

LOCAL PLAN – ISSUES & OPTIONS

City Plan 2036 - Shaping the Future City

Sharing answers to questionnaire before publication

Version 5 - 4th November 2016

The link to the plan is <http://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-policy/Pages/Local-Plan-Review.aspx>

<i>Question</i>		Suggested changes/additions
SECTION 2 - STRATEGIC OBJECTIVES		
<i>2.1 Question</i>	<i>What do you consider to be the key challenges that need to be addressed in the Local Plan review?</i>	
2.1 Answer	Because residents live in the City 24 hours a day (including sleeping there), their needs do come into conflict with those of businesses, and workers and visitors who want to enjoy themselves – increasingly 24 hours a day. One way of preserving the balance and better protecting residential amenity would be to explicitly recognise as residential areas the 4 residential wards in the City of London, and offer them specific protections against the extended activities that go on elsewhere in the City.	
<i>2.2 Question</i>	<i>How could the Local Plan help to facilitate the City of London's role as the leading future world class City? Can it provide a flexible framework to respond to significant change whilst providing the certainty sought by much of the development industry?</i>	
2.2 Answer	The City to lead in delivering an enriched approach to providing an environment which delivers for business, residents, visitors, the environment and biodiversity	
<i>2.3 Question</i>	<i>Are the five strategic objectives listed in paragraph 2.6 still relevant? If not, what should the key objectives be in the new Plan?</i>	
2.3 Answer		
SECTION 3 - A WORLD FINANCIAL & BUSINESS CENTRE		
Sub-section 1- Offices		
<i>3.1 Question</i>	<i>Should we protect an identified "Commercial Core" where only offices and complementary commercial uses will be permitted? Outside the core, should we be more flexible allowing a mix of land uses, including housing and hotels? What areas of the City should be outside of any identified core?</i>	
3.1 Answer	Support identifying a commercial core, where only offices are permitted. We would go further and suggest its corollary, that outside the commercial core, in areas with residential clusters (eg the 4 residential wards) residential needs should have priority	
<i>3.2 Question</i>	<i>How should the Local Plan provide the flexibility in workspaces needed to address increased economic uncertainty and possible</i>	

	<i>turbulence?</i>	
3.2 Answer		
3.3 Question	<i>Should we continue with the current approach of setting office floorspace targets with defined 5 year phases, or move to a different approach, possibly using a criteria based policy?</i>	
3.3 Answer		
3.4 Question	<i>How should the Local Plan encourage new and emerging employment sectors? Should we aim to maintain the City's distinctive employment base, with a concentration of financial and business services, or diversify more?</i>	
3.4 Answer		
3.5 Question	<i>How important is it to use policy to protect a range of office sizes and employment opportunities? Should we have specific policy protection for offices suitable for Small and Medium Enterprises (SMEs)? What type of floorspace are SMEs looking for?</i>	
3.5 Answer		
3.6 Question	<i>Are large floorplate offices still required in the City? Should more flexible floorplates and building designs be encouraged to support new ways of working?</i>	
3.6 Answer		
Sub-section 2- Utilities infrastructure		
3.7 Question	<i>How can we ensure that the necessary infrastructure is planned for and installed in a timely and cost effective manner? Could the City Corporation instigate a more strategic and collaborative approach to implementation and funding of utility infrastructure?</i>	
3.7 Answer		
3.8 Question	<i>How can we influence the development of digital connectivity infrastructure ensuring that it is effective but does not detract from the significance of heritage assets or obstruct streets and pavements?</i>	
3.8 Answer		
3.9 Question	<i>Are there further mitigation measures which could be considered to reduce the disruption caused by construction activity in the City? How can we influence the provision of suitable utilities infrastructure for construction sites, ensuring it does not result in unacceptable air quality, noise and vibration impacts or affect the utilities capacity available for neighbouring properties?</i>	
3.9 Answer	Much tougher noise and pollution standards during construction	
Sub-section 3 - Safety and Security		
3.10 Question	<i>What are the key issues concerning night-time entertainment? Should we identify areas of the City either to promote or restrict night-time entertainment uses? If so, which areas would you suggest? Would clear dispersal routes help to minimise the impact of night-time venues?</i>	
3.10 Answer	The Local Plan should identify the large residential clusters as areas to restrict night time entertainment uses. We propose the 4	

	<p>residential wards, including Aldersgate and Cripplegate. Dispersal routes that discouraged people leaving night time venues from using the streets immediately around the Barbican Estate and overlooked by flats* would be helpful.</p> <p>[*namely, Aldersgate Street, the lower end of Goswell Road, the open ends of Beech Street, including its connection into Chiswell Street; Silk Street, Moor Lane, Fore Street, Wood Street]</p>	
<i>3.11 Question</i>	<i>How can buildings and spaces be designed to create a safe and permeable public realm while protecting against security threats?</i>	
3.11 Answer	Bollards and minimal amounts off plate glass (this also helps reduce light pollution)	
<i>3.12 Question</i>	<i>Should we include further planning policy measures to tackle crime and anti-social behaviour? If so, what measures?</i>	
3.12 Answer		

SECTION 4 - KEY CITY PLACES

Sub-section 1 - Key City Places

4.1 Question	<i>Should the concept of Key City Places be retained in the new Local Plan? Should we continue to focus only on areas where significant change is expected? Should they be renamed as Areas of Change?</i>	
4.1 Answer	Neutral on City Places. Residents haven't noticed that the designation of North of the City has helped protect residential amenity	
4.2 Question	<i>Are there other areas of the City not mentioned in the questions below that require a particular policy focus? If so, please state why.</i>	
4.2 Answer	We think that if the City is serious about respecting its small residential population, the Local Plan should treat residential areas (most easily identified as the residential wards) differently from the rest of the City. If the residential wards are recognised as such and given some protection [from excessive development, evening and night time activity, noise pollution, and light pollution] then residents have no problem with the rest of the City's commercial and other activities	

Sub-section 2 - The North of the City/Cultural Hub

4.3 Question	<i>Should the North of the City continue to be considered as a single Key City Place, or should we focus attention on two specific Areas of Change; the Cultural Hub in the North-West and the Liverpool Street/Broadgate area in the North-East?</i>	
4.3 Answer	There may be merit in separating the Liverpool Street/Broadgate area from the rest of the North of the City. The question suggests the other part is the Cultural Hub, but please note (as you do in para 4.6) that the Cultural Hub coincides with the City's largest concentration of residences and two of its residential wards. We agree that Cultural hub activities (and particularly supporting facilities) will need to be <i>very carefully planned</i> to respect both residential amenity and the heritage importance of the Barbican and Golden Lane estates – themselves an important part of the Cultural hub (visitors come to see the architecture).	
4.4 Question	<i>What new issues will we need to consider in the Local Plan as the Cultural Hub develops? What other land uses and facilities will be required to support the emerging Cultural Hub, and how can these be accommodated whilst protecting residential amenity? How can we balance the needs of larger numbers of pedestrians with vehicles that are essential for the running of Smithfield and St Bartholomew's Hospital?</i>	
4.4 Answer	The local plan needs to observe the delicate balance that exists between the activities of the Cultural Hub and the residential area it sits within. Residents observe that it is rarely the cultural activities of the Arts Centre, GMSD, and Museum of London (and this is probably true for any Centre for Music built on the site of the Museum of London) that disturb residential amenity. It is overwhelmingly the commercial activities – bars, restaurants, booked spaces for wedding parties and other events, (including noise from associated plant) and the dispersal of patrons from these activities - that disturb residential	

	<p>amenity.</p> <p>We recognise that bars and restaurants are an inevitable part of a Cultural institution these days, but to recognise that the surroundings are residential squares the organisations of the Cultural Hub must invest more in</p> <ul style="list-style-type: none"> - Better sound insulation - Better management - Better dispersal policies <p>And the City needs to limit activities in open areas in the evenings and night times when these take place near residents' flats.</p> <p>Moreover any plans should be designed to attract visitors <i>to</i> attend the Cultural institutions and not just to “hang out” in the public space around the area. A residential area is not appropriate for “hanging out” in the way, for example, that people hang out on the South Bank without every going to any of the National Theatre, the BFI, the Hayward, the Royal Festival Hall, or the other concert halls.</p> <p>We therefore think it is important that public space should “belong” to institutions and be accessible from those institutions and not be a part of a general thoroughfare.</p> <p>Balancing larger number of pedestrians with vehicles that are essential for Smithfield and St Barts: Widen the pavements generally to accommodate more pedestrians whilst ensuring that this does not encourage more cyclists to use them. Make clear designated routes for commercial traffic to Smithfield and for hospital traffic to St Barts (including to carparks)</p>	
4.5 Question	<i>How should the business environment around Liverpool Street be planned? What challenges will this bring and how can they be addressed Should there be increased support in the Local Plan for technology sector companies, particularly seeking to provide more flexible and adaptable workspaces?</i>	
4.5 Answer		
Sub-section 3 - Cheapside and St Paul's		
4.6 Question	<i>Is there a need to retain a specific policy for Cheapside and St Paul's as a Key City Place? Should the area be modified? If so, how?</i>	
4.6 Answer		
4.7 Question	<i>How can the area provide greater appeal to visitors, workers and shoppers? How should it link to the proposed Cultural Hub to the north?</i>	
4.7 Answer	<p>It should be made obvious to visitors who want to reach the cultural hub (in order to go to an exhibition, a concert, a cinema, or to look at the architecture etc) how to get there from Cheapside.</p> <p>But there is no natural link between Cheapside and the Cultural Hub, and an artificial one should not be created or assumed. Cheapside should be self sufficient in bars and restaurants and not rely on those from the cultural hub. Indeed, it may be more natural to encourage patrons of the Cultural hub to restaurants/bars on Cheapside</p>	

Sub-section 4 - Eastern Cluster		
4.8 Question	<i>Should further intensification be encouraged within the Eastern Cluster? Should the current policy area be retained or should it be modified? If so, where and how?</i>	
4.8 Answer		
4.9 Question	<i>What changes would be needed to existing infrastructure to accommodate further intensification in the Eastern Cluster?</i>	
4.9 Answer		
4.10 Question	<i>Should special emphasis be placed on the public realm to cope with increased pedestrian movement in the Eastern Cluster? Should we be pedestrianizing streets in the Eastern Cluster and creating more open spaces through buildings? What routes through the Eastern Cluster should we improve?</i>	
4.10 Answer		
Sub-section 5- Aldgate		
4.11 Question	<i>Does the Aldgate area still merit its own Key City Place? If so, should the area be extended to become an East of City area including the area around Tower Hill and/or Middlesex Street? What should be the main policy focus of any newly designated area?</i>	
4.11 Answer		
4.12 Question	<i>How can the amenity of residents in the Aldgate area be protected within a lively mixed use environment?</i>	
4.12 Answer		
Sub-section 6- Thames and the Riverside		
4.13 Question	<i>What mix of land uses will be appropriate on the City's riverside over the next 20 years? Should the Local Plan provide clearer, more prescriptive guidance on the development potential and appropriate uses of sites along the riverfront?</i>	
4.13 Answer		
4.14 Question	<i>Should we seek greater use of the River Thames for transport, for example by retaining and enhancing river transport infrastructure at Blackfriars Pier (when relocated) and Walbrook Wharf, and the reinstatement of infrastructure at Swan Lane Pier? Should we promote the use of the river for future servicing of buildings in the City?</i>	
4.14 Answer		
4.15 Question	<i>Should we seek greater use of the River Thames for transport, for example by retaining and enhancing river transport infrastructure at Blackfriars Pier (when relocated) and Walbrook Wharf, and the reinstatement of infrastructure at Swan Lane Pier? Should we promote the use of the river for future servicing of buildings in the City?</i>	
4.15 Answer		

SECTION 5 - CITY CULTURE AND HERITAGE

Sub-section 1 - Design

5.1 Question	<i>What are the new design issues for the City that we need to consider in the Local Plan review? Should more detail be included in the design policies?</i>	
5.1 Answer	<p>*Daylight and sunlight. We would like to see calculations made by developers exclude the effect of balconies. The fact that they can use the existence of balconies to show that their buildings do not much affect daylight and sunlight – when they manifestly do – adds injury to insult for residents. This provision alone has allowed huge buildings to be built close to residential flats, spoiling the listed landscape, reducing daylight and increasing light pollution from artificial lighting.</p> <p>*The current restrained policy on advertising is welcome. The City needs to improve its wayfinding, and further visual distractions are not helpful</p> <p>*Roof terraces are an important design consideration because they cause nuisance next to residential areas. We would like planning conditions to restrict their use when they overlook residential clusters to a reasonable time in the evening – 7 pm.</p> <p>*Plate glass windows should be limited on the following grounds</p> <p>a) light pollution is an increasing problem for residences, as LED lights get more powerful. We would like to see some planning conditions that require all or some of the following:</p> <ul style="list-style-type: none"> - the light exposure to residences opposite buildings to fall below a specified threshold (much lower than the current brightness) - a requirement that lights should be switched off completely between the hours of 9pm and 7 am, or the equivalent effect created by drawing of blinds <p>b) security – if bombs explode shattering glass kills people</p> <p>c) overlooking – both ways, a lack of privacy for the occupants of an office with floor to ceiling windows (including all the clutter under their desks), and overlooking of next door residences</p>	

Sub-section 2 - Visitors, Arts and Culture

5.2 Question	<i>Are there certain areas of the City where hotel development is inappropriate, or where hotels should be encouraged? Should these areas be identified in detail or more generally?</i>	
5.2 Answer	<p>Hotels are not a good mix with residences because of hotel patrons arriving at all hours of the day and night [Report on “City of London Hotel Study: Market Strategy and Policy Advice for New Hotel Developments in the City of London”, 2009:</p> <p>“Hotel operations generally do not make good neighbours for residential uses particularly due to noise nuisance at unsocial hours and the transient population of visitors coming into the neighbourhood.”]</p> <p>We note that the area round St Paul’s is very close to the cultural hub. It is not clear why new hotels need to be built nearer.</p>	
5.3 Question	<i>Should we set a target for the number of new hotel bedrooms or hotels in the Local Plan? If so, what do you think that target should be?</i>	

5.3 Answer	No. Whilst some consideration to the forecast growth in visitor numbers in the period under review should be given to ensure that adequate future accommodation options are available, there are other building priorities in the City itself. The City is already well served with hotels both inside and outside the Square Mile, in particular in the St Paul's district which, as noted in 5.2 above, provides close and convenient access not only to the principal business areas but also to the cultural hub. Hotel growth should be largely restricted to these adjacent areas.	
5.4 Question	<i>Should accommodation for business visitors to the City be prioritised over accommodation for tourists? If so, what role can the planning system play in ensuring this is delivered?</i>	
5.4 Answer	Hotel accommodation for business visitors should be prioritised over accommodation for tourists. The whole thrust of City Strategy is that the City is a business district, the engine of a vast economy. It's a very small area (with congested streets) and not far to visit for tourists staying in surrounding areas. There is no need to build hotels to accommodate tourists.	
5.5 Question	<i>Should the Local Plan encourage uses and activities which could attract more visitors? Should this include on-street activities? What type of activities would be appropriate in the City and what types would be inappropriate?</i>	
5.5 Answer	We see no point in attracting visitors just for the sake of it. The City is interesting enough to attract visitors already, and if the cultural hub institutions put on attractive events and exhibitions visitors will come anyway. What sort of cultural hub do you want to encourage? The City sees itself as world class. Its culture should be world class and its manners should be world class. That does not mean providing street food for visitors to a classic concert or a Bauhaus exhibition. There are plenty of places in London for any visitor (or resident) to get street food (including in the City). There is no need to create more, particularly around residential areas. Part of our argument for recognising the Barbican and Golden Lane areas as residential is for the Local Plan to recognise that visitors "hanging out" and accessing street food is not appropriate in a residential community. The approach to St Pauls from the Millenium Bridge and on the bridge itself is spoilt by street vendors and entertainers	
Sub-section 3 - Historic Environment		
5.6 Question	<i>How can the Local Plan help new development conserve and enhance the significance of heritage assets? What should the Local Plan say about the setting of heritage assets? Should we include policies and guidance within the Local Plan on nondesignated heritage assets?</i>	
5.6 Answer	We would like to see the Barbican and Golden Lane estates designated as conservation areas. At present the fact of being listed has not prevented the setting of the Barbican estate being spoilt by modern buildings of much vaster scale and completely unrelated architectural styles being built within metres of the estate. The City has many heritage assets and it has not in general served them well. They are dwarfed by modern commercial buildings of indifferent quality and mediocre design	

5.7 Question	<i>How can heritage assets be used in the most adaptable and flexible way to boost their future relevance without harming their significance?</i>	
5.7 Answer	<p>Do not surround heritage assets with inappropriately designed and oversized blocks so that their legacy can be protected and residents, workers and visitors are able to view and enjoy them. The Barbican podium was an innovation ahead of its time and the extension of these through the City could give pedestrians greater safety and an enhanced experience especially at peak times. The London Wall Place scheme has created such an above pavement thoroughfare.</p> <p>The Current barbican Highwalks network should be protected where it extends beyond the estate, lest the Barbican be cut adrift from its surrounding City</p> <p>Future plans should build on the current north-south routes and east-west routes across the Barbican Estate via the existing Highwalks and the existing surrounding streets at street level without building any new ground level routes through the estate.</p>	
5.8 Question	<i>Should there be a specific policy that protects the setting and Outstanding Universal Value of the Tower of London World Heritage Site?</i>	
5.8 Answer	The answer is probably Yes given the importance of the site and the present thoughts of improving connectivity from the Tower through the City. In this regard however it will be interesting to note the recommendations made by the UNESCO World Heritage Committee 2016 and then respond accordingly.	
Sub-section 4 - Protected Views		
5.9 Question	<i>Should we maintain the current approach to local view protection in the City? If not, how should the approach be changed and which views should be affected?</i>	
5.9 Answer	YES. In such an important and historic area, the protection of such views as those of St Paul's Cathedral and other significant City buildings and skylines are vitally important.	
5.10 Question	<i>How do the current view protection policies affect development in the City? What would be the impact on development in the City if the view protection policies were changed?</i>	
5.10 Answer	The current protection policies help to prevent obscuration of key significant views. The view protection policies have worked well for nearly 80 years and it would be nice to think that they will continue to do so for the next 80 - or more.	
5.11 Question	<i>Should we be recognising and protecting new views from publicly accessible locations? If yes, which ones?</i>	
5.11 Answer	The answer should clearly be Yes but given the density of building, both current and proposed, in such an already overcrowded area it is hard to think what or how many "new views" could either be recognised let alone protected.	
Sub-section 5 - Tall Buildings		
5.12 Question	<i>Should we continue to promote tall building development in the City and should these buildings continue to be clustered? Should the current tall building cluster in the east of the City be altered? Are there any other areas of the City which could accommodate tall buildings without compromising its distinctive character and heritage?</i>	
5.12	The continued development of tall buildings seems inevitable	

Answer	<p>given the constraints on space but whether they should continue to be promoted is open to debate. One absolutely key requirement is that clusters of tall buildings should be forbidden around residential areas.</p> <p>Given the scale of the clustering of buildings already in the City let alone the number of those which have been proposed but have not yet reached completion , it is hard to see any other area which could accommodate tall buildings "without compromising its distinctive character and heritage".</p>	
5.13 Question	<p><i>What more should we do to address the wider impacts of tall building proposals, such as pedestrian movement, public realm, micro-climate and wind mitigation? Are there any other factors to consider?</i></p>	
5.13 Answer	<p>Strict examination of all such planning proposals must be made to ensure e.g appropriate distance from other buildings, appropriate location and scale, consideration of the potential impact on the working and residential populations of wind tunnels, air pollution, shadow and loss of natural light. Sufficient landscaping and the creation of green space is absolutely key in such areas. Perhaps there should be stronger arguments made for a more diverse city approach i.e. to provide a more diverse range of building ages, heights, sizes and costs which could provide a variety of economic opportunities at a broader range of price points.</p>	
5.14 Question	<p><i>Should the Local Plan include reference to the CAA's London Tall Building Policy and its intention to object to proposals exceeding 305m AOD in order to give more comprehensive policy guidance in the Local Plan?</i></p>	
5.14 Answer	<p>YES - surely this is just common sense!</p>	
General		

SECTION 6 - ENVIRONMENTAL SUSTAINABILITY

Sub-section 1 - Sustainability and Climate Change

<p>6.1 Question</p>	<p><i>Should we identify and positively plan for infrastructure such as district heating and smart grid technologies to enable a more sustainable, low carbon future for the City? What technologies and infrastructure are likely to be viable and operationally feasible in the City? Should they be required in certain types of developments?</i></p>	
<p>6.1 Answer</p>	<p>Sustainability will be crucial in the life of the next City Plan and for all those who live and work in the area.</p> <p>District heating networks – Buro Happold 2013 report found that there is enough heat in London to meet 70% of the city’s heating. There are already schemes in Kings Cross and QE Olympic Park. Apart from reduced costs this initiative would make a difference to fuel security and carbon emissions. The Local Plan should include a feasibility study at the very least.</p> <p>Smart Grid Technologies - planning positively for green infrastructure (PPS12) is vital for health and well-being for the huge number of people who work and live in the City. Providing amenity green space, play and public art spaces in our urban environment needs a strategic approach. There are many new initiatives that the City Plan should include. Already there are floor tiles and street lamps that generate electricity and a developer could be encouraged in the planning system to cover our busiest streets with floor tiles adjacent to their building.</p>	
<p>6.2 Question</p>	<p><i>What type of climate resilience measures should be incorporated into new development, refurbishment and the public realm? How should such measures be secured?</i></p>	
<p>6.2 Answer</p>	<p>HM Govt Climate Resilient Infrastructure report 2011 acknowledged the need to face up to the challenges of climate change. A low carbon climate resilient infrastructure is important to protect the ICT and transport systems in the City. Refurbishing buildings is more sustainable than demolition and rebuild. Many of us in the Barbican have seen much of the latter bordering the Estate in the last 20 years.</p>	
<p>6.3 Question</p>	<p><i>Should we identify and encourage specific local measures to improve air and water quality, conserve water and minimise flood risk, minimise noise and light pollution and eliminate potential land contamination. If so, what should they include?</i></p>	
<p>6.3 Answer</p>	<p>Air quality in London is the worst in Europe and the data on Beech Street tunnel is of great concern. Our local plan must be robust in its commitment to improve.</p> <p>Specific measures to improve air and water quality, conserve water, minimise noise and light pollution and eliminate land contamination would all be welcome to residents. We suggest:</p> <ul style="list-style-type: none"> -tougher standards on vehicles -reduced numbers of vehicles in the City. Reduce numbers of minicabs and delivery vans -tougher standards on light pollution, including enforcement action where it causes a persistent nuisance - much tougher noise and pollution standards for contractors – quieter machinery, activities; better acoustic and dust hoarding; better enforcement of standards - no routine Saturday noisy works in residential areas <p>Paris already bans cars older than 1997 and has traffic free days, Norway’s plan is to ban all petrol and diesel cars by 2025.</p>	

	<p>We would welcome a robust approach to offices that cast intrusive light into dwellings. Although developments are built to statutory guidelines we have much experience of lights being left on during weekends and holiday periods where there is no-one in the offices and for blinds not being used. France has placed itself at the forefront of the anti-light pollution movement with a series of ambitious laws. As of July, offices have been required to switch off their lights one hour after the last employee has left the building. Shops and the facades of public buildings must do without any lighting after 1 a.m., at which point even neon signs must be switched off. Berlin has committed itself to a lighting concept that involves keeping the lights as low as possible.</p> <p>Light pollution initiatives will be developed, especially in cross disciplines such as Energy Saving, Biodiversity, and Human Health in the EU-project STARS4ALL</p>	
--	---	--

Sub-section 2 - Transport and Motor Vehicles

6.4 Question	<p><i>What actions could the City Corporation take to reduce congestion in the City?</i></p> <p>Improved public transport is key to mitigating traffic congestion. In the middle term future, TfL plans to increase the frequency of trains and also extend working hours (Night Tube) on all lines passing through the City. These, generally desirable developments, must, however, only be done following modernisation of track and trains (particularly on the sub-surface lines which pass directly under City residential areas) with “state of the art” noise and vibration reducing technologies</p>	
6.4 Answer	<p>Congestion in the City is a problem and it is important for the Plan to address this in the various sections</p>	
6.5 Question	<p><i>Should occupiers of large developments be required to only accept deliveries outside peak periods, including at nighttime? Should medium-sized buildings be required to provide off-street servicing areas?</i></p>	
6.5 Answer	<p>The LEN initiative is a good one.</p> <p>Night time deliveries are unacceptable in residential areas and should remain forbidden. Off street servicing areas in medium size buildings would be welcome.</p> <p>There should be a strategy in the plan that protects the well-being of residents from noise of night deliveries</p>	
6.6 Question	<p><i>Should we promote consolidation centres, even though this may require the use of land outside the City and over which the Local Plan has no jurisdiction?</i></p>	
6.6 Answer	<p>We recognise that delivery vans do cause problems in the City, both air pollution and congestion. It is not clear that decanting deliveries into smaller vehicles will reduce congestion, though if the vehicles are electric it may ease pollution. Consolidation centres near residences are inappropriate because they generate traffic and hence noise 24 hours a day.</p>	
6.7 Question	<p><i>How can we reduce the impact of motor vehicle traffic on air quality? What measures could reduce exposure to pollution? Should we encourage alternative modes of travel, including electric vehicles, providing appropriate electric charging infrastructure without causing street clutter?</i></p>	
6.7 Answer	<p>Promotion of safe cycling with more cycle-ways and electric cars would make a real difference to air quality. Providing electric charging points has to be part of a local plan, electric cars will be the norm in 10 years,</p>	

	charging needs to be convenient and reliable. In the future residents will require more charging points in the Barbican car parks.	
Sub-section 3 - Pedestrians, Cyclists and Motorcyclists		
6.8 Question	<i>How can more open space and pedestrian routes be created in and around large developments? How can we create more space for pedestrians? Should certain streets in areas of high congestion be pedestrianised or time limited, or should certain types of vehicles be restricted in those areas?</i>	
6.8 Answer	We would support pedestrian-only streets that allow vehicle access to residents' homes. With so many road closures in the area especially at weekends we sometimes say 'we are just trying to get home!'	
6.9 Question	<i>Should the requirements for cycling parking in developments be increased, remain the same or be decreased? Should large developments be required to provide off-street public cycle parking spaces?</i>	
6.9 Answer	Cycle parking in developments and a safe route from areas outside the City are crucial to encouraging greener travel. Requiring large developments to provide off street public cycling spaces would be an excellent initiative. Pedestrian overcrowding is a problem in the City. Consider requiring large developments to leave open space at ground level and include walkways at higher level	
6.10 Question	<i>Should there be more on-street or off-street motorcycle parking in the City?</i>	
6.10 Answer	Motor cycle parking, more? I don't think so	? Not sure we have a view. I'd be inclined to say nothing
Sub-section 4 - Waste and the "Circular Economy"		
6.11 Question	<i>What measures could we include to secure waste reduction associated with development? Should we promote circular economy principles, zero waste plans and on-site management of waste for large developments?</i>	
6.11 Answer	The Barbican Estate has a very good waste collection and recycling system and the house groups are happy to work with CoL to ensure that residents make full use of this	
6.12 Question	<i>Should we continue to rely on waste management facilities outside the City? If so, how should we co-operate with other waste planning authorities to ensure adequate and appropriate planning for waste?</i>	
6.12 Answer	-	
6.13 Question	<i>Should we continue to safeguard Walbrook Wharf as a waste site? Are there any other sites in the City which could be used for waste management, reducing the need to export waste elsewhere?</i>	
6.13 Answer	Walbrook Wharf to be safeguarded??	?? Not sure ??
Sub-section 5 - Flood Risk		
6.14 Question	<i>Should national SuDS standards continue to be applied to major development only or should we require smaller development to incorporate a certain standard of SuDS? If so, what type of smaller developments should be included?</i>	
6.14 Answer		
6.15 Question	<i>Should we require flood resistance and resilience measures for new development and refurbishment schemes within the City Flood Risk Area? If so what measures should be specified?</i>	

SECTION 7 - CITY COMMUNITIES

Sub-section 1 - Open Spaces and Recreation

7.1 <i>Question</i>	<i>Should we continue to protect or enhance the existing open spaces in the City? How can we deliver more open space in the City?</i>	
7.1 Answer	We should continue to protect and enhance the open spaces in the City. Particularly, we should protect those in the Listed Grade II* within the Barbican Residential Estate, as laid out in the Barbican Listed Building Management Guidelines. This protection should include the protection of the levels of daylight and sunlight that reach these spaces. Roof-top terraces and sky-gardens are no substitute. Indeed, we should not encourage the building of roof-top terraces on office blocks within or across the street from the residential clusters of the Barbican and Golden Lane as misuse of these terraces can result in nuisances being caused to residents. Where such terraces are built, their usage should be limited to Mon-Fri, 0800 – 1900.	
7.2 <i>Question</i>	<i>Should priority be given to greenery within open spaces or to harder surfaces that are easier to maintain? Should developers be required to contribute towards the future maintenance of new open spaces?</i>	
7.2 Answer	Priority should be given to greenery.	
7.3 <i>Question</i>	<i>Should we require buildings over a certain size to contain a proportion of public space and/or employee recreational space within the building, including roofspace?</i>	
7.3 Answer	We should require buildings over a certain size to contain a proportion of public space and/or employee recreational space within the building, but NOT including roofspace where the building is close to the residential clusters, see our response to 7.1 above. Developers should be encouraged to make more imaginative use of internal atriums, for example to include climbing walls. Where there is space in a development, away from the residential clusters, the hard landscaping should include facilities like volleyball, netball or basket ball pitches. These require little upkeep, and new office blocks often already include changing and shower room (for bicycle users).	
7.4 <i>Question</i>	<i>What type of outdoor open spaces and recreation facilities are most needed in the City? Should we specify what should be sought in new open spaces in terms of seating, planting and other facilities, depending on their location and character?</i>	
7.4 Answer	Where there is space in a large development, say in a courtyard, away from the residential clusters, the hard landscaping should include facilities like volleyball, netball or basket ball pitches. These require little upkeep, and new office blocks often already include changing and shower room (for bicycle users).	

Sub-section 2 - Retailing		
7.5 Question	<i>Should the number or role of PSCs be modified and/or should the boundaries of existing PSCs be amended? Is it still an appropriate policy objective to prioritise A1 units over other retail uses in PSCs?</i>	
7.5 Answer	<p>Yes and yes.</p> <p>In addition, we should constrain future increases of retail facilities in or opposite the main residential clusters, particularly that of the Barbican. Where it is necessary and appropriate to have:</p> <p><i>A1 Shops - Shops, retail warehouses, hairdressers, undertakers, travel and ticket agencies, post offices, pet shops, sandwich bars, showrooms, domestic hire shops, dry cleaners, funeral directors and internet cafes.</i></p> <p><i>A2 Financial and professional services - Financial services such as banks and building societies, professional services (other than health and medical services) and including estate and employment agencies.</i></p> <p>These should be allowed, but the opening times of A3 facilities, and the nuisance that their patrons can cause on the pavements outside of them, make them problematic.</p> <p><i>A3 Restaurants and cafés - For the sale of food and drink for consumption on the premises - restaurants, snack bars and cafes.</i></p> <p>In particular, we are concerned by the rise in general of retail facilities that are AE at breakfast or lunchtime but morph into an A4-type establishment in the evening.</p> <p><i>A4 Drinking establishments - Public houses, wine bars or other drinking establishments (but not night clubs).</i></p> <p>As far as A5 establishments are concerned:</p> <p><i>A5 Hot food takeaways - For the sale of hot food for consumption off the premises.</i></p> <p>We would like permissions for A3 establishments in or opposite the Barbican Residential Estate to be conditioned in such a manner to disallow an A5 element, so that no nuisance is caused by a Deliveroo / UberEat or similar bicycle / scooter / motorbike delivery service.</p>	
7.6 Question	<i>Do the retail links still serve a clear purpose or should we allow retail uses throughout the City? Should isolated retail units continue to be protected?</i>	
7.6 Answer	Existing isolated retail units should be protected.	
Sub-section 3 - Housing		
7.7 Question	<i>Should we define the boundaries of existing residential areas more clearly to indicate where in the City further residential development would be permitted? Or, should residential development be permitted anywhere in the City as long as the particular site is not considered suitable for office use and residential amenity consistent with a city centre location can be achieved?</i>	
7.7 Answer	No, we should not define the boundaries of existing residential areas more clearly to indicate where in the City	

	<p>further residential development would be permitted. Indeed, we should encourage residential development adjacent and close to the existing residential areas, as long as it does not affect the daylighting and sunlighting of existing residences.</p> <p>At present the City has some recognizable residential clusters (namely the 4 residential wards). We are very keen that those areas should be recognized as residential areas and residential amenity protected within them by separate rules limiting noise and light pollution and busy activity in evenings, night times, and weekends. To the extent possible it would make sense to encourage further residential development within or close to those areas so they can share some protection.</p> <p>However, the City also has smaller residential buildings dotted throughout the square mile. It is hard to see how they can be protected to the same extent as the residential wards. But we would make two points:</p> <ul style="list-style-type: none"> - If new residences (wherever they are built) house Londoners (and are not simply investment vehicles) then there is a severe need for more housing so it should not be discouraged - Just because it is not possible to fully protect all residences in the City from the full blast of City commercial and night time activity, does not mean that those longstanding residential areas (designated as residential wards) should not be given additional protection of residential amenity 	
7.8 Question	<i>Should we plan to meet the London Plan housing target, or the level of need identified in the Strategic Housing Market Assessment? Is there a need to exceed the London Plan housing target to address wider London housing need?</i>	
7.8	We would support the City taking measures to prevent residential units being bought by overseas investors and never occupied. Unoccupied flats should attract increasing penalties the longer they are unoccupied and the money spent building more affordable and social housing	
7.9 Question	<i>Is it feasible in the City for residential units to be successfully incorporated in a building with non-residential uses? Or would co-existence undermine the operation of City businesses and/or residential amenity?</i>	
7.9 Answer	Our experience is that such dual use buildings can be very difficult when it comes to protecting residential amenity, unless a strong management agreement to protect residential amenity is included in the Planning conditions. This is difficult to achieve when the same developer wants maximum flexibility from both types of usages.	
7.10 Question	<i>Are there types of housing to suit specific needs that we should encourage in the City e.g. sheltered housing for the elderly or new forms of rental accommodation?</i>	
7.10 Answer	We should discourage hostel accommodation, student accommodation and short term letting (less than six months) close to or in the current residential clusters as these can have a negative impact on residential amenity.	

7.11 Question	<i>Should the level of affordable housing required in the City be increased to allow the supply of rented affordable housing to be retained alongside starter homes? Is the approach to seeking commuted sums and delivering affordable housing acceptable?</i>	
7.11 Answer	No, the level of affordable housing required in the City should not be increased to allow the supply of rented affordable housing to be retained alongside starter homes. However, the approach to seeking commuted sums and delivering affordable housing outside the City should be amended so that the new housing (built outside the City, is within 2.0 km of the City's boundaries thus making it easy for lower paid City workers and keyworkers.	
7.12 Question	<i>Are there any areas of land in the City that should be considered suitable for 'permission in principle' for housing-led development through the Local Plan review?</i>	
7.12 Answer	No.	
Sub-section 3 - Social and Community Infrastructure		
7.13 Question	<i>What type of facilities and services would be appropriate to meet the needs of current and future City workers? Are these different to the facilities needed by residents? How can facilities for workers and residents be best delivered?</i>	
7.13 Answer	The NHS primary care strategy enables patients to register at surgeries other than where they live. City workers can use City GP practices yet there is only one NHS doctors' surgery within the City. This is unacceptable. Where very large redevelopment schemes come forward, the City should step in and demand the space for an NHS doctors' surgery, at ground or upper ground level, at a reasonable rent for the usage, for residents and office workers. There should be an NHS doctors' surgery in each of the four quarters of the City.	
7.14 Question	<i>Should we plan to meet the need for social and community services in full within the City, or work with partners in neighbouring boroughs?</i>	
7.14 Answer	As far as the physical infrastructure and buildings are concerned, these needs should be met within the City. This does not exclude partnering with neighbouring boroughs as far as administration and personnel are concerned. If the necessary infrastructure and buildings are not put up within the City, there is the very great risk that the larger neighbouring borough erects the facility close to the middle of that borough, but far from the City's residential clusters.	
General		