

<b>Appendix 2: Detailed Comments of the Corporation of London on the Draft London Plan</b>			
<b>Draft London Plan</b>		<b>Subject</b>	<b>Comment</b>
<b>Page</b>	<b>Section/Para</b>		
<b>1</b>		<b>Introduction</b>	
1	Para 1	Mayor's overall vision	<u>Support:</u> The Corporation supports the Mayor's overall vision of making London an "exemplary sustainable world city".
1	Para 4	Need for a strategic plan	<u>Support:</u> The Corporation considers that London needs a concise, coherent strategic plan and welcomes the publication of the DLP as an important step in that process. However the Corporation also notes that the DLP is over 400 pages long and is to be supported by up to 18 DLP supplementary planning guidance documents. The Corporation is concerned that the DLP should be a genuinely strategic document focusing more succinctly and consistently on the strategic issues facing London. A document which was similar in length and scope to LPAC Advice would have a better strategic focus.
7	Objective 1	Making the most sustainable and efficient use of space in London; encouraging growth in areas of need and opportunity	<u>Support:</u> The Corporation supports the sustainable and efficient use of space in London and considers that the City's location at the centre of London's public transport network makes it a good location for sustainable growth.
8	Objective 2	Making London a better city for people to live in	<u>Support:</u> The Corporation supports the emphasis on making London a better place to live and is concerned that the expected growth in population and employment needs to be complemented by an appropriate increase in the resources needed to maintain and improve Londoners' quality of life.
9	Objective 3	Making London a more prosperous city with strong and diverse economic growth	<u>Support:</u> The Corporation supports the objective of strong and diverse economic growth in London. It expects the financial and business services sector which is clustered in and around the City to make a major contribution to this growth provided that the implementation of the policies in the DLP do not harm the current and future international competitiveness of this important sector.

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<b>Appendix 2: Detailed Comments of the Corporation of London on the Draft London Plan</b>			
<b>Draft London Plan</b>		<b>Subject</b>	<b>Comment</b>
<b>Page</b>	<b>Section/Para</b>		
9	Objective 4	Promoting social inclusion and tackling deprivation and discrimination	<u>Support:</u> The DLP's Objective 4, promoting social inclusion, is supported by a recognition that better access to education, training and advice will help the disadvantaged gain better jobs and to achieve a better quality of life. The Corporation supports this emphasis on education and training and is particularly concerned that residents of the City fringes and other parts of inner London should be able to benefit from the job opportunities available in the City and in the regenerating City Fringe.
10	Objective 5	Improving London's transport	<u>Support:</u> The Corporation recognises that major transport improvements are essential to the success of the growth-based strategy in the DLP and strongly supports the public transport improvements advocated in the DLP. The Corporation is also concerned to see better acknowledgement given in the DLP to the needs of London's central business cluster for major upgrading and better use of existing transport infrastructure to overcome unreliability and overcrowding problems.
11	Objective 6	Making London a more attractive, well-designed and green city	<u>Support:</u> The Corporation supports the DLP's commitment to the redevelopment of brownfield land and the protection of London's Green Belt. The Corporation has long been a champion of green belt protection through its ownership and management of important open spaces in and around London. The Corporation also supports the DLP's strong commitment to sustainability through strategies for biodiversity, waste, air quality, noise and energy management.
<b>15</b>		<b>1. Change in London</b>	
<b>15</b>		<b>1A The forces driving change</b>	
23	Para 1A.27	Future economic and employment change	<u>Support:</u> The Corporation welcomes the DLP's assumption of a long term trend of employment growth in London.
27	Paras 1A.30-32	Finance and business services sector	<u>Support:</u> The Corporation welcomes the expected employment growth in the finance and business services sector and notes that this sector is clustered in and around the City. Therefore the Mayor's employment forecasts generally support the Corporation's expectation that there will be significant employment growth in and around the City during the next 10-15 years.

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<b>Appendix 2: Detailed Comments of the Corporation of London on the Draft London Plan</b>			
<b>Draft London Plan</b>		<b>Subject</b>	<b>Comment</b>
<b>Page</b>	<b>Section/Para</b>		
<b>38</b>		<b>1B London's place in the world</b>	
42	Para 1B.17	London's wider regional importance	The Corporation agrees with the London focus of the DLP but is also concerned that London's wider regional importance should be fully recognised. The projected employment growth in London should benefit Londoners primarily but there will continue to be a role for commuting from surrounding regions as access to a large regional labour market is one of the strengths of the 'world city' functions which cluster in central London. <u>Objection:</u> Para 1B.17 should recognise that there will continue to be role for commuting in order that central London activities can still access the large regional labour market.
<b>45</b>		<b>2. Spaces and Places in London</b>	
<b>45</b>		<b>2A The focus of change across London</b>	
48	Table 2A.1	Employment figures for the City in 2001	Table 2A.1 stated that the base employment figure for the City in 2001 is 293,048. This is probably c.30,000 below the actual figure for 2001. <u>Objection:</u> Table 2A.1 should be updated to take account of the ABI actual figure for the City which is due to be published in September 2002. It is likely to be c.30,000 higher than that stated in Table 2A.1. The employment growth forecast of 93,000 additional jobs in the City by 2016 should take as its base figure the actual figure for 2001 and not to the 293,048 figure in Table 2A.1.

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Appendix 2: Detailed Comments of the Corporation of London on the Draft London Plan			
Draft London Plan		Subject	Comment
Page	Section/Para		
52	Map 2A.3	Definition of central London	<p>Map 2A.3 splits London's central activities zone (CAZ) between the Central and East sub-regions. The City is in the East sub-region with Hackney and Tower Hamlets; the rest of the CAZ is within the Central sub-region. Inclusion of the City in the East sub-region is consistent with growing Partnership and other links between the City and its eastern hinterland but does not reflect the strong Partnership and other links with the Central sub-region. Many will find it hard to understand that the City can be part of central London but outside the Central sub-region. The division of CAZ between regions makes it difficult for the DLP and subsequent sub-regional frameworks to plan adequately for the whole of central London, and more particularly the central business cluster which is the hub of London's economic dynamism.</p> <p><u>Objection:</u> The Central London sub-region is not necessary in its proposed form. An alternative approach could be to divide London into just four sub-regions: north, east, south and west. The DLP's proposed Central sub-region could be subdivided between the other regions and the City could remain in the East sub-region. Central policy issues would still need to be addressed directly and clearly by giving greater emphasis in the DLP to the importance and special integrated character of the whole CAZ and its Wider Central Area.</p> <p>If the suggested restructuring of the sub-regions is not accepted then it will still be essential that the existing and future importance of the City and its fringe areas are fully recognised in the preparation of both the East sub-region and the Central sub-region spatial frameworks.</p>

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<b>Draft London Plan</b>		<b>Subject</b>	<b>Comment</b>
<b>Page</b>	<b>Section/Para</b>		
55	Table 2A.3, para 2A.29, Tables 2B.3 & 2B.4	Forecast total employment growth for the East sub-region	The DLP contains inconsistent and confusing figures on the employment growth forecasts for the whole East sub-region and also for the component parts of the sub-region. Table 2A.3 forecasts 249,000 additional jobs in the sub-region and para 2A.29 is consistent with this figure. However para 2B.34 refers to 255,000 additional jobs. <u>Objection:</u> Amend the DLP to make the East sub-region's additional jobs forecasts consistent throughout the DLP.
63	Policy 2A.5	Sustainable development and a sequential approach to site selection	<u>Support:</u> The Corporation supports the policy approach which recognises the sustainability benefits of redeveloping existing sites which are or will be well served by public transport. Good accessibility by public transport make City redevelopment more sustainable provided that the public transport network is well maintained and upgraded as needed.
<b>72</b>		<b>2B Sub-regional frameworks</b>	
77	Tables 2B.1, 2, 3 & 4	Opportunity Areas and Areas of Intensification near the City	<u>Support:</u> The Corporation supports the identification of Opportunity Areas and Areas of Intensification in and around the City. This provides welcome confirmation that there is scope to accommodate increased floorspace in the City and City fringes which can reinforce the established cluster. However the Corporation is concerned that the floorspace forecasts need some clarification. (see p.86 comments below).
80	Table 2B.2	Areas of Intensification	<u>Objection:</u> Though supporting the identification of Areas of Intensification near the City, the Corporation is concerned that the indicative employment growth figures for these areas are an inappropriate level of detail for a strategic plan.
80	Para 2B.27	Future of central London wholesale markets	The Corporation recognises that Farringdon/Smithfield is an Area of Intensification and notes that the future of this area could be affected by the outcome of the Government's review of wholesale markets in central London.

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Appendix 2: Detailed Comments of the Corporation of London on the Draft London Plan			
Draft London Plan		Subject	Comment
Page	Section/Para		
86	Table 2B.3	Forecast employment growth in the various parts of the East sub-region which includes the City.	<p>The DLP needs to state clearly and consistently the employment growth projections for the various parts of the East sub-region which includes the City. Para 2A.29 states that the East sub-region could gain 56,000 additional jobs outside the City and the Isle of Dogs. Table 2B.3 states that the Isle of Dogs could gain 100,000 extra jobs and so the implication is that the City could gain 93,000 of the 249,000 additional jobs forecast for the East sub-region.</p> <p>However, this 93,000 figure needs to be confirmed because it could be inconsistent with the figures in Tables 2B.3. This table suggests that 210,700 of the additional jobs in the East sub-region will be in the identified Opportunity Areas, which do not include the City. If total additional jobs forecast in the East sub-region is 249,000 then this implies that there will be a net gain of just c.40,000 jobs in the non-Opportunity Area parts of the East sub-region. This c.40,000 figure can only be consistent with the 93,000 net gain figure described above if other non-Opportunity Area parts of east London are to experience a net loss of c.50,000 jobs. Though this is not impossible it does need careful examination and explanation. The Corporation would be very concerned if clarification shows that the DLP is not forecasting sufficient employment growth in the City and City fringes to sustain the existing central business cluster which benefits London's world city role.</p> <p><u>Objection:</u> Amend the DLP to show clearly the disaggregated employment growth forecasts for the City and the other parts of the East sub-region. Confirm that the City is forecast to gain 93,000 jobs as implied by para 2A.29. Revise Table 2B.3 to ensure that it is consistent with this gain in the City. Clarify the implication in Table 2B.3 that some parts of the East sub-region are set to lose significant numbers of jobs if the City is forecast to gain 93,000.</p>

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<b>Appendix 2: Detailed Comments of the Corporation of London on the Draft London Plan</b>			
<b>Draft London Plan</b>		<b>Subject</b>	<b>Comment</b>
<b>Page</b>	<b>Section/Para</b>		
86	Tables 2B.1, 2, 3 & 4.	Forecast employment growth in the City Fringe.	Tables 2B.1, 2, 3 & 4 give a forecast employment growth of 58,000 for identified locations in the fringe areas around the City. This contrasts with the Corporation's estimate that the City fringes can accommodate at least 100,000 additional jobs. <u>Objection:</u> The additional job forecasts for the City fringe areas identified in Tables 2B.1, 2, 3 & 4 should be reviewed upwards to reflect the considerable growth capacity in locations near the City.
<b>111</b>		<b>3. Thematic Policies</b>	
<b>111</b>		<b>3A Living in London</b>	
111	Objectives 2 & 4	Living in London	<u>Support:</u> This section is about living in London and is divided into four parts: housing, health/education, diversity and burial grounds. The Corporation supports the general objectives (2 and 4) from which the policies stem, that is to make London a better city for people to live in and to promote social inclusion.
112	Para 3A.7	Introduction to the housing section	<u>Support:</u> The Corporation supports this section of the DLP concerned with increasing the supply of housing, especially by encouraging higher density development, and providing more affordable housing. The housing section is also welcomed in terms of its willingness to recognise that some boroughs have particular circumstances which require flexibility and its recognition that housing problems often require pan-London solutions. This flexible approach is recognised in para 3B.26 where it is accepted that in parts of the City a mix of uses including housing could undermine strategic policy for office development. Policies 3A.9 and 3A.10 referred to below also allow for exceptional circumstances where off site provision of housing or payments in lieu might be acceptable.

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Appendix 2: Detailed Comments of the Corporation of London on the Draft London Plan			
Draft London Plan		Subject	Comment
Page	Section/Para		
127	Policy 3A.8	Affordable housing	<p>This policy advises that the Corporation's UDP should include the indicative affordable housing targets set out in Table 3A.3 (50% affordable housing in all housing proposals in the City). For areas of high land value and dense business development, such as the City, it is often financially impossible and physically impractical to provide affordable housing as part of a residential development. Providing the amenities and services sought by residents can also be difficult in the City. However, much more could be achieved if the affordable element could be provided off-site in areas of lower land value, which in the case of the City would mean nearby in neighbouring boroughs. Such provision would still be addressing the inner London affordable housing problem without being hindered by local authority boundaries which have little relevance to the housing and employment markets.</p> <p><u>Objection:</u> The DLP should amend policy 3A.8 and Table 3A.3 to recognise that the 50% target is not appropriate in certain boroughs due to physical and financial circumstances. The Government-sponsored critique of the Three Dragons Report should be taken into account when establishing appropriate affordable housing targets and thresholds. Lower, more realistic targets could lead to more affordable housing actually being delivered. Provision of more intermediate housing for key workers is considered to be a priority for London.</p>
131	Policies 3A.9 & 10	Exceptional cases and cash-in-lieu	<p>The Corporation strongly supports the Mayor's intention to promote flexible arrangements whereby payments in lieu of on-site affordable housing can be spent outside the borough, thereby meeting local need on a sub-regional level without the restrictions of borough boundaries. Consequently the Corporation considers that policy 3A.9 should be amended so that on-site provision is not a requirement for all parts of London.</p> <p><u>Objection:</u> Amend policy 3A.9 so that on-site provision of affordable housing is not a requirement for all parts of London. The circumstances of the City and the objectives of strategic office policy mean that parts of the City should be treated as exceptions to the general approach being suggested for elsewhere.</p>

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Appendix 2: Detailed Comments of the Corporation of London on the Draft London Plan			
Draft London Plan		Subject	Comment
Page	Section/Para		
132	Para 3A.53	Provision of affordable housing outside the borough boundary	<u>Support:</u> The Corporation strongly supports the Mayor's intention set out in para 3A.53 to promote flexible arrangements whereby payments in lieu of on-site affordable housing can be spent outside the borough, thereby meeting local need on a sub-regional level without the restrictions of borough boundaries.
141	Policy 3A.21	Education facilities	<u>Objection:</u> The DLP should recognise more clearly in policy 3A.21 that it is the boroughs which are responsible for providing primary and secondary education. The suggested criteria-based approach to the provision of educational facilities needs to be applied flexibly to enable a borough to make a local decision based on local circumstances which does not inhibit the timely provision of appropriate facilities.
142	Policy 3A.22	Higher education	<u>Support:</u> DLP recognises the importance of higher education to London's world city role. The Corporation plays its part in assisting this sector, particularly through its close links with London Guildhall University, City University and the Guildhall School of Music and Drama, but also through support of other higher education institutions. The Corporation supports the recognition in policy 3A.22 that provision of sufficient student accommodation is an important issue and considers that student needs should form part of increased affordable housing provision.
146	Policy 3A.23	Population diversity	The DLP details seven different groups of people in London that it considers require policy frameworks to deal with their particular spatial needs. The DLP suggests Supplementary Planning Guidance is prepared to this end. The Corporation considers that it would be more efficient for boroughs to develop their own policies to deal with the needs of particular groups in their locality and that the proposed DLP Supplementary Planning Guidance is an inappropriate level of detail for a strategic document. <u>Objection:</u> The Corporation does not consider it necessary for DLP Supplementary Planning Guidance to be prepared on meeting the spatial needs of the identified groups. Such documents would be an inappropriate level of detail for a strategic plan.

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<b>Draft London Plan</b>		<b>Subject</b>	<b>Comment</b>
<b>Page</b>	<b>Section/Para</b>		
149	Policies 3A.25/ 3A.26	Community impact	<p>These policies advise that boroughs should set out their expectations for planning applications in areas adjacent to the designated Areas for Regeneration, demonstrating how development should contribute towards meeting nationally and locally defined floor targets (for employment, crime, health, etc). The application should also be subject to social and economic impact assessments.</p> <p>The Corporation considers that the level of detail being asked for would be inappropriate in the City's case and to some extent would duplicate existing practices. UDPs already state that benefits could be achieved through their planning obligation/planning gain policies. In addition the Corporation is heavily involved in implementing strategies which ensure community benefits to neighbouring boroughs through numerous partnership initiatives.</p> <p><u>Objection:</u> The DLP should recognise that community benefits are already addressed in planning obligation/planning gain policies and should not seek to duplicate these arrangements through a separate set of community benefit assessments and policies. Community benefit assessments are relevant to UDPs only if other mechanisms for assessing impacts and achieving benefits do not already exist.</p>
<b>154</b>		<b>3B Working in London</b>	
154	Para 3B.1	Objective 3	<u>Support:</u> The Corporation support the Mayor's objective of making London a more prosperous city with strong and diverse economic growth.

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Appendix 2: Detailed Comments of the Corporation of London on the Draft London Plan			
Draft London Plan		Subject	Comment
Page	Section/Para		
156	Paras 3B.7-26	Demand and supply of office accommodation	<p>The Corporation notes that the DLP seeks to facilitate growth in London's global role with emphasis on the consolidation of the CAZ and the Opportunity Areas around it. The Corporation welcomes the expected growth in the financial and business services sector and notes that this sector is clustered in and around the City. The Corporation notes that Table 3B.4 has identified capacity for an additional 312,000 office jobs in the East sub-region and is concerned that this figure takes full account of the capacity in the City and the City fringe.</p> <p><u>Objection:</u> In order to make the DLP's intentions clear both the potential capacity figures and the employment forecasts in the DLP should be disaggregated to smaller units so that role of the City and its fringe are made explicit. (See comments on p.55 and p.86 for the need to clarify the spatial distribution of the employment growth forecasts in the DLP.)</p>
161	Policy 3B.4	Office provision	<p><u>Support:</u> The Corporation supports policy 3B.4 which states that boroughs should rejuvenate office based activities in the CAZ (including the City) in view of their contribution to the London economy.</p>
161	Policy 3B.5	Mixed use development	<p>The Corporation welcomes the DLP's general commitment to more mixed use development in London in order to contribute to local economic and social vitality, to a greater range of employment opportunities and to a more sustainable future through reduced need to travel.</p> <p><u>Objection:</u> However the Corporation is concerned that policy 3B.5 concerning mixed use development identifies only housing as a suitable mixed use within office developments. Other uses, such as retailing, can be an important part of a successful mix of uses and therefore policy 3B.5 should not be so specific on the mix of uses that could complement an office development.</p>

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<b>Draft London Plan</b>		<b>Subject</b>	<b>Comment</b>
<b>Page</b>	<b>Section/Para</b>		
163	Para 3B.26	Exceptions to mixed use development policy 3B.5	<u>Support:</u> The Corporation is concerned that the introduction of mixed uses is not always appropriate to the locality and should not undermine existing strengths. Therefore it welcomes the recognition in para 3B.26 that increased emphasis on mixed uses will not apply in parts of the City and the Isle of Dogs where such a mix could undermine strategic policy for office development. Residential development requires good access to schools, shops, leisure facilities and open spaces which is difficult to achieve in predominantly commercial areas such as the City. Residential and commercial uses are also often incompatible neighbours in an area such as the City where the built fabric is under continual renewal and where the servicing and operational needs of businesses frequently conflict with expectations of residential amenity.
163	Para 3B.26	Reference to off-site provision of housing as an alternative to mixed use development	<u>Objection:</u> The Corporation notes the statement in para 3B.26 that the redevelopment of office sites without a mix of uses will be accompanied by off-site provision of housing as part of a planning agreement. This reference to housing is unduly prescriptive as other types of planning gain might be more appropriate to site circumstances.
<b>174</b>		<b>3C Connecting London</b>	

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Appendix 2: Detailed Comments of the Corporation of London on the Draft London Plan			
Draft London Plan		Subject	Comment
Page	Section/Para		
176	Policy 3C.1 & Policy 3C.2	Transport and development policies	<p>The Corporation welcomes the commitment in the DLP to substantial improvements in the capacity, accessibility, affordability, quality and integration of London's public transport. It agrees that development and redevelopment should be concentrated in areas with good levels of accessibility by public transport. The City already has excellent public transport accessibility which should be enhanced by the public transport improvements set out in the DLP and the Transport Strategy, particularly Crossrail1, which links the City to the east and west. Short term measures should also be taken to improve significantly existing bus and tube performance. The Corporation also strongly supports the reference in policy 3C.2 to Green Travel Plans and advocates their wider application across London.</p> <p>The Corporation is concerned that desirable new development that meets the DLP's overall objectives should not be delayed by short-term capacity constraints on some public transport modes. Extra capacity should be provided by enhancements to the bus priority network while longer-term, principally rail-based, improvements are being planned and constructed.</p> <p><u>Objection:</u> Remove the references to current capacity from the policies 3C.1 and 3C.2 in order that desirable development in the DLP's growth sub-regions is not unnecessarily restricted by the short term situation on some public transport modes. The wording in bullet point 4 of Objective 5 (p.10) could be included in these policies as it is a better expression of the appropriate relationship between transport and development over the period of the plan, i.e. "integrate development with public transport to ensure that there is a proper fit between development and the capacity of the public transport network to service it over the period of the plan, taking appropriate opportunities to intensify the use of land where current or future transport capacity allows".</p>

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<b>Draft London Plan</b>		<b>Subject</b>	<b>Comment</b>
<b>Page</b>	<b>Section/Para</b>		
177	Para 3C.8	Transport and development text	<u>Objection:</u> The text in para 3C.8 should be amended to make it consistent with the suggested changes to policies 3C.1 and 3C.2 above. The reference to existing capacity should be replaced by the approach in page 10 of the plan which considers the likely public transport services over the whole period of the plan.
178	Para 3C.9	Trams and light rail	Trams/light transit systems are mentioned in the context of town centres, suburbs and opportunity areas but are omitted from bullet point 2 which refers to Central London. This is a serious omission given the significant role that Cross River Transit is expected to play in improving the accessibility and capacity of public transport in Central London. (N.B. The Corporation also considers that there may be scope for additional light rail schemes within Central London and has recently commissioned a study to assess the broad economic and technical feasibility of introducing such a scheme to serve the City). <u>Objection:</u> Add reference to trams/light rail in 3C.9 bullet point 2
183	Policy 3C.7 Para 3C.24 Policy 3C.10	Commuter rail services	The proposals within the DLP to improve London rail services (Policy 3C.10) are welcome but this should not be at the expense of longer distance rail services which also fulfil a vital commuter role. The Corporation therefore particularly supports the commitment in Policy 3C.7 to improve longer distance commuter rail services but suggests additional safeguards in Policy 3C.10. <u>Support:</u> Policy 3C.7 - Improvement of longer distance commuter rail services <u>Objection:</u> Policy 3C.10 – Add ‘whilst safeguarding longer distance commuter services’ to end of first sentence.
184	Policy 3C.8	Better public transport	The Corporation welcomes the objective of improving London's transport and strongly supports the proposed rail, tube and other transport schemes that will improve access to and from the City <u>Support:</u> Policy 3C.8

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<b>Draft London Plan</b>		<b>Subject</b>	<b>Comment</b>
<b>Page</b>	<b>Section/Para</b>		
189	Paras 3C.37 & 38	River crossings	The DLP should have given greater consideration to the need to improve strategic orbital movements. The Corporation considers that there may be alternatives to the proposed Blackwall - Silvertown local crossing which would improve orbital movement, take traffic from Tower Bridge and facilitate the eastward extension of the Congestion Charging Zone. <u>Objection:</u> Add reference to the need to improve orbital movement and remove strategic traffic from Tower Bridge.
192	Policy 3C.15	Allocation of street space / Strategic Road Hierarchy	The Corporation is concerned that the DLP does not include a diagram showing the strategic road hierarchy and that the Mayor's Transport Strategy mentions it only in passing, stating that the RPG3 road hierarchy should continue to be used until it is revised. The absence of such a diagram from the DLP makes it harder to appreciate the relationship between the intended pattern of development and future changes in road traffic management. Its absence could also lead to significant cross-boundary inconsistencies and other network problems. The strategic road hierarchy diagram should also take into account the Congestion Charging Scheme. <u>Objection:</u> Add diagram showing the strategic road hierarchy for London.
194	Policy 3C.17	Improving conditions for buses	Bus depots should be mentioned. The increase in service provision over recent years is leading to a shortage a suitable facilities. <u>Objection:</u> Add reference to bus depots.
198	Para 3C.56	River transport	Para 3C.56 refers to the use of the River for freight transport but the opportunity for making better use of the river for passenger services is not covered. Given the emphasis on development in the Thames Gateway there should be scope for increasing the role of river services for commuting and other journey purposes. <u>Objection:</u> New policy needed supporting of the development of river passenger services.

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<b>Draft London Plan</b>		<b>Subject</b>	<b>Comment</b>
<b>Page</b>	<b>Section/Para</b>		
199		<b>3D Enjoying London</b>	<u>Support:</u> This section sets out policies dealing with consumers, culture and leisure, visitors and the open environment. The Corporation supports the general objectives (1,2,3,6) from which the policies stem, that is, to seek to make London a better city for people to live in.
204	Policy 3D.2 and Annex 5	Assessing retail capacity	Policy 3D.2 advises that boroughs should assess retail capacity and need in their town centres, which is consistent with PPG 6, but Annex 5 implies that boroughs may be required to carry out such assessments. The approach is supported, but it may not be appropriate to carry out a standard retail assessment in the City due to the unique population, workforce and spending patterns of the area.
206	Para 3D.23	Strategic Cultural Areas	<u>Support:</u> The DLP provides the spatial framework for the Mayor's cultural strategy and recognises that London's role as a world city is supported by a number of internationally important cultural institutions including museums, galleries and theatres which are amongst London's major tourist attractions. The Corporation has long been a major patron of the arts and welcomes the suggestion in DLP para 3D.23 that the Barbican should be considered as one of London's 'Strategic Cultural Areas' which should be protected and enhanced.
208	Para 3D.27	Late-night entertainment	The paragraph mentions that some commercial areas should be developed as complementary late-night entertainment locations. Specific locations are not detailed but the technical report which informs the SDS (Late Night London: Planning and Managing the Late Night Economy) lists the City as an area that could help relieve immediate pressure on the West End from late-night activities. This technical report states that further research is required before detailed guidance is developed on the topic. There are concerns that late-night entertainment activity would be inappropriate in the City. The Corporation would wish to be fully involved in any evolving guidance.

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<b>Draft London Plan</b>		<b>Subject</b>	<b>Comment</b>
<b>Page</b>	<b>Section/Para</b>		
213	Para 3D.38	Hotels	The paragraph fails to recognise business hotels when discussing the wide variety of hotel types which can best relate to different localities. <u>Objection:</u> Amend the DLP to include business hotels in the list which illustrates the wide variety of hotel types.
214	Policy 3D.8	Realising the value of open spaces	<u>Support:</u> The DLP recognises the importance of the River Thames and other open spaces to Londoners' quality of life. Enjoyment of the River Thames has been enhanced by the central London bridges which the Corporation maintains and by the creation and improvement of the riverside walk along the north bank of the Thames. As an owner and manager of some of London's large and small open spaces the Corporation welcomes the DLP's commitment in policy 3D.8 to protecting and promoting London's network of open spaces, to realising their current and potential future value to communities, and to protecting the many benefits they provide such as sport and recreation, regeneration, economic, health, culture, biodiversity and the environment.
215	Policy 3D.10	Depiction of open spaces on the UDP Proposals Map	While the Corporation agrees that policies for the protection of open spaces in the City should be included in the UDP it is felt that due to the small size and particular distribution of the City's open spaces, it is more useful to include open space designations in supplementary planning guidance rather than on the UDP proposals map. <u>Objection:</u> Policy 3D.10 should be amended to allow open spaces to be shown in UDP supplementary planning guidance instead of on the UDP proposals map.
220	Policy 3D.12/para 3D.57	Green roofs	<u>Support:</u> The Corporation welcomes the encouragement given to providing new or enhanced habitats such green roofs on new development where appropriate – the Corporation has already encouraged some developments to incorporate green roofs.
223		<b>4. The Crosscutting Policies</b>	
223		<b>4A London's metabolism</b>	

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<b>Appendix 2: Detailed Comments of the Corporation of London on the Draft London Plan</b>			
<b>Draft London Plan</b>		<b>Subject</b>	<b>Comment</b>
<b>Page</b>	<b>Section/Para</b>		
224	Policies 4A.1-3	Waste	The Corporation expects to be able to meet its recycling target and play its part in implementing the Mayor's Waste Strategy.
230	Policy 4A.6	Air quality	<u>Support:</u> Implementing the Mayor's Transport and Spatial Development Strategies will be pivotal to improving air quality in London, especially through bodies such as Transport for London who have the wider strategic role that is necessary to tackle air pollution.
233	Policies 4A.7-10	Energy use	<u>Support:</u> The Corporation welcomes the strategic context that the DLP will give to energy conservation and reducing CO <sub>2</sub> emissions, but greater emphasis needs to be given to the economic use of renewable energy for heating and power. The main requirement of most modern offices is for cooling and this could come from community cooling plants, using chilled beams and low temperature ground water. Consideration should be given to extending the policies to encourage retro-fitting of energy-saving and renewable energy technologies during the refurbishment of existing buildings, especially public ones.
236	Policy 4A.11	Water	<u>Support:</u> Sewerage infrastructure may become a more important issue as often the primary cause of local flooding is inadequate drainage due to poor maintenance of surface water drains and sewers. Climate change is likely to increase the risk of flooding. Leak and leak detection is also an issue that needs addressing.
237	Policy 4A.12	Noise	<u>Support:</u> The Corporation welcomes the approach to noise – the Mayor can influence highway noise through traffic management, spatial development and highway maintenance.
238	Policy 4A.13	Climate change	<u>Objection:</u> The Corporation welcomes the precautionary approach that the DLP will take to development proposals in areas likely to flood, but is concerned that insufficient emphasis is given in policy 4A.13 to the range of other effects of climate change such as increased urban heat island effects, the implications for building design and cooling requirements, migration putting greater pressure on London, transport disruption, etc.
<b>240</b>		<b>4B Designs on London</b>	

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Appendix 2: Detailed Comments of the Corporation of London on the Draft London Plan			
Draft London Plan		Subject	Comment
Page	Section/Para		
241	Policy 4B.2	Promoting world class architecture and design	<p>The policy proposes the production of SPG and similar documents on:</p> <ul style="list-style-type: none"> <li>• Design guidelines</li> <li>• Inclusive and accessible environment</li> <li>• Sustainable design and construction</li> <li>• Public realm</li> </ul> <p><u>Objection:</u> The Corporation questions whether these are all strategic matters and considers that they should be left to the boroughs.</p> <p>The policy also refers to:</p> <ul style="list-style-type: none"> <li>• "The 100 spaces for London programme"</li> <li>• Involving the Mayor's Architecture and Urbanism Unit in applications.</li> </ul> <p>The "100 spaces" programme is not explained anywhere in the London Plan and the Corporation seeks clarification of this.</p> <p>The Corporation also seeks clarification of the type of schemes and the nature of the involvement of the Mayor's A&amp;U unit.</p>
243	Policy 4B.3	Maximising the potential of sites	<p><u>Support:</u> The Corporation fully supports the principle of maximising the potential of sites. However, the Corporation does not support the reintroduction of plot ratio as a control on development (para 4B.14). Plot ratio has been abandoned by most London boroughs as it was an inflexible and impractical tool. It is considered sufficient for the policy to encourage suitable densities of development in general terms without trying to introduce a quantitative control.</p> <p>Para 4B.15/Table 4B.1 set out residential densities. In the City, densities significantly higher than the maximum in the table have often been achieved, and are considered acceptable.</p> <p><u>Objection:</u> The London Plan should make it clear that the densities quoted are for guidance only and are not binding on boroughs' UDPs or on individual planning applications where it can be shown that local circumstances justify variation from the general standards.</p>

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<b>Appendix 2: Detailed Comments of the Corporation of London on the Draft London Plan</b>			
<b>Draft London Plan</b>		<b>Subject</b>	<b>Comment</b>
<b>Page</b>	<b>Section/Para</b>		
246	Policy 4B.4	Enhancing the quality of the public realm	<u>Support:</u> The policy is supported, but it is noted that it is not reflected in policy 5.3 on planning obligations. (see comment on p. 270.)
248	Policy 4B.8	Tall buildings - location	<u>Support:</u> The policy is supported. Major clusters of tall buildings could be located in the Central Activities Zone which includes the City. Such a cluster in the City would be well served by public transport and would reinforce the existing central business cluster centred on the City. However, the statement "Boroughs should not impose blanket height restrictions on tall buildings" is unclear. Restrictions in certain areas, such as protected views, may be appropriate. The City's UDP balances protection in some areas with potential to build tall in others.
250	Policy 4B.9	Large scale buildings - transport considerations	The Corporation's comments on policies 3C.1 and 3C.2 are also relevant to this policy. Desirable development in the DLP's growth sub-regions should not be restricted by the short term situation on some public transport modes. <u>Objection:</u> Amend the policy to remove the restriction on development where the public-transport capacity constraint is likely to be temporary. The approach taken in bullet point four of objective 5 in the Introduction (DLP page 10) is much more appropriate as it looks at the relationship between transport and development over the whole period of the plan.
253	Policy 4B.12	Views in London	<u>Support:</u> Policy supported in principle, but see comments on the 'Views in London Annex.' The involvement of the boroughs in the proposed SPG on views is essential.
<b>261</b>		<b>5. Delivering the Vision</b>	
262	Policy 5.1	Working in partnership	<u>Support:</u> The policy is supported in principle, though the Corporation is not convinced that strategic technical assistance from the GLA is appropriate on Section 106 agreements as these are a matter between the applicant and the local planning authority.

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<b>Appendix 2: Detailed Comments of the Corporation of London on the Draft London Plan</b>			
<b>Draft London Plan</b>		<b>Subject</b>	<b>Comment</b>
<b>Page</b>	<b>Section/Para</b>		
269	Policy 5.2	Promoting development	<u>Support:</u> The policy refers to bringing forward locations for development in relation to transport capacity and phasing. The Corporation supports the policy in principle but does not consider it realistic or desirable to hold back development in central London until all proposed transport infrastructure has been provided and seeks assurance that this is not the intention of the policy.
270	Policy 5.3	Priorities in planning obligations	<u>Objection:</u> The Mayor's priorities for planning obligations in policy 5.3 should be amended to include important objectives such as environmental improvements, training and regeneration initiatives. Elsewhere in the DLP (e.g. policy 4B.4) it is stated that enhancement of the public realm should be promoted, but this is not reflected in policy 5.3. Such initiatives can enhance the environment of the City and the City fringes and also the skills base of the local labour force. These improvements can have strategic importance as they attract inward investment and create jobs for Londoners. The Corporation currently negotiates planning obligations and, in doing so, balances strategic and local needs. It is not considered appropriate for the Mayor to be included in planning obligations, and so no change to the legislation is necessary.
274	Para 5.51	Affordable housing	<u>Objection:</u> The Corporation questions whether the target of 50% affordable housing is realistic. (See comment on p.127, Policy 3A.8)
275	Para 5.56	Land : under-development	The Corporation supports the statement that land should not be under-developed or under-used. However, it considers that specific policies on minimum densities or plot ratios would not be practicable.
276	Policy 5.7	Phasing of development and transport provision	<u>Objection:</u> The policy should not be used to hold back necessary development because proposed transport infrastructure is not yet in place. The indicative phasing targets should be applied flexibly given the uncertainties over public transport provision. (see comments on p.176 &177).

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<b>Appendix 2: Detailed Comments of the Corporation of London on the Draft London Plan</b>			
<b>Draft London Plan</b>		<b>Subject</b>	<b>Comment</b>
<b>Page</b>	<b>Section/Para</b>		
279	Table 5.3	Timing of major transport schemes	The provision of improved transport infrastructure is critical to the implementation of the development proposals in the Plan and should therefore be delivered at the earliest opportunity. The Cross River Transit scheme in particular is well developed and work undertaken by the Cross River Partnership suggests that given appropriate priority an earlier implementation date of 2009 is achievable. <u>Objection:</u> Bring forward completion date of Cross River Transit to 2009.
280	Policies 5.8 & 5.9 Table 5.4	Monitoring and review Measuring progress Key performance measures	<u>Support:</u> Policies are strongly supported. It is essential to closely monitor the effects of the London Plan and, if it is failing to achieve its aims, to review the plan at the earliest opportunity. A particular concern is that the projected growth in financial and business services employment will only be achieved if the policies in the DLP do not harm the international competitiveness of this sector. There will be a need to implement the policies flexibly, where appropriate, to avoid damaging London's international competitiveness.
<b>301</b>		<b>Annex 2 The Blue Ribbon Network</b>	
301		Annex 2	<u>Support:</u> The Corporation welcomes annex 2 on the blue ribbon network and generally supports its policies.
305	Policy BR2	The natural value of the Blue Ribbon Network	<u>Objection:</u> The policy states that development into water space will be permitted "where it serves a water dependant purpose." Para 9 defines water dependent uses as those "that can only be located on <u>or adjacent to</u> waterspaces." This is a serious weakening of the policy of RPG3b/9b, as it would permit development in the Thames which could be located on land instead. It should be revised to state that only development that specifically needs to be in the river will be allowed.
<b>341</b>		<b>Annex 3 Views in London</b>	

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Appendix 2: Detailed Comments of the Corporation of London on the Draft London Plan			
Draft London Plan		Subject	Comment
Page	Section/Para		
343	Section 2.1	Establishment of London Panoramas	<u>Support:</u> The Corporation supports in principle the review of London's view protection framework. It supports in principle the narrowing of existing strategic view protection areas and notes that the proposed changes are intended to continue to protect uninterrupted views of St. Paul's as a landmark within each London panorama. It supports in principle the narrowing of the background protection areas and notes that under the proposed changes it is intended that development in the background should still preserve or enhance the ability to recognise and appreciate St. Paul's as a landmark building. The text is not clear as to whether a reduction in the width of viewing corridors is also being proposed and if so to what extent. This aspect of the London Panoramas proposal requires further clarification. The Corporation also supports the review of the importance of the Westminster Pier and Richmond Park strategic views which are different in character from all the other existing strategic views.
343	Section 2.1	Strategic view target height on St. Paul's Cathedral	The DLP correctly states that the sightline target height on St. Paul's Cathedral for the protected strategic views is 52.1 mAOD Newlyn. However this height relates to the base of the lower <u>drum</u> of St. Paul's and not to the base of the lower <u>dome</u> as stated in the DLP. <u>Objection:</u> The text of the Viewing Corridors para should be corrected to refer to 'drum' and not 'dome'.
345	Policy VA1	Management of London Panoramas	<u>Support:</u> The Corporation supports in principle the management of the London panoramas. However, there is also concern that the proposed approach could add new considerations to the assessment of proposed development such as the effect on the wider panorama from strategic viewpoints. The Corporation wishes to be involved in the preparation of the Mayor's supplementary planning guidance on view protection which will give greater detail on the changes being proposed.

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<b>Appendix 2: Detailed Comments of the Corporation of London on the Draft London Plan</b>			
<b>Draft London Plan</b>		<b>Subject</b>	<b>Comment</b>
<b>Page</b>	<b>Section/Para</b>		
347	Table VA1	Townscape views from City Hall and St. James Park	<u>Objection:</u> The Corporation is concerned at the possible constraints on redevelopment in the City arising from the proposed protection of the City Hall and St James's Park townscape views. These effects should be investigated fully during the preparation of the proposed London Views supplementary planning guidance which the Corporation would like to be consulted upon.
349	Policy VA 4	Management of Protected Views	<u>Objection:</u> The Corporation is concerned that the proposals for the management of river prospects largely duplicate policies in Annex 2, the Blue Ribbon Network particularly those referring to design, tall buildings and to development in or adjoining the existing Thames Policy Area. They could also duplicate policy protection in the City UDP afforded by the existing Thames Policy Area designation and the St. Paul's Heights. The need for strategic intervention in short and medium distance view management is also questioned.
<b>379</b>		<b>Annex 6 Implementation tools</b>	
379		Bridge House Estates Trust	<u>Support:</u> The Corporation supports the recognition in the DLP that the Bridge House Estates Trust's charitable work is of strategic benefit to London.
<b>389</b>		<b>Annex 7: Partnerships that can help deliver the plan</b>	
392		London Parks Forum	<u>Support:</u> The Corporation welcomes the establishment of a London Parks Forum.

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