

2 Planning Policy

2.1 Introduction

2.1.1 This chapter provides an overview of the planning policy relevant to the Environmental Impact Assessment (EIA) of the Bank Station Capacity Upgrade (BSCU), taking account of relevant national, regional and local policy documents.

2.1.2 *Section 38(6) of the Planning and Compulsory Purchase Act 2004* requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. The Development Plan comprises:

- *The London Plan* (Greater London Authority, 2011);
- *Core Strategy* (City of London Corporation, 2011); and
- saved policies of the *Unitary Development Plan* (City of London Corporation, 2002).

2.1.3 A new *Local Plan* is expected to be adopted in early 2015 and will supersede the *Core Strategy* and *Unitary Development Plan*. Several other policy documents are also relevant to the proposals and an overview of these is included in this chapter.

2.1.4 Specific relevant policies are considered in further detail within the assessment topic chapters. A matrix providing the full text of relevant policies is contained at Appendix A2.1.

2.1.5 Figure 2.1 (see ES Figures Volume) illustrates the key land use policy designations relative to the BSCU.

2.1.6 This chapter describes the general policy context, with more specific planning policies set out in the relevant technical chapters of the ES. The planning policy context for the BSCU comprises three levels of planning policy – national, regional and local. Within each level there is both planning policy and guidance, which combines to provide the overall framework for the consideration of BSCU.

2.1.7 As part of the consultation exercise, an EIA scoping opinion was sought from the TWA Orders Unit in September 2013, and was received in November 2013. A Scoping Report (see Appendix A1.1) was submitted as the vehicle through which a Scoping Opinion was sought. The scoping opinion received from the TWA Orders Unit is provided in Appendix A1.2. Appendix A1.3 tabulates the scoping opinion comments and provides LUL's responses, including reference

to where any points have been addressed within this ES or reasons for their exclusion.

2.2 National Planning Policy and Guidance

National Planning Policy Framework (Department for Communities and Local Government, 2012)

2.2.1 The *National Planning Policy Framework (NPPF)* was published in March 2012. It contributes to the achievement of sustainable development at a national level, taking account of economic, social and environmental considerations.

2.2.2 *Paragraph 17* identifies twelve core planning principles, the following being of particular relevance:

- *proactively drive and support sustainable economic development to deliver the business units, infrastructure and thriving local places that the country needs;*
- *always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;*
- *take account of the different roles and character of different areas, promoting the vitality of our main urban areas;*
- *encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;*
- *conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;*
- *actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and*
- *take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.*

2.2.3 *Paragraphs 18, 20 and 21* provide policy on economic growth and facilitating investment. *Paragraphs 31 and 41* address transport infrastructure.

2.2.4 *Paragraph 152* advises that significant adverse impacts on any of the three dimensions of sustainable development should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate.

- 2.2.5 The *NPPF* also contains more specific guidance relevant to particular EIA topics, such as *Chapter 12 Conserving and Enhancing the Natural Environment* which includes guidance on noise, air quality and contaminated land, and *Chapter 13 Conserving and Enhancing the Historic Environment* which includes guidance on archaeology and built heritage.

Planning Practice Guidance (Department for Communities and Local Government, 2014)

- 2.2.6 The national *Planning Practice Guidance (PPG)* is a new web-based resource that was published in final form in March 2014 and cancels a great deal of planning practice guidance. The *PPG* has sought to refresh, stream-line and update planning practice guidance, including the *Planning for the Historic Environment Practice Guide 2012*, to make sure that it supports national planning policy in an easily accessible way. Relevant guidance from the *PPG* has been referred to in the relevant topic chapters of this ES.

2.3 Regional Planning Policy and Guidance

The London Plan (Greater London Authority, 2011)

- 2.3.1 *The London Plan* was published in July 2011 and is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over a 20–25 year period.
- 2.3.2 *The London Plan* provides the framework for the development and use of land in London: linking-in improvements to infrastructure (especially transport); setting out proposals for implementation, coordination and resourcing; and helping to ensure joined-up policy delivery by the Greater London Authority (GLA) group of organisations (including Transport for London (TfL)).
- 2.3.3 *Chapter 4 London's Economy* seeks to promote and enable the continued development of a strong, sustainable and increasingly diverse economy, ensuring the availability of sufficient and suitable workspaces.
- 2.3.4 *Chapter 5 London's Response to Climate Change* sets out a comprehensive range of policies to underpin London's response to climate change, which includes policies relating to reducing CO₂ emissions, sustainable design and construction, renewable energy, waste and contaminated land.
- 2.3.5 *Chapter 6 London's Transport* and *Policy 6.1* in particular encourages the closer integration of transport and development through the strategic transport proposals identified in Table 6.1, which includes a congestion relief scheme at Bank Station.
- 2.3.6 *Chapter 7 London's Living Places and Spaces* focuses on a broad range of policy areas that impact directly on how people perceive and use places. This

includes policies relating to heritage assets, archaeology, strategic views, air quality, noise and the natural environment.

The London Plan – Revised Early Minor Alterations (Greater London Authority, 2013)

- 2.3.7 A number of alterations have been made, in particular regarding references to Government guidance and national legislation enacted since July 2011. *The London Plan Revised Early Minor Alterations* now forms part of the statutory development plan.
- 2.3.8 *Chapter 3, Paragraph 3.10A* outlines the aim of the Plan *to create opportunities for employment and economic development to meet the needs of all the community; improve access to green and open spaces and leisure facilities (including using the planning system to secure new provision); support safe and sustainable transport systems (including walking and cycling); reduce road traffic casualties; improve air quality, reducing noise...*

Draft Further Alterations to The London Plan (Greater London Authority, 2014)

- 2.3.9 *The Draft Further Alterations to The London Plan* seek to ensure that *The London Plan* responds to national policy changes and key issues emerging from analysis of census data that has been released since the publication of *The London Plan* in 2011.
- 2.3.10 Relevant emerging *Policy 4.1 Developing London's Economy* outlines the mayor's role and how it will work with partners to *maximise the benefits from new infrastructure to secure sustainable growth and development*.
- 2.3.11 *Paragraph 4.4A* states that *Investment in new infrastructure is critical to securing sustainable growth and development. This Plan seeks to maximise the economic, social and environmental benefits from such investment in London. For the London economy, these benefits include economic output, employment, productivity, business opportunities, regeneration and the capital's contribution to the wider UK economy*.
- 2.3.12 This document was released for public consultation between January and April 2014. The current programme indicates that the Examination in Public is due to take place in September 2014 with adoption in March of 2015. A '*Schedule of Suggested Changes*' to the *Draft Further Alterations of The London Plan* was published in July 2014.
- 2.3.13 Given that the Transport and Works Act Order (TWAO) application for the BSCU is expected to be determined in 2016, this draft emerging policy has been considered in this ES.

London View Management Framework Supplementary Planning Guidance (The Mayor of London, March 2012)

- 2.3.14 The *London View Management Framework Supplementary Planning Guidance* (SPG) is a key part of the Mayor's strategy to preserve London's character and built heritage. It explains in greater detail *The London Plan* policies for managing the impact of development on key panoramas, river prospects and townscape views.

The Mayor's Transport Strategy (Greater London Authority, 2010)

- 2.3.15 The *Mayor's Transport Strategy* sets out his transport vision for London and details how TfL and partners will deliver the plan over a next 20 year period.
- 2.3.16 Station congestion relief is identified as critical to assist existing passenger flow, and cater for future increases in demand. *Proposal 19* seeks to *deliver station capacity and accessibility enhancements at key central London interchanges*, including specific reference to Bank Station.

The Mayor's Economic Development Strategy for London (Greater London Authority, 2010)

- 2.3.17 The *Economic Development Strategy (EDS)* sets out the Mayor's vision for the London economy and how it can be realised. The Strategy is based on five objectives; *Objective 5 is to attract the investment in infrastructure and regeneration which London needs, to maximise the benefits from this investment.*
- 2.3.18 Section 5 of the *EDS* relates to '*Investing in London's future*' stating that investment in growth and regeneration is essential to achieve all of the objectives of the strategy, and stating that the Mayor will direct growth into the places that have the greatest need of and potential for development, as set out in *The London Plan*.
- 2.3.19 The strategy, in *Paragraph 5.25*, states that sustained investment in infrastructure, including transport, will be essential if London's competitiveness and innovation are to be maintained. *Paragraph 5.41* states that *the Mayor's spatial and transport policies also achieve a strong correlation between anticipated future employment growth and improved public transport accessibility and capacity. The implementation of these policies will require investment in transport sustained right up to 2031 and beyond.*

The Mayor's Business Waste Management Strategy for London (Greater London Authority, 2011)

- 2.3.20 This document provides further policy guidance on the management of business waste, with the aim of encouraging the reduction of waste and promoting reuse and recycling.

Sustainable Design and Construction SPG (Greater London Authority, April 2014)

- 2.3.21 This SPG provides guidance on the implementation of *The London Plan Policy 5.3*, as well as a range of other *London Plan* policies that deal with matters relating to environmental sustainability such as land, air, noise, light and water.

2.4 Local Planning Policy**City of London Core Strategy (City of London Corporation, 2011)**

- 2.4.1 The *Core Strategy* sets out the overarching strategic objectives to provide a framework for the development of the City of London to 2026 and beyond.
- 2.4.2 *Policy CS16* in particular seeks to facilitate and secure *improvements to public transport capacity ...at existing ... London Underground stations including ... Bank Station*.
- 2.4.3 The *Core Strategy* also contains a range of policies that are relevant to individual EIA topics, which, among others, include Heritage, Transport, Townscape, and Environmental Sustainability.

City of London Unitary Development Plan (City of London Corporation, 2002)

- 2.4.4 The *Unitary Development Plan (UDP)* was adopted in 2002 and 55 policies were 'saved' by the Secretary of State in September 2011. The 55 saved policies will stay in force until the adoption of the *Draft Local Plan* (see below). Specific extant policies relevant to particular EIA topics are included within the relevant chapters of this ES.

City of London Draft Local Plan (City of London Corporation, December 2013)

- 2.4.5 The *Draft Local Plan* will replace the *Core Strategy* and *UDP* when adopted. Its content is similar to the *Core Strategy* but has been updated to take account of current government guidance and updated evidence base information.
- 2.4.6 The *Draft Local Plan* covers a range of topics relevant to this EIA such as archaeology, built heritage, noise, air quality, transport, townscape, contamination and water resources. *Draft Policy CS16* maintains the position that the City of London needs to secure *increased public transport capacity* and supports the BSCU.
- 2.4.7 Consultation on the *Draft Local Plan* finished in February 2014, with an Examination in Public due to take place later this year. The policy document is expected to be adopted in late 2014. Given that the TWAO application is expected to be determined in 2016 all relevant policies have been considered in this ES.

- 2.4.8 There are a number of supplementary and planning guidance documents that are relevant to particular environmental issues, as summarised below.
- *Protected Views Supplementary Planning Document* (City of London Corporation, 2013) - The SPD provides further guidance on the view protection policies contained within the *Core Strategy*.
 - *Bank Conservation Area - Character Summary and Management Strategy SPD* (City of London Corporation, 2012) - This Strategy provides an understanding of the significance of the Bank Conservation Area by identifying and analysing its principal characteristics.
 - *City of London Planning Advice Note 3, Archaeology in the City of London* (City of London Corporation, 2004) - This planning advice note sets out guidance to be followed for archaeological work carried out in the City of London. It covers all stages of archaeological work: assessment, evaluation, geotechnical investigations which may affect archaeological remains, archaeological investigation, recording and excavation, post excavation work, publication, and archiving.
 - *City of London Rail Strategy* (City of London Corporation, 2009) - The Rail Strategy identifies that the City of London Corporation is particularly keen to see new capacity for Bank Station and to maintain regular contact with London Underground to investigate options for improving passenger provision.
 - *City of London Local Implementation Plan* (City of London Corporation, 2012) - This document sets out the City of London Corporation's proposals for the implementation of the Mayor of London's Transport Strategy. The document highlights in *Paragraph 2.8* that upgrades to Bank Station providing congestion relief and step-free access is a scheme of particular relevance to the City of London and the City of London Corporation's programmes.
 - *City of London Bank Area Enhancement Strategy* (City of London Corporation, 2013) - This document sets out the City of London Corporation's vision for transport and public realm improvements in the Bank area over the next 10 years. It highlights that there is significant demand for improvements to Bank Station, commenting on a 25 per cent increase in passenger numbers between 2005 and 2010. The strategy acknowledges in *Paragraph 2.3.3* the major plans by London Underground Limited to upgrade Bank Station, by providing extra capacity and new exits/entrances to accommodate increasing numbers of passengers.
 - *City of London Air Quality Strategy* (City of London Corporation, 2011) - This document sets the strategic direction for air quality policy at the City of London Corporation from 2011 until 2015. It outlines the steps that the City

of London Corporation will take, and is already taking, to improve air quality in the City of London.

- *City of London Noise Strategy 2012-2016* (City of London Corporation) - This document brings together and updates policies and programmes that are already in place to manage and mitigate noise. It also proposes additional measures, which together with existing ones, should improve management of noise in the City of London.
- *City of London Infrastructure Delivery Plan* (City of London Corporation, 2013) - This document assesses existing infrastructure provision within the City of London and considers future need together with how it could be funded. It outlines forecasted growth in development within the City of London as well as population projections. The document notes in *Chapter 2* that, with regard to Bank Station, the Council will work with TfL to develop and implement a project to increase capacity and improve accessibility.
- *City of London Climate Change Adaptation Strategy* (City of London Corporation, 2010) - This document aims to identify the priority risks associated with climate change and proposes adaptation measures which are designed to ensure that the City of London's infrastructure and services cope under a changing climate.

2.5 Summary

2.5.1 The requirement for the BSCU is clearly set out in the Development Plan and other policy documents.

2.5.2 It can be concluded that there is strong policy support for the BSCU.

2.5.3 There is a range of planning policies that are relevant to the BSCU. Where relevant to the topic, these policies are presented in the topic-specific chapters of this ES.