

City of London Corporation's Comments on the Mayor of London's Statement of Ambition 'A City for All Londoners' (October 2016)	
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	<p>There is much in the Mayor's high level priorities that can be supported as they form a good basis for further Mayoral strategies. The City Corporation looks forward to working closely with the Mayor and his team at GLA and TfL as his strategies and the London Plan develop, in particular to ensure that the preparation of the City's Local Plan and the London Plan are co-ordinated as far as possible and that the London Plan provides an effective framework for future planning policy to maintain the City's role as a leading international financial and business centre. The City Corporation is reviewing the City of London Local Plan and aims to publish a draft Local Plan for public consultation in autumn 2017, at approximately the same time as the draft London Plan.</p> <p>The Mayor's continued support and commitment to the protection of the international business cluster within the City of London and the rest of the Central Activities Zone is welcome. It accords with the City Corporation's overall corporate aim, and that of the City Local Plan 2015, to maintain the City's role as a world leading international financial and business services centre. The Mayor does recognise that maintenance of this role will require further investment in the transport infrastructure serving central London and this can also be welcomed.</p> <p>The Mayor has an ambition to spread the benefits of economic growth across London and signals that policies, including transport investment, will be aligned to ensure that the benefits of growth are more widely distributed. Whilst this ambition is also supported, it is important for the London Plan and the other Mayoral strategies to recognise the wider benefits that accrue to London and the UK from the current concentration of business activity within the CAZ. Policies need to recognise that support for the CAZ is not incompatible with the aims of spreading the benefits of growth across London.</p> <p>Housing is a key priority for the Mayor and the framework outlined for increased housing provision, higher density in appropriate places well served by public transport, and a focus on affordability are supported. A key concern for businesses in the City is the ability to recruit and</p>

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	<p>retain high quality staff and this requires access to a range of housing opportunities across the Capital. The scope for new housing within the City of London is limited without impacting on the quality of the City's business offer and this needs to be expressly recognised in the London Plan. Nevertheless, the City Corporation will play its part in helping to address housing needs through its existing housing estates and land it owns across London. Accepting that significant new residential development is not possible in the City without compromising the City's business function, the London Plan, and the Mayor's other strategies, need to address the impact that commuting costs from residential suburbs to central London can have on business development.</p> <p>The Mayor's focus on air quality as a key concern is welcomed and accords with the City Corporation's concerns. The City Corporation is actively exploring ways of delivering improvements in air quality within the City, including within the Low Emissions Neighbourhood, and looks forward to working closely with the Mayor and the GLA team to develop and implement effective measures to deliver air quality improvements.</p> <p>Transport capacity, the ability for people to get to and from and move within the City easily, and the ability to service the City's growing business cluster are key priorities for the City Corporation and the London Plan must pay its part in proposing and implementing solutions alongside the City's Local Plan. The Mayor's commitment to further investment in London's transport infrastructure, including his recognition of the need to ensure continued good access to the business cluster in central London, is therefore welcomed. The Mayor does, however, need to approach transport in an integrated way, ensuring that the implications of modal shift on all transport modes and the ability to move through London are addressed. The role of consolidation centres in reducing the impact of freight and servicing traffic in London needs to be considered. The Mayor's support for further runway capacity at Gatwick is noted, in contrast to the Government's decision to expand capacity at Heathrow. The City Corporation urges the Mayor to work with all airports and operators in London and the surrounding area to address the issue of runway capacity and deliver without delay the increased capacity that London's business needs</p>

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	to grow.
Part 1: Accommodating Growth	
Competing and Interrelated Land Use	The City Corporation recognises the pressures placed on London by its growing population, and welcomes the Mayor's acknowledgement that, alongside addressing the implications of population growth, it is crucial to sustain and promote economic growth in London. It is essential that the London Plan sets out measures to ensure continued economic and employment growth, particularly in the Central Activities Zone, to retain London's role as a World City and to continue to generate the funds and investment needed to tackle the City's housing, transport, environmental and other challenges.
Employment land in central London	<p>The City Corporation welcomes the Mayor's confirmation that it is vital to continue to promote economic growth in London. The City also welcomes the Mayor's confirmation of the important role played by the City of London and other parts of the CAZ in delivering this growth and the Mayor's view that these areas will remain the primary place of work for many people. The City Corporation welcomes the Mayor's strong commitment to protect and sustain the important job-creating role of areas of strategic national and international importance, including the City, and his commitment to resist the loss of offices to housing. The London Plan and the Mayor's Transport Strategy must recognise the critical role that transport plays in maintaining the central London economy and the support in the Mayor's document for further improvement is particularly welcomed.</p> <p>The Mayor's positive and welcoming statements on the economic role of the CAZ are critical in ensuring that this area can continue to attract world class business and jobs and make a vital contribution to the London and UK economies.</p>
Employment land across the City	The City Corporation supports the Mayor's ambition to spread the economic benefits of economic growth to all parts of London, facilitated by further investment in public transport (including Crossrail 2), cycling and further river crossings. In promoting growth across London, the London Plan needs to recognise the wider benefits that accrue to London and the UK as a whole from the agglomeration of financial and business services, in particular, within the Central Activities Zone and which also facilitates the more sustainable use of public transport as a means of commuting to work.
Housing and mixed-use land	The City Corporation supports the principle of an intensification of development around well-connected

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	transport nodes as a means of increasing housing supply across London. This needs to be concentrated in areas which form the origin of trips, such as around public transport nodes in outer London, rather than around destination areas, such as the City of London. Whilst the City has very good public transport accessibility, the priority to sustain and improve economic growth in central areas suggests that a better use of land in areas like the City would be higher density employment generating development, rather than higher density residential development, and this needs to be recognised in the London Plan .
Green Growth	<p>The City Corporation welcomes the Mayor's emphasis on the need for London to remain green and healthy and the particular emphasis on air quality. The City Corporation is actively progressing initiatives to address air quality concerns, including the designation of a Low Emission Neighbourhood near the Barbican.</p> <p>The City Corporation owns and manages nearly 4,500 hectares of historic and natural open space for public recreation and health across London and the south east, including Hampstead Heath and Epping Forest. The City Corporation therefore has a major role to play in ensuring that London can remain a green city.</p> <p>The City Corporation looks forward to working closely with the Mayor on the development and implementation of his strategies and plans for improved air quality and open space in London.</p>
Cultural capital	The City Corporation welcomes the Mayor's emphasis on culture and the need to grow London's cultural offer for both Londoners and visitors. The City Corporation is developing an enhanced cultural quarter around the Barbican and Smithfield, associated with the Museum of London's proposed move to Smithfield. This major initiative will expand the cultural offer of the Barbican Strategic Cultural Area identified in the current London Plan and should be reflected in both the London Plan and the Mayor's proposed cultural infrastructure plan.
Changing the way we travel	The Mayor's commitment to take action to address London's transport problems, increasing capacity, reducing emissions and delivering a more efficient and effective transport network, is strongly supported. The Mayor intends to introduce innovative measures, including considering consolidation of freight, timed servicing of buildings and using road space at different times for different uses. The City Corporation is actively looking at measures to enable the efficient servicing of buildings within the Square Mile, including the use of consolidation centres , reducing congestion and conflict between road users and addressing air quality impacts, and looks forward to working with the Mayor as he develops his Transport Strategy and

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	drafts policy in the London Plan.
Part 2: Housing	
Affordable Housing and increasing housing supply	<p>The City Corporation supports the Mayor's emphasis on delivering new housing which is affordable to all Londoners. The lack of affordable housing has been identified by City businesses as a key risk to future economic growth and is an issue that needs to be addressed urgently. The City Corporation is looking to make a contribution to wider London needs, by developing up to 700 new affordable residential units on City Corporation owned housing estates across London, and by making land available for up to 3,000 additional market homes on City Corporation owned land outside of the Square Mile.</p> <p>Whilst supportive of the Mayor's aims to deliver affordable housing, it is important that housing delivery should be flexible enough to address local housing need and be informed by borough or strategic housing market assessments, rather than having to conform to top-down inflexible targets.</p>
Housing in a global city	The City Corporation notes the Mayor's intention to develop appropriate policy responses to the issue of foreign ownership of housing. As a major global centre of financial and business services, the City Corporation has an interest in how planning and housing policy should address both the needs of Londoners and firms recruiting from a global market, and looks forward to working with the Mayor as he develops policy in this field.
Part 3: Economy	
Planning for business	The City Corporation strongly supports and welcomes the Mayor's commitment to retaining London's role as an international business centre and the need to plan for effective transport and affordable housing to meet the needs of London's growing workforce. The London Plan should reinforce the wider economic and sustainability benefits to London and the UK as a whole which accrue from an agglomeration of commercial activity within the Central Activities Zone. Retention of this important central London role will require further investment in transport and utilities provision, in particular, to ensure that the CAZ can remain an attractive location for international investment.
Infrastructure	The City of London supports the Mayor's proposals for increased investment in public transport, including the commitment to Crossrail 2, Bakerloo Line Extension and HS2. Although these lines will not pass directly through the City, they will contribute to an increase in London-wide public transport capacity and network resilience which will enhance London's wider attractiveness as a place in which to do business. The City Corporation notes the Mayor's support for further runway capacity at Gatwick rather than

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	<p>Heathrow and also notes the Government's preference for expansion at Heathrow. The City Corporation considers that further capacity is needed without delay to support London's economy and demonstrate that it is globally competitive and forward looking. The City Corporation urges the Mayor to work with all airports and operators in London and the surrounding area to address the issue of runway capacity and deliver without delay the increased capacity that London's business needs to continue to grow.</p> <p>The City Corporation strongly supports the Mayor's emphasis on improving digital connectivity in London. The City Corporation is actively working with the GLA and others to improve access to affordable and high speed broadband for all companies across London. This is critical to enable London to compete in a global market and the City Corporation looks forward to continued joint working with the Mayor on this issue.</p>
Children and young people	The Mayor has set out his ambitions to provide access to high quality education for London's young people. As a sponsor of academies in several inner London boroughs, the City Corporation shares this ambition. To ensure that this can be delivered, the London Plan needs to set out a co-ordinated planning approach to the delivery of housing growth and service provision, ensuring that the necessary education, health and social and community facilities are provided to meet the needs of an increased number of households.
Economic opportunity across London	The Mayor refers to his intention to spread tourism across London and increase hotel provision in Opportunity Areas and town centres in outer London. Whilst supporting this aim, the City Corporation would like to work closely with the Mayor to better understand the demand for hotel accommodation in central London, how this relates to the priority need for office floorspace in the City and how this demand will be taken forward in the London Plan.
Part 4: Environment, Transport and Public Space	
A healthy, resilient, fair and green city – air quality	<p>The City Corporation supports measures to address poor air quality in London, including addressing the contribution from road transport. The City Corporation itself is actively seeking to address air quality issues in the City and has received Mayoral funding for a Low Emission Neighbourhood centred on the Barbican and is keen to continue joint working with the Mayor to address poor air quality issues.</p> <p>The Mayor sets out his aim that all new buildings should be air quality positive, i.e. make a positive</p>

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	contribution to reducing emissions and improving air quality. The City Corporation supports this aim and looks forward to continued joint working with the Mayor as his policies develop.
A resource efficient city – zero carbon by 2050	The City Corporation supports the Mayor's ambition for London to become a zero carbon city by 2050. The Mayor refers to ensuring that new homes built in London should be zero carbon and a range of measures and initiatives to address this. However, there is no reference to the need to achieve zero carbon commercial buildings, or zero carbon transport. These are critical factors in moving towards the overall aim of a zero carbon city and should be addressed in the London Plan and the Mayor's Transport Strategy.
Cycling and walking	The City Corporation supports in principle the ambition to increase cycling as a means of transport and to pay more attention to the role of walking. In promoting cycling measures, the Mayor should consider the implications for in-building cycle parking provision, but also the impact of reallocating road space from motorised vehicles to cycles. To achieve an increase in cycling trips whilst not causing greater levels of congestion for motorised vehicles, it is critical that the Mayor's Transport Strategy and London Plan take an integrated approach to transport looking at all modes and the implications of encouraging modal shift.
Sport and Recreation	The document does not address the provision of sport and recreation facilities for Londoners. The potential for sport and recreation to improve the health and quality of life for Londoners, particularly children, needs to be addressed within the London Plan and the Mayor's other strategies. There is mention of Green Growth and the role of green roofs in mitigating climate change, there should also be recognition of the potential for roof space to contribute towards meeting sport, recreation and leisure needs.
Public space	The City Corporation supports the Mayor's aims for an accessible network of open spaces, but there is no explicit reference to the London Green Grid initiative, or to the role that pocket parks can play in higher density inner urban areas. This section does not address the benefits to biodiversity and public health that come from creating and maintaining open spaces in London. There is no reference to the role of open spaces in addressing climate change or providing for sustainable drainage. These issues need to be addressed in the London Plan.
Higher density	The Mayor outlines his view on the role of tall buildings and the need for such buildings to make a positive contribution to the streetscape and skyline and to take account of the ground level effects. The London Plan needs to recognise the benefits of clustering tall buildings, such as in the City of London's tall building cluster, consider further in the revised London Plan the relationship between planning for tall buildings and the London Plan's strategic views protection, as well as addressing the impact of tall

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	buildings on heritage assets.
Heritage	In promoting London's heritage and protecting and enhancing London's heritage assets, the London Plan should address the important role that heritage can play in making London an attractive location for new investment. The juxtaposition of modern commercial buildings and heritage assets is one of London's unique selling points compared to other world cities and this should be considered within the context of the London Plan's heritage policies.
Other issues	<p>Whilst accepting that this document cannot cover fully all elements of planning or other key areas of Mayoral policy, the London Plan needs to address the significance to London of the River Thames, as an open space and a transport route, as well as its contribution to biodiversity and to flood risk. Similarly, the diverse roles of other watercourses in London need to be considered.</p> <p>Likewise there appears to be no reference to dealing with London's waste. This will be a key strategic issue for the new London Plan, given the growth pressures outlined in the document combined with the fact that a number of London's existing waste processing facilities are located in Opportunity Areas where there are significant pressures for residential redevelopment.</p> <p>There appears to be no reference to Sustainable Drainage measures and their role in reducing runoff, the potential for sewer surcharge and the reduction in flood risk. SuDS also bring potential opportunities to create new open and green spaces that have not been addressed.</p>
Part 5: A City for All Londoners	
	<p>The City Corporation supports the overall aim for London to be an inclusive City, addressing the needs of the different groups in our society and effectively tackling crime and anti-social behaviour. The City Corporation also supports the Mayor's intention to improve the health of Londoners and for health considerations to run through all his policies.</p> <p>The consideration of safety seems to focus on the Mayor's forthcoming police and crime plan but does not deal directly with the broader relationship between planning policy and transport policy and security, and the mechanisms that could be put in place within London's crowded places. Issues of safety and security are key considerations when considering planning applications and transport infrastructure in the</p>

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	City of London and the City Corporation would like to see the London Plan specifically address this issue and commit to addressing the security and safety of the City which is essential to its continued success as an international financial and business centre.