western façade follows the curve of Goswell Road and features a single storey colonnade at ground with a parade of dual aspect shops opening onto the street and into the Estate.

In between the buildings are large rectangular communal courts of hard and soft landscaping, each with its own character, and the community facilities including community centre and swimming pool. While Golden Lane is a private estate, it has open thresholds and publicly accessible thoroughfares. The external spaces are as important to the character and special interest of the estate as the buildings themselves.

Sandwiched between the two Estates lies a small group of historic, post-war and recent buildings, including the Jewin Welsh Presbyterian Chapel, a non-designated heritage asset, and the Grade II listed shell of the former Cripplegate Institute.

BARBICAN ESTATE

The Brutalist Barbican Estate, built between 1962 and 1982, covers the largest and central part of the Neighbourhood Area. The Barbican is arguably the greatest piece of urban architecture of post-war Britain, unique in its kind and of worldwide reputation. It is Britain's largest listed object. The Estate represents a huge jump in scale from the traditional small-scale and low-rise setting of the Barbican area, including the Golden Lane Estate, to the mid-rise environment of the grander and representative buildings and open

spaces of the City beyond London Wall and Moorgate, such as Finsbury Circus and Finsbury Square.

The Barbican Estate is a composition of individual slab blocks, three sculptural towers, and cultural and educational buildings expressed as one single monolithic piece of architecture – a city in its own. The residential buildings of the Estate are elevated on pilotis and hover above one- to three-storey high brickwork podia and at their midst the free-flowing landscape. While the pedestrian podium levels and highwalks are open public realm, they are designed to be reached by only a few access points from street level. All public buildings, as the City of London School of Girls, the Guildhall School of Music and Drama, and the Barbican Arts Centre have direct access from street level.

The Estate is divided into Centre Barbican and North Barbican. The whole of Centre Barbican is set on a perpendicular grid parallel to Moorgate where buildings are placed around the sequence of grand open spaces. North Barbican follows at a 35-degree angle, along the direction of Beech Street. The three triangular shaped towers, strategically placed at centre and either end of Beech Street, mediate between the two diverging grids.

The architectural language of the residential buildings has a consistent and restricted palette of materials: brindled brickwork for podia, low-rise schools and terrace houses; bush hammered concrete for residential slab blocks with plant boxes along the continuous, horizontal band of balconies, timber framed windows, and white barrel-vaulted roofs; and bush hammered concrete, white tiles and metal framed glazed panels and screens for the Barbican Art Centre.

The Barbican Estate is introvert in character. The podia and residential blocks along the Estate's perimeter have created an oasis, a sheltered and secluded internal environment of private and public spaces with sunken gardens, terraces, lakes and water features.

COMMERCIAL SOUTH BARBICAN

To the south the Barbican Estate and within the Neighbourhood Area lie the former Museum of London and Bastion House, which formed part of the commercial South

Barbican redevelopment along London Wall with its originally six regularly spaced, parallel and modular point blocks on top of two-storey podia, as governed by the overall masterplan. While four of the towers have since been replaced by clusters of new towers, one tower at eastern end, Beaumont City Tower, and one at western end, Bastion House, have survived.

The tallest tower of the post-war plan was the 35-storey high Britannic House on Ropemaker Street, immediately to the east of the Barbican Estate.

The mid-rise office blocks between Britannic House and London Wall have since been replaced, morphing the previously distinguishable towers into a continuous wall of tall buildings along Moor Lane.

LISTED HERITAGE ASSETS

Listed Buildings - Grade I

Church of St Giles

St Botolph's Church

Listed Buildings - Grade II*

Crescent House

Listed Buildings - Grade II

Barbican Estate

Dorothy Annan Murals, Speed

Highwalk

Great Arthur House

Cuthbert Harrowing House

Cullum Welch House

Bowater House

Golden Lane Community Centre

Bayer House

Stanley Cohen House

Basterfield House

Golden Lane Leisure Centre

Hatfield House

Sir Ralph Perrin Centre

Designated Landscapes

Barbican Estate (grade II*)

Golden Lane Estate (grade II)

Scheduled Ancient Monuments

London Wall: section of Roman and medieval wall and bastions, West and North of Monkwell Square.

2.4 **Townscape and building heights**

The Neighbourhood Area includes one group of tall buildings and straddles two merging clusters of high-rise and tall buildings which bleed into the Neighbourhood Area. The definition of building heights in between low-rise and tall buildings is area specific: Mid-rise buildings form the predominant building height within the Neighbourhood Area and the City of London at large. Those buildings that project above the general datum and are perceived as significantly higher than their neighbours but below the tall building threshold are classed as high-rise.

- LOW-RISE: up to 18m or 6 storeys (Golden Lane, Litte Britain, Museum of London, Chiswell Street).
- MID-RISE: 20-45m or 7-12 storeys (Barbican, Aldersgate Street, St Martin's Le Grand, One London Wall).
- HIGH-RISE: 45-75m or 13-21 storeys (Great Arthur House, Blake Tower, 1 Silk Street, Ropemaker Street, More Lane, London Wall, Rotunda Tower, Old and New Bastion House).
- TALL BUILDINGS: as defined by the draft City 2040 policy – i.e. those above 75m (Barbican towers, Heron Tower, City Point).

BARBICAN

The three Barbican towers are the tallest buildings within the northwestern fringe of the City of London. By design, the heights all align and in contrast to the two clusters, the residential Barbican towers form a generously spaced composition, with ample breathing space in between and around them. When viewed from within and without the Neighbourhood these form a significant, coherent trinity.

LONDON WALL

The first group of high-rise buildings, which sits between Moorgate and Aldersgate Street, goes back to the post-war commercial element of the Barbican masterplan along London Wall with six parallel 17-storeys high modular towers placed at regular intervals on two-storey podia framing the street. Since the 1990s the central four original towers have been successively replaced by larger ones and others added in between. Hence, the lightness of the original scheme is being lost to a haphazard and dense cluster of towers, some only metres apart. The general building height, however, has broadly been maintained and remained below the tall building threshold.

ROPEMAKER STREET

A group of tall and high-rise buildings has developed around a thirty-five-storey singular tower from 1967 to the east of Moor Lane, just outside the Neighbourhood Area. Britannic House, formerly headquarters of BP, was refurbished and extended in 2000, and renamed Citypoint. Over the past decade several tall buildings were added to the west, north and north-west of Citypoint. Together they form another dense cluster of towers, on streets laid out for a 17th century city. Whilst the buildings vary in height, they do not exceed the crown of the original tower.

MOORFIELDS

The post-war plan for the Barbican area saw a general building height of 8-10 floors with a small number of high-rise and tall buildings strategically placed and projecting above. This compositional clarity has recently been lost as the latest redevelopment of the lower post-war courtyard blocks, between Moorfields and Moor Lane, from Ropemaker Street in the north to London Wall in the south, has resulted in a continuous wall of tall mega-structures – some attached, others only meters apart – which now connect the previously separate clusters on Ropemaker Street and London Wall. The general building height has doubled, from a medium of 10 floors to over 20 – with far reaching impact on townscape, conservation areas and listed buildings, views and residential amenities.

IMPACTS

Due to the adjacency of the Neighbourhood Area, any addition to these clusters will have a significant impact on the Grade II and Grade II* listed Barbican Estate, the Grade II and Grade II* listed Golden Lane Estate, the Barbican and Golden Lane Conservation Area, the Grade II listed Brewery and the Brewery Conservation Area, the Grade I listed churches St Giles' and St Botolph, and the Postman's Park Conservation Area.

The Barbican is also one of four City parks and gardens included on Historic England's Register of Parks and Gardens of special interest. The Barbican and Golden Lane Neighbourhood Planning Area encompasses all these assets in recognition that they are important to the identity of the Neighbourhood. The Forum recognises that conserving and developing these assets requires partnership working with government, Historic England, and other stakeholders – as well as with the City of London through the Mayor's Plan for London 2021, the adopted Local Plan (2015) and the City Plan 2040 once made.

The Area contains significant elements of green infrastructure, providing a focus for the neighbourhood as well as direct economic benefits to the productivity of workers and the well-being of residents and workers alike. As well as the contribution of the nationally-registered Barbican garden, the Area also has Postman's Park and Barber Surgeons' Garden (both Sites of Local Importance for Nature Conservation) and the Barbican Wildlife Garden (a Site of Borough Importance for Nature Conservation). There are many local opportunities to expand this green infrastructure further still.

The Neighbourhood Forum Area also contains the (now closed and soon to be relocated) Museum of London, the Guildhall School of Music and Drama and the Barbican Centre – a cultural quarter recognised in the London Plan 2021 as one of the capital's strategic cultural areas⁴ and integral to the neighbourhood, both by being joined physically and by being a key feature of life in the area for residents and visitors. Community facilities, open to the public, such as Golden Lane Pool and Leisure Centre and the lending Library in the Barbican residential estate all help to cement the ties which bind this neighbourhood together. Places of worship include the listed St Giles Cripplegate, St-Botolph-without-Aldersgate (now used by the Free Church of Scotland), the Jewin Welsh Chapel (developed as part of the Golden Lane Estate in 1960 to replace a chapel in the Barbican, which itself replaced the original chapel established in 1774, the first of 30 Welsh chapels in London). Currently unmarked, yet incredibly important, are both the City's only pre-expulsion Jewish Cemetery (dating back to before 1177), and the place where John Wesley had his "Aldersgate conversion" in 1738 leading to the founding of the major world faith of Methodism. All are significant features of the Area, acknowledged to bind the neighbourhood together in culture, history and worship.

2.5 **Relationship with existing Planning Policy**

The Forum supports the London Plan in recognising the Barbican neighbourhood as a special area within the Central Activities Zone (CAZ) which is rich in cultural activity and where there is a rich mix of strategic functions and local uses.

⁴ The Mayor of London's London Plan 2021, https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

As this strategic plan for London says, this is a place where achieving a suitable sustainable balance is important *“The quality and character of the CAZ’s predominantly residential neighbourhoods should be conserved and enhanced. This should ensure a variety of housing suitable to the needs of diverse communities, including affordable housing, whilst ensuring that development does not compromise strategic CAZ functions. Boroughs should also consider social infrastructure demands generated by residents, workers and visitors in the CAZ when undertaking social infrastructure need assessments”* (2.4.19)⁵.

The City of London’s Local Plan (both current and draft) defines the area as one of strategic importance with regard to planning. In the current Local Plan⁶ it is defined as a “Key City Place” (North of the City) and in City Plan 2040 it is defined as a “Key Area of Change” (Barbican and Smithfield). The Barbican and Golden Lane Neighbourhood Forum Area is entirely within both these areas of strategic planning importance, as defined by the local planning authority.

The area has a long-standing status as a recognisable, distinct Residential Area (and now a designated Neighbourhood) – a status that is likely to continue for many years to come. The City’s current Plan expected that approximately 60 - 70% of new residential development in the City would take place in the Area, and the City Plan 2040 implicitly expects further housing development in this Area. As a result, the Barbican and Golden Lane Neighbourhood Area will remain predominantly residential for the foreseeable future.

⁵ The Mayor of London’s London Plan 2021, CAZ policies such as 2.4.19, page 79
https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

⁶ City of London Local Plan 2015 (Adopted) <https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-local-plan-adopted-2015.pdf>

3 Strategic Priorities and Spatial Strategy

- 3.1 The Forum supports the City of London's ambitions to ensure that growth is accommodated sustainably, to protect and enhance heritage, and to improve public health and the public realm. These align with our objectives which were accepted by the City of London when it designated the Forum in June 2023. To make the City Plan more effective and deliver on the promise of a City that delivers "sustainable economic growth" (1.2 Economic objective) and is "environmentally sustainable" (1.4 Environmental objective), the Forum would also like to see a Social Objective (1.3) to improve the health, amenity and quality of life for the City's workers, residents and visitors rather than just "engaging with" them.
- 3.2 In particular we support a 'retrofit first' approach to development which aligns with the latest national and London-wide planning policy goals in an effective way. In the interests of effective policy a more detailed approach is justified by the evidence and we propose an approach in line with Westminster; this is set out in section 9 of this report. NPPF para 157 calls for "radical reductions in greenhouse gases", a test which is not met by the proposed City policy on retrofit. Lowering operational carbon emissions for the future cannot be at the expense of releasing unacceptable levels of embodied carbon now.
- 3.4 We are surprised that the Corporation's ambitions do not include making the City one of the best places, globally, to work, live and play. There is no strategy to explicitly protect and promote uses and places of international importance, like the Barbican. The most prized City firms, which are key to the City (and UK) economy, are all international businesses with world-wide choice over where they locate. Their benchmarks are global, and the *quality* of the City's environment and its green space, heritage, views, culture, places to eat and shop (as well as quality of life) are just as important to the growth and retention of top firms as office floorspace availability.
- 3.5 We support the Spatial Strategy of focussing delivery of office floorspace and tall buildings in the City Cluster KAOC, supplemented by growth in the KAOCs of Fleet Street, Ludgate and Liverpool Street, even though we question the quantum. Given the rise of flexible working, especially in the sort of high-end professional jobs that are common in The City, and where it is crucial to retaining the talent that drives economic growth, we are sceptical that there is need for 1.2million m² net additional office floorspace to achieve the economic output identified. The City may be applying a standard formula of 12m² per job to an aspiration of 100,000 additional

jobs to reach its office target of 1.2million m² of new office floorspace, but it is highly unlikely that City firms will continue to allocate 12m² office space for each full time equivalent (FTE) in future and credible evidence sees the “new normal” as 63 desk spaces per 100 FTE employees⁷. Both the evidence and target on office floorspace should be revisited. We also question the City’s presentation of the pipeline of office consents and the shifting baseline as a basis for calculating progress towards the target.

- 3.6 There should be stronger policy and controls in areas where uncharacteristic height, massing and overbearing are unsuitable. Current policy has resulted in speculation, inappropriate height and mass, and a harmful reduction in diversity of uses in the Barbican & Golden Lane Area. A Tall Building definition of 75m+, when combined with a policy that does not exclude buildings that are under 75m but are tall in relation to their surroundings from predominantly residential areas or Conservation Areas, will have the same effect. As well as affecting amenity, and damaging townscape, evidence shows that this is also damaging the residential/cultural mix of uses that the City now seeks to encourage. A more balanced set of townscape policies in this Neighbourhood would ensure that the predominantly residential character is retained in the Barbican & Golden Lane, in line with the London Plan. Just as some areas of the City are suitable for dense office development, however, other areas are not and these should also be identified spatially.
- 3.7 We support the Spatial Strategy 2.1 (3) of focussing additional housing “in and around the identified residential areas”. GLA monitoring evidence⁸ shows that the CAZ has systematically accommodated many more residents over recent years whilst achieving strong economic growth, proving that these two outcomes are not incompatible.
- 3.7 We also support an overall strategy of good growth, provided this also ensures that those from disadvantaged backgrounds benefit from the opportunities created by that growth – as a *strategic* priority for the Corporation and The City.
- 3.8 Office rents in The City are already substantially below those in the West End, and a further surplus of City floorspace would be extremely damaging to investors and therefore to the viability and deliverability of economic floorspace in particular. The current office space

⁷ <https://volterra.co.uk/blog/the-post-pandemic-workplace-and-office-employment-densities-in-central-london/>

⁸ <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/monitoring-london-plan>

occupancy rate of 35% ⁹ represents an extremely inefficient use of land and buildings entirely contrary to the NPPF and London Plan.

- 3.9 Office building in the City now have an extremely short life-span. One in Gresham Street, for example, is now being retrofitted less than 25 years after being built. New offices need to meet the ESG priorities of *neighbourhoods, residents and communities* as well as occupiers and workforces. The strategic priority should be to ensure that offices are high quality. Most importantly they need to be built to last, or at the very least to be deconstructed so that the materials can be reused.
- 3.10 We regret that high quality amenity, quality of life and liveability are not to be found in the Corporation's strategic priorities for The City, nor meeting the health needs of communities, nor the provision of new high quality homes. Our view is that supporting the communities that live in the City to flourish by protecting residential amenity and ensuring a liveable environment should be an objective.
- 3.11 Retail is struggling in the City post-pandemic. While the Forum supports the growth and revival of retail in the four principal shopping centres, and active frontages at the foot of office and commercial buildings, the area of independent locally-important retail is a Neighbourhood Shopping Area along Aldersgate Street/Goswell Road (A1) which also needs strong protection and support as a strategic priority; either in the Spatial Strategy or the Smithfield & Barbican KAOC policy set, or both.
- 3.12 In seeking to diversify uses, it seems that the Corporation has misunderstood the nature and importance of culture to the City and by doing so has created a strategy that is highly unlikely to be effective¹⁰. Culture is not just something to be consumed through a series of "attractions"; its value to the economy and life of London is also in its production, which is why the contribution of the Barbican Arts Centre, the Guildhall School of Music and Drama and the surrounding culture/arts SME base is so important to the cultural life of London. The significance of the cultural economy and the potential opportunity for this area to grow and develop it are why the London Plan recognises it as a home to a cultural and creative cluster (2.4.14) as well as to the City. As a strategy, the City's cultural offer should be defined more clearly in keeping with the character of the areas where it is to be supported, broadened, and developed to increase

⁹ London office occupancy rates are less than half pre-Covid levels in the UK, at about 35 per cent, according to Remit Consulting. This compares with pre-pandemic levels of 60 per cent to 80 per cent – reported in The National, Feb 2024

¹⁰ During the Reg 19 consultation the City's anticipated evidence in the form of the Cultural Strategy was not available

skills and employment as well as enjoyment, while managing the impact on existing residential communities. The Plan should therefore clearly define and balance cultural development according to the classifications of the CPF and in reference to the London Plan.

- 3.13 Finally, the City's evidence shows that space will need to be allocated to uses and developments that are crucial to reducing carbon emissions and improving resilience in the face of a changing climate over the lifetime of the Plan. We find the Plan to be insufficiently forward-looking in light of the robust evidence about climate change, whole life carbon, and Urban Heat Island effect in the City, rendering City Plan 2040 contrary to NPPF paras 157, 158 and 159. The Spatial Strategy needs to ensure that sufficient space is available in the right places to expand ground level open space and plant more trees (in sufficient quantity to achieve measurable results), or to support cooling networks, for example, in order to make sure that the whole Plan Area is sustainable.

4 Smithfield & Barbican KAOC (S23)

- 4.1 The Smithfield and Barbican area contains the largest residential area of the City of London. Since the post-war redevelopment, starting with the Golden Lane Estate and then the Barbican Estate, the eastern half of the KAOC has been and remains a predominantly residential area. It has a rich architectural, archaeological, economic, environmental and cultural heritage which contributes significantly to the diversity and success of the City. The relocation of the Museum of London from its current position as an integral part of the post-war Barbican redevelopment to Smithfield, the renewal of the Barbican Arts Centre after half a century of operation and the potential relocation of the historic Smithfield Market, taken together will result in significant change. This creates a strong rationale for having a strategic policy to guide the Barbican & Golden Lane's future development given that it contains a variety of adjacent uses and that it is predominantly residential with housing covering over two-thirds of the KAOC¹¹ area.
- 4.2 We find that the entirely different and separate characteristics of the "Barbican & Golden Lane" area and the "Smithfield" area are not sufficiently recognised in the Plan to achieve an effective policy nor a successful outcome for the area.
- 4.3 Smithfield is a predominantly commercial area with a long-established pattern of use throughout the day and night; dominated by a wholesale market that has been there for centuries, night clubs and bars, a large teaching hospital serving a broad catchment area and a small quiet residential area beside it. The Cultural Planning Framework focal area of Barbican and Smithfield identifies only 'Clusters of night time activity located around Smithfield Market and Holborn Viaduct.'
- 4.4 The Barbican & Golden Lane Neighbourhood Area, on the other hand, represent a large predominantly residential, tranquil area with a significant and world-class cultural centre at its heart. The Barbican Arts Centre has managed to co-exist peaceably with the neighbouring housing for fifty years mainly due to the excellence of the original design, and because it is not a raucous use, and due to its doors closing at 11pm.
- 4.5 The opportunities and challenges of providing for growth in the Barbican & Golden Lane Neighbourhood are completely different to those in the Smithfield area of the KAOC. The impacts of change in Smithfield on the predominantly residential Barbican & Golden Lane require effective, coherent and clearly separate policy and management.

¹¹ The evidence of the Plan's existing conditions and spatial priorities for Smithfield and Barbican (Figures 31 and 32 on pages 279 and 280) show that "Identified Residential Areas" cover at least two-thirds of the KAOC as a whole and a much higher proportion of the "Barbican and Golden Lane" sub-area

- 4.6 We agree that the proposed Key Area of Change for Smithfield and Barbican boundary describes a zone that will be subject to significant change (S23 and policy maps¹²), however, the Forum does not consider that it is justified or effective to then have a second strategic policy (S24) which only applies to the “Smithfield” sub-section of this KAOC without a balancing strategic policy for the “Barbican and Golden Lane”, particularly as “Smithfield” is not defined spatially.
- 4.7 This policy deficit leaves the Barbican & Golden Lane, which is a significant part of the City Plan as a whole as well as of the KAOC, with policy requirements that are not met by S23. The Forum’s suggestions for adjusting S23 are in the interests of policy effectiveness, clarity and coherence. We therefore propose;
- a) amendments to Strategic Policy S23, particularly with regard to residential amenity, housing, accessibility, servicing, air pollution, retail and demolition/construction; and
 - b) resolving conflicting policies on food uses;
 - c) adding wording to Strategic Policy S23 to encourage improvements to the Long Lane/Beech Street/Aldersgate junction, together with better accessibility for all, and lifts to the Highwalk at that junction; and
 - d) a new Strategic Policy (S23B) for the Barbican & Golden Lane, to provide greater clarity and in so doing create more effective policy; and
 - e) applying Strategic Policy S24 (9) [freight & servicing] to the whole KAOC, and not just to Smithfield by moving it from S24 to S23.

4.8 Strategic Policy S23

- 4.8.1 The Forum supports S23 (1) and S23 (5). On the same basis, S23 (9) is strongly supported; Citigen is essential for the Barbican Arts Centre which is about to renew its heating and cooling systems. The Forum strongly supports S23 (10) especially where this allows for the sensitive retrofit or retention/enhancement of heritage assets for hotel use if they are unsuitable for affordable or specialist housing, or otherwise would be lost or demolished.
- 4.8.2 The Forum supports improving pavements and lifts for pedestrians but, as written, policy S23 (2) would run into significant challenges in providing *additional* routes through the Registered Park and Garden and Grade II listed Barbican Estate without impacting on its overall integrity as a masterplanned landscape (as noted in its listing) – or adversely affecting architectural heritage, open space and residential amenity. The KAOC is a small compact area well-served with streets and walkways. There is scant evidence that “connectivity” or “permeability” is lacking, but there

¹² City Plan 2040 – KAOC Smithfield and Barbican - Figures 31 and 32 on pages 279 and 280

is substantial evidence that improved accessibility for all in this area requires more, and more reliable, lifts, ramps and widened pavements on existing routes in places like Beech Street tunnel. In the interests of clarity and more effective policy, therefore, the Forum proposes the following change to S23 (2);

2. Improving inclusive and pedestrian accessibility ~~Ensuring the retention and improvement of pedestrian permeability and connectivity through the large sites such as Smithfield Market site, and by encouraging better lift and ramp access to Barbican Highwalks whilst seeking to preserve pedestrian permeability, heritage, open space, amenity, privacy, security and noise abatement for residents and businesses;~~

- 4.8.3 The Forum supports S23 (3) and the matching policy of S24 (3) about the future use of Smithfield always provided that the amenity of existing residential areas in the whole KAOC is protected under the “agent of change” principle. We propose adding the following words to both policies in the interests of clarity, consistency and effective policy;

“...whilst protecting residential amenity for existing homes in the KAOC”

- 4.8.4 The Forum has considered the Smithfield and Barbican Policy S23 (4) “*Supporting and enabling residential development in appropriate locations*” with the policy for Smithfield S24 (7) “*Resisting residential development adjacent to the current market site or future Museum of London in order to minimise potential adverse impacts on residential amenity*” and the City-wide policy for Housing S3, which says new housing is to be encouraged “*in or near identified residential areas*” but without any identified sites for delivering it. There is robust evidence that the need for affordable rented housing and specialist housing in the Barbican and Golden Lane Neighbourhood is met with substantial difficulty in finding suitable, available and achievable sites on which to deliver housing. Densification of existing residential sites may require sacrificing existing open space; an unacceptable alternative given the robust evidence of OS deficit in the City and this area. By ruling out Smithfield for housing without providing for it elsewhere in the KAOC, the City Plan risks reducing the scope for housing supply in the KAOC and thereby in the City as a whole.

- 4.8.5 Our proposal is that;

- a) Housing site allocations are necessary; City Plan 2040 needs to be more specific about how it will ensure that local needs for housing are met either within the City and within the Smithfield and Barbican KAOC (Strategic Policies S3 and S23)
- b) Strategic Policy 23B be developed for the Barbican and Golden Lane part of the KAOC (see paragraph 4.9 below)

4.8.6 The Forum has considered policy S23 (6) and S23 (11) together. Beech Street tunnel is relevant to both. It is busy, polluted and unpleasant, with narrow pavements. It is directly under and vents up to a dense residential part of the Barbican Estate. Residents' car parks, deliveries and emergency services all need direct access to/from Beech Street tunnel. This relationship is significant as the access points in the tunnel represent the "front door" to residences above it for anyone arriving by vehicle, including emergency vehicles. Air quality needs to be improved and traffic reduced, but not if this simply relocates vehicles to another part of the Neighbourhood or hinders access. Some uses are completely unsuitable for this location. The City Plan provides no credible evidence for the inclusion of "vitality" in this tunnel, a phrase which is sufficiently vague to cover unsuitable uses which may cause nuisance for those living above and around the tunnel, and for the nearby schools. The Forum supports S23 (6) only provided the policy is reworded in the interests of clarity and effectiveness to say;

"6. Making improvements to Beech Street to reduce the volume of vehicle traffic, improve air quality and increase amenity, widen pavements and improve accessibility for all without worsening neighbourhood traffic, air quality or access ~~and vitality~~,"

S23 (11) also needs to be reworded. "Routes between the London Museum and the Barbican" is too loose, covering both Beech Street tunnel and the Highwalk above Beech Street when both are unsuitable as locations for "encouraging leisure, retail or food & beverage uses". Streets in Smithfield, such as Long Lane and Carthusian Street, are very suitable for these uses yet S23 (11) is inconsistent with the Smithfield-only policy S24 (8) which promotes "a retail and leisure economy", without food & beverage uses, even though Smithfield is seen as a "late evening, 7 day a week" place to a degree that new housing will be resisted by the Plan. Taken together as they stand these policies would mean that the only place that food & drink uses would be encouraged would be inside the Beech St tunnel or above it – the most unsuitable places possible – which cannot be the intended outcome or justified by evidence. In the interests of effective, clear and coherent policy, the Forum proposes rewording so that either;

- S23 (11) applies only to "Long Lane and Carthusian Street" (and delete "Routes between the London Museum and the Barbican"), or
- Add "food & beverage uses" to the Smithfield policy S24 (8), define the Smithfield area to which it applies and delete S23 (11).

The Forum also considers that there is insufficient acknowledgement of the retail, food and drink offering on Long Lane, Carthusian Street, Aldersgate and Goswell Road in the policy as it

stands. This retail corridor straddles both the London Borough of Islington and City of London, so perhaps it is understandable that it has not received similar attention as, for example, the Primary Shopping Area designated in Moorgate, but it is a significant Neighbourhood Shopping Area and it could benefit from the anticipated increase in footfall in Smithfield when the new Museum opens. The Forum considers that the policy S23 (11) could contain an additional amendment to say:

'This includes encouraging the retention of the existing leisure, retail, food and beverage uses along Long Lane, Carthusian Street, Aldersgate Street/Goswell Road (A1) (and the Barbican launderette), as these businesses play an important role in supporting the residential community and local economy.'

Including these local retail corridors would assist the City Plan to reflect the aims of NPPF para 97 (d) and 110 (a) to retain shops, facilities and services for the community and reduce the length of journeys required for shopping, particularly in light of the City's own Retail Needs Assessment which identifies 'Shops and other retail around the edges of the Golden Lane, Mansell Street and Barbican estates, which play a role in serving the residential communities'¹³.

4.8.7 The Forum supports the principle of S23 (7) as pollution is at unacceptable levels throughout the KAO. Given the substantial evidence on this, however, the proposed policy is ineffective and ignores some of the most harmful pollution¹⁴ and nuisance altogether. The City is currently consulting on a new Air Quality Strategy 2025 – 2030; we expect therefore to expect to receive, and have the opportunity to respond to, further information before, and at, the Examination In Public. Demolition/construction is a significant source of noise and air pollution and should be limited to Monday-Fridays in the interests of residents' health. Office and commercial terraces are unacceptably noisy, as can be seen from City environmental health officers' comments on planning applications. Traffic generates air pollution and particulates at street level; needing green mitigation at the same level, because that is where it is breathed in at the highest concentrations. In the interest of making policy more effective, the Forum suggests rewording policy S23 (7) to say;

Seeking to minimise pollution levels by resisting demolition/construction at weekends, restricting access at all times to new non-residential terraces, reducing and curtailing nighttime light pollution, managing traffic and increasing green infrastructure at street level.

¹³ City of London, Retail Needs Assessment, p. 35

¹⁴ As identified by the WHO – see our supporting evidence

4.8.8 The Forum supports the principle of S 23 (8) but it ignores evidence and assessments that point to the need to make accessibility (and lifts) a priority for visitors, workers and residents alike in this area. To make policy more effective the Forum suggests rewording policy S23 (8) to say;

Seeking improvements to accessibility for all including wider pavements, safer crossings, more reliable lifts and ramps (such as at Barbican tube) and better cycle routes.

4.8.9 The Forum strongly supports S 23 (12) and proposes additional wording to support the development of a cultural hub around the Barbican;

- *Affordable spaces for start-ups etc*
- *Artist/maker spaces*

4.8.10 The Forum supports the principle of S 23 (13) provided that the “special character” of the Barbican and Golden Lane is recognised as “*predominantly residential and tranquil with a world-class cultural centre*” (i.e. not the same as the “special character” of Smithfield as a “*late evening 7 day a week*” place).

4.8.11 New policy S23 (14) – this Smithfield Policy S24 (9) should apply to the KAO as a whole “9. *Ensuring new activities and developments contribute to a reduction in freight and vehicular movements, whilst not adversely impacting the operation of businesses and amenity of residents;*”

4.8.12 New policy S23 (14)
“Encourage improvements to the Long Lane/Beech Street/Aldersgate junction and its public realm, together with better accessibility for all, public toilets and lifts to the Highwalk”.

4.9 Proposed Strategic Policy S23 B – Barbican and Golden Lane

The Forum questions the City of London’s evidence for excluding a strategic policy for Barbican and Golden Lane. We agree that both parts of the KAO will experience change from the same root causes; the relocation of the Museum of London from the Barbican to Smithfield in the early years of the Plan, the anticipated move of Smithfield market later, and the opportunity to “develop a world-class cultural destination centred around the Barbican Centre and Smithfield”¹⁵. We have not seen any credible evidence from the City, however, to show that it is feasible to successfully shape a place with nighttime economy uses at one end of a 200m street¹⁶ and tranquil predominantly residential uses at the other, without having separate, focussed strategic policies for each distinct area.

¹⁵ City of London – City Plan 2040 - Sustainability Appraisal p. 13

¹⁶ Long Lane from Smithfield Market to Aldersgate Street junction/start of the Barbican Estate

The City of London's own evidence base proves that Barbican and Golden Lane is a unique area which demands special treatment¹⁷. This is further evidenced by the Barbican and Golden Lane Conservation Area SPD¹⁸. It is also underlined by the two sets of Listed Building Management Guidelines SPD and the Barbican and Golden Lane Area Strategy (2015).¹⁹ A separate policy is necessary, particularly as legitimate concerns, raised previously and noted in the Consultation Statement have not all been remedied²⁰, such as this; 'the Barbican Association highlighted a spatial clash between the Northwest of the City being its biggest residential area, with more housing planned, and the site of the City's major cultural offer, with more 24-hour activity planned. This is a fundamental contradiction and there are no policies in the Plan to resolve that clash'.

The Forum's suggested policy for the Barbican and Golden Lane (to be defined as the part of the KAOC to the west of Aldersgate Street) is;

New Strategic Policy S23B: Barbican and Golden Lane

The City Corporation will protect and enhance the predominantly residential, cultural and historic character of Barbican and Golden Lane by:

- 1. Support residential development that meets specific local needs for specialist elderly accommodation and affordable rented accommodation in the [corrected]²¹ "identified residential areas".*
- 2. Enhancing, maintaining and encouraging sensitive refurbishment of the Barbican Arts Centre and Guildhall School of Music and Drama as a focus for the strategic cultural area recognised in the London Plan, and supporting the reuse of the Barbican Exhibition Halls for start-ups, digital and creative industries, cultural organisations and artists/makers;*
- 3. Resisting development adjacent to the Barbican Estate and Golden Lane Estate and the residential blocks and streets of the area that has an adverse effect on residential amenity in this predominantly residential part of the KAOC which does not have a late evening, 7 day a week character;*

¹⁷ See the City of London Tall Buildings Topic Paper, for example;

<https://www.cityoflondon.gov.uk/services/planning/planning-policy/evidence-draft-city-plan-2040>

¹⁸ <https://www.cityoflondon.gov.uk/assets/Services-Environment/barbican-golden-lane-ca-spd.pdf>

¹⁹ <https://www.cityoflondon.gov.uk/assets/Services-Environment/public-realm-barbican-golden-lane-area-strategy.pdf>

²⁰ City of London – City Plan 2040 – Consultation Statement

²¹ See boundary change to include missed residential areas

4. *Enhancing the distinctive character of the area by retaining residential and listed buildings and encouraging new development which respects;*
 - a. *the predominant low-rise and mid-rise character²² of the Brewery Conservation Area and the Barbican and Golden Lane Conservation Area*
 - b. *the heritage, design and fabric of the Registered Landscapes, Parks and Gardens and also of the Grade II and Grade II* Listed Buildings [to be identified in full in final policy wording]*
 - c. *the reference heights and grain of the neighbourhood*
 - d. *the Barbican Estate Listed Building Management Guidelines SPD²³ and Golden Lane Estate Listed Building Management Guidelines SPD²⁴*
 - e. *and keeps an appropriate distance from the trinity of Barbican towers to protect their composition, and does the same for Great Arthur House.*
5. *Protecting the heritage and plan of both the listed Barbican and Golden Lane estates – the way squares are formed and the way that Highwalks – whether high level or ground level - intersect with them. Developments that cut across these original plans will be resisted.*
6. *Resist loss of Highwalks and Highwalk ramps, and encourage new Highwalks that sensitively integrate with the existing ones and do not damage residential amenity. Encourage the provision of lift access to the Highwalk from Aldersgate St (w) near Barbican tube through developer contributions or directly.*
7. *Supporting the relocation of the Museum of London to Smithfield, and encourage meanwhile cultural and community use of the original Museum of London building and Bastion House during the relocation;*
8. *Protect amenity by requiring developments to restrict access to new office and commercial roof terraces, install automated blinds, increase green infrastructure with emphasis on tree cover to mitigate urban heat island effects and refrain from noisy deconstruction and construction works at weekends and bank holidays. Developments should also demonstrate how they will avoid generating additional light pollution with an emphasis on any residential neighbour impacts and fully reference the City of London's Lighting Supplementary Planning Document;*
9. *Urban Greening*

²² As defined in the Barbican & Golden Lane Conservation Area SPD

²³ [Barbican Estate Listed Building Management Guidelines - City of London](#)

²⁴ Golden Lane Estate Listed Building Management Guidelines - City of London

- a) Development must achieve a minimum UGF score of 0.4, and 0.6 for major development in the area
- b) Any Biodiversity Net Gain should be required to be delivered within the Barbican & Golden Lane Area so that it benefits the local community and environment.

10. Development adversely affecting health and sport facilities will be resisted.

11. Air Quality

- a) Development should not damage the health of the air by increasing emissions of harmful pollutants to it. Such pollutants include: greenhouse gases; those considered by the United Nations to cause adverse impacts to the natural environment; and particles and gases considered by the World Health Organisation (WHO) to be harmful to human health. Barbican & Golden Lane, being predominantly residential, is a sensitive receptor zone and any proposal that results in an increase in air pollution will only be justified in exceptional circumstances.
- b) Development should comply at least with all minimum UK environmental requirements in relation to air pollutants whichever is the more stringent.
- c) All development must be at least 'air quality neutral' and not cause or contribute to worsening air quality. On major development this should be demonstrated through an Air Quality Impact Assessment which must additionally demonstrate how local air quality can be improved across the proposed development as part of an air quality positive approach.
- d) Major development must demonstrate that it is designed to ensure that indoor air quality complies with the latest WHO guidelines for short and long term air quality including particulate matter (PM_{2.5} and PM₁₀), nitrogen dioxide (NO₂), carbon monoxide (CO), formaldehyde and volatile organic compounds (VOCs). Carbon dioxide (CO₂) concentrations in indoor air should also be considered. Compliance with such standards is also encouraged on medium development and substantial refurbishment schemes.
- e) Air intake points servicing internal air handling systems (including air filtration systems and heating and cooling systems) should be located away from Beech Street, Aldersgate Street, London Wall, Silk Street and Moor Lane.
- f) Flues should be directed away from residential dwellings.)

12. Encourage the retention of ground floor retail units at Crescent House on Aldersgate Street, in the Golden Lane Estate, as these provide an important local shopping, food and drink offering for local residents in an area that otherwise lacks nearby retail uses.

4.10 Policy maps for the Smithfield and Barbican KAOC

As well as the boundary and residential area changes relating to Plan policy and proposed earlier in this report, the Forum questions the following issues with the Spatial Priorities map;

- a) There is substantial, robust evidence that the junction of Long Lane/Beech Street and Aldersgate Street needs to be safer, and more accessible, with a reinstated public toilet, a lift up to the Highwalk and, if possible, a lift down to Barbican Tube platforms (extending accessible access to the adjoining Elizabeth Line platforms of Farringdon). We question why this is not identified, and why it is not the top priority for public realm improvement in City Plan 2040.
- b) The green space shown on Moor Lane does not exist at that location – a green space on the corner of Moor Lane and Silk Street is not shown, nor is the substantial greening with mature trees on Fore Street (S) – all need to be mapped, enhanced and extended.
- c) We question why City Point Plaza is not clearly identified as key open space to be retained, extended and subject to high quality public realm improvement, including trees offering broad cover and substantial greening.
- d) We question the evidence for the location of the pedestrian routes at the eastern end of the KAOC. The whole of Moor Lane, from Fore Street to Chiswell Street is a key north-south route, which already takes heavy footfall from people diagonally crossing City Point Plaza (SE:NW) from Moorgate Tube, as well as from people walking the length of the street. The stretch of Moor Lane north of Ropemaker Street (and the adjacent crossing points) is inadequate in terms of accessibility and a priority. Chiswell Street also needs improvement, particularly along the stretch from Moor Lane west to Brewery, Montcalm Hotel (with its bars and restaurants); it is a significant route leading to the Barbican and Whitecross Street market and shops. All of these would help the viability of this area and offer a useful adjunct to the Barbican Arts Centre, allowing for intensification of use in a location infinitely more suitable and deserving than the residential Silk Street, bordered by Cromwell Tower and Speed House with its single-glazed bedrooms all facing the street.
- e) The proposed N-S pedestrian route outside the KAOC joins London Wall at the junction with Wood Street/Fore Street; an exceptionally busy and unattractive junction which is not a destination in its own right. The route therefore relies on the Highwalk and lifts/escalator

improvements at that junction for pedestrians to go up and down to ground level. The route also needs to continue within the KAOC along Fore Street to join with Moor Lane.

- f) There is substantial evidence of need for public realm improvements along Golden Lane, Aldersgate Street (along its whole length)/Goswell Road (by the shops), Little Britain, Carthusian Street and Fann Street – none of which are mapped. The colonnade of shops under Crescent House on Aldersgate Street/Goswell Road should also be identified as a Neighbourhood Shopping Area and the routes to it from Smithfield and Barbican tube should be identified to improve footfall and viability.
- g) The historic alleyway of Braidwood Passage from Aldersgate St through to Smithfield is currently stopped up temporarily but will be reinstated as part of the 150 Aldersgate Street scheme. It is on a key walking route through to the GP surgery and Barts Hospital which needs to be mapped and prioritised to make sure that very high quality public realm is maintained and full accessibility secured. It must not sink back into being a nighttime urination spot for the drinkers of Smithfield, and it must be level, wide, green and pleasant. This is outside our Neighbourhood boundary but crucial to our Neighbours and we therefore will be relying on the City Plan 2040 to recognise its importance as a key pedestrian route.

5 Housing

- 5.1 The supply of affordable housing in the Barbican & Golden Lane Neighbourhood, and housing for older people and those with support needs, is a concern for the Forum.
- 5.2 We have commissioned our own professional Housing Needs Assessment (see separate supporting evidence) which concludes that the housing priorities for the Area are both affordable private rented dwellings, and specialist accommodation for older people and those with support needs.

Table 5-6: Age structure of Barbican and Golden Lane, 2011 and 2021

Age group	2011 (Census)		2021 (Census)		Change
0-14	344	8.1%	301	6.7%	-12.5%
15-24	299	7.0%	363	8.1%	21.4%
25-44	1,510	35.6%	1,632	36.5%	8.1%
45-64	1,303	30.7%	1,242	27.8%	-4.7%
65-84	693	16.3%	834	18.7%	20.3%
85 and over	98	2.3%	98	2.2%	0.0%
Total	4,247	100.0%	4,470	100.0%	5.3%

Source: ONS 2011, ONS 2021, AECOM Calculations

Table 4-1: Tenure (households) in Barbican and Golden Lane, 2021

Tenure	NA	City of London	London	England
Owned	48.2%	36.5%	45.2%	61.3%
Shared ownership	0.2%	0.2%	1.5%	1.0%
Social rented	13.1%	14.9%	23.1%	17.1%
Private rented	38.4%	48.4%	30.1%	20.6%

Sources: Census 2021, AECOM Calculations

- 5.3 We support the policy intention [HS1] for new housing to be provided in or next to existing residential areas, particularly where it would allow people to stay in their own neighbourhoods as their support needs increase. We find it hard to understand where this new housing will be located, however, without site allocations. Our evidence shows that the residential area boundaries in our Neighbourhood Area have been drawn too tightly, missing residencies which evidence shows as being within our predominantly residential, cohesive Neighbourhood when the Forum was designated. It would therefore be more appropriate, accurate and straightforward to use the Barbican & Golden Lane Neighbourhood Forum boundary. Without such a change it is not entirely clear how housing delivery is to be achieved in this Area, given that the three main sites have

already been built on, both of our large residential estates are Listed and short of space, and the presumption against conversion of office sites to residential use.

- 5.4 The City's assertion that housing targets can be met by windfall provision has not been underpinned by adequate evidence, especially with regard to the Barbican & Golden Lane Neighbourhood Area and by extension the Barbican & Smithfield KAOC, which is the largest residential area of the City. Nor is there sufficient evidence to justify a lower target for specialist older housing than the London Plan. Our evidence (provided separately), therefore provides justification for amendments to the City Plan 2040 to;
- a) Extend the "residential area" (Figure 32) to include the whole of the Forum Area boundary, as this has already been accepted by the City of London as a cohesive residential neighbourhood on designation;
 - b) Designate sites for housing which meet the Plan target, in the main, with housing for which there is local need;
 - c) resist loss of open space, amenity space/views and greening where existing residential estates are being redeveloped (HS1[3]) in the interest of improving the deficit of open space, tree canopy cover and greening in general in the City.
- 5.5 Co-living and shared living schemes (whether purpose-built or a conversion) may have a place in the Smithfield & Barbican KAOC, particularly if this means the reuse or retrofit of a building rather than demolition, and if it can be shown that such provision is likely to relieve pressure on the availability of affordable private rented homes elsewhere in the Neighbourhood. However, such schemes will have been designed to meet a specific demand, meaning that, without significant adaptation, changing the development to meet an alternative residential use will result in a failure to meet the minimum space standards. In the interest of effective policy on the quality and standards of housing, Policy (S3) should be re-worded to say

Policy S3 [1b] Within identified residential areas, the delivery of affordable housing, build to rent, sheltered and extra-care housing is a priority. Co-living and hostel accommodation may also be allowed, if it can be shown that this relieves pressure on the availability of affordable housing nearby, does not cause excessive concentration or cause adverse impact on / loss of permanent residential accommodation. Housing is encouraged in residential areas particularly if this means the reuse or retrofit of a building rather than its demolition. To protect housing standards and residential amenity, shared living

developments are prevented from converting to other housing types through legal agreements and conditions.

5.6 Student housing

The Barbican & Golden Lane Neighbourhood Forum would prefer to see real affordable rented and specialist residential development to meet evidenced local need. However, we acknowledge that, under the current City Plan 2040 and the London Plan, our Area is in theory a viable location for student housing. Given this, clarification is needed as to whether the City Plan, and the City Corporation, intends to include student housing in its definition of 'residential development' for the Barbican & Smithfield KAO (page 48 - para 4.1.5 says it does not, para 4.1.6 says it partly meets housing need though a formula of 2.5 student rooms to 1 residential unit). Since the City of London 2022 Housing Monitoring Report shows 797 additional student units completed in recent years and the 2023 SHMA acknowledges a large pipeline of further supply amounting to 1,413 units in total, the Forum believes there is no justification for locating additional student units in the Area unless there is robust evidence to show that providing specialist student rooms would relieve competition and price pressure in the wider private rented sector to the benefit of other groups, and particularly those in need of affordable accommodation.

5.7 Local housing in the Barbican & Golden Lane Neighbourhood

The City's strategy of using developer contributions to fund new homes outside the City means that local people have to move away from their current homes and social networks to benefit directly. It is worth emphasising that the Barbican & Golden Lane Neighbourhood's Housing Needs Assessment (HNA, provided separately) is robust evidence of need for Affordable Housing in the Area and every effort should be made to maximise delivery locally where viable.

5.8 The City is the landlord of the Barbican Estate and Golden Lane Estate and, as local authority and also through its separate (private) investment portfolio, is a substantial landowner in the Neighbourhood Area. It therefore has options to deliver housing, either on public sector land or on investment land, beyond those available to most local authorities through the Local Plan. The Forum regrets that the City has not, as yet, brought forward any of its own land for new housing in the Neighbourhood, and we remain hopeful that this position will change.

5.9 Using public sector land, or private developer-led schemes, would be preferable in this Neighbourhood to the regeneration and intensification of the existing estates, which would not be possible nor advisable given their heritage status. We request that such redevelopment of listed

housing is ruled out in the lifetime of the Plan, with a focus on maintaining, repairing and upholding the fabric of the housing and buildings as heritage significant assets to the Neighbourhood. NPPF 129a) says that increasing the density of housing in city centres should be the norm, but it does allow for this not to apply if *“it can be shown that there are strong reasons why this would be inappropriate”*. The heritage status of the Barbican and Golden Lane Estates, in which the masterplanned grid with its communal garden squares is a significant element, together with the existing density, and the significant deficit of open space and green space, taken together, provide the “strong reasons” for not seeking further intensification in this Neighbourhood.

- 5.10 Finally, and we appreciate this is outside the scope of the current Plan, we note that a great deal of specialist housing need could be met by the City by the selective “buy back” of under-used leasehold residences and that this would be both a cost-effective and land-efficient way of addressing the evidenced housing and social care needs locally.

6 Heritage

- 6.1 The Barbican & Golden Lane Neighbourhood Area is one of very high heritage significance, including parts which meets the global benchmark of world-class.
- 6.2 In 2023, the government's Independent Panel on UNESCO World Heritage status, convened by the Department of Culture, Media and Sports said *"As a masterpiece of brutalist architecture and town planning reflecting the standards of its time and arguably, one of the best examples of municipal urbanism, the Barbican is one of the best examples of municipal urbanism in the Brutalist style in the world that has maintained its authenticity and integrity despite periods of adaptation and change"*²⁵.
- 6.3 Most of the area lies within designated conservation areas, and it contains a large number of statutorily listed buildings together with Registered Parks and Gardens and Scheduled Ancient Monuments.
- 6.4 At the moment, Core Strategy Policy CS12 of the adopted 2015 City Plan identifies the need to: (i) Safeguard the City's listed buildings and their settings, while allowing appropriate adaption and new uses: (ii) Preserve and enhance the distinctive character and appearance of the City's conservation areas, while allowing sympathetic development within them. No similar stated aim has been included within the Draft 2040 Plan. The Forum proposes that the wording of current policy CS12 is reinstated in City Plan 2040.
- 6.5 The Barbican and Golden Lane Neighbourhood Forum considers that despite the policies set out in S11 of the Draft Plan for Managing Change to the Historic Environment, the necessary and vital protection of heritage assets will be seriously reduced by the emphasis placed elsewhere in the Plan on achieving a very large increase in new office floorspace and the encouragement of tall buildings.
- 6.6 The 'public benefits' that may be perceived from large-scale office development seem likely to be used to justify harm to the historic environment which would normally be considered unacceptable. Such an approach should not be allowed to mitigate against harm to the historic environment.
- 6.7 Policy HE1(6) should be strengthened to require that opportunities to enhance conservation areas be positively sought and pursued, not merely 'considered'. As proposed the wording does not comply with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 which stipulates a duty to pay special attention to the desirability or preserving or enhancing the

²⁵ Note to Barbican Cultural Alliance, from the government's advisory committee on the UNESCO Tentative List, provided by DCMS, August 2023

character or appearance of conservation areas, nor is it in accordance with the requirements of Section 16 of the National Planning Policy Framework.

- 6.8 The Barbican and Golden Lane Neighbourhood Forum notes with concern the proposed reference to the ‘immediate setting’ of the Bevis Marks Synagogue in policy HE1[8]. Such a concept does not comply with national policy: NPPF defines setting as ‘the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve’. NPPF makes no distinction between immediate or wider setting. Were such a distinction to be deemed acceptable within the City Plan the implications for heritage protection in the BGLNF area could be severely damaging. The Forum proposes that the word “immediate” is deleted from Policy HE1[8].
- 6.9 The Forum is also concerned that the City of London Corporation has no register of non-designated heritage assets and, in decision-making on planning applications, its committees tend to take the view that if an asset is not listed or registered it has no heritage value at all. This is contrary to NPPF (209) particularly with regard to non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, such as the Jewish Cemetery dating back to 1177. The lack of listing status also disadvantages the City’s twentieth-century buildings, where listing is slowly advancing but whose value as heritage assets is bound to increase in the future.
- 6.10 The Forum takes the view that non-designated heritage assets can make a positive contribution to the City’s environment and distinctiveness as a prime location for business. We regret that the only reference to non-designated heritage assets is in S11[d] which refers to retrofitting them. Our proposal is for a procedure to identify and record non-designated heritage assets in the City in a public list, using agreed criteria for identification, combined with a specific policy to protect them;
- “To ensure that development is sympathetic to the local character and history and aims to maintain and enhance a strong sense of place, new development should be fully integrated with existing designated and undesignated heritage assets without causing undue harm and without loss of local distinctiveness.”*
- 6.11 Finally, the Forum also notes a reference in the City Plan 2040 (p302) to the CAAC - Conservation Area Advisory Committee as “A consultative group set up to advise on planning applications and other proposals in the City’s conservation areas”. According to a Committee Report in 2023 “The City of London Conservation Area Advisory Committee (CAAC) was set up by the

Corporation of London in 1973 and a constitution was approved in 1982. Membership of the Committee is open to representatives of Ward Clubs, amenity bodies and City institutions and organisations by invitation of the Committee. Eleven of the City's twenty-two Ward Clubs are represented on the Committee. National conservation organisations represented include the Ancient Monuments Society, The Twentieth Century Society and the Georgian Group. Local amenity groups represented include the City of London Historical Society and the London Society. Representatives from professional bodies include Royal Town Planning Institute (RTPI), Royal Institute of British Architects (RIBA), the Royal Institute of Chartered Surveyors (RICS and The Urban Design Group. A quorum consists of seven members of the Committee.²⁶ However, there is no list of members, or means of contacting the committee, and no minutes are published.

- 6.12 The 2023 committee report also said that “Although some members of the Committee have relevant professional qualifications, the main criterion is to take an active interest in the buildings and environment of the City”. This oddly-constituted advisory body hardly provides reassurance that the governance, independent monitoring and standard-setting for heritage in the City is receiving the attention it deserves and needs, nor that heritage planning decision-making is getting suitably qualified advice, given the worldwide status of much of that heritage, nor that the interests of users, residents and stakeholders are represented. We recall that, in the case of the Tulip; “The Secretary of State notes that there is little evidence of how internal design reviews had shaped the outcome, that there was no independent review until after the application was reported to committee”²⁷. We urge the City to undertake an independent review of the constitution, terms of reference, transparency, accountability and effectiveness of CAAG.
- 6.13 Without strong and independent design reviews, planning decision-makers and committees would benefit from strengthened and clear Heritage policy to actually achieve its aims.
- 6.14 The Forum is also concerned that the City Plan treats heritage primarily in terms of visitor facilities. There is nothing about safeguarding the City’s portable heritage assets i.e. collections of rich historical value held in City buildings. We propose inserting a third point into Policy CV1. ‘Proposals resulting in the removal of portable heritage assets (items or collections of historic importance) from the City will normally be resisted.’

²⁶ The 25 Wards of the City of London each have a Ward Club (some Wards share a club). The Ward Clubs are primarily clubs aimed at residents and those who work in the City particularly the business voters. They organise the Wardmote (Ward Moot). A Ward Beadle opens & closes the Wardmote and in the past would fine Freemen who failed to attend.

²⁷ TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 78 APPEAL MADE BY BURY STREET PROPERTIES (LUXEMBOURG) S.A.R.L. - LAND ADJACENT TO 20 BURY STREET, LONDON EC3A 5AX. APPLICATION REF: 18/01213/FULEIA

7 Tall Buildings

- 7.1 As our supporting evidence (provided separately) outlines in more detail, we agree with the 'City Plan 2024 – Tall Buildings and Heritage Report' that the Barbican and Golden Lane area is 'very sensitive' to tall buildings.
- 7.2 We also support the principle that *"Outside the designated areas, policy will be amended to specify that these areas have been identified as being very sensitive to tall buildings and that new tall buildings would be inappropriate in these areas"*²⁸. In accordance with this, the Barbican & Golden Lane Neighbourhood Forum considers that the whole of the Neighbourhood Area, and by extension the Smithfield & Barbican KAOC, is inappropriate for new tall buildings. In the interests of conformity, clarity and effectiveness Policy S23 should be extended to say that "buildings that are significantly taller than their surrounding will be resisted".
- 7.3 The Forum notes that between the existing 2015 plan and City Plan 2040 the City's definition of a tall building has changed from "those which significantly exceed the height of their general surroundings" to "buildings over 75m AOD". This represents a radical (and uncommented on) departure from the definition in the previous plan
- 7.4 Furthermore we consider the 75m+ definition of a tall building to be arbitrary and inappropriate to the context of conservation areas in the City, and specifically to the conservation areas within the Barbican & Golden Lane Neighbourhood Area. The BGLNF strongly objects to the amendment of the wording of Policy S12 to remove the statement in the existing Local Plan that tall buildings are inappropriate in conservation areas. It is considered that this change would radically weaken the level of protection of the historic environment, and fundamentally threaten the character and appearance of the BGLNF area. The wording in the currently adopted local plan (CS14) should therefore be reinstated to say that tall buildings (defined in this case as those that significantly exceed the height of their general surroundings) are inappropriate in conservation areas. It is essential that the existing presumption against tall buildings in conservation areas be retained.
- 7.5 The Barbican and Golden Lane Conservation Area SPD, specifically describes the immediate setting of the conservation area is low- to mid-rise²⁹. The tall buildings that do exist within the conservation area, notably Golden Lane's Great Arthur House and the trinity of Barbican towers were all built as part of meticulous post-war masterplan, carefully positioned and proportioned

²⁸ City Plan 2024 – Tall Buildings and Heritage Report – City of London Corporation

²⁹ Barbican and Golden Lane Conservation Area SPD, adopted in February 2022, Section 4

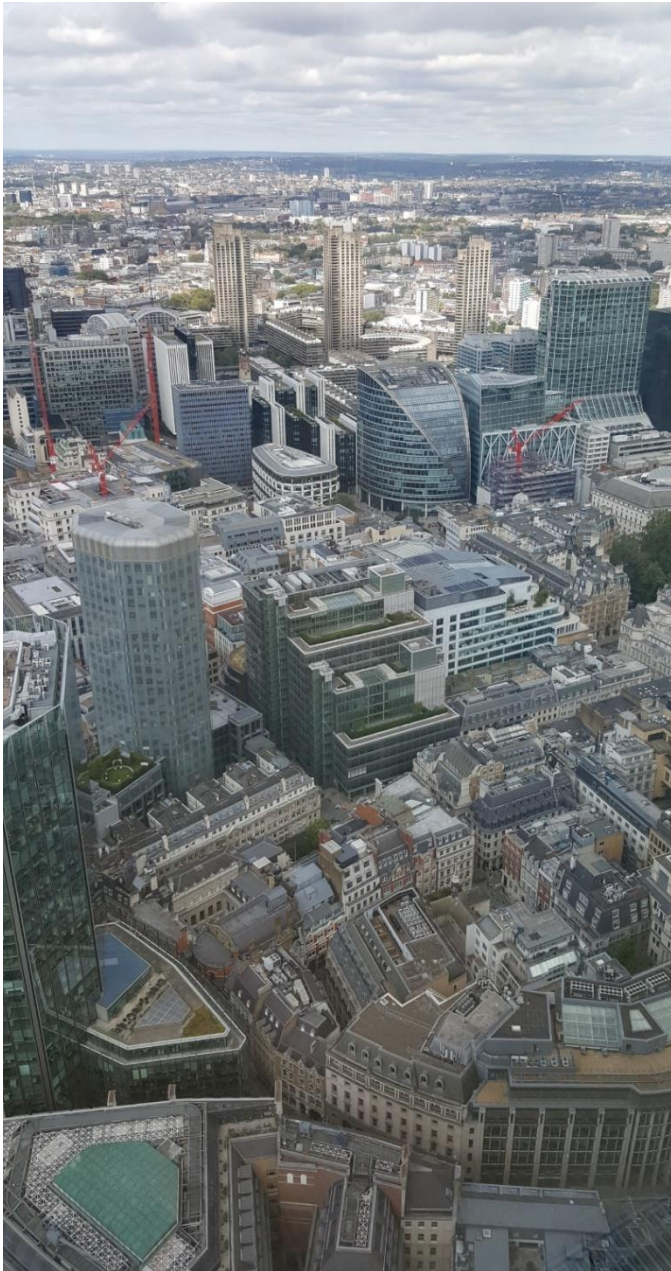
among ranges of lower buildings and extensive public realm. The spaces and distances between the taller elements are essential to their setting as individual heritage assets and are also intrinsic to the character and appearance of the conservation area. New tall buildings would be completely inappropriate for the area, and extremely damaging to its character and appearance. The SPD specifically describes the southernmost end of the estate as the ‘foothills’³⁰ of the Barbican where the scale is lowest and closest to that of more traditional forms of building. The southern part of the BGLNF area which includes Little Britain, the north side of Gresham Street, Ironmongers’ Hall and the former site of the Museum of London is conspicuously low scale.

- 7.6 Outside the conservation area but within the BGLNF area, Bastion House and the original Museum of London complex are also an important part of the post-war masterplan, complying with the grid layout and integrated into the elevated pedestrian walkway system. Evidence of the significance of the orthogonal layout of Bastion House has been clearly set out by C20 Society and Historic England. These buildings are also critical to the setting of the conservation area and nearby listed buildings. It is considered that these sites are inappropriate for new tall buildings (defined as those that are significantly taller than the height of their surroundings).
- 7.7 We have a concern that the consequence of defining tall buildings as 75m+ is that it incentivises high-rise developments that are just under the 75m threshold, across the whole City, and specifically in and adjacent to the Barbican & Golden Lane’s predominantly residential and heritage-rich neighbourhood where the reference height is low to mid rise and buildings much taller than the reference heights cause substantial harm.
- 7.8 Just as not all locations are suitable for Tall Buildings, not all locations are suitable for slightly lower but still inappropriately high buildings either.
- 7.9 Within the Barbican & Golden Lane Neighbourhood the only buildings above 75m are the listed trinity of Barbican towers, Heron Tower, and City Point. Buildings of up to 18m or 6 storeys form the main character of Golden Lane (the Barbican & Golden Lane Conservation Area), Little Britain, Museum of London and Chiswell Street (the Brewery Conservation Area). The bulk of the listed Barbican Estate (in the Barbican & Golden Lane Conservation Area) is 20-45m or 7-12 storeys, together with Aldersgate Street, St Martin’s Le Grand, and One London Wall. Pencil towers of 45-75m or 13-21 storeys in height, such as Great Arthur House, Blake Tower, or Bastion House, as with the trinity of Barbican towers, are typically part of a well-designed composition, with ample breathing space in between and around them.

³⁰ Ibid, Page 28

7.10 New development just under the 75m Tall Building threshold, in locations adjacent to the Barbican and Golden Lane Neighbourhood Area, will have a significant impact on the Barbican and Golden Lane Conservation Area, the Brewery Conservation Area, the Postman's Park Conservation Area, and their Grade II* and Grade II listed buildings, scheduled monuments, gardens and landscapes. The Barbican & Golden Lane Area is generally not suitable for buildings out of scale with their neighbours and surrounding area, particularly where closeness of developments to one another would also cause the type of harm that City Plan 2040 policy (S12 [10.f]) only seeks to prevent with tall buildings by maintaining "adequate distance between buildings to ensure high quality experience at the street level;". This should be amended to say *"adequate distance between buildings to ensure high quality sustainable townscape experience at the street level;"*.

8 Open Space and Green Infrastructure (S14)



Open Space

8.1 Open space, and particularly green open space is extremely thin on the ground in the City. The purpose of the City Plan 2040 is not simply to expand office provision: it must deliver sustainable patterns of development. A failure to plan for adequate green and open space contravenes London and national planning policy. Evidence shows that the City's current proposals are ineffective at ensuring adequate access to green and outdoor space, adversely affecting health, productivity and happiness for workers, visitors and residents.

8.1.1.1 Without clear evidence of need nor evidence of how the proposed policy will release specific sites for creating new ground level green and open space to meet a reasonable standard³¹, our view is that it is not possible to see the City Plan 2040 as sound as it will be contradicting national and London policy by not delivering sustainable patterns of development and by not

being based on robust and objective need assessment (NPPF 11, 15, 35 etc)

8.2 The NPPF (11[b]) says that strategic policies should, as a minimum, provide for “objectively assessed needs for housing and other uses” (our emphasis). There is no objective assessment of need for Open Space for residents in City Plan 2040, and we question the City's evidence for setting standards of Open Space for the workday population so low, for failing to respond the deficit in Open Space, and consequently for failing to plan in sufficient detail for an increase of Open Space to a sufficient target level to meet the combined needs of residents, workers and visitors.

- 8.3 The City's Open Space policy does not conform with the London Plan Policy G4 Open space which requires (G4[1]) a "needs assessment of all open space to inform policy" nor does it conform to G4[3] with regard to "ensuring that future open space needs are planned for, especially in areas with the potential for substantial change", in particular as this relates to the Smithfield & Barbican KAOC. It does little to meet the Mayor of London's target of making more than 50 per cent of London green by 2050.
- 8.4 The City has provided no evidence to support the notion that "the most appropriate standard" is a ratio of public open space per 1,000 week day day-time population at 0.06 hectares of "amenity space" (i.e. counting space you look at but can't access). This is 1/10th of the part of the Fields in Trust benchmark for "amenity space", which itself is only part of the normal Open Space benchmark of 1.6ha or more per 1,000 population. Unlike commuters who may have access to Open Space in their home areas, for residents the City is home and their need for Open Space is no less than anyone else's.
- 8.5 Even by the City's inadequate, tiny and unevidenced measure, however, City Plan 2040 fails to secure anything like a suitable amount of Open Space. Applied to a current workday population of 615,000³² and the additional workforce of 100,000³³ anticipated, City Plan 2040 would be required to deliver a total public open space of 42.9ha against current provision of 34.5ha. This deficit of 8.4ha of Open Space takes no account of the Open Space lost and due to be lost by development consents since 2022; and we know that this pipeline of planning permissions allows building over existing open squares and plazas in the City. The 8.4ha deficit also does not account for the number and needs of residents, which barely figure in the equation used to calculate need (by excluding working residents, for example).
- 8.6 The Forum considers that the City needs to improve its evidence base by providing a more reasonable, accurate and up to date analysis of the needs for Open Space, including the needs of residents; by mapping areas of deficit related to the relevant categories of Open Space (such as public Open Space, outdoor sports, play etc); and then by putting forward a target and more detailed spatial strategy for how deficits will be addressed with provision of new Open Space of the right type in the right locations.
- 8.7 Expanding Open Space provision must be part of Policy OS1, including identifying in policy those areas where new Open Space is deficient and/or needs to be created. Examples already in the

³² City of London Statistics Briefing, May 2024

³³ From the City Plan 2040's own office space forecasts

- supporting text include; along the river, the City Cluster, Aldgate and Smithfield (para 12.2.1), the City Cluster (para 12.2.1), west of Farringdon Street and east of Bishopsgate (para 12.4.1)
- 8.8 Next to a picture of the beautiful ground level green lawn by St Paul's Cathedral, the City Plan 2040 says "there is a need for additional open space in the City to provide facilities for the growing daytime population, to help reduce the effects of pollution and climate change, to provide facilities for relaxation, tranquility, leisure and sport, and to increase biodiversity" (para 12.2.0), and yet instead of expanding provision it favours "improving access to open space". This is too weak.
- 8.9 Taking people's gardens is not the answer (Policy OS1[3]). Existing housing estates and blocks in the City typically rely on communal private gardens and open spaces for residents, all of whom are living in areas of deficit against the accepted standards of Open Space for residents. The intention of the policy to "increase public access" to "existing and new open spaces" may not have been to take residents' gardens, but it would be allowable and even encouraged under it. Where existing open space is actually private communal garden space for residents who have no other gardens, public access is not appropriate. Seeking to secure private residential garden spaces as "publicly accessible open space" will damage residential amenity by simply robbing Peter to pay Paul. Taken together with the policies to regenerate estates (S3, KAOCs etc) this policy is too broad and imprecise to protect the loss of open space for residents and, with it, amenity. OS1[3] should be amended to exclude private residential garden space which is already in significant deficit in the City.
- 8.10 Underwhelming pocket parks on the highway are not the answer, either (Policy OS1[3]). During Covid times a number of "pop-up" seating areas appeared in the City. A couple of benches, on a pallet base with a bit of planting, would be located in the street usually next to a Pret to allow workers to eat lunch safely outside. These were described as "pocket parks". A policy, as OS1[3] does, which seeks to create "open space from underused highways" should at the very least create spaces of a reasonable size and a very high quality to ensure they make a positive contribution to the environment.
- 8.11 Ground level Open Space is crucial – the City knows this; there is robust evidence to support this; the statement (para 12.2.1) that "New spaces at ground level should be created where possible" and (9.4.5) that "the provision of outdoor public space at ground level will be prioritised" should be put into policy to make the Plan effective. There is an overall and area-specific deficit of ground-level easily accessible open space and greening that, if corrected, is

capable of having a real impact on shading City streets, bringing down UHI, and improving the health of visitors, workers and residents – all of which are necessary to a material degree according to the City’s own evidence of need and deficiency.

- 8.12 The Forum is of the view that the intention of Strategic Policy (S14) to “promote a greener City” is too limited, imprecise and unrelated to the function of a plan to shape development. The evidence shows that the City needs more open space as well as more greening, and the strategy should be to increase both to a significant degree. We support the “protection” of “existing open and green spaces”; instead of “promoting” greening, (S14) needs to create new *ground level* open space publicly accessible to all and to resist loss of such space in absolute terms. A target for ground level open space is also necessary.
- 8.13 We agree that the new and upgraded SINC identified in para 12.4.2 are sound and we support this proposal fully. The Barber Surgeons’ SINC, however, was upgraded and is missing from the text although it is on the list.
- 8.14 The Forum questions the City’s evidence about Open Space and standards of access to it. Deficiencies are greater than presented, in our view, and the policy response therefore is ineffective in creating the volume of Open Space and Green Infrastructure necessary to reach acceptable standards in the City and for it to be in conformity with the London Plan and NPPF.
- 8.15 The Forum notes that the City’s Open Space SPD (para 3.8.5) agreed that “*The Mayor of London’s SPG All London Green Grid Framework (2012) identifies the whole of the City as being in the indicative deficiency areas in relation to District Parks, Local Parks and access to nature.*” Eleven years later, the City is still deficient in Open Space to a significant degree. Positive policy is needed to extend this much-needed land use.
- 8.16 Design policies that need to be strengthened to extend ground level open space provision include;

S8[13] – replace “open space” with “the quantity of ground level open space”

S8[15] – add “at ground level where possible”

S8[17] – change to [“delivers a net increase of publicly available open space, at ground level, and overall...”] and add [“green space”] to the list

S14[2] – add [“at ground level where possible”]

DE2[2f] – add [“Such greening biodiversity and public realm improvements should be at ground level. High level gardens will not be considered an adequate substitute for the loss of public realm and the loss of ground level open space will be resisted”].

DE2[5] is supported. Changes to designs as a result of cost savings measures have led to worse design, reduced residential amenity, and breaches of planning policy (e.g. 21 Moorfields. Late changes in design have led to hostile vehicle mitigation needing to be placed on the public realm, which has in turn undermined a greening project for Moor Lane and a loss of “public benefit”)

- 8.17 Open space which is not at ground level and which is not routinely and easily accessible to all has proved problematic in the City (see supporting evidence provided separately). Viewing terraces that are supposed to compensate for the loss of ground level open space, and greening, which are then closed for safety reasons, for example, deliver a significant public *disbenefit*. Once a public square is built on it is gone, probably forever, and the risks to “public benefit” of the alternative provision (which is now on private land) then failing or being withdrawn in future are underestimated and un-mitigated in this Plan. This counts heavily against the policy of replacing ground level open space with controlled access upper terraces.
- 8.18 It is worth recalling the Secretary of State’s decision³⁴ to uphold the refusal of consent for “The Tulip”, a 305.3m AOD mixed use visitor attraction located between the Gherkin (St Mary Axe) and Bevis Marks Synagogue. The Planning Inspector’s Report repeats the London Review Panel finding that the roof terrace was “not equivalent to fully public open space at street level”. His further comments, also repeated by the Secretary of State, concluded that the City’s growing number of viewing galleries reduced their weight as “benefits from tourism” and that, even from such a great height “the probability is that the quality of the views out would to some extent be compromised by the erection of the latest permissions even if the sight of other towers was an opportunity to view them up close at a height”³⁵. Neither open upper terraces, which may not last and can be unsafe, nor closed and safer viewing galleries of diminishing interest, therefore, are an entirely equivalent replacement for ground level, green open space.

³⁴ TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 78 APPEAL MADE BY BURY STREET PROPERTIES (LUXEMBOURG) S.A.R.L. - LAND ADJACENT TO 20 BURY STREET, LONDON EC3A 5AX. APPLICATION REF: 18/01213/FULEIA

³⁵ IR 14.111

Green Infrastructure

8.19 The City Plan 2040 emphasises green corridors biodiversity corridors. The Forum supports what we understand to be the policy intention here; to join up green spaces for the measurable benefit of people and wildlife, in keeping with NPPF para 185 which says plans should: “*identify, map and safeguard*” habitats and ecological networks, including “*wildlife corridors and stepping stones that connect them*”. We find, however, that this intention is unlikely to be met even by the cumulative effect of the proposed policy, spatial strategy, KAO designations and spatial priorities in the City Plan 2040.

8.20 The City has;

- a) Not allocated any locations in the Spatial Strategy for “green corridors” (the thin lines on Figure 18: Green Corridors, page 218 are labelled as “green links”). These supposed “links” do not identify “habitats and ecological networks”. Instead they cut through densely-developed urban areas with no indication of what is expected to be “linked” nor how a “corridor” of green could be achieved
- b) Produced insufficient evidence for the location of those “green links”, many of which run alongside the City’s most polluted and congested main roads and junctions. An anticipated multi-million spend on a “biodiversity corridor” project at the junction of London Wall and Moorgate, just by the plaza at the exit of Moorgate tube, illustrates the point. This replaces a small lawn outside the Keats at The Globe Pub with some planting and seating. It creates no additional open space, very little additional greenery, and although it will doubtless be very popular with the drinkers who pack the lawn after work, it is hard to see how the target species in most need of habitats according to City Plan³⁶ will benefit at all.
- c) Not provided evidence to show how its proposed “stepping stones” of small isolated pockets of green at ground level and open to the public actually link up, for the species in question, with small private terraces at roof level 10+ storeys up. A biodiversity corridor is only effective if the bees, bats and birds can navigate from one pocket of green to another.
- d) Not provided any evidence of the options assessed in order to reach this policy, nor of exactly how it will create benefit for people, key species or the environment, and to what amount.

³⁶ House sparrows, peregrine falcons, swifts, black redstarts, bats, bumblebees and stag beetles - City Plan 2040 para 12.4.2

e) Not resolved potentially conflicting planning guidance and therefore uses for roof space (for Biodiversity Net Gain, PV panels, roof-top plant such as ventilation, green amenity space etc) anticipated by many policies in the Plan.

8.21 Green corridors have been shown to improve biodiversity, air quality, urban cooling and mental health and Gross Value Added to name just a few benefits. In the main, the “multiplier effect” of creating green corridors comes from physically linking ground-level open space. Evidence shows that the City has “*a high proportion of sites with a zero (or close to zero) baseline for biodiversity*”³⁷ at the moment, and evidence also shows that, without effective policy, developers do little to improve this (see also the City’s UGF study discussed below and further in supporting evidence). The Forum therefore proposes;

- a) *a map showing a distinct corridor for biodiversity based on evidence of how target species are likely to get from one puddle of green to another and the priorities for linking up such spaces*
- b) *a change to s14[8] to require developers to demonstrate how, as a minimum, the site will attract and/or protect the City’s target species, and for major schemes to secure monitoring and management of the BNG spaces to ensure that they remain effective at securing BNG for the lifetime of the building.*

Urban Greening Factor

8.22 The London Plan sets a minimum Urban Greening Factor (0.3) London-wide until a local plan identifies the appropriate level of urban greening required. In the case of the City of London, with its evidenced and significant deficit of green open space and biodiversity, coupled with being a high risk UHI area with significant overheating risks, it beggars belief that the UGF target can possibly also be 0.3.

8.23 Evidence (provided separately) all points to a need for a high level of urban greening and trees with broad cover, as well as for a need for no net loss of greening. We question the evidence that a minimum score of 0.3 reflects an assessment of “*the appropriate amount of urban greening*”³⁸ (our emphasis) and as a result the City’s policy is unsound and will be ineffective.

³⁷ City Plan 2040 – para 12.5.0, page 222

³⁸ As required by the London Plan

- 8.24 Instead, the Forum’s proposal for Policy OS2 is that there should be no net loss of greening through development on any site, that UGF should be raised to 0.6 minimum on major developments in the City, require the inclusion of “trees which are large at maturity and provide biomass, shade and amenity” and (in line with the London Plan minimum) a UGF target of at least 0.4 in the predominantly residential Barbican & Golden Lane part of the Smithfield and Barbican KAOC.
- 8.25 This would benefit City workers, as the City’s UGF Study also found that *“In the City of London, green infrastructure provides direct economic benefits and benefits to the productivity of workers. Green infrastructure is important in ensuring that the City is a more desirable place to work, thereby attracting and retaining companies”*.

9 Carbon, Climate, Cooling (S8, S14, S15)

Carbon

- 9.1 The density of The City and the unsuitable nature of some existing developments make it a big contributor to London's net whole life-cycle carbon, a potential generator of large amounts of embodied carbon and a root cause of urban heat in London putting it firmly in the government's High Risk zone for overheating.
- 9.2 The Forum supports the aims of Strategic Policy S8: Design in its 'retrofit first' approach which concerns itself with reducing the harmful and carbon-emitting effects of new development.
- 9.3 Given the strength of the evidence that greater retrofitting is essential and that UHI causes severe health problems, especially for older people, children and those with underlying health conditions, our view, however, is that these policies risk being ineffective in bringing carbon or UHI down. Nor are they robust enough to meet benchmarks that can reasonably be expected to become the accepted standard over the lifetime of the plan.
- 9.4 The Forum finds that, according to robust evidence the City Plan Policy on retrofit first S8[1] is insufficiently forward-looking and far too loose for the specific circumstances outlined in the City's evidence base and our own evidence that shows the depth of the problem in the City, the urgent need for change to bring carbon emissions and heat levels down, and the requirement for policy consistency within the CAZ across adjoining London boroughs. For these reasons, the Forum proposes an equivalent approach to that in Westminster's latest policy, namely:

PRIORITISING RETROFITTING OVER DEMOLITION

A. Development should adopt a retrofit-first approach, where options for retrofitting and retention of existing buildings are considered before demolition. Where substantial or total demolition is proposed, this should be fully justified through an appraisal of the construction options, assessing the carbon cost and public benefits of refurbishment, retrofit, deep retrofit or newbuild options. Development involving total demolition of a building which has more than a single storey will generally be resisted, unless demonstrated through the appraisal that:

- 1. The proposed development will deliver public benefits which could not be delivered through a suitably comparable retrofit option; and*
- 2. The whole-lifetime carbon of a new building would be less or similar to a suitably comparable retrofit option; or*

3. *The proposed development has bespoke operational requirements which could not be provided through the repurposing, adaptation and/or extension of the existing building(s); or*
4. *It is demonstrated that a retrofitting option is not possible or achievable due to structural constraints, demonstrated through an independently verified structural engineers report.*

REDUCING EMBODIED CARBON EMISSIONS

B. All development involving total or substantial demolition of a building which has more than a single storey, and all major developments are required to:

1. Submit a Whole Life-Cycle Carbon assessment, which demonstrates how the development will achieve:

a. For new non-residential buildings a target upfront embodied carbon

equivalent of London Energy Transformation Initiative (LETI) band “A”, with an absolute minimum rating of “B”.

b. For new residential buildings, including mixed-use over 18 metres in height, a target upfront embodied carbon equivalent of LETI band “C”, with an absolute minimum rating of “D”. Where development is proposing the delivery of policy compliant levels of affordable housing (35% for private sector land, and 50% for public sector land), applicants should demonstrate the maximum embodied carbon reductions deliverable without affecting the viability of affordable housing delivery.

c. For new residential buildings, including mixed-use below 18 metres in height, a target upfront embodied carbon equivalent of LETI band “B”, with an absolute minimum rating of “C”. Where development is proposing the delivery of policy compliant levels of affordable housing (35% for private sector land, and 50% for public sector land), applicants should demonstrate the maximum embodied carbon reductions deliverable without affecting the viability of affordable housing delivery.

d. For developments involving the construction of bespoke buildings which do not have a recognised LETI benchmark, or self-build or custom- build homes, applicants should achieve the maximum reductions in upfront embodied carbon deliverable, and these should be fully justified.

e. In exceptional circumstances where there are site specific constraints which make the benchmarks undeliverable, any shortfall against the minimum embodied carbon targets will be offset through a financial contribution towards the council’s carbon offset fund.

2. Where substantial or total demolition is proposed, applicants must:

- a. *Submit a Circular Economy Statement including a pre-redevelopment, and pre-demolition and reclamation audit which demonstrates how materials will be reused and repurposed; and*
- b. *Design any new structures to ensure the longevity of the building, easy adaptation, and with easily re-usable materials.*

UNLOCKING AND PROMOTING RETROFITTING

C. Proposals involving responsible retrofitting, which result in energy, performance, and climate adaptation upgrades, will be supported in principle.

D. When considering the townscape, heritage or design impacts of extensions or alterations, which are demonstrated through the appraisal of the construction options as necessary to viably achieve a wider retrofit of a building, regard will be had to the desirability of securing the retention and retrofit of the building, including improvements to its environmental performance, building longevity and climate change adaptation.

Applicants should demonstrate in a Sustainable Design Statement or Retrofit Plan how technical risks have been addressed and how harm to heritage assets has been avoided or minimised.

Climate and Cooling

- 9.5 As the National Centre for Earth Observation³⁹ says “In cities, urban heat islands occur where the land surface is densely covered with roads, pavement, buildings, and other surfaces that absorb and retain heat. This effect increases energy costs, air pollution levels, and heat-related illnesses and fatalities.” It is a significant environmental problem in the City of London.
- 9.6 The City is already in the most severe overheating “High Risk” zone⁴⁰ according the government, in which current residential overheating and/or the risk of residential overheating is the highest in the country. The evidence for this is sufficiently compelling that building regulations now must ensure that any new homes built in this zone warrant special measures in their design to improve ventilation and cooling to a higher standard than anywhere else in the country, and yet City Plan 2040 makes no attempt to bring UHI down over the lifetime of the plan.
- 9.7 Overheating has a disproportionate effect on elderly people, children and those with underlying health conditions (see evidence provided separately). The City has evidence of populations of

³⁹ <https://www.nceo.ac.uk/article/britain-is-heating-up-how-heat-mapping-can-help-the-uk-adapt-to-climate-change/>

⁴⁰ <https://www.gov.uk/government/publications/overheating-approved-document-o>

sensitive residents and sensitive sites like Barts Hospital where the risk to health from overheating is severe.

- 9.8 Strategic Policy (S15) mainly seeks to ensure that buildings withstand severe climate conditions, without sufficiently mitigating the climate and overheating impact of the development itself. On this basis we consider S15 to be unsound. The wording of S15[1] implicitly accepts that new development will cause further UHI over the current position in which the City is already in a “high risk” UHI zone. Instead of seeking to slow the rate at which UHI rises further, all the evidence indicates that development should seek to positively reduce environmental overheating. We propose that (S15 [1]) be reworded to say; “Development must contribute to a reduction in the City’s urban heat island effect as well as minimising overheating within buildings;”.
- 9.9 Policy (CR1) Overheating and the urban heat island effect is similarly designed to have no impact on UHI reduction, and does not reflect the robust evidence that the City has significant environmental problems with environmental heat that, without effective policy, are likely to worsen further during the lifetime of the Plan (see evidence provided separately). As the City of London LAEP evidence shows, waste heat from buildings is already a problem and one that is unlikely to be solved by sharing waste heat through point-to-point connections with neighbouring developments – as they are all generating significant amounts of waste heat themselves. In developments next to residential areas the waste heat is, more often than not, simply vented into the atmosphere; workers inside offices, therefore, are cooled while neighbouring homes roast. The LAEP suggests that a network is required to distribute the City’s waste heat to areas beyond its boundary where it can be used effectively and efficiently (by the way, rather than spending CIL money on bollards, such a network would be a good infrastructure investment). City Plan 2040 (S15) is insufficiently forward-looking in our view and CR1 should be revised to require developers to demonstrate that developments have been designed to a) reduce the urban heat island effect; b) reduce overheating throughout the development; c) prepare for connection to a waste heat network exporting heat to those that need it; d) no waste heat is vented to the atmosphere.
- 9.10 In view of the evidence from the City’s LAEP⁴¹ it is surprising that policy is not stronger on Citigen (or equivalent) for cooling as well as heating. This is especially important for the Barbican Arts Centre and Guildhall School of Music & Drama, the Barbican Exhibition Halls, cooling the

⁴¹ Local Area Energy Plan

listed fabric of Golden Lane and the Barbican residential estates, supporting low carbon growth in offices, retail, housing, community and cultural uses in The City.

9.11 Currently there are underlaps in City Plan 2040 policy and the Forum notes an additional requirement to strengthen the following design policies with regard to overheating;

(S8) – Sustainable design – add a new point “contribute to reducing urban heat island effect”

(S8 [13]) – says “.... addressing solar glare, daylight and sunlight, wind conditions and thermal comfort” add “(including the urban heat island effect on surrounding area) and delivers improvements in air quality, reduction in urban heat, open space and views”;

(DE1[4]) – says”....wider sustainability improvements in the area” add “including reducing urban heat island effect”

(DE1[8 e]) – says”Demonstrate climate resilience” add “(including measures to reduce the urban heat island effect)”

(DE1[8]) – ~~Prioritise the objectives of the City of London Local Area Energy Plan [LAEP]~~ should instead say “demonstrate how the development will transfer heat and cooling to/from nearby developments, and provide for future links into local energy, waste heat, heat and cooling networks in line with the City of London LAEP (provision of sufficient space and financial contributions for future connections will be secured by conditions and planning obligations)”.

10 Health and Inclusion (S1)

- 10.1 The City's stated Social objective includes "creating a more inclusive, healthier and safer City for everyone". According to the NPPF (8) a Plan's "*social objective – to support strong, vibrant and healthy communities.....with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;*" must be met with "mutually supportive" economic and environmental objectives, reflected in the underlying policies and with the presumption in favour of sustainable development in mind.
- 10.2 It is, therefore, a matter for the whole of City Plan 2040 that development should directly contribute to making the City healthier for everyone or provide effective mitigation to achieve the same effect. In an area where the bulk of development is high-end office development, that should not be too difficult to achieve. We applaud the City Plan's aims to promote healthy buildings for workers; this needs to be met by a healthier environment for residents and visitors. Given the strength of evidence of the need to improve health, inclusion and safety in the City, the Plan's ambition (S1) to "enable all communities to access" various facilities will be ineffective at meeting the objective to create healthier communities over the lifetime of the Plan. The only improvement the City Plan 2040 seeks to make is air quality – and then only with regard to NO₂, PM₁₀ and PM_{2.5} – which is the minimum statutory requirement and ignores the WHO's list of pollutants which damage health.
- 10.3 Strategic Policy S1 – in the interest of effective policy resulting in a healthier City;
- a) (S1[3]) should make it clear that "*Health Impact Assessments (HIAs) show how the development will help to protect and improve the health of all the City's Communities*".....
 - b) (S1[6 a]) – should say – "*do no demolition, deconstruction or construction on Saturday mornings in residential areas, and engage with neighbours before and during construction to minimise adverse impacts and mitigate any residual adverse impacts*";
 - c) (S1 [6 c]) – should reduce levels of all air pollutants to comply with the latest WHO guidelines for short and long term air quality including particulate matter (PM_{2.5} and PM₁₀), nitrogen dioxide (NO₂), carbon monoxide (CO), formaldehyde and volatile organic compounds (VOCs). Carbon dioxide (CO₂) concentrations in indoor air should also be considered.
 - d) (S1 [6 e]) – add – *install automated blinds on windows to drop at 7pm facing existing homes*
- 10.4 The evidence (below and provided separately) shows that to actually improve health and wellbeing in the City Strategic Policy S1 also needs ensure that development;
- a) Increases ground level open space;

- b) Helps bring environmental noise levels within WHO guidelines of 53 dB Lden (adjusted 24 hour average) and 45 dB Lnight (night-time average), starting with residential areas;
- c) Reduce the UHI effect especially in residential areas and near sensitive sites like Barts Hospital and locations where people vulnerable to heat are.

- 10.5 The first point of the City Plan 2040 Strategic Policy S1: Healthy and Inclusive City says the Plan will be “*implementing the principles of the City of London Corporation Joint Health and Wellbeing Strategy*”. The Forum notes that City Health & Wellbeing Strategy is out of date. A new one (2024-2028) discussed by the City of London’s Health and Wellbeing Board on 3rd May 2024 but not published as an evidence document, has no “principles” to implement, and appears to have dropped children as a priority (which would be discriminatory as a basis for planning policy). Our comments in this section are provisional, therefore, pending development, consultation and publication of official City Health & Wellbeing “principles” covering the Plan period and we expect to receive and have the opportunity to respond to such further information before, and at, the Examination In Public.
- 10.6 HL1: Inclusive buildings and space – this policy is strong on paper, and we welcome its aims. The Forum urges the City to do all it can to ensure that is not trumped by other demands, like HVM or constraints, considered too late in the design process.
- 10.7 HL2: Air Quality – Policy (HL2[2]) needs to be extended to comply with the latest WHO guidelines for short and long term air quality including particulate matter (PM2.5 and PM10), nitrogen dioxide (NO₂), carbon monoxide (CO), formaldehyde and volatile organic compounds (VOCs). Carbon dioxide (CO₂) concentrations in indoor air should also be considered.
- 10.8 HL3: Noise is at unhealthy levels and needs to be reduced throughout the City. Because of the extended hours of exposure experienced by residents, as well as the vulnerability to noise of some groups, noise levels need to be reduced and particularly in residential areas. The City’s evidence on this is out of date; the Forum has supplied its own separately. Policy (HL3) needs to be rewritten to require noise assessments to show how developments will make a positive contribution to bringing environmental noise levels within WHO guidelines of 53 dB Lden (adjusted 24 hour average) and 45 dB Lnight (night-time average), starting with residential areas; banning demolition and all types of construction from sites in and adjacent to residential areas on Saturdays as well as Sundays; and minimising and mitigating noise pollution to be less than the current baseline for neighbouring uses under the “agent of change” principle.

- 10.9 HL5: Social and Community facilities – we support the principle of protecting existing facilities in situ, however current policy similar to (HL5[1b]) has led to completely unsuitable space and facilities for effective replacement provision, in our experience. To be effective at making the City healthier; (HL5) needs to protect **and improve** existing social and community facilities in situ. However, new and expanded provision is also needed and (HL5[2]) not all identified community and social need can be met by “flexible multi-use space”. The Forum’s evidence (provided separately) demonstrates where provision of, say, a “bookable meeting room” available during office hours in an office block is utterly useless at meeting any of the identified social and community needs in our Neighbourhood or the City as a whole. (HL5[2]) should have an “or” instead of “and” between b. and c.
- 10.10 HL6: Public toilets - under-provision of public toilets is a direct health problem in the City leading to further indirect health and safety problems caused by street urination in our open spaces and public realm especially but not exclusively at night. Accessible public toilets open 24/7 are in particularly short supply, especially in the Community Toilet Scheme (HL6 [3]), membership of which should be a requirement for any development next to public open space. We support the provision of more public toilets in the City; with workday numbers due to rise to 715,000 at least in the lifetime of the Plan, we urge the City to secure sufficient contributions to ensure that provision meets the identified need.
- 10.11 HL7: Sport and recreation – The Forum recognises the deficiency in space for sport but (HL7 [1]) we question the City’s evidence for a “network” of “free outdoor sporting facilities” created by re-assigning widely used public open space. The evidence of un-met need for sport and recreation in the City is heavily weighted in favour of teens and elderly residents on the City’s housing estates, rather than commuting office workers who can afford to make use of the City’s many gyms (some even within the office) and who have access to sports facilities where they live (as do visitors). This policy risks using land to create a narrower benefit to a much smaller group of people than the current land usage and as such, in this location, would be contrary to the NPPF. New outdoor sporting facilities should be in addition to current open space.
- 10.12 HL9: Health Impact Assessments – “Health Impact Assessments (HIAs) must show how the development will help to protect and improve the health of all the City’s Communities”.....
- 10.13 S2: Safe and Secure – (S2 [6]) we question the City’s evidence for the list of people “more likely to experience crime” given the data on the victims of crime and race, sexual orientation, religion etc.

Health problems and policy not addressed in the City Plan 2040

- 10.15 Homelessness - Levels of rough sleeping are high in the City and a priority for health as well as housing provision, and yet this gets no attention at all in City Plan policies despite, rightly, being one of the reasons for policy S1 (para 3.1.10). The Forum also notes that rough sleeping is only one manifestation of the City's homelessness problem, which also results in couch-surfing and staying in inadequate, unsuitable or unsafe accommodation. The City's looked after children, for example, are routinely placed elsewhere and the housing needs of children leaving care may not have been assessed at all.
- 10.16 Aging - Our own evidence (provided separately) shows that the 75+ population of the Neighbourhood is projected to increase by 482 individuals to reach a total of around 877 in 2040. This is a 122% increase, doubling the share of the population in this age group. The housing, care and social/community needs of this changing population do not seem to have been planned for in the City Plan 2040. The Forum takes the view that out-of-borough provision should not be the default way to meet these needs, especially as much of the housing stock in the Barbican & Golden Lane Neighbourhood is very suitable for home-based care based on hyper-local service hubs, to assist those who would like to stay in their own homes as long as possible. We encourage the City of London Corporation to work with the residential community to explore the possibility of a "Caring Neighbourhood" model, and to adopt policies that retain space and extend facilities to deliver health and social care locally in an efficient and effective manner. Planning obligations should also be used towards this end. To do so would help to meet the London Plan CG3 (E) requirement to "plan for appropriate health and care infrastructure to address the needs of London's changing and growing population".
- 10.17 Out of borough provision, returning to the City - We have not seen evidence to support the view that "it is often not economic to deliver effective services for City residents from locations within the City" (para 3.1.3), nor any assessment of the additional burden that out-of-borough provision places on the City's service users themselves. The demographic shift over the lifetime of the Plan suggests that service needs will grow, and with that the need for facilities within the City that are being outsourced now. The Plan is not sufficiently forward-looking and makes no provision for this, either spatially or in terms of existing community, social and health provision.

- 10.18 Deprivation - We agree that there are pockets of deprivation (para 3.1.7) and not just in the locations mentioned; we have not seen any evidence, however, that “securing skills and training programmes” (para 3.1.7) has had any measurable impact on deprivation in the City.
- 10.19 Extreme heat and health - City Plan 2040 fails to analyse or prepare for the impact of City UHI concentration and extreme heat events on Barts Hospital nor on other key health providers in the Smithfield and Barbican KAOC.
- 10.20 Cool Spaces – the City Plan 2040 makes no plans for developing cooling centres, providing shelter, drinking water and medical care. According to the Greater London Authority website mapping (London Cool Spaces Summer 2024) the City of London has no Tier 1 Cool Spaces, and only one Tier 2 Cool Space (at Aldgate, outside the Barbican & Golden Lane Neighbourhood, a facility which serves residents in the east of the City but provides no help to those in the west). We note that Tier 2 spaces are not targeted at vulnerable populations and do not provide medical support, and so are inadequate to cater for the specific problems of vulnerable people and overheating detailed in our evidence.
- 10.21 Defibrillators – 24/7 public access - The Corporation’s draft City Plan 2036 encouraged developers to provide facilities to improve the community’s health – such as drinking water fountains, publicly accessible toilets and defibrillators – but defibrillators have been taken out of City Plan 2040. The Neighbourhood Forum questions the evidence for removing this policy, given the rate of heart disease and the high number and concentration of workers, residents and visitors in the City. For our evidence on this please see the supporting documentation. We propose that 24/7 public access defibrillators (plus maintenance) are reinstated to City Plan 2040 in a new Policy designed to extend health and wellbeing provision.

11 Design (S8) and Residential Amenity (new DE9, HS3)

11.1 S8 Design – in addition to our comments on carbon, cooling and climate (above) the Forum’s evidence also supports the following changes to policy on the grounds of making the City Plan 2040 more effective:

(DE1 [8]) add “h. ensure that the building does not emit heat to the surrounding area.

(DE2 [2]) says “...loss of daylight and sunlight” add “and thermal comfort impacts at street level and to any surrounding sensitive sites such as residences or hospitals”... or intrusive solar glare..

(DE2) Supporting text 9.3.7 says “plant should be located below ground”. This should be made policy next to residential areas. (there is a lot of unused space at basement level in new developments in the City)

(DE3) Public realm – add “Neighbourhood Forums” to first sentence

(DE3 [5]) – add “increased open space at ground level”

(DE 4[1]) – substitute “considered” for “encouraged”

(DE 4[1b]) reword to say “There would be no immediate overlooking of residential premises, unacceptable disturbance from noise or other significantly adverse impacts on residential amenity. Where there is a potential for a significantly adverse impact, the use of an extensive green roof and a restriction on access should be required as an alternative; near residences terraces should not be used between 6pm and 8am on weekdays and should be closed at weekends and bank holidays.

(DE 4[2]) – add “space for queuing indoors” (for reasons of safety and security)

(DE 4[new]) – add public “changing places” toilets

(DE 7) – together with (HS 3[3]) - daylight and sunlight – should be aligned to specify the meaning of “cumulative impact” and adding the requirement for an assessment to ensure that residences are not subject to unacceptable levels of daylight and sunlight as a result of development.

(DE8) - amended to say “Automated blackout blinds should be fitted to office windows next to residences, to drop at 7pm”.

(DE 8) – add controls over illuminated screen displays inside buildings but facing out over the public realm, and particularly facing homes

(HS3 [2]) – add “All development proposals should be designed to minimise overlooking and seek to protect the privacy, daylighting and sunlighting levels to adjacent residential accommodation. Developers should submit a Residential Visual Amenity Threshold (RVAT) assessment as part of applications within or on the boundaries of the City’s residential clusters. Light spill from development that could affect residential areas should be minimised, in line with policy DE8;

In order to give effect to the plan’s intention to protect daylight in residences, a full assessment is necessary to ensure that the resulting absolute level of daylight is not unacceptably low, even if the relative change falls with the BRE guidelines of acceptability. This also gives force to item 3 of the policy on cumulative development.” (We suggest additional paragraphs of explanation, in particular to ask developers to refer to BRE’s updated best practice guidance [BR 209 2022 Site Layout for daylight and sunlight: a guide to good practice] when preparing proposals, as it is the exemplar best industry guidance on how to avoid causing loss of daylight to neighbouring properties, and how to avoid impacts on amenity and privacy to neighbours). This would also conform with the City’s approach to public open space (para 9.8.1) which. says “Given the importance of the City’s open spaces in a high-density urban environment, the impact of any changes to sunlight on the public realm will need to be carefully evaluated even if proposals comply with BRE guidelines. The City Corporation may require independent verification of these assessments at the developer’s expense”.

- 11.2 The Neighbourhood notes that the City of London does not make use of independent design review panels (a Planning Inspector having also found in one case that that pre-application discussions were no substitute, being “neither transparent nor rigorous”⁴²). This is contrary to advice on the use of design review panels in NPPF 138. Strong design policy, therefore, is necessary.

Residential Amenity

⁴² Appeal Report APP/K5030/VV/20/3244984

- 11.3 The explanation of residential amenity in the City Plan 2040 is in the glossary, which sees it as “The elements of a location or neighbourhood that contribute to its overall character and the enjoyment of residents.” Since residential amenity is referred to in policy throughout the Plan, and to make City Plan 2040 policy effective, the Forum proposes the following new policy to meet the evidenced needs, in line with the NPPF;

Policy DE9 - Residential Amenity

1. Development will be required to provide a high quality environment and a good standard of residential amenity for existing and future occupants of land and dwellings. Development which would have an unacceptable adverse impact on the residential amenity of existing or future occupants of land and dwellings will not be allowed.

2. Impact on residential amenity will be assessed to:

- i. protect the distinctive character of the existing building(s) and the surrounding area with respect to the design, scale and materials used on the building(s);*
- ii. protect trees and other soft landscaping of amenity value, providing replacement planting where necessary;*
- iii. ensure development will maintain a good standard of daylight, sunlight, outlook and privacy for all existing and future occupants of buildings;*
- iv. avoid the introduction of unacceptable additional accesses, traffic or parking resulting in an increase of visual intrusion, noise or disturbance; and*
- v. ensure that noise, disturbances, smells, fumes and other harmful effects from surrounding land uses and/or associated operations will not have an unacceptable adverse impact on residential amenity.*

- 11.4 Also in the glossary is the City’s definition of the agent of change principle. In the interests of effective policy, the Forum proposes that this should be in Strategic Policy S3 Housing:

addition to item 4

Ensuring that other new land uses within identified residential areas are compatible with residential amenity. This is in conformity with the agent of change principle, which is the principle “that the person or organisation responsible for change is responsible for managing the impact of that change. This includes impacts from

noise, vibration and lighting. For example, a new residential development near an existing cultural use would be responsible for ensuring that residents are not disturbed by the activities of the cultural use. Similarly, a new cultural use near an existing residential development would need to ensure that existing residents are not disturbed.” [from Glossary definition]

12 Culture

- 12.1 The City Plan 2040 Strategic Policy S6: Culture & Visitors - This suite of policies rests on a Cultural Planning Framework, which itself rests on a Cultural Strategy. The Cultural Planning Framework is yet to be consulted on and the City has no current Cultural Strategy. The Forum notes, therefore, that key information is missing. We are not sure how a Planning Framework can be considered finalised when the thing it is delivering has not been adequately specified. Culture differs from place to place, and objectives need to be defined before any policy to deliver can be judged effective or not. Our comments in this section are provisional, therefore, pending publication of the official City Cultural Strategy (CCS) and Cultural Planning Framework (CPF) covering the Plan period and we expect to receive, and have the opportunity to respond to, such further information before, and at, the Examination In Public.
- 12.2 We believe the policies lean heavily toward cultural 'consumption' and 'visitor experience' rather than supporting greater 'production' and community categories. The CPF evidence review of cultural development plans states 'We established a detailed picture of provided cultural offer across 20 plans. This shows a variety of proposals but also a lack of provisions within the cultural production and community categories.' Policies should be aiming to rebalance this.
- 12.3 The policy also refers twice (S6[1.and 5.]) to 'cultural placemaking' but this is undefined and no mention is made of this in the CPF.
- 12.4 Policy S6[8] refers to enabling 'night-time activity and around cultural and tourist attractions where public transport..are available' but makes no reference to the agent of change principle and we note that the CPF focal area of Barbican and Smithfield identifies only 'Clusters of night time activity located around Smithfield Market and Holborn Viaduct.' The Forum has reflected this in its analysis of the KAOC S23 and S24 policies.
- 12.5 Supporting the development of creative industries (S6[6]) is to be welcomed but there seem to be a lack of policies to underpin this aspiration. The London Plan Policy HC5 makes clear commitments, especially '2) identify and promote new, or enhance existing, locally-distinct clusters of cultural facilities, venues and related uses defined as Cultural Quarters'. These commitments are not reflected in the City Plan but the CPF states 'Home to the City's major cultural institutions, the Barbican and Smithfield area has a strong, culturally-driven identity that supports a robust cluster of creative businesses...But this development activity may threaten to displace the smaller-scale cultural clusters. It will be important to maintain the unique cultural and architectural character, especially at its smaller grain, by ensuring plentiful affordable

workspace' and 'Lack of commitment towards affordability of spaces will preclude growth of cultural production spaces'. The City's evidence, therefore, already points to a policy about creation of affordable creative space that overcomes some of the constraints identified.

12.6 The Cultural Planning Framework document Part A states clearly that "The CPF is not a cultural strategy for the City of London but contains elements that might usefully contribute to the development of a cultural strategy in the future. It has not been designed to suggest a City-wide cultural vision or objectives, nor does it propose a timeline for recommended cultural actions." (Cultural Planning Framework, Part 1-A, January 2024). Meanwhile the City's Culture Libraries and Heritage Committee has been tasked with overseeing the development of a Cultural Strategy but this is still in the pipeline pending action on the Martin Review of Destination City. We would like to see a coherent and coordinated set of policies once the Cultural Strategy has been thoroughly consulted on with the community and considered and adopted, including but not limited to the creation of affordable creative space.

12.7 Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities - We welcome the intention to protect arts, cultural and visitor facilities but have concerns about the lack of definition of 'visitor facilities'. The London Assembly Culture Infrastructure Plan notes that top visitor attractions include heritage buildings, theatre, music, galleries and museums. The CPF defines a Cultural Ecosystem encompassing "Cultural Infrastructure" with sub-groups: Cultural Consumption, Cultural Production, Heritage, and Community; and "Cultural Contributors" with sub-groups: Tourism, Development, Night-time and Leisure, Other. We believe Policy CV1 is too loose to be meaningfully applied without a clearer definition of 'visitor facilities' and how these relate or map to the "cultural contributors" identified in the CPF. The CPF also suggests formula for calculating developer contributions but goes on to ask the question: 'Do we only count cultural infrastructure uses in the formula? Do we weight infrastructure and contributors differently?' The issues of definitions and weighting needs to be resolved following consultation.

12.8 Policy CV2: Provision of Arts, Culture and Leisure Facilities - Policy CV2.2 requires the provision of onsite facilities for developments of 10,000sqm whereas the CPF states that 'Planners should encourage developments between 10,000 - 60,000sqm to meet the target with either financial or spatial contributions' and 'should encourage developments over 60,000sqm to meet the target with spatial contributions, except in extraordinary circumstances (e.g. a cultural space in the development location would not meaningfully contribute to the cultural fabric of the City; a financial contribution toward the given focal area would be of greater value than a spatial

contribution)’. We suggest that if cultural development plans are to be ‘informed by the City Corporation’s Cultural Planning Framework’ (CV2.1) then the recommendations of the CPF should be clearly echoed in the policy and it be amended to reflect the evidence and advice of the CPF.

12.9 CV2[3] also does not reflect the evidence in the CPF: ‘Our studies and conversations with both planners and developers...favours financial contributions for small schemes. Firstly, financial contributions for schemes of this size are much more feasible from the developer’s perspective; lettable space on the ground floor is already constrained in most of these schemes, and any spatial provision would necessarily be small and potentially poorly located. Secondly, many small, fragmented, and low-quality cultural spaces would not have the same positive impact as one larger cultural space or a pool of financial resources to support programming, events, or existing institutions. Foregrounding spatial contributions for projects under 10,000sqm misses critical opportunity to maximise the potential impact of developer contributions and threatens to create a fragmented landscape of underused spaces that do not meaningfully contribute to the cultural fabric of the City.’ We suggest this policy also be amended to reflect the evidence of the CPF to encourage pooling of financial resources to support cultural provision.

12.10 Policy CV3: Provision of Visitor Facilities – we question the City’s evidence base for this policy, particularly pending action on the Martin Review of Destination City. Public toilets are in very short supply in the City, particularly ones to “changing places” standards, which are open and accessible at the right times, in the right locations, and in sufficient numbers to meet peak anticipated demand over the lifetime of the plan. Developer provision of facilities has not always been an unqualified success (see evidence provided separately) and City Plan 2040 needs to be far more ambitious in securing funds for offsite provision as well as onsite. We have seen no evidence of need for permanent tables “in nearby open spaces and the public realm”; these significantly limit the use of open space and public realm especially for anyone with limited mobility or sight. Temporary tables in open space or the public realm need to be managed, cleaned, stored away in the winter and so forth; it is not clear how this can be secured to the high standard necessary through planning obligations (except in a few limited sites next to one of the City’s diminishing ground level open spaces, in which case why have a policy?). “Key routes” are not defined, nor what “animation” means. Traditional playgrounds only serve a small age range and are unsuitable for many locations in the City due to the high levels of air pollution, noise and traffic. The City certainly does not have the open space to accommodate traditional

single-use outdoor play areas for current or projected visitor numbers over the lifetime of the plan. Taken together with the play policy, City Plan 2040 encourages private, indoor play facilities for visitors which, in practice, may be very similar to the sui generis “experience” uses that could be in conflict with primary shopping centres. High quality outdoor landscapes, for example, designed to a high standard and planned to allow for children to run about safely, climb and explore the same space that adults are also enjoying, would be far more suitable.

- 12.11 Policy CV4: Hotels We support this policy but would like to see it enhanced from ‘permitted’ to ‘enabled’ (as with policy CV5) where potentially stranded assets, such as lower grade office space could be converted to serviced accommodation use. The report Future of Office Use (June 2023) commissioned by the City by Arup and Frank Knight states ‘We suggest that intervention is needed to allow for fewer obstacles for older stock to be updated to meet office market needs, or to convert to other uses’ and ‘The City could explore the implications of amending policy that requires ‘viability assessment’ when considering change of use, where this would incentivise the retention and improved environmental performance of existing buildings’.
- 12.12 Policy CV5: Evening and Night-Time Economy - We note that the agent of change principle is only specified in relation to new residential development and not in evening and nighttime use. We believe the policy should be strengthened in line with the NPPF and London Plan to specifically include the agent of change principle across all development.

13 Retail

- 13.1 Retail, for the most part, is struggling in the City of London post-pandemic. Even in the four principal shopping centres (PSCs) of Moorgate & Liverpool St, Leadenhall Market, Cheapside and Fleet Street, which have always been popular with mid and high-end retailers, units are still empty and planning applications are coming in to convert prime space to, for example, temporary library use (for four or five years) and sui generis “experience” uses such as visitor game/entertainment venues, which do not meet the vision or strategy for clustering and sustaining shopping which is compatible with the overall Plan.
- 13.2 Whilst it is sensible for retail growth in the Primary Shopping Centres over the lifetime of the Plan, there is currently a need to support and protect local independent neighbourhood shops as well. The City’s Retail Needs Assessment on p. 35 refers to ‘Shops and other retail around the edges of the Golden Lane, Mansell Street and Barbican estates, which play a role in serving the residential communities’. Aldersgate Street/Goswell Road in the Forum’s Area and the KAOC for Smithfield & Barbican is an important hub for the community. There is evidence that these neighbourhood shops could benefit from the change and growth in Smithfield, for example, an opportunity that is not yet reflected in the City Plan 2040 and should be, in our view.
- 13.3 If established corporate retailers are not returning to the City in droves, neighbourhood shops and cafes are struggling even more and recovery is still extremely fragile. Independent shops, and Aldersgate Street/Goswell Road (A1) is a good example of this, are also small businesses (SMEs), which typically vary in the amount of support they seek or get, and which are the last point in supply chains (and therefore vulnerable to their weaknesses). This is evident in Aldersgate Street/Goswell Road (A1) where the shops got differing levels of grants and support during the pandemic and after it, and one, a long-standing DIY and building supplies merchant, was brought down in part by the collapse and non-payment of debts by a much bigger firm and its sub-contractors.
- 13.4 In order to protect and support much-needed independent retail and neighbourhood shops we propose;

(S5) Retail and active frontages – add “encouraging the provision of “neighbourhood” shops in residential areas and resisting other uses

(RE3 and RE2) – Move (RE2 3J) to RE3 “The loss of convenience retail units located close to, or that meet, a local residential need will be resisted, unless it is demonstrated that they are no longer required”.

14. Infrastructure

14.1 Evidence of need and provision of infrastructure in the City points to a significant requirement for infrastructure over the lifetime of the plan in order to;

- reduce the City's UHI effect;
- successfully decarbonise electricity supply;
- distribute excess waste heat;
- distribute zero carbon cooling;
- improve air quality by reducing reliance on diesel generators;
- build the most robust and secure communications networks possible to withstand risks to the critical digital infrastructure supporting the City's financial services (many of which are themselves critical national infrastructure);
- increase resilience to heat and floods caused by climate change;
- build green infrastructure for health and BNG;
- build health and community infrastructure; and
- create a network of cultural infrastructure.

Development contributions will be required to fund, develop and extend this infrastructure to meet the City's future needs over the lifetime of the plan and beyond, where infrastructure provision has to anticipate longer-term needs. We question the City's evidence for seeking appropriate levels of developer contributions to this infrastructure and we find the City Plan 2040 to be insufficiently forward-looking in planning for future needs (contrary to NPPF).

14.2 To be more effective we propose the following, based on our supporting evidence;

Policy (IN1) Infrastructure provision and connection add "Developments should connect to a second substation for back up power, rather than relying on diesel back up generators".

The City is relatively well-served with electricity sub-stations supplying decarbonised power, and this is likely to further improve over the lifetime of the plan. It is also an area of very poor air quality. This policy change would make the policy of energy efficient buildings more effective and also make policies of not worsening air quality more effective

14.3 The City's own Local Area Energy Plan (LAEP) correctly notes that the high level of production of waste heat is a major issue in the City⁴³ and one which is expected to grow over the lifetime of City Plan 2040. If this waste heat is vented to the atmosphere it will also be a contributing factor to the City's UHI problem. In the appendix to the LAEP Arup's report (p67) recommends that the City Plan 2040 should require major developments to prepare for connection to a heat offtake network in future. This would allow excess heat to be redistributed to buildings and places that could use it, would mitigate UHI to some degree, and would contribute to the City and London's net zero aspirations. The Forum requests, therefore, that this forward-looking recommendation is adopted. In the City Plan 2040 as it stands, Policy IN1 (1b.) only seeks connections to existing decentralised energy networks, and Policy IN2 (2) only seeks "provision of space" if "potential capacity problems are identified", both do too little to respond to the evidence that future-proofing new buildings and their surroundings is a necessity.

Policy proposal - major developments should be required to prepare for connection to a heat offtake network in future.

[ENDS]

⁴³ City of London LAEP, 2023, Appendix commissioned from Arup

Appendix A: Schedule of Proposed Amendments to Policy and Maps

City Plan 2040 Policy		Proposed amendment
General		The Barbican and Golden Lane Neighbourhood Plan is in preparation; the Forum considers it appropriate that this should be explicitly acknowledged and accommodated within City Plan 2040
Figure 1		the Barbican & Golden Lane Neighbourhood Area should be mapped in Figure 1: Key Diagram, as it is material to planning decision-making;
		The role and status of Neighbourhood Plans and Forums to be set out, at least, in the Glossary of the Plan
		the “Barbican” part of the KAOC was extended to be co-terminus with the designated boundary of the Barbican & Golden Lane Neighbourhood Area at its south-west corner
Strategic Priorities	UNSOUND	a) <u>Climate</u> - We find the Plan to be insufficiently forward-looking in light of the robust evidence about climate change, whole life carbon, and UHI in the City, rendering City Plan 2040 contrary to NPPF paras 157, 158 and 159
	UNSOUND	b) <u>Heritage</u> - At the moment, Core Strategy Policy CS12 of the adopted 2015 City Plan identifies the need to: (i) Safeguard the City’s listed buildings and their settings, while allowing appropriate adaption and new uses: (ii) Preserve and enhance the distinctive character and appearance of the City’s conservation areas, while allowing sympathetic development within them. No similar stated aim has been included within the Draft 2040 Plan. The Forum proposes that the wording of current policy CS12 is reinstated in City Plan 2040.
	UNSOUND	c) <u>Housing</u> – It is unclear how housing targets are to be met without site allocations, nor why the supply of specialist housing seems lower than the Mayor of London target d) <u>Culture</u> - the City’s cultural offer should be defined more clearly in keeping with the

		<p>character of the areas where it is to be supported, broadened, and developed to increase skills and employment as well as enjoyment, while managing the impact on existing residential communities. The Plan should therefore clearly define and balance cultural development according to the classifications of the CPF and in reference to the London Plan.</p>
1.2 Economic objective		<p>No evidence for policies based on the idea that office uses are “compromised” by other uses in the specific circumstances of the City.</p>
1.3 Social objective		<p>add a Social Objective (1.3) to “improve the quality of life for the City’s workers, residents and visitors” rather than just “engaging with” them.</p>
1.4 Environmental objective		
Spatial Strategy	UNSOUND	<p>add a sub-paragraph 2.1 (12) to say “a detailed Neighbourhood Plan for the Barbican & Golden Lane Neighbourhood Area will be brought forward in conformity with City Plan 2040.”</p> <p>Housing sites not allocated, lack of clarity over where student housing to be used to meet housing targets, residential areas insufficiently defined nor where residential amenity is to be protected.</p> <p>Spatial Strategy does not identify “green corridors” referred to in policy (the thin lines on Figure 18: Green Corridors, page 218 are labelled as “green links”). These supposed “links” do not identify “habitats and ecological networks”.</p> <p>No spatial strategy for extending open space to the degree necessary to meet acceptable standards</p>
Health, Inclusion & Safety	UNSOUND	<p>City Plan 2040 does not meet the London Plan CG3 (E) requirement to “plan for appropriate health and care infrastructure to address the needs of London’s changing and growing population”.</p>

Strategic Policy S1: Healthy and Inclusive City		<p>S1's extremely limited aim to "enable all communities to access" facilities should be "to create healthier communities for everyone"</p> <p><i>(S1[3]) should make it clear that "Health Impact Assessments (HIAs) show how the development will help to protect and improve the health of all the City's Communities".....</i></p> <p><i>(S1[6 a]) – should say – "do no demolition, deconstruction or construction on Saturday mornings in residential areas, and engage with neighbours before and during construction to minimise adverse impacts and mitigate any residual adverse impacts";</i></p> <p><i>(S1 [6 c]) – should reduce levels of all air pollutants to comply with the latest WHO guidelines for short and long term air quality including particulate matter (PM2.5 and PM10), nitrogen dioxide (NO2), carbon monoxide (CO), formaldehyde and volatile organic compounds (VOCs). Carbon dioxide (CO2) concentrations in indoor air should also be considered.</i></p> <p><i>(S1 [6 e]) – add – install automated blinds on windows to drop at 7pm facing existing homes</i></p> <p>Strategic Policy S1 also needs ensure that development; Increases ground level open space; Helps bring environmental noise levels within WHO guidelines of 53 dB Lden (adjusted 24 hour average) and 45 dB Lnight (night-time average), starting with residential areas; Reduce the UHI effect especially in residential areas and near sensitive sites like Barts Hospital and locations where people vulnerable to heat are.</p>
Policy HL1: Inclusive buildings and spaces		
Policy HL2: Air quality		<p>Policy (HL2[2]) needs to be extended to comply with the latest WHO guidelines for short and long term air quality including particulate matter (PM2.5 and PM10), nitrogen dioxide (NO2),</p>

		carbon monoxide (CO), formaldehyde and volatile organic compounds (VOCs). Carbon dioxide (CO ₂) concentrations in indoor air should also be considered.
Policy HL3: Noise		Policy (HL3) needs to be rewritten to require noise assessments to show how developments will make a positive contribution to bringing environmental noise levels within WHO guidelines of 53 dB Lden (adjusted 24 hour average) and 45 dB Lnight (night-time average), starting with residential areas; noise from completed developments to be less than the current baseline for neighbouring uses under the “agent of change” principle; and banning demolition and all types of construction from sites in and adjacent to residential areas on Saturdays as well as Sundays & Bank Holidays
Policy HL4: Contaminated land and water quality		
Policy HL5: Location and protection of social and community facilities		<p>(HL5) needs to protect and improve existing social and community facilities in situ.</p> <p>However, new and expanded provision is also needed and (HL5[2]) not all identified community and social need can be met by “flexible multi-use space”.</p> <p>(HL5[2]) should have an “or” instead of “and” between b. and c.</p>
Policy HL6: Public toilets		Community Toilet Scheme (HL6 [3]), membership of which should be a requirement for any development next to public open space.
Policy HL7: Sport and recreation		
Policy HL8: Play areas and facilities		
Policy HL9: Health Impact Assessment (HIA)		“Health Impact Assessments (HIAs) must show how the development will help to protect and improve the health of all the City’s Communities”
Strategic Policy S2: Safe and Secure City		(S2 [6]) we question the City’s evidence for the list of people “more likely to experience crime” given the data on the victims of crime and race, sexual orientation, religion etc.
Policy SA1: Publicly accessible locations		
Policy SA2: Dispersal Routes		

Policy SA3: Designing in Security		
Housing		
4.1 Housing Context		
Strategic Policy S3: Housing	UNSOUND	<p>Housing site allocations are necessary; City Plan 2040 needs to be more specific about how it will ensure that local needs for housing are met either within the City and within the Smithfield and Barbican KAO (Strategic Policies S3 and S23)</p> <p>Policy (S3) should be re-worded to say</p> <p>Policy S3 [1b] Within identified residential areas, the delivery of affordable housing, build to rent, sheltered and extra-care housing is a priority. Co-living and hostel accommodation may also be allowed, if it can be shown that this relieves pressure on the availability of affordable housing nearby, does not cause excessive concentration or cause adverse impact on / loss of permanent residential accommodation. Housing is encouraged in residential areas particularly if this means the reuse or retrofit of a building rather than its demolition. To protect housing standards and residential amenity, shared living developments are prevented from converting to other housing types through legal agreements and conditions.</p> <p>addition to item 4</p> <p>Ensuring that other new land uses within identified residential areas are compatible with residential amenity. This is in conformity with the agent of change principle, which is the principle “that the person or organisation responsible for change is responsible for managing the impact of that change. This includes impacts from noise, vibration and lighting. For example, a new residential development near an existing cultural use would be responsible for ensuring that residents are not disturbed by the activities of the cultural use. Similarly, a new cultural use near an existing residential development would need to ensure that existing residents are not disturbed.” [from Glossary definition]</p>
Policy HS1: Location of New Housing		<p>a) Extend the “residential area” (Figure 32) to include the whole of the Forum Area boundary, as this has already been accepted by the City of</p>

		<p>London as a cohesive residential neighbourhood on designation;</p> <p>b) Designate sites for housing which meet the Plan target, in the main, with housing for which there is local need;</p> <p>c) resist loss of open space, amenity space/views and greening where existing residential estates are being redeveloped (HS1[3]) in the interest of improving the deficit of open space, tree canopy cover and greening in general in the City.</p> <p>HS1[3] within the Smithfield and Barbican KAOC redevelopment of Listed housing should be ruled out in the lifetime of the Plan, with a focus on maintaining, repairing and upholding the fabric of the housing and buildings as significant heritage assets to the Neighbourhood.</p>
Policy HS2: Loss of housing		
Policy HS3: Residential environment		<p>(HS3 [2]) – add “All development proposals should be designed to minimise overlooking and seek to protect the privacy, daylighting and sunlighting levels to adjacent residential accommodation. Developers should submit a Residential Visual Amenity Threshold (RVAT) assessment as part of applications within or on the boundaries of the City’s residential clusters. Light spill from development that could affect residential areas should be minimised, in line with policy DE8;</p> <p>In order to give effect to the plan’s intention to protect daylight in residences, a full assessment is necessary to ensure that the resulting absolute level of daylight is not unacceptably low, even if the relative change falls with the BRE guidelines of acceptability. This also gives force to item 3 of the policy on cumulative development.” (We suggest additional paragraphs of explanation, in particular to ask developers to refer to BRE’s updated best practice guidance [BR 209 2022 Site Layout for daylight and sunlight: a guide to good practice])</p>
Policy HS4: Housing quality standards		
Policy HS5: Short term residential letting		
Policy HS6: Student accommodation and hostels		Add 1f. They would not involve the loss of permanent residential accommodation or

		prejudice the development of permanent residential accommodation in residential areas, particularly, affordable rented accommodation for older people or those with special needs
Policy HS7: Older persons housing to		
Policy HS8: Self and custom housebuilding		
Offices		
Strategic Policy S4: Offices	UNSOUND	Floorspace target not supported by robust evidence
Policy OF1: Office Development		
Policy OF2: Protection of Existing Office Floorspace		
Policy OF3: Temporary 'Meanwhile' Uses		
Retail		
Strategic Policy S5: Retail and active frontages		(S5) Retail and active frontages – add “encouraging the provision of “neighbourhood” shops in residential areas and resisting other uses
Policy RE1: Principal Shopping Centres		
Policy RE2: Active frontages		(RE3 and RE2) – Move (RE2 3]) to RE3 “The loss of convenience retail units located close to, or that meet, a local residential need will be resisted, unless it is demonstrated that they are no longer required”.
Policy RE3: Specialist retail uses and clusters		RE3 “The loss of convenience retail units located close to, or that meet, a local residential need will be resisted, unless it is demonstrated that they are no longer required”.
Policy RE4: Markets		
Culture & Visitors		
Strategic Policy S6: Culture and Visitors		<p>Without a Cultural Strategy it is hard to comment but we note the evidence of a lack of provisions within the cultural production and community categories.’ Policies should be aiming to rebalance this.</p> <p>(S6[1.and 5.]) refer to ‘cultural placemaking’ but this is undefined and no mention is made of this in the CPF.</p> <p>We would like to see a coherent and coordinated set of policies once the Cultural Strategy has been thoroughly consulted on with the community and</p>

		considered and adopted, including but not limited to the creation of affordable creative space.
Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities		<p>To be effective needs a clearer definition of 'visitor facilities' and how these relate or map to the "cultural contributors" identified in the CPF.</p> <p>Also add: Proposals resulting in the removal of portable heritage assets (items or collections of historic importance) from the City will normally be resisted.</p>
Policy CV2: Provision of Arts, Culture and Leisure Facilities		We suggest this policy also be amended to reflect the evidence of the CPF to encourage pooling of financial resources to support cultural provision.
Policy CV3: Provision of Visitor Facilities		we question the City's evidence base for this policy
Policy CV4: Hotels		We support this policy but would like to see it enhanced from 'permitted' to 'enabled' (as with policy CV5) where potentially stranded assets, such as lower grade office space could be converted to serviced accommodation use.
Policy CV5: Evening and Night-Time Economy		We note that the agent of change principle is only specified in relation to new residential development and not in evening and nighttime use. We believe the policy should be strengthened in line with the NPPF and London Plan to specifically include the agent of change principle across all development
Policy CV6: Public Art		
Infrastructure		
Strategic Policy S7: Infrastructure and Utilities		
Policy IN1: Infrastructure provision and connection		Policy (IN1) Infrastructure provision and connection add "Developments should connect to a second substation for back up power, rather than relying on diesel back up generators".
Policy IN2: Infrastructure Capacity		Policy proposal - major developments should be required to prepare for connection to a heat offtake network in future.
Policy IN3: Pipe Subways		
Design		
S8[1] retrofit		<p><i>PRIORITISING RETROFITTING OVER DEMOLITION</i></p> <p><i>A. Development should adopt a retrofit-first approach, where options for retrofitting and retention of existing buildings are considered before demolition. Where substantial or total demolition is proposed, this</i></p>

		<p>should be fully justified through an appraisal of the construction options, assessing the carbon cost and public benefits of refurbishment, retrofit, deep retrofit or newbuild options. Development involving total demolition of a building which has more than a single storey will generally be resisted, unless demonstrated through the appraisal that:</p> <ol style="list-style-type: none"> 1. The proposed development will deliver public benefits which could not be delivered through a suitably comparable retrofit option; and 2. The whole-lifetime carbon of a new building would be less or similar to a suitably comparable retrofit option; or 3. The proposed development has bespoke operational requirements which could not be provided through the repurposing, adaptation and/or extension of the existing building(s); or 4. It is demonstrated that a retrofitting option is not possible or achievable due to structural constraints, demonstrated through an independently verified structural engineers report. <p>REDUCING EMBODIED CARBON EMISSIONS</p> <p>B. All development involving total or substantial demolition of a building which has more than a single storey, and all major developments are required to:</p> <ol style="list-style-type: none"> 1. Submit a Whole Life-Cycle Carbon assessment, which demonstrates how the development will achieve: <ol style="list-style-type: none"> a. For new non-residential buildings a target upfront embodied carbon equivalent of London Energy Transformation Initiative (LETI) band “A”, with an absolute minimum rating of “B”. b. For new residential buildings, including mixed-use over 18 metres in height, a target upfront embodied carbon equivalent of LETI band “C”, with an absolute minimum rating of “D”. Where development is proposing the delivery of policy compliant levels of affordable housing (35% for private sector land, and 50% for public sector land), applicants should demonstrate the maximum embodied carbon reductions deliverable without affecting the viability of affordable housing delivery.
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		<p>c. For new residential buildings, including mixed-use below 18 metres in height, a target upfront embodied carbon equivalent of LETI band “B”, with an absolute minimum rating of “C”. Where development is proposing the delivery of policy compliant levels of affordable housing (35% for private sector land, and 50% for public sector land), applicants should demonstrate the maximum embodied carbon reductions deliverable without affecting the viability of affordable housing delivery.</p> <p>d. For developments involving the construction of bespoke buildings which do not have a recognised LETI benchmark, or self-build or custom-build homes, applicants should achieve the maximum reductions in upfront embodied carbon deliverable, and these should be fully justified.</p> <p>e. In exceptional circumstances where there are site specific constraints which make the benchmarks undeliverable, any shortfall against the minimum embodied carbon targets will be offset through a financial contribution towards the council’s carbon offset fund.</p> <p>2. Where substantial or total demolition is proposed, applicants must:</p> <p>a. Submit a Circular Economy Statement including a pre-redevelopment, and pre-demolition and reclamation audit which demonstrates how materials will be reused and repurposed; and</p> <p>b. Design any new structures to ensure the longevity of the building, easy adaptation, and with easily reusable materials.</p> <p>UNLOCKING AND PROMOTING RETROFITTING</p> <p>C. Proposals involving responsible retrofitting, which result in energy, performance, and climate adaptation upgrades, will be supported in principle.</p> <p>D. When considering the townscape, heritage or design impacts of extensions or alterations, which are demonstrated through the appraisal of the construction options as necessary to viably achieve a wider retrofit of a building, regard will be had to the desirability of securing the retention and retrofit of the building, including improvements to its environmental performance, building longevity and climate change adaptation.</p>
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		<i>Applicants should demonstrate in a Sustainable Design Statement or Retrofit Plan how technical risks have been addressed and how harm to heritage assets has been avoided or minimised.</i>
Strategic Policy S8: Design		<p>(S8) – Sustainable design – add a new point “contribute to reducing urban heat island effect”</p> <p>(S8 [13]) – says “.... addressing solar glare, daylight and sunlight, wind conditions and thermal comfort” add “(including the urban heat island effect on surrounding area) and delivers improvements in air quality, reduction in urban heat, open space and views”;</p> <ul style="list-style-type: none"> - replace “open space” with “the quantity of ground level open space” - add “at ground level where possible” - change to [“delivers a net increase of publicly available open space, at ground level, and overall....”] and add [“green space”] to the list
Policy DE1: Sustainable Design		<p>(DE1[4]) – says”....wider sustainability improvements in the area” add “including reducing urban heat island effect”</p> <p>(DE1[8 e]) – says”Demonstrate climate resilience” add “(including measures to reduce the urban heat island effect)”</p> <p>(DE1[8]) – Prioritise the objectives of the City of London Local Area Energy Plan [LAEP] should instead say “demonstrate how the development will transfer heat and cooling to/from nearby developments, and provide for future links into local energy, waste heat, heat and cooling networks in line with the City of London LAEP (provision of sufficient space and financial contributions for future connections will be secured by conditions and planning obligations)”. (DE1 [8]) add “h. ensure that the building does not emit heat to the surrounding area.</p>
Policy DE2: Design Quality		<p>(DE2 [2]) says “...loss of daylight and sunlight” add “and thermal comfort impacts at street level and to any surrounding sensitive sites such as residences or hospitals”... or intrusive solar glare..</p> <p>DE2[2f] – add [“Such greening biodiversity and public realm improvements should be at ground</p>

		<p>level. High level gardens will not be considered an adequate substitute for the loss of public realm and the loss of ground level open space will be resisted”].</p> <p>DE2[5] is supported. Changes to designs as a result of cost savings measures have led to worse design, reduced residential amenity, and breaches of planning policy</p> <p>(DE2) Supporting text 9.3.7 says “plant should be located below ground”. This should be made policy next to residential areas. (there is a lot of unused space at basement level in new developments in the City)</p>
Policy DE3: Public Realm		<p>(DE3) Public realm – add “Neighbourhood Forums” to first sentence</p> <p>(DE3 [5]) – add “increased open space at ground level”</p>
Policy DE4: Terraces and Elevated Public Spaces		<p>(DE 4[1]) – substitute “considered” for “encouraged”</p> <p>(DE 4[1b]) reword to say “There would be no immediate overlooking of residential premises, unacceptable disturbance from noise or other significantly adverse impacts on residential amenity. Where there is a potential for a significantly adverse impact, the use of an extensive green roof and a restriction on access should be required as an alternative; near residences terraces should not be used between 6pm and 8am on weekdays and should be closed at weekends and bank holidays.</p> <p>(DE 4[2]) – add “space for queuing indoors” (for reasons of safety and security)</p> <p>(DE 4[new]) – add public “changing places” toilets</p>
Policy DE5: Shopfronts		
Policy DE6: Advertisements		
Policy DE7: Daylight and sunlight		<p>(DE 7) – together with (HS 3[3]) - daylight and sunlight – should be aligned to specify the meaning of “cumulative impact” and adding the requirement for an assessment to ensure that residences are not subject to unacceptable levels of daylight and sunlight as a result of development.</p>
Policy DE8: Lighting		<p>(DE8) - amended to say “Automated blackout blinds should be fitted to office windows next to residences, to drop at 7pm”.</p>

		(DE 8) – add controls over illuminated screen displays inside buildings but facing out over the public realm, and particularly facing homes
New Policy DE9 - Residential Amenity		<p><i>1. Development will be required to provide a high quality environment and a good standard of residential amenity for existing and future occupants of land and dwellings. Development which would have an unacceptable adverse impact on the residential amenity of existing or future occupants of land and dwellings will not be allowed.</i></p> <p><i>2. Impact on residential amenity will be assessed to:</i></p> <ul style="list-style-type: none"> <i>i. protect the distinctive character of the existing building(s) and the surrounding area with respect to the design, scale and materials used on the building(s);</i> <i>ii. protect trees and other soft landscaping of amenity value, providing replacement planting where necessary;</i> <i>iii. ensure development will maintain a good standard of daylight, sunlight, outlook and privacy for all existing and future occupants of buildings;</i> <i>iv. avoid the introduction of unacceptable additional accesses, traffic or parking resulting in an increase of visual intrusion, noise or disturbance; and</i> <i>v. ensure that noise, disturbances, smells, fumes and other harmful effects from surrounding land uses and/or associated operations will not have an unacceptable adverse impact on residential amenity.</i>
Transport		
Strategic Policy S9: Transport and Servicing		
Policy VT1: The impacts of development on transport		
Policy VT2: Freight and Servicing		<p>Add new text:</p> <p>2. Major commercial development must provide for;</p> <ul style="list-style-type: none"> a) servicing, including space for freight vehicles to turn around, to be entirely inside any development next to residences, and b) freight consolidation and use technological and procurement solutions that enable efficient servicing and deliveries to sites. <p>7. Streets that are:</p> <ul style="list-style-type: none"> a) Next to residences, or

		<p>b) Designated cycle routes, or</p> <p>c) Designated as pedestrian corridors or “healthy streets” or equivalent</p> <p>will not normally be permitted to be used as access routes to or from service bays.</p>
Policy VT3: Vehicle Parking		
Policy VT4: River Transport		
Policy VT5: Aviation Landing Facilities		
Strategic Policy S10: Active Travel and Healthy Streets		
Policy AT1: Pedestrian Movement, Permeability and Wayfinding		
Policy AT2: Active Travel including Cycling		
Policy AT3: Cycle Parking		
Heritage & Tall buildings		
Strategic Policy S11: Historic Environment		<p>The Forum proposes a procedure to identify and record non-designated heritage assets in the City in a public list, using agreed criteria for identification, combined with a specific policy to protect them;</p> <p>“To ensure that development is sympathetic to the local character and history and aims to maintain and enhance a strong sense of place, new development should be fully integrated with existing designated and undesignated heritage assets without causing undue harm and without loss of local distinctiveness.”</p> <p>We also urge the City to undertake an independent review of the constitution, terms of reference, transparency, accountability and effectiveness of CAAG.</p>
Policy HE1: Managing Change to the Historic Environment	UNSOUND	<p>Policy HE1(6) should be strengthened to require that opportunities to enhance conservation areas be positively sought and pursued, not merely ‘considered’.</p> <p>The Forum proposes that the word “immediate” is deleted from Policy HE1[8].</p>
Policy HE2: Ancient Monuments and Archaeology		

Policy HE3: Setting of the Tower of London World Heritage Site		
Strategic Policy S12: Tall Buildings		<p>The BGLNF strongly objects to the amendment of the wording of Policy S12</p> <p>The wording in the currently adopted local plan (CS14) should therefore be reinstated to say that tall buildings [defined as in CS14 as buildings “which significantly exceed the height of their general surroundings “] are inappropriate in conservation areas.</p> <p>City Plan 2040 policy (S12 [10.f]) says “adequate distance between buildings to ensure high quality experience at the street level;”. This should be amended to say “adequate distance between buildings to ensure high quality sustainable townscape experience at the street level;”.</p>
Strategic Policy S13: Protected Views		
Open Spaces & Green Infrastructure		
Strategic Policy S14: Open Spaces and Green Infrastructure	UNSOUND	<p>Strategic Policy (S14) aim to “promote a greener City” is too limited, imprecise and unrelated to the function of a plan to shape development.</p> <p>The evidence shows that the City needs more open space as well as more greening, and the strategy should be to increase both to a significant degree.</p> <p>We support the “protection” of “existing open and green spaces”; instead of “promoting” greening, (S14) needs to create new <i>ground level</i> open space publicly accessible to all and to resist loss of such space in absolute terms.</p> <p><i>- add [“at ground level where possible]</i></p> <p>S14[8] to require developers to demonstrate how, as a minimum, the site will attract and/or protect the City’s target species, and for major schemes to secure monitoring and management of the BNG spaces to ensure that they remain effective at securing BNG for the lifetime of the building.</p>

		<p>Policy addition: text (para 12.2.1) that “New spaces at ground level should be created where possible” and (9.4.5) that “the provision of outdoor public space at ground level will be prioritised” should be put into policy to make the Plan effective.</p>
Policy OS1: Protection and provision of open spaces		<p>OS1[3] should be amended to exclude private residential garden space which is already in significant deficit in the City.</p> <p>A policy, as OS1[3] does, which seeks to create “open space from underused highways” should at the very least create spaces of a reasonable size and a very high quality to ensure they make a positive contribution to the environment.</p>
Policy OS2: Urban Greening	UNSOUND	<p>There should be no net loss of greening through development on any site, and UGF should be raised to 0.6 minimum on major developments in the City, requiring the inclusion of “trees which are large at maturity and provide biomass, shade and amenity” and (in line with the London Plan minimum) and a UGF target of at least 0.4 in the predominantly residential Barbican & Golden Lane part of the Smithfield and Barbican KAOC [see also suggested policy S23B below]</p>
Policy OS3: Biodiversity		
Policy OS4: Biodiversity Net Gain		
Policy OS5: Trees		<p>Reword to say:</p> <p>3. Other than in exceptional circumstances, only permitting the removal of existing trees which are dead, dying or dangerous. Where trees are removed, requiring their replacement with large mature trees of an equivalent value capable of surviving in that location, with funding for maintenance and further replacement if necessary.</p>

		<i>We note that specialist tree suppliers can now successfully relocate mature trees.</i>
Climate Resilience		
Strategic Policy S15: Climate Resilience and Flood Risk	UNSOUND	S15 [1]) be reworded to say; “Development must contribute to a reduction in the City’s urban heat island effect as well as minimising overheating within buildings;”.
Policy CR1: Overheating and Urban Heat Island Effect		CR1 should be revised to require developers to demonstrate that developments have been designed to a) reduce the urban heat island effect; b) reduce overheating throughout the development; c) prepare for connection to a waste heat network exporting heat to those that need it; and d) no waste heat is vented to the atmosphere.
Policy CR2: Flood Risk		
Policy CR3: Sustainable drainage systems (SuDS)		
Policy CR4: Flood protection and flood defences		
Strategic Policy S16: Circular Economy and Waste		
Policy CE1: Sustainable Waste Facilities and Transport		
Policy CE2: New waste management sites		
S23		<p>POLICY CLARIFICATION</p> <p>Clarification is needed as to whether the City Plan, and the City Corporation, intends to include student housing in its definition of ‘residential development’ for the Barbican & Smithfield KAOC (page 48 - para 4.1.5 says it does not, para 4.1.6 says it partly meets housing need though a formula of 2.5 student rooms to 1 residential unit).</p>
S23		<p>POLICY AMENDMENTS</p> <p>S23 (new point);</p> <p>Policy S23 should be extended to say that “buildings that are significantly taller than their surrounding will be resisted will be resisted”.</p> <p>S23 (2);</p> <p><i>2. Improving inclusive and pedestrian accessibility</i> Ensuring the retention and improvement of pedestrian permeability and connectivity through the</p>

		<p>large sites such as Smithfield Market site, and by encouraging better lift and ramp access to Barbican Highwalks whilst seeking to preserve pedestrian permeability, heritage, open space, amenity, privacy, security and noise abatement for residents and businesses;</p> <p>S23 (3) add; “...whilst protecting residential amenity for existing homes in the KAOC”</p> <p>S23 (6) reword to say; “6. Making improvements to Beech Street to reduce the volume of vehicle traffic, improve air quality and increase amenity, widen pavements and improve accessibility for all without worsening neighbourhood traffic, air quality or access and vitality,”</p> <p>S23 (7) to say; Seeking to minimise pollution levels by resisting demolition/construction at weekends, restricting access at all times to new non-residential terraces, reducing and curtailing nighttime light pollution, managing traffic and increasing green infrastructure at street level.</p> <p>1 S23 (8) to say; Seeking improvements to accessibility for all including wider pavements, safer crossings, more reliable lifts and ramps (such as at Barbican tube) and better cycle routes.</p> <p>S23 (11) a) either; S23 (11) applies only to “Long Lane and Carthusian Street” (and delete “Routes between the London Museum and the Barbican”), or Add “food & beverage uses” to the Smithfield policy S24 (8), define the Smithfield area to which it applies and delete S23 (11).</p> <p>b) S23 (11) additional amendment to say:</p>
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		<p><i>‘This includes encouraging the retention of the existing leisure, retail, food and beverage uses along Long Lane, Carthusian Street, Aldersgate Street/Goswell Road (A1), and the Barbican launderette, as these businesses play an important role in supporting the residential community and local economy.’</i></p> <p>S 23 (12) additional wording to support the development of a cultural hub around the Barbican; <i>Affordable spaces for start-ups etc Artist/maker spaces</i></p> <p>S 23 (13) needs to recognise the “special character” of the Barbican and Golden Lane as “predominantly residential and tranquil with a world-class cultural centre” (i.e. not the same as the “special character” of Smithfield as a “late evening 7 day a week” place).</p> <p><u>New policy S23 (14)</u> – this Smithfield Policy S24 (9) should apply to the KAOC as a whole “9. Ensuring new activities and developments contribute to a reduction in freight and vehicular movements, whilst not adversely impacting the operation of businesses and amenity of residents;”</p> <p><u>New policy S23 (14)</u> <i>“Encourage improvements to the Long Lane/Beech Street/Aldersgate junction and its public realm, together with better accessibility for all, public toilets and lifts to the Highwalk”.</i></p>
NEW 23B		Strategic Policy 23B be developed for the Barbican and Golden Lane part of the KAOC
NEW 23B Strategic Policy S23B: Barbican and Golden Lane		<p>The City Corporation will protect and enhance the predominantly residential, cultural and historic character of Barbican and Golden Lane by:</p> <ol style="list-style-type: none"> 1. Support residential development that meets specific local needs for specialist elderly accommodation and affordable rented accommodation in the [corrected boundary]⁴⁴ “identified residential areas”. 2. Enhancing, maintaining and encouraging sensitive refurbishment of the Barbican Arts

⁴⁴ See boundary change to include missed residential areas

		<p>Centre and Guildhall School of Music and Drama as a focus for the strategic cultural area recognised in the London Plan, and supporting the reuse of the Barbican Exhibition Halls for start-ups, digital and creative industries, cultural organisations and artists/makers;</p> <p>3. Resisting development adjacent to the Barbican Estate and Golden Lane Estate and the residential blocks and streets of the area that has an adverse effect on residential amenity in this predominantly residential part of the KAO C which does not have a late evening, 7 day a week character;</p> <p>4. Enhancing the distinctive character of the area by retaining residential and listed buildings and encouraging new development which respects;</p> <ul style="list-style-type: none"> a. the predominant low-rise and mid-rise character⁴⁵ of the Brewery Conservation Area and the Barbican and Golden Lane Conservation Area b. the heritage, design and fabric of the Registered Landscapes, Parks and Gardens and also of the Grade II and Grade II* Listed Buildings [to be identified in full in final policy wording] c. the reference heights and grain of the neighbourhood d. the Barbican Estate Listed Building Management Guidelines SPD⁴⁶ and Golden Lane Estate Listed Building Management Guidelines SPD⁴⁷ e. and keeps an appropriate distance from the trinity of Barbican towers to protect their composition, and does the same for Great Arthur House. <p>5. Protecting the heritage and plan of both the listed Barbican and Golden Lane estates – the way squares are formed and the way that Highwalks – whether high level or ground level - intersect with them. Developments that cut across these original plans will be resisted.</p> <p>6. Resist loss of Highwalks and Highwalk ramps, and encourage new Highwalks that sensitively integrate with the existing ones and do not damage residential amenity. Encourage the</p>
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⁴⁵ As defined in the Barbican & Golden Lane Conservation Area SPD

⁴⁶ [Barbican Estate Listed Building Management Guidelines - City of London](#)

⁴⁷ Golden Lane Estate Listed Building Management Guidelines - City of London

		<p>provision of lift access to the Highwalk from Aldersgate St (w) near Barbican tube through developer contributions or directly.</p> <p>7. Supporting the relocation of the Museum of London to Smithfield, and encourage meanwhile cultural and community use of the original Museum of London building and Bastion House during the relocation;</p> <p>8. Protect amenity by requiring developments to restrict access to new office and commercial roof terraces, install automated blinds, increase green infrastructure with emphasis on tree cover to mitigate urban heat island effects and refrain from noisy deconstruction and construction works at weekends and bank holidays. Developments should also demonstrate how they will avoid generating additional light pollution with an emphasis on any residential neighbour impacts and fully reference the City of London's Lighting Supplementary Planning Document;</p> <p>9. Urban Greening</p> <p>c) Development must achieve a minimum UGF score of 0.4, and 0.6 for major development in the area</p> <p>d) Any Biodiversity Net Gain should be required to be delivered within the Barbican & Golden Lane Area so that it benefits the local community and environment.</p> <p>10. Development adversely affecting health and sport facilities will be resisted.</p> <p>11. Air Quality</p> <p>a) Development should not damage the health of the air by increasing emissions of harmful pollutants to it. Such pollutants include: greenhouse gases; those considered by the United Nations to cause adverse impacts to the natural environment; and particles and gases considered by the World Health Organisation (WHO) to be harmful to human health. Barbican & Golden Lane, being predominantly residential, is a sensitive receptor zone and any proposal that results in an increase in air pollution will only be justified in exceptional circumstances.</p> <p>b) Development should comply at least with all minimum UK environmental requirements in relation to air pollutants whichever is the more stringent.</p>
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		<p>c) All development must be at least ‘air quality neutral’ and not cause or contribute to worsening air quality. On major development this should be demonstrated through an Air Quality Impact Assessment which must additionally demonstrate how local air quality can be improved across the proposed development as part of an air quality positive approach.</p> <p>d) Major development must demonstrate that it is designed to ensure that indoor air quality complies with the latest WHO guidelines for short and long term air quality including particulate matter (PM2.5 and PM 10), nitrogen dioxide (NO 2), carbon monoxide (CO), formaldehyde and volatile organic compounds (VOCs). Carbon dioxide (CO 2) concentrations in indoor air should also be considered. Compliance with such standards is also encouraged on medium development and substantial refurbishment schemes.</p> <p>e) Air intake points servicing internal air handling systems (including air filtration systems and heating and cooling systems) should be located away from Beech Street, Aldersgate Street, London Wall, Silk Street and Moor Lane.</p> <p>f) Flues should be directed away from residential dwellings.)</p> <p>12. Encourage the retention of ground floor retail units at Crescent House on Aldersgate Street/Goswell Road (A1), in the Golden Lane Estate, as these provide an important local shopping, food and drink offering for local residents in an area that otherwise lacks nearby retail uses.</p>
S24		<p>Within the Smithfield and Barbican KAOC, “Smithfield” needs to be defined. We propose that Aldersgate Street/Goswell Road (A1) is the obvious boundary dividing the two distinct parts of the KAOC.</p>
S24		<p>S24 (3) add “...whilst protecting residential amenity for existing homes in the KAOC” either;</p>

		<i>S23 (11) applies only to “Long Lane and Carthusian Street” (and delete “Routes between the London Museum and the Barbican”), or Add “food & beverage uses” to the Smithfield policy S24 (8), define the Smithfield area to which it applies and delete S23 (11).</i>
OTHER		
Glossary of the Plan, to include reference to an explanation of; a) Neighbourhood Plan b) BGLNF – Barbican and Golden Lane Neighbourhood Forum		the Barbican & Golden Lane Neighbourhood Forum is the first to be designated in the City and the addition of a Neighbourhood Plan to the existing planning hierarchy is relatively novel to applicants and decision-makers alike here.
POLICIES MAPS		
Figure 1: Key Diagram	Page 14	a) the Barbican & Golden Lane Neighbourhood Area should be mapped.
Figure 12		does not show the buildings of the Barbican – the residential blocks, Arts Centre, and Girls’ School as the grade II listed building that they are. It only shows the grade II* listed landscape.
Figure 17		Should clearly show using distinct colours; private open space, public open space, green space
Figure 18: Green Corridors	page 218)	a new map showing a distinct corridor for biodiversity based on evidence of how target species are likely to get from one puddle of green to another and the priority sites for further greening which would link up such spaces
Figure 31 Smithfield and Barbican existing conditions and Figure 32 Smithfield and Barbican Spatial Priorities	P 278 & P280	a) the KAOC should be co-terminus with the Barbican & Golden Lane Neighbourhood Area at the south-west corner b) the Barbican and Golden Lane Neighbourhood Area boundary should be mapped c) We propose that the boundary between the “Smithfield” area and the “Barbican & Golden Lane” Area should be Aldersgate Street/Goswell Road (A1) d) We propose that the whole of the Barbican & Golden Lane Neighbourhood Area should be defined as a “Residential Area” e) The “Barbican Junction” where Aldersgate Street, Beech Street and Long Lane

		<p>meet at Barbican tube station should be a Spatial Priority</p> <p>f) Locations for improving lifts and accessibility for all should be mapped as a Spatial Priority (such as at Barbican tube)</p> <p>g) Locations for improving provision of accessible 24/7 public toilets should be mapped as a Spatial Priority (such as by Barbican and Moorgate tube stations)</p> <p>a) The Neighbourhood Shopping Area in the Colonnade on Aldersgate Steet should be a spatial priority and the routes to it from Smithfield and Barbican tube should be identified to improve footfall and viability.</p> <p>h) Highwalks should be mapped</p> <p>i) Private, communal garden and open space on the Golden Lane Estate should not be classed as “Other Public Realm”</p> <p>j) There is no “Green Space” on Moor Lane within the 21 Moorfields site as shown. A green space on the corner of Moor Lane and Silk Street is not shown, nor is the substantial greening with mature trees on Fore Street (S) – all need to be mapped, enhanced and extended</p> <p>b) City Point Plaza needs to be clearly identified as key open space to be retained, extended and subject to high quality public realm improvement.</p> <p>c) The following are key pedestrian routes:</p> <ul style="list-style-type: none"> • whole of Moor Lane, from Fore Street to Chiswell Street, • Moor Lane north of Ropemaker Street (and the adjacent crossing points) • Chiswell Street also needs improvement, particularly along the stretch from Moor Lane westwards <p>d) Silk Street, being residential street, is less suitable for heavy pedestrian and traffic use</p> <p>e) The proposed N-S pedestrian route, joining the KAOC at London Wall’s junction with Wood Street/Fore Street requires lift and elevator improvement. It also needs to continue within the KAOC along Fore Street to join with Moor Lane.</p> <p>k) public realm improvements along Golden Lane, Aldersgate Street (along its whole length)/Goswell Road (by the shops), Little Britain, Carthusian Street and Fann Street – none of which are mapped</p>
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		<p>l) Braidwood Passage from Aldersgate St through to Smithfield is a key walking route through to the GP surgery and Barts Hospital which needs to be mapped and prioritised.</p> <p>m) Strategic Cycleways should be shown</p>
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