

17 June 2024  
By email only  
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Development Plans Team  
Environment Department, City of London Corporation  
Guildhall  
London  
EC2P 2EJ

Dear Sir/Madam,

**Re: City of London Corporation's City Plan 2040 consultation**

Please find attached our submission to the City Plan 2040 on behalf of the City Property Association (CPA), the membership body for owners, investors, developers and professional advisors of real estate operating in the City of London. A link to our 168 member companies can be found [here](#).

The CPA welcomes the opportunity to comment on this ambitious draft City Plan 2040 for the Square Mile, which aims to ensure the City remains a world-leading place for business and leisure. The CPA commends the City Corporation's vision, which aligns with our shared goals of sustainable growth, economic prosperity and global competitiveness.

For London to maintain its status as a global business centre, and help power the UK economy, the City of London will need to deliver significant growth over the Plan period. We believe the draft Plan can achieve this, without compromising its heritage context, by focusing future growth in areas able to accommodate increases in office floorspace whilst also prioritising innovative approaches to sustainable development.

The City of London is a critically important driver of economic growth for the UK, generating £97 billion GVA annually. It provides employment for 1 in every 52 workers in Britain, reinforced by its inclusion in the capital's Central Activities Zone (CAZ) which contributes to 48% of London's GVA. Unlike any other London borough, the entirety of the City of London is contained within the strategically important CAZ. Due to its densification of uses and the associated benefits of agglomeration, alongside multiple public transport connections within a narrow geographic area, it is also a highly sustainable location.

The provision of best-in-class, sustainable office space is critical in attracting global employers and skilled jobs. Increasingly, occupiers are seeking the very best workspaces to attract and retain talent, boost productivity and staff wellbeing.

There is a clear recognition that the City needs to be able to adapt and respond to global events and economic and social shifts, so it is essential that the Plan is flexible to ensure the City remains resilient. The CPA supports in principle the City Corporation's priorities and considers that this draft Plan, with our proposed amendments and edits, will support the growth and the adaptability of the Square Mile for the Plan period. It will also ensure that the City continues to be an enjoyable and thriving place to live, work and visit.

We look forward to continued engagement with the City Corporation to shape a City Plan that not only meets the current needs of the Square Mile, but anticipates future opportunities and challenges. If you have any questions in the meantime, please do not hesitate to contact me.

Yours faithfully,



**Charles Begley**  
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## **City of London Corporation: City Plan 2040 consultation**

### **Representations by City Property Association**

June 2024

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## Executive summary

The CPA welcomes the opportunity to comment on this ambitious City Plan for the Square Mile, following on from the consultation on the publication of plans in May 2021 and in 2018-19. We appreciate the opportunity to have been engaged in its evolution, and that our previous comments have been considered.

The City is a unique area that needs to deliver significant growth over the plan period within a broad context that includes heritage and its importance to both UK plc and London's economy. Indeed, the entire Square Mile is located in the capital's strategically important Central Activities Zone (CAZ).

The CPA considers that the draft City Plan 2040 celebrates the City's identity and supports its ambitions. The CPA supports the City Corporation's ambition to grow, enabling it to continue to drive economic growth and continue to lead and compete globally as a world class location for business and leisure, in line with the City Corporation's Destination City vision.

There is also a clear recognition that the City needs to be able to adapt and respond to global events and economic and social shifts, therefore it is essential that the Plan is flexible to ensure the City remains resilient. The CPA supports in principle the City Corporation's priorities and considers that this draft Plan, with our proposed amendments and edits, will support the growth and the adaptability of the Square Mile for the plan period. It will also ensure that the City continues to be an enjoyable and thriving place to live, work and visit.

## Legal requirements and tests of soundness

The CPA has undertaken a detailed review of the draft City Plan (Regulation 19) and looks forward to further engagement and collaboration with the City Corporation to help ensure that the Plan is found to be sound in accordance with paragraph 35 of the National Planning Policy Framework (NPPF).

Paragraph 35 of the NPPF states that *"Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:*

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant".*

Paragraph 36 of the NPPF is clear that the above-mentioned tests of soundness will be applied to non-strategic policies i.e., where these are contained within a Local Plan in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies for the area.

These representations assess the proposed changes against the four tests for soundness of policy set out within the NPPF.

The Greater London Authority Act 1999 established the obligation for the Mayor to produce a spatial development strategy at a strategic level i.e., the London Plan. Section 24 of the Planning and Compulsory Purchase Act 2004 requires that local development documents are in general conformity with the spatial development strategy for London (the London Plan). Section 19 of the 2004 Act sets out further requirements of local development documents. The London Plan also forms part of the Statutory Development Plan for development within London.

As many planning issues cross administrative boundaries, the Localism Act 2011 introduced a ‘Duty to Cooperate’ to ensure that Local Planning Authorities and other public bodies ‘work together in relation to the planning of sustainable development that extends beyond their own administrative boundaries’. Local Planning Authorities must demonstrate their compliance with the Duty to Cooperate as part of their Local Plan examination.

The CPA considers that if the suggested comments in the response are taken into consideration, the Plan will have enough flexibility to enable the City to adapt and ensure it continues to operate as a successful and leading global city. As exemplified by the City Corporation’s response to the global Covid crisis (e.g. the Destination City strategy), flexibility and fleet of foot allows it to adapt to change and accommodate yet unknown challenges and these comments seek to enhance the Plan’s supporting function. These representations comment on each chapter of the draft City Plan as set out overleaf.

## **1. Office Growth and Tall buildings**

The CPA fully supports the City’s economic resilience and its role as a global destination and a world leading financial and professional services centre. It is vital that sufficient Grade A office floorspace is available to meet projected employment growth over the plan period. Worldclass floorspace needs to be provided to ensure that the best businesses continue to invest in the City.

In terms of the net additional office floorspace requirement, we are of the view that the draft Local Plan should be consistent with the realisation of the higher requirement of 1.9 million sqm as set out in the topic paper/ evidence base. The Square Mile has unique occupiers and working patterns, which are different to other office sub-markets in the central London area.

The CPA considers that the strategic office policy should refer to the ‘Return of In-person’ scenario assessed by Arup and Knight Frank as part of the evidence base, such that demand for additional office floorspace will be aligned with the 1.9 million sqm target over the plan period. It is essential that the City can accommodate the additional growth to ensure it can continue to maintain its position as a world-leading international financial and professional service centre. For the reasons set out in these representations, the CPA considers that the appropriate office floorspace target will require greater flexibility in the City Cluster Tall Buildings Area to ensure that all potential sites are fully optimised.

The CPA recognises the detailed work undertaken in developing the tall buildings policy and we are broadly supportive of the policy, which focuses on growth and height in the City Cluster and Fleet Valley Tall Building Areas. Against that background - and with the target floorspace delivery set as a *minimum* – the CPA is concerned that the ‘jelly mould’ proposed for the City Cluster will prove unduly restrictive, allowing insufficient headroom to meet a range of realistic economic and employment growth forecasts over the Plan period. We consider the

consequences of inflexibility will be more severe if the economic and employment growth forecasts are borne out through the Plan period.

Given the Plan's heavy reliance on the City Cluster to meet the anticipated net additional floorspace requirements, and in conformity with Policy SD4 of the London Plan, the CPA seeks the wording of the Policy S12 is amended to ensure sites can be optimised and deliver the required floorspace.

## **2. Retrofit First Approach and Sustainability**

The CPA continues to support and promote best practice environmental sustainability to help ensure the City meets its Net Zero 2040 target. The inclusion of a 'retrofit first' approach is supported by the CPA in principle, which aligns with the London Property Alliance's (LPA) [Retrofit First, Not Retrofit Only](#) research paper. Furthermore, the CPA supports the aspiration to deliver exemplary designed developments and to respond to the City's unique heritage assets. In addition, the CPA endorses delivery against sustainability initiatives, urban greening, and greater biodiversity across the City.

In addition, we note the CPA submitted [representations](#) to the draft *Planning for Sustainability* Supplementary Planning Document which was consulted on in May 2024. The CPA supports in principle the preparation of this further piece of detailed guidance which sets out exemplary standards for sustainability, and considers it aligns well with many of the objectives of the LPA Retrofit First, Not Retrofit Only research paper published in 2022. We support the alignment of the Draft City Plan, with the draft Sustainability SPD.

## **3. Culture and Visitors**

The CPA champions the Destination City vision as adopted by the City. Public realm improvements and a strong cultural, retail and leisure offer are essential to ensure that the City is a place to work, play and relax. The CPA supports the delivery of cultural and visitor attractions from major developments, but consider it is unreasonable to require these from certain types of developments (including change of use, retrofit and refurbishment, and refurbishment and extension). The requirement also needs to be proportional to the proposal. Furthermore, there are circumstances, where these types of facilities cannot be provided onsite, so there needs to be flexibility applied by decision-makers, to ensure that the most appropriate type of facility can either be provided or contributed towards by developers. There is a fine balance that needs to be made alongside other S106 obligations and CIL sought from development, to ensure that developments remain viable and deliverable. Policies on this topic need to be suitably flexible to ensure they are appropriate and fit for purpose having regard to commercial development and cultural provision. The CPA would request and welcome further discussion with officers on this requirement.

## Representations to draft City Plan 2040

Where relevant, the CPA recommend changes to draft Plan policies – deletions are identified through ~~strike through~~ and additional text is identified in **blue emboldened text**.

### Chapter 1 - Strategic Priorities

The CPA acknowledges that this chapter has been revised extensively and simplified from the previous iteration of the draft Plan. This amendment is welcomed by the CPA.

The CPA endorses the Strategic Priorities which underpin the draft Plan and considers that these priorities have been informed by stakeholders, national and London-wide policy, and the strategies of the City Corporation and other partners. The CPA agrees that the City must be economically, environmentally and socially sustainable, shaped by history and heritage, and open to regeneration.

The CPA provides the following comments on the Strategic Priorities:

1. **1.2 Economic Objective** – The CPA endorses the City Corporation’s aspiration for growth and the need to set out a minimum requirement for net additional office floorspace by 2040. The CPA’s position on this is set out under chapter 5. We support the delivery aligned with the ‘return of in-person scenario’ of 1.9 million sqm, as set out in the Offices Topic Paper, across the plan period. The Strategic Priority also acknowledges the need to provide more vibrant and diverse retail, cultural, leisure and visitor attractions, demonstrating the City’s aspiration to become a leading leisure destination. The CPA endorses the development of Destination City, and the desire to provide a strong attraction and visitor sector within the Square Mile.
2. **1.3 Social Objective** – The CPA supports the objective to deliver new, inclusive open spaces to create public realm for everyone within the City. Furthermore, the CPA acknowledges the City’s communities including workers and residents and other stakeholders, and the need to deliver housing and accommodation within the Square Mile, City Corporation Estates and other appropriate sites outside the City.
3. **1.4 Environmental Objective** – Underpinning this priority is the City Corporation’s Climate Action Strategy, which the CPA endorses and will work with partners towards the delivery of a net zero carbon City of London by 2040, taking a ‘retrofit first, not retrofit only’ approach to development. Further, the CPA supports the aspiration to deliver exemplary designed developments and to respond to the City’s unique heritage assets. In addition, the CPA endorses delivery against sustainability initiatives, urban greening and greater biodiversity across the City.

The CPA considers that the Strategic Priorities comply with the Planning and Compulsory Purchase Act 2004 (as amended by the Neighbourhood Planning Act 2017), which require local planning authorities to identify Strategic Priorities for the development and use of land within an administrative area. Furthermore, the Strategic Priorities align with the NPPF, to achieve sustainable development and meet the three overarching objectives; an economic, a social and an environmental objective. The CPA acknowledges that the Strategic Priorities will provide benefit for more than one of the three sustainable development objectives and are wholly interlinked.

## Chapter 2 – Spatial Strategy

The Spatial Strategy seeks to retain the City’s function as an international and national commercial centre, and support growth and development over the plan period. The growth and net addition of office floorspace will largely be delivered in the City Cluster and supplemented by other Key Areas of Change (KAOC). The CPA provides comments on this under chapter 11. The City Corporation’s Spatial Strategy will enable the City to adapt and introduces further emphasis on the retail and leisure sectors to boost the evening and weekend economy, alongside diversifying the delivery of accommodation. The CPA endorses the principles of the Spatial Strategy. The CPA has no comments on the Key Diagram (Figure 1).

Part 5 of the Spatial Strategy refers to the Cultural Planning Framework and the CPA has provided comments on this under chapter 7.

## Chapter 3 – Health, Inclusion and Safety

The CPA provides the following detailed comments on several of the draft policies included in chapter 3. There are a number of points within the chapter which the CPA considers require clarification and / or amendment.

### Strategic Policy S1: Healthy and Inclusive City

We welcome the updated wording to bullet 12 which recognises that there may be a requirement for relocation of existing community facilities where justified. It should also be acknowledged in the policy wording that a loss may be acceptable where part of a recognised (published) strategy or where the loss leads to the release of funding for enhanced community facilities elsewhere.

We suggest that the policy is amended accordingly, ***“12 - Protecting and enhancing existing community facilities, allowing for relocation or loss as part of an agreed or recognised strategy where justified, and providing new facilities where required”.***

It is considered that draft policy HL5(1) should also be updated to recognise that a loss may be acceptable where part of a recognised published strategy or where the loss leads to the release of funding for enhanced community facilities elsewhere.

### Policy HL1: Inclusive Buildings and Spaces

The CPA supports the promotion of equality, diversity and inclusion. However, the requirement for major developments to submit ‘Equality Impact Assessments’ needs to be better defined. The CPA does not consider it is justified to require such an assessment for all major developments, and the scope of the requirement should be limited to what it is appropriate for planning policy to control. The requirement for an Equality Impact Assessment should be related to the nature and scale of the development, and not simply required for all major developments.

### Policy HL3: Noise

Regarding the requirement for major development proposals to explore opportunities to enhance the ‘existing acoustic environment’ (part 5), the CPA requests that the term ‘acoustic environment’ be better defined (i.e. is this referring to the acoustic environment within development sites). The policy requirement should be clarified. The scope of the requirement should also be proportionate to the floorspace uplift proposed.

### Policy HL6: Public toilets

Clarification should be provided within the draft policy on the requirement for the provision of a range of public toilet facilities, which the CPA considers should be focussed on larger-scale developments that are open to the public, or where large areas of public realm are created.



Further, the CPA raises concern with the requirement for publicly accessible toilets to be open 24 hours a day. The requirement has the potential to act as a barrier to future developments providing publicly accessible toilets. This is due to the onerous building management regime associated with ensuring the cleanliness and safety of the facilities outside of normal operating hours. We seek the following amendments to part 2 of the policy: ***“Requiring publicly accessible toilets with visible signage, which should be available ~~24 hours a day~~, during normal opening hours particularly in areas with concentrations of night-time activity”.***

The approach we suggest would ensure alignment with London Plan Policy S6 which requires large scale developments (defined as developments that fall within Category 1B Part 1 of The Town and Country Planning (Major of London) Order 2008, unless a development plan provides a local definition) that are open to the public, and large areas of public realm, to provide publicly accessible toilets to be available during opening hours, or 24 hours a day where accessed from areas of public realm.

#### Policy HL9: Health Impact Assessment (HIA)

The CPA considers ‘major development’ to be an inappropriate threshold for developments to provide a ‘rapid’ Health Impact Assessment and request that a floorspace based threshold be adopted (i.e. for developments providing over 1,000 sqm of new floorspace). We recommend the following amendments to this policy, ***“~~Major development~~ Developments providing over 1,000 sqm of new floorspace where relevant should submit a rapid Health Impact Assessment (HIA). A full HIA will be required on those developments that are subject to an Environmental Impact Assessment (EIA). An HIA may also be required for developments considered to have particular health impacts, including those involving sensitive uses such as education, health, leisure or community facilities, publicly accessible open space, hot food take away shops, betting shops and in areas where air pollution and noise issues are particularly prevalent”.***

#### Policy SA1: Publicly Accessible Locations

The CPA considers that the need for a ‘full risk assessment’ needs to be better defined and should be ascertained through consultation with the City of London Police and other relevant stakeholders through the planning process. We do not consider it is justified to require such an assessment for all major developments. On this basis, we suggest that the policy is reworded as follows ***“All major developments where relevant are required to address the issue of publicly accessible locations and counter-terrorism by”.***

#### Policy SA2: Dispersal Routes

The CPA does not consider that a Management Statement should be required for all applications for major commercial development and developments which propose nighttime uses. In many instances, the location of the site in relation to nearby sensitive uses will determine whether such a statement is required. Accordingly it is considered that the draft policy should be amended, ***“Applications for major commercial development and developments which propose night-time uses should include a Management Statement, where necessary setting out detailed proposals for the dispersal of patrons and workers from premises to ensure the safe egress of all people, minimise the potential for over-crowding and reduce the instances of anti-social behaviour, particularly in residential areas and near noise sensitive uses and developments such as health facilities and schools”.***

In addition, in many instances detail relating to the preparation of Management Statements is not known at the application stage, therefore the CPA considers that the requirement for a Management Statement, if necessary, could be secured by planning condition.

## Chapter 4 – Housing

The City’s general approach to housing development is supported by the CPA. However, there are a number of points within the chapter which the CPA considers require clarification and / or amendment. These are set out below.

### Housing Requirement

Paragraph 4.1.8 identifies that the commercial core of the City of London is inappropriate for residential development. It is considered that this point should be expanded to explain this position and clarify with the following wording *“having regard to economic growth and job creation within the Central Activities Zone (CAZ) to reflect the prominent role the commercial core plays in providing capacity for world city business functions”*.

Paragraph 4.1.10 sets out that the City of London’s total housing requirement, a combination of the London Plan housing target and the housing requirement identified by the national standard method, is 1,706 dwellings. This is based on the London Plan housing target of 146 dwellings per annum between 2025/26 and 2029/30 and 102 dwellings per annum between 2030/31 and 2039/40. However, it appears that the figures may be incorrect. 146 dwellings per annum for the period 2025/26 – 2029/30 (a 5-year period) equates to 730 dwellings (as opposed to 686), which would create a total housing requirement of 1,750 dwellings. It is considered that the figures should be updated to reflect these inaccuracies.

In accordance with the above paragraph, the reference to 686 dwellings in paragraph 4.1.11 should be updated to *“730 dwellings for 2025/26 – 2029/30”*.

### Strategic Policy S3: Housing

The CPA recommends that part 1 of strategic policy S3 should be updated to reflect the total housing requirement of 1,750 dwellings (as opposed to 1,706) as noted above.

Part 1, b identifies that for-sale market housing is likely in some instances to have a role to play in making housing development viable. It is considered that the word “some” should be replaced with “most” which reflects the CPA’s experience and the finding within the BNP Paribas Viability Assessment forming part of the evidence base. We recommend the following amendments to this policy, *“Within identified residential areas, prioritising the delivery of affordable housing, co-living, build to rent, hostels, sheltered and extra-care housing, while recognising that for sale market housing would be likely in ~~some~~ most instances to have a role to play in making housing development viable”*.

Part 3 requires the provision of a “publicly accessible viability and feasibility assessment” for proposals which do not meet on-site or off-site affordable housing requirements. Whilst a viability assessment is a commonly understood term, it is not clear what is meant by feasibility assessment, and this should be clarified within the supporting text or removed. Furthermore, we note that the BNP Paribas Viability Assessment suggests that the commuted sum payment per unit of affordable housing foregone is proposed to increase from £440,000/unit to £559,000/unit.

The CPA has not had sight of the evidence / full dataset adopted by BNPPRE informing their opinion of residential sales values and commercial rents and yields. As such, we are unable to provide full comment on the conclusions reached or critique the quality of this supporting evidence. Given this, there is an overall issue surrounding data transparency. Consequently, we are unable to determine if the resulting opinions regarding viability are appropriate for the multiple typologies that have been tested.

We consider there to be limitations with the adoption of BCIS data for construction costs, particularly given the high level of specification associated with and delivered within the City of London. BCIS data fails to consider

several significant other costs associated with development, costs which we would reasonably anticipate being present within the City of London. These include, but are not limited to, facilitating works, external works, major and minor demolition, temporary diversion works, specialist groundworks, and façade retention. As such, we consider BCIS data to present a somewhat diluted view of construction costs which can often serve to overstate any resulting viability conclusions.

A finance rate of 6% is too light and not reflective of our experience within the market. As such, we consider this low rate will serve to subsequently overstate the resulting viability position in each tested example. We consider a rate of 7.50% – 8.00% to be more appropriate and in line with standard market assumptions.

Albeit viability benchmarks and premiums are discussed within BNPPRE's report, it is not immediately clear how these Benchmark Land Values for each tested typology are calculated. Naturally, both the calculation of the Existing Use Value ('EUV') and the applied premium are pertinent within establishing an appropriate Benchmark Land Value ('BLV'). Without full understanding of how these BLVs have been calculated, we are unable to comment on the robustness of these benchmarks and the resulting viability positions. As such, we would benefit from greater insight into this process".

It is considered that an additional sentence should be added to both paragraph 4.1.5 and paragraph 4.2.3, to reflect the fact that co-living can provide a form of affordable accommodation for key workers. It is suggested that each sentence is amended after "early stage of their career" to include the following additional wording ***"and may provide a form of market affordable accommodation for key workers within the City of London"***.

Paragraph 4.2.7 states that *"the City Corporation will expect developers to deliver on-site affordable housing in new housing development above the affordable housing threshold"*. It is not clear why affordable housing delivery would need to be above the threshold and it is considered that the word *"above"* should be replaced with *"to meet or exceed"*. Therefore, paragraph 4.2.7 should be reworded as follows, ***"the City Corporation will expect developers to deliver on-site affordable housing in new housing development above to meet or exceed the affordable housing threshold"***.

Paragraph 4.2.12 states that developments that propose lower levels of affordable housing will need to be supported by robust viability assessments and these will be published alongside other publicly accessible planning documents on the City Corporation's website. Whilst this position is noted and supported, it is considered that there should be some acknowledgement that there may be instances where information must be redacted where it is commercially sensitive.

Paragraph 4.2.14 as currently drafted does not make sense. We would suggest that the final sentence which refers to viability mechanisms should be omitted as it is not required.

#### Policy HS1: Location of New Housing

Paragraph 4.3.5 states that with regard to regeneration of housing estates *"tenants should be involved at all stages of the process and have the opportunity to shape the proposals"*. Whilst community engagement is recognised to deliver the best outcomes from development, if tenants were directly opposed to the proposals, this could have the potential to de-rail essential regeneration schemes. We would suggest that the sentence is amended to read ~~"Tenants should be involved at all stages of the process and have the opportunity to shape the proposals."~~ ***tenants should be consulted on the proposals and their feedback considered and used to inform the proposals"***.

### Policy HS2: Loss of Housing

Paragraph 4.4.0 identifies that an exception to the policy is the amalgamation of no more than two units which meets a clearly identified need for larger family accommodation or for retirement purposes. This is welcomed but it is considered that this should be included within the wording of Policy HS2. Accordingly, it is considered that an additional point 4 should be added to Policy HS2 to state, *“no more than two units are amalgamated to meet an identified need for larger family accommodation or for retirement purposes”*.

Paragraph 4.4.1 requires development sites that have received planning permission for residential, and which demonstrate that there is a deliverable housing element, will be refused permission for change of use to non-residential use. This appears overly onerous and does not reflect the fact that market conditions could change which make a housing element undeliverable. Accordingly, it is considered that *“unless it is evidenced that the development is not deliverable”* is added to the end of the sentence.

### Policy HS6: Student Accommodation and Hostels

Part 1, c states that purpose built student accommodation (PBSA) will only be permitted where it is well connected to relevant further or higher education institutions but doesn't go as far as saying that a Nominations Agreement would be required. However, the requirement for a Nominations Agreement is then referred within paragraph 4.8.1. It is considered that the policy should also refer to a Nominations Agreement to ensure that the two are consistent and aligned. This would also ensure consistency with the London Plan.

Part 3 of Policy HS6 states that 35% of student accommodation should be secured as affordable student accommodation. However, it is not clear whether this is based on floorspace or by room and it should be clarified that it is calculated on a room basis in accordance with the GLA's approach.

### Policy HS7: Older Persons Housing

Part 1 of Policy HS7 states that the City Corporation will aim to ensure that there is a sufficient supply of appropriate housing available for older people by seeking a minimum of 86 net additional dwellings for older persons between 2023 and 2040 (a 17-year period). However, the SHMA refers to 86 dwellings being required between 2021 and 2043 (a 22-year period). The number of new additional dwellings required for older persons should therefore be reviewed and updated to reflect any provision between 2021-2023 but also to account for any provision likely to come forward in the three years post the end of the plan period (i.e. 2040-2043).

Paragraph 4.9.0 refers to the need for 86 specialist older persons units over the life of the Plan period, but this period should in fact be 2021-2043 in line with the SHMA. The final sentence states *“the London Plan has an indicative figure of 10 units per year”* but it is not clear what this relates to.

Paragraph 4.9.1 states that *“specialist older persons housing should deliver affordable housing in line with Policy S3”*. It is considered that this sentence should be extended to state *“unless it falls within Class C2 where affordable housing would not be required in line with the London Plan”*.

## Chapter 5 - Offices

The National Planning Policy Framework emphasises the importance of planning for economic growth and productivity. Planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. The London Plan supports creating and improving the quality, flexibility and adaptability of office space of different sizes.

The draft Plan states that the office market is the primary function of the City and identifies significant economic and employment growth over the plan period. The CPA agrees that to maintain the City's position as a world leading financial and professional services centre, it is vital that sufficient office floorspace is available to meet projected employment growth and demand from a range of occupiers over the plan period.

The City's uniquely important role as driver of economic growth is reinforced by its inclusion in the capital's Central Activities Zone (CAZ), which contributes to 48% of London's GVA and 41% of London's jobs, despite occupying just 2.2% of its land area. The City of London covers 2.9 sq km, all of which (100% of its entire land area) is contained in the CAZ; the only borough to do.

The London Property Alliance (of which CPA belongs alongside its sister association WPA) commissioned Arup to compile and analyse the impact of three economic scenarios on a range of indices and outputs. These include balanced growth, business as usual and checks on growth between 2023 and 2045. In the report, *'Good Growth in Central London'*, the balanced growth scenario is supported by flexible planning and growth policies, investment in local infrastructure and business support, which could lead to substantially more jobs, GVA, homes, borough and mayoral CIL and S106 receipts. Under this scenario, in the City of London it identifies that 120,400 jobs (FTE) will be created and £31,100m GVA up to 2045.

The report, which also analyses sustainability and carbon emissions across CAZ boroughs, reveals that total greenhouse gas emissions in CAZ+ boroughs reduced by 48% between 2005 and 2021, with emissions from commercial activities being cut by more than 75%. It noted that the City of London had made the biggest decrease, a reduction of 63%

During the same period, employment increased across the CAZ, leading to an even larger average reduction in commercial emissions per job in the area, from 3.5t to 0.6t CO<sub>2</sub>e per job between 2005-2021, **with the City of London achieving the lowest emissions per job (0.3t CO<sub>2</sub>e per job)**. In comparison, the average level in England and Wales is 2.5t CO<sub>2</sub>e per job, around 4 times higher than CAZ+ average. The CAZ and, particularly, the City of London is the most sustainable location for economic growth, given the reduction in its emissions but also its location and proximity to transport hubs for maximised employment density.

### Strategic Policy S4: Offices

Draft policy S4(1) seeks to increase the City's office floorspace stock by a minimum of 1.2 million sqm net during the plan period. Elsewhere at paragraph 5.1.1, the 1.2 million sqm figure is described as a "target". Paragraph 5.1.2 confirms that the demand target is intended to reflect the central of three projections based on different scenarios for office attendance, office densities, occupancy rates and employment projects, upon which we comment in detail below.

The City's evidence base, 'Future of Office Use' prepared by Arup and Knight Frank and the Offices Topic Paper, identifies that anywhere between 6 and 20 million sq ft of net additional office space will be required by 2040. The CPA agrees with Arup and Knight Frank that much of the demand will be for best-in-class office space, reflecting the flight to quality.

However, the Offices Topic Paper states that *“current office occupancy and movement trends are showing a middle ground between the Hybrid Peak and Return of In-Person scenarios”*, which translates to an additional office floorspace requirement between 1.2 million sqm and 1.9 million sqm.

The CPA believes that the latest evidence is already confirming the need to plan fully for delivery of the higher floorspace target, and the “return of in-person” scenario. Arup/Knight Frank define this scenario as one which *“assumes that working patterns more closely resemble pre-pandemic behaviours with attendance still more concentrated around the middle of the week/workers attend the office at 80% of 2019 levels”*.

The City’s unique make up of financial and professional services businesses includes small to medium-sized enterprises (SMEs) which make up 20% of businesses and generate 40% of jobs in the City. Large financial, business and professional services occupiers generate the other 60% of the City’s workforce. This means that the return of in-person is now prevailing, with a mid-week ‘hybrid peak’ that is far less pronounced than that experienced in other markets.

In addition, in person working on both Mondays and Fridays is increasing, with [EG reporting](#) a 37% increase on Mondays and a 42% increase on Fridays across office provider [Argyll’s](#) central London portfolio, compared to a year ago. This included five offices in the City of London.

We therefore conclude that the office floorspace target in the draft Local Plan should accommodate and support the ‘Return of the In Person’ scenario with a target of 1.9 million sqm over the plan period. It should be noted that the City operates very differently to other sub-markets within the CAZ across London, due to its unique make up which is driven by its occupiers – this includes a very high proportion of highly skilled workers, of which a high proportion are young and international. As noted above, the City of London is the most sustainable location for economic growth, given its location, employment density and transport connectivity. This is further evidenced in the following paragraphs which evidences the fast rate at which these employees have returned to work.

The CPA’s support for a Plan that is based on the ‘Return of In Person’ scenario (80% of pre-pandemic levels) is fully consistent with the latest available data from Transport for London (TfL), which captures entries and exits from all key stations serving the Square Mile across 52 weeks of the year (Figure A).

Whilst this data was not available to the City Corporation or their consultants when preparing the evidence base, we believe this complete and up-to-date information provides a compelling basis for the higher office floorspace requirements consistent with the ‘return of in-person’ scenario.





Figure A: Rail Taps, City of London Stations (Weekdays): 2019, 2023 and 2024 (YTD). (Source: Transport for London)

The complete data for 2023 (blue) shows that last year, all weekday rail taps (entries and exits) at key stations serving the City were already approaching 80% of their pre-pandemic levels (green). The entry and exit figures for this year (purple) across all weekdays are consistently higher than last year, confirming the CPA’s view that the trend in the City is very much towards increasing office attendance.



Figure B: Rail Taps, City of London Stations (Thursdays): 2019, 2023 and 2024 (YTD). (Source: Transport for London)

The data is presented for all weekdays at Figure A. However, it is important to note that if data is selected for comparison on one of the midweek days – Thursday is shown at Figure B – reflecting peak level staff attendance for which offices must be right-sized, the data indicates that levels of attendance are even closer to the pre-

pandemic baseline, again with the trend towards higher attendance between 2023 and 2024 year to date. The CPA believes that this provides clear data to confirm our belief that the City is already operating in the 'return of in-person' scenario.

Having regard to the four considered criteria, office attendance, office densities, occupancy rates and employment projections, we make the following observations:

1. **Office Attendance** – The 'Future of Office Use' report prepared by Arup and Knight Frank is based on the City Office market in early 2023, relying on evidence from 2022. It identifies that the City is experiencing a gradual return of its office-based workforce, with London Underground ridership into the City in the last week of April 2023 showing average levels around 69% of pre-pandemic levels and up to 75% in the middle of the week. In addition, to the TFL data the CPA sees office attendance continuing on an upward trend and the City functioning in line with the 'return of in-person' scenario. CPA members, including Landsec have confirmed that across their Central London Portfolio occupancy is reaching pre-pandemic levels.
2. **Office Density** – JLL research confirms that an occupancy density metric is now one person per 10 sqm, with an 80% utilisation rate. British Council for Offices (BCO) sets out that this is one person per 12 sqm. JLL evidence that de-densification of offices to accommodate greater collaboration space and amenities, alongside the return to the office suggests that the future demand will not be reduced at least events. Feedback from CPA members reinforce this and shows good occupiers are expected to continue to seek space that can accommodate greater amenities to support staff wellbeing and attract and retain talent in line with the above BCO specification during the Plan period. JLL refers to Oxford Economics research predicting stronger growth in the earlier years of the forecast, with an additional 85,000 jobs created by 2031. Given the barriers to the delivery of new high-quality space in the medium term, JLL considers that demand is expected to exceed supply. This further demonstrates that the City is more aligned with the 'return of in-person' scenario.
3. **Occupancy Rates** – The Arup/Knight Frank report notes that attendance trends have been estimated using a diverse range of data sources including TfL ridership data (present and compared to pre-pandemic), employer surveys (on attendance and occupancy rates) and Arup's own London office attendance. As evidenced above, the data has evolved over the last 18 months, confirming that occupancy rates are much higher than estimated in the Square Mile.
4. **Employment Projections** – Arup and Knight Frank state that the City experienced high levels of growth in population and employment figures in the lead up to the pandemic. They note that the City accommodates over 440,000 office-based jobs and over the period from 2015 to 2021, there was a rapid growth of emerging office-based jobs. Evidence from JLL confirms that as of 2023, there are just over 495,000 office jobs in the City (Oxford Economics- based on BRES data) and forecasts suggest that there will be further growth in employment, particularly as the Square Mile attracts employers from across central London, and in particular from centres such as Canary Wharf, which was not necessarily envisaged in 2022. This evidence again points towards the City aligning with the 'return of in-person' scenario. Furthermore, LPA in their Good Growth in the CAZ research identifies that under their 'balanced growth scenario' that there will be an increase of +120,400 jobs (FTE) between 2023 to 2045.

The CPA believes the draft Local Plan needs to be updated to reflect the unique current working patterns in the Square Mile, which are different to other office sub-markets in the central London area, and which have changed materially in the last two years. Whilst the CPA supports the use of the term 'minimum' in Part 1 of the policy, we are firmly of the view that the draft Local Plan should be consistent with the realisation of the higher figure of 1.9 million sqm and be flexible in its approach to meeting this target.



The supporting policy wording at paragraph 5.1.1 and 5.1.2, details that *“it is vital to ensure that sufficient office floorspace is available to meet projected employment growth and occupier demand and that additional office development is of high quality and suitable for a variety of occupiers”*. As set out above, the CPA considers from its insight that businesses are returning to a more intensive occupation to that modelled in the central scenario. Furthermore, the City Corporation has acknowledged that the City is operating between the central and upper scenario in their topic paper. Therefore, it is essential that the City can accommodate the additional growth to ensure that it can continue to maintain its position as a world-leading international financial and professional service centre. Overall, the CPA recommends that the supporting text should refer to the ‘return of in-person’ scenario assessed by Arup and Knight Frank, as demand for additional office floorspace will be aligned with the 1.9 million sqm target over the plan period.

In terms of Part 2 – 5 of the draft policy, the CPA endorses the wording as drafted and considers that it enables flexibility when approaching office development within the City.

For the reasons we set out more fully in relation to the draft Tall Buildings policy, we believe the appropriate office floorspace target will require greater flexibility in the City Cluster Tall Buildings Area to ensure that all potential sites are fully optimised. The current evidence base indicating potential capacity is limited (see Office Topic Paper, March 2024) but the modelling which has been undertaken places very heavy reliance upon delivery within the City Cluster (85%), with the Fleet Valley (5%) and the rest of the City (10%) making comparatively modest contributions to the overall total. The City Cluster Tall Buildings Area and the Jelly Mould should be defined to accommodate the level of employment growth and occupier demand we anticipate over the plan period.

#### Policy OF1: Office Development

Draft Policy OF1 ‘Office Development’ prioritises the ‘retrofitting of existing buildings’; this is endorsed by the CPA. The draft policy wording is clear that this is not a retrofit only approach, which aligns with the London Property Alliance’s (LPA) [Retrofit First, Not Retrofit Only: A focus on the retrofit and development of 20<sup>th</sup> century buildings](#) research paper. The CPA’s comments on this are further detailed under chapter 9.

The CPA acknowledges the need for flexibility as set out in Policy OF1 ‘Office Development’, to respond to different types and sizes of occupiers and changing trends in the office market. The CPA supports the additional policy provisions that office developments should seek to deliver against, including outstanding design, designed for future flexibility, provision of a range of occupiers, promotion of healthy and inclusive working environments and where appropriate provide a proportion of flexible and affordable workspace. The CPA considers that these requirements are well aligned with the current market and evidence base prepared by Arup and Knight Frank. The CPA endorses that developments should seek to meet these requirements, however, in certain circumstances it may not be possible, and this should not impact the viability and deliverability of new office floorspace to meet the strategic priorities of the City Plan.

The CPA acknowledges the importance of supporting activities that endorse complementary uses alongside office development, which contribute to the City’s economy including retail, leisure, education, health facilities and cultural uses. This supports the wider Destination City initiative, and the CPA’s comments are detailed in chapter 7 on this.

The CPA questions the need for Part F of the policy which states, “where appropriate, provide a proportion of flexible and affordable workspace suitable for micro, SMEs”. London Plan Policy E3 ‘Affordable Workspace’ Part C, states that boroughs, in their development plans, should consider detailed affordable workspace policies in light of local evidence of need and viability.

However, within the evidence base supporting this policy, there is no evidence provided to demonstrate a need for affordable workspace. The CPA considers that the sub-markets in the Square Mile provide a wide variety of inherently affordable office accommodation options, including serviced offices. Furthermore, the draft policy sets out that this affordable workspace should be suitable for micro businesses and SMEs. Arup and Knight Frank's 'Future of Offices' report states that over 98% of all City businesses are SMEs, with fewer than 250 employees. Therefore, whilst the CPA supports the principle of the delivery of affordable workspace in appropriate circumstances, we would query its inclusion within draft Policy OF1, on the basis that there is no identified need for it and that the City is characterised by many SMEs. The CPA recommends the omission of part F of the policy.

#### Policy OF2: Protection of Existing Office Floorspace

Draft Policy OF2 'Protection of Existing Office Floorspace' has been substantially amended and is now in two parts. The first part sets out the conditions which an applicant would need to meet to demonstrate the loss of office. The second part of the policy sets out four routes to support the total loss of the office or change of use. The CPA supports this overall policy approach, as some existing office buildings need to consider alternative uses, as it is not viable to upgrade to the forthcoming mandatory requirement for EPC A and B or create additional floorspace to generate sufficient viability, thus without this policy intervention there could be a risk of buildings becoming stranded assets. Furthermore, it is essential for supporting functions (e.g. hotels) to grow at the same pace of provision of offices and visitor and leisure amenities. The new route included is the 'retrofit fast track' route. The CPA acknowledges that the inclusion of the routes included within the second part of the draft policy, which enables applicants whose assets are no longer suitable or viable to support the strategic office function to be utilised for other uses. The CPA supports the inclusion of the new route (Part b – retrofit fast track route), which enables existing buildings to be used for hotel use, cultural use or educational use, and removes the requirement for viability justification. The evidence base sets out that demand for alternative uses to offices within the City is limited to hotels, cultural and education uses. Overall, the CPA considers that this would result in a small proportion of the existing office stock being lost to hotel use, and it acknowledged that the policy wording has been carefully drafted to principally enable the change of use of non-strategic and unviable office stock. The CPA endorses the inclusion of this new route and considers it unlikely to materially impact upon the existing office stock, but further supporting the wider initiatives of the City Plan and 'Destination City' and to provide accommodation to visitors to the City.

Paragraph 5.3.10 of the supporting policy wording sets out that '*further guidance on the evidence required to support the loss of office floorspace is set out in the Office Use SPD*'. However, the draft Plan is not consistent with the 2015 Office Use SPD. The CPA considers that the SPD is now largely out of date and reference to the SPD in the context of draft Policy OF1 'Protection of Existing Office Floorspace' should be omitted, to avoid conflicts and uncertainty.

## Chapter 6 – Retail

The CPA provides the following detailed comments on the relevant draft policies included in chapter 6. There are several points within the chapter which require clarification or amendment to help ensure it is sound.

### Strategic Policy S5: Retail and Active Frontages

The CPA is supportive of the strategic approach to delivering a greater mix of retail, leisure, entertainment, culture and other appropriate uses, to enrich the ‘ground floor economy’. Retail has evolved since the adoption of the previous City Plan, with ‘top-up’ and ‘pop-up’ retail, competitive socialising, experience, leisure and events space becoming a huge part of the sector. These uses do not necessarily need to be located within ‘Principal Shopping Areas’. The approach to encouraging the opening of retail and other uses in the evenings and weekends also reflects the City Corporation’s Destination City vision. The draft Strategic Policy seeks to broaden the retail offer within the City and recognises the value of alternative uses, however, it is considered that the subsequent policies are not consistent with this.

### RE1: Principal Shopping Centres

The CPA considers that it is important that the draft Plan recognises changes in occupational demand and provides additional flexibility in respect of ground floor land uses to enable more innovative new uses, and for start-ups and entrepreneurs to be accommodated. It is important that planning policy can respond appropriately and support the need to integrate the main office use, with subordinate ground floor uses where such demand exists.

The draft policy is too prescriptive in the context of changes to the Use Class Order and introduction of Class E. As currently worded, the policy does not seem to reflect current retail trends or the continued direction of the retail market. The retail industry is in transition, and policies need to reflect this. Furthermore, in stating that the loss of existing ground floor retail frontages and/or floorspace will be resisted but also noting that complementary uses that increase footfall and provide active frontages will be supported, the policy as currently worded is unclear. This is whether the loss of existing retail frontages and/or floorspace would be acceptable in instances whereby they are replaced with complementary uses. The CPA seeks that the policy wording be updated to specify that the loss of existing retail frontages and/or floorspace is acceptable in instances whereby they are replaced with complementary uses that increase footfall and provide active frontages.

Furthermore, Part 2 of the policy should be updated to be clear that the loss of ground floor retail frontages and/or floorspace will be resisted where the existing floorspace does not benefit from an open class E use. Therefore, the following amendment is suggested to the draft policy ***“The loss of existing ground floor retail frontages and/or floorspace where the existing floorspace does not benefit from an open class E use will be resisted and additional retail provision...”***

### Policy RE2: Active Frontages

The CPA welcomes the approach to draft Policy RE2 being focused upon the encouragement of ground floor active frontages throughout the Square Mile.

Notwithstanding this, the CPA does not support the blanket requirement for the loss of existing active frontages to be justified by way of a 12-month marketing period. The policy should be more flexibly applied to allow for site specific considerations, and to consider instances whereby a qualitative over quantitative approach could be beneficial to the overall active frontage offering. Therefore, the CPA recommends that the following amendments

to Part 2 of the policy ***“The loss of existing active frontage uses will be resisted. Development that proposes their loss should be supported by evidence demonstrating that there is no demand for active frontage uses ~~and that premises have been actively marketed for a period of no less than 12 months.~~ Alternative uses that would support the retail environment should be provided”.***

Policy RE3: Specialist Retail Uses and Clusters

Draft Policy RE3 sets out that the City Corporation will seek to retain specialist retail uses and premises “that are historically and culturally significant to the City of London”. Supporting text at paragraph 6.4.3 notes that the City Corporation may attach conditions to planning permissions, to ensure the retention or replacement of specialist facilities on the same site where they are impacted by development proposals. Whilst the CPA supports protecting historically and culturally significant assets, it is not always possible if the uses are no longer viable. The City must support alternative viable uses which can also retain historical and cultural significance.

The CPA objects to the approach proposed under Policy RE3, on the basis that there is a need to recognise the changing and challenging retail market, combined with the fact that a large proportion of retail stock would now fall within an open Class E use. It is also important that the draft Plan provides sufficient flexibility to allow retail to evolve and thrive throughout the Square Mile, and to allow the vibrancy of ground floor frontages to be maintained through alternative means. Further, neither the policy or supporting text is clear as to what makes a use or premises of historical or cultural significance.

The policy goes on to note that development within ‘existing and potential clusters of retail uses’ should ‘enhance and support retail uses in the area’. Supporting text at paragraph 6.4.1 identifies a series of loosely defined ‘retail clusters’. The implications of the policy for a development site within an area considered to be a ‘cluster of retail uses’ is not clear from the policy wording as currently drafted. Furthermore, the focus on ‘retail’ as opposed to active frontages is not supported.

## Chapter 7 – Culture and Visitors

The CPA provides the following detailed comments on the relevant draft policies included in chapter 7. There are several points within the chapter which require clarification or amendment.

### Strategic Policy S6: Culture and Visitors

Draft Policy S6 Culture and Visitors, refers to a Culture Planning Framework (CPF), and notes that cultural, leisure and recreational facilities should be in line with the “Culture Planning Framework”. Elsewhere there is reference to a “Cultural Planning Framework”. As a minor point, the CPA considers that there needs to be consistency in terminology i.e. culture or cultural; that said, the status and details of this Framework is unclear.

The CPA is concerned that the CPF is given weight in the draft Plan, yet the Framework has not been the subject of consultation and scrutiny. Accordingly, it is not considered that cultural proposals should be or can be “in line” with a Framework document that does not form part of the development plan or carry any weight. Further, if any policy seeks alignment with the CPF (following consultation and scrutiny), the policy should be more specific as to which part or parts of the document it is expected to align with.

We note the CPF prepared by Publica and TJ Culture states in its introduction “*it creates an evidence base and set of recommendations that can underpin the production of new planning guidance for culture to be introduced to complement the City Plan 2040*”. The CPF is therefore not a document equivalent to an SPD or guidance and can therefore be given no weight in the decision-making process. CPA considers that the draft Plan should not reference the CPF in this way and the requirement for applicants or others to have regard to the content of the document is considered unjustified.

A further reference to the CPF is made at paragraph 7.1.5; it references the broad nature of the CPF, and notes that new cultural infrastructure, visitor attractions and complementary facilities will be expected to realise the broad ideas of the Framework. In principle, the CPA recognises the ambitions of Destination City and are supportive of it, but there is concern with reliance on the CPF in this policy context.

### Policy CV2: Provision of Arts, Culture and Leisure Facilities

The CPA raises concern with Policy CV2 Provision of Arts, Culture, and Leisure Facilities and does not consider the policy fully justified. Again, there is concern with reliance on the CPF, which is not a policy document of any standing or weight. Whilst the provision of culture as part of major developments is accepted in principle, the basis of this provision needs to be set out with reference to planning policy whether in the Local Plan or other suite of statutory policy documents.

Within part 1 of the draft policy, the CPA is concerned with the reference to “vibrancy” as part of the requirement to submit Culture Plans. Whilst culture is defined by reference to Destination City earlier in the draft Plan, reference to vibrancy is not, and it is not clear how vibrancy is defined or what is expected in respect of the “vibrancy” element of such a Plan. We suggest that reference to vibrancy is omitted. Again, the reference to the CPF is a concern within part 1 of this policy, given the status of this document. It is suggested that part 1 of the policy is amended as follows ***“Requiring major developments to submit Culture and ~~Vibrancy~~ Plans setting out how their development will culturally enrich the Square Mile, informed by the City Corporation’s Cultural Planning Framework (CPF)”***.

Within part 2 of Policy CV2, the CPA accepts in principle the proposed policy requirement to submit a Culture Plan for major developments over 10,000 sqm, however, the policy should be proportionate to the development

scale and floorspace area uplift. It would be unreasonable, for example, for an existing building of circa 10,000 sqm proposing a 1,000 sqm extension to provide a Cultural Plan. The policy should be applied with respect to potential area uplift, and not total area. This approach would ensure consistency with how application schemes are assessed, and planning obligations applied and would ensure that retrofit/refurbishment schemes of scale are not unduly burdened.

There is concern with part 3 of the policy, and the requirement for major developments below 10,000 sqm to make provision for arts, culture or leisure facilities. Again, the CPA considers that provision of such facilities should be related to floorspace uplift and not total floorspace. It would be unreasonable, for example, for major developments including COU, retrofit and refurbishment, and refurbishment and extension, to make provision for such on-site or off-site facilities. The draft policy needs to fully acknowledge proportionality in respect of any cultural provision being sought. There is also concern regarding reference to off-site provision or contributions, as no detail is set out. This detail cannot be left to a non-statutory Framework or SPD.

The suggestion of and limited details on a financial contribution is not justified and is not open to robust review and scrutiny. We note there are brief suggestions of this approach in the CPF, but detail is limited and the CPF has no policy status. There is also concern that such provision does not have regard to the viability of development. It may not be viable to provide culture on all major developments, but also that it might not necessarily be appropriate within all major developments. This needs to be recognised in the policy.

Accordingly, the CPA would welcome further discussion with officers around the potential to pooling of contributions, noted in supporting paragraph 7.3.5. There is no policy detail or basis for a financial contribution and the details set out in the CPF are unclear and confusing and need to be the subject of scrutiny. The CPA is also concerned to note that the viability assessment submitted as part of the evidence base states *“In the emerging Plan, the Council intends to seek financial contributions or on-site culture. We have tested a range of contributions per sq m GIA, as follows: ■ £40 ■ £60 ■ £90 ■ £120 ■ £150 ■ £180”*. There is no clear basis for these assessed contributions, and the ‘formula’ set out in the CPF appears arbitrary and without explanation. The CPA is concerned by the analysis set out in the BNP Paribas Viability Assessment and the wide-ranging cultural contributions considered, which are not referenced elsewhere in the draft Plan or justified.

Overall, the CPA seeks clarity on this draft policy and would welcome further discussions with officers on the proposed wording of policy CV2 to ensure it is found to be sound.

The CPA considers it unreasonable to expect applicants to “provide robust management plan for operational and management arrangements at the pre-application stage” as set out at paragraph 7.3.4. Cultural operators are often not able to commit to projects at planning stage (let alone pre-application stage). This requirement is considered unworkable, and the CPA considers that planning conditions are appropriate mechanisms to secure management plans. In many instances, operational and management details will not be known at the early stage of a project, and developers and applicants are not experts in this field to provide sufficient detail at this stage. The supporting text should be reviewed and updated accordingly. The position is no different to that outlined at paragraph 7.6.10, which recognises that only an outline Management Statement can be submitted in respect of nighttime entertainment, “when details of the end use operator are not known”.

Additionally, the supporting text should acknowledge and provide flexibility in relation to operation and management details. Cultural operators are not often able to make very early commitments to accommodation and space given the lead in periods associated with major development projects. Accordingly, details relating to operation and management can rarely be provided at the application stage. The provision of cultural space is no different to office and retail space where end user tenants and operators are not known at the application stage. Pre-lets are often unusual prior to commencement of development and the situation is no different for cultural

operators, although arguably the situation is even more uncertain, as cultural operators are often not able to make medium-to longer-term funding decisions.

Policy CV3: Provision of Visitor Facilities

The CPA supports in principle draft policy CV3 Provision of Visitor Facilities, however, it is important that the policy provides flexibility for the circumstances of a site and recognises that all the facilities set out in points 1-7 will not be appropriate.

Policy CV4: Hotels

The CPA supports in principle draft policy CV4 Hotels.

Supporting paragraph 7.5.3 makes reference to draft policy OF2 and the Office Use SPD. It is noted that the draft City Plan 2040 is not consistent with the 2015 Office Use SPD. It is considered that the SPD is now out of date and reference to the SPD in the context of draft policy OF2 should be omitted to avoid conflicts and uncertainty.

At supporting paragraph 7.5.7, the CPA does not consider that apart-hotels or serviced apartments/accommodation fall within Class C3, and we are not aware of evidence to support this suggestion. We would propose that reference to Sui Generis would be more appropriate and the supporting text updated accordingly.

Page 111 appears to set out a draft policy in respect of the public realm/ public art, but the draft policy is not titled. This should be reviewed and updated. The CPA supports this draft policy in principle.



## Chapter 8 – Infrastructure

### Strategic Policy S7: Infrastructure and Utilities

The CPA acknowledges that alongside reducing carbon emissions, ensuring resilience and delivering infrastructure, infrastructure investment is also critical. The Royal Town Planning Institute (RTPI) has undertaken research which details that this challenge is immense, with recent analysis estimating the total cost of London's infrastructure requirements at £968bn to 2041 (in 2018 prices) with a £121bn funding gap. The RTPI state that to achieve value for money, a whole systems approach will be needed to ensure that the right infrastructure is delivered at the right time and place. The CPA endorses strategic policy S7 which seeks to coordinate and facilitate infrastructure planning and delivery and the transition towards a zero carbon and climate resilient City.

### Policy IN1: Infrastructure Provision and Connection

The CPA acknowledges the requirement that utility infrastructure and connections must be designed into and integrated within a development. When this is not possible to provide the details at the application stage then planning conditions and/or obligations will be used to secure the provision of such details. The CPA further acknowledges that the dense concentration of businesses means that high demand is focused in a restricted geographical area. The CPA does not have specific comments on the wording of this policy.

### Policy IN2: Infrastructure Capacity

The CPA recognises the issues around infrastructure capacity in the City, given its small geographical area. The CPA does not support the inclusion of part 2 of the policy, which states *“Where potential capacity problems are identified, and no improvements are programmed by the utility company, the City Corporation will require developers to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades”*. This could warrant developments unviable and undeliverable if a further requirement is placed on developers to facilitate improvements to existing infrastructure due to capacity constraints. It is considered that developers contribute significantly through Mayoral CIL2 and City CIL which should support infrastructure improvements. Therefore, the CPA would request clarification on this policy as monies from the CIL mechanism could be used and this should be reflected in the draft policy.



## Chapter 9 – Design

### Strategic Policy S8: Design

The CPA supports the City Corporation’s strategic ambition to deliver high quality buildings, streets and spaces through innovative, sustainable and inclusive design.

The adoption of a ‘retrofit first’ approach is also supported in principle, subject to our representations in respect of Policy DE1 and the requirement for a ‘retrofit first’ approach to remain in general conformity with the London Plan’s ‘Good Growth’ objectives, and the provisions of Policy D3 and SD4.

While Policy S8 outlines broad principles around design quality and sustainability that will be relevant considerations for many different forms of development, we do not consider the inclusion of point 17 to be justified in seeking to ‘maximise’ publicly accessible and free to enter spaces within development.

We do recognise that some larger-scale developments in the Square Mile may present the opportunity to deliver some new publicly accessible space, but there will be many instances where it will not be appropriate, practical or necessary to do so. The reference to this provision having particular application ‘along the river and around City landmarks’ is ambiguous in its geographical application.

We propose the following amendment to strategic policy S8 **“*Delivers publicly accessible space within the development where appropriate, and encourages by maximising the amount of accessible, inclusive and free to enter open spaces, roof terraces, cultural offers and other spaces, including in tall buildings and along the river and around City landmarks*”**.

### Policy DE1: Sustainable Design

The CPA supports the City Corporation’s overall ambition to promote sustainable design and a ‘retrofit first’ approach.

To ensure the draft Plan as a whole is positively prepared and effective, Policy DE1 should make clear that the delivery of sustainable design will involve balancing the economic, social and environmental dimensions of development with regard to the Plan’s strategic objectives. This would ensure the policy is in general conformity with the London Plan’s ‘Good Growth’ objectives, as well as policy D3 (optimising site capacity through the design-led approach) and policy SD4 in respect of the Central Activities Zone.

The policy should be amended to embed this holistic approach, specifically where it seeks to ensure the ‘most sustainable and suitable approach’ for any given site and before introducing the need for development to ‘minimise whole life-cycle carbon emissions’.

As currently drafted, these explicit requirements have no balancing or reciprocal wording that acknowledges the need to optimise sites in the context of the wider economic and social dimensions of sustainable development. Without that balance, the policy could be interpreted and applied as one which always favours the least carbon intensive development option in any given scenario.

The draft City Plan (policy DE1) includes a requirement for major developments to achieve a minimum BREEAM rating of ‘excellent’ and aim for ‘outstanding’. The CPA considers that flexibility should be applied to the requirement to achieve outstanding, as on a case-by-case basis, as there may be site specific factors which mean mandatory performance requirements for rating cannot be achieved, particularly for retrofit projects.

The CPA acknowledges that the draft City Plan (policy DE1) introduces a requirement for applicants to ‘commit to achieving a minimum Nabers UK rating of 5\*’. A Nabers rating of 5\* may not be practical or reasonable for retrofit schemes, particularly those with retained facades, where it may not be possible to achieve the fabric efficiencies necessary for ratings at the upper end of the Nabers scheme. The application of Nabers 5\* needs therefore to be applied proportionally and with appropriate flexibility, reflecting the recent introduction of the scheme to the UK. It is assumed that the requirement for Nabers rating only relates to office developments, however this should be clarified.

Policy DE4: Terraces and Elevated Public Spaces

The draft policy would require all major developments to provide free to enter, publicly accessible elevated space. This will not be justified, reasonable or practical in many instances, especially on major developments where the floorspace created does not exceed the 1,000 sqm major development threshold to any significant degree.

In our view this policy should be amended to make clear that publicly accessible elevated spaces will only be appropriate in specific circumstances, having regard to the overall scale of development and the wider public benefits that development may deliver, including any retail, leisure or cultural offer.

We suggest that draft policy DE4 is amended as follows ***“Requiring all tall buildings ~~or major developments~~ to provide free to enter, publicly accessible elevated spaces where appropriate, which may include roof gardens, terraces, public viewing galleries, or other retail or leisure facilities to create attractive destinations for people to enjoy the City’s spectacular skyline and views”.***

## Chapter 10 – Transport

The CPA considers that the transport chapter is largely aligned and consistent with the City Corporation’s Transport Strategy and the proposed revised Transport Strategy. Policies that contribute to inclusivity and accessibility of the City’s streets are supported by the CPA. Freight and servicing networks are complex, and we support the City Corporation’s pragmatic approach to reducing the number of freight vehicles within the Square Mile, including via river and rail freight (policy VT2). The CPA has made further detailed comments on Policy AT3 ‘Cycle Parking’ below.

However, the transport chapter could further reinforce the City’s commitment to delivering Vision Zero (strategic policy S9, policy VT1, strategic policy S10, policy AT2). This could reiterate the updates within the revised Transport Strategy in regard to the Vision Zero Action Plan and the delivery of measures that improve the street environment to reduce the likelihood and severity of collisions. The current draft City Plan 2040 does not clearly communicate the City’s commitment to delivering Vision Zero nor the important context it brings to the Transport Strategy. It would be good to see, for example, in either strategic policy S9 or strategic policy S10 the mention of the application of the safe system approach and the principles of road danger reduction to deliver Vision Zero. The supporting text could outline the current priority locations for Safe Streets interventions that are based on revised collision and casualty data analysis. This is important given progress against the City Corporation’s targets has been slower than anticipated, and as reaching Vision Zero is core to making walking and wheeling more inclusive.

### Policy AT3 – Cycle Parking

The CPA raises concern with draft Policy AT3(1), and for the reasons set out below, strongly consider that a revised approach to long stay cycle parking in the Square Mile is required.

Data collection from British Land and GIC’s 100 Liverpool Street development, which was completed in 2020 and is fully occupied, has shown that at present only around 20% of the cycle parking spaces are occupied on a given day. Data collected from AXA-IM’s 22 Bishopsgate which was also completed in 2020, has shown that at present only around 16% of the cycle spaces are occupied on a given day. It should be noted that these two buildings were designed to the 2016 London Plan which had lower cycle parking standards for cycle space provision than the 2021 London Plan (1 space per 90 sq m GEA). Applying the 2021 London Plan standards to 22 Bishopsgate would result in only 10% of the cycle spaces being occupied by today’s demand.

Encouraging cycling and other modes of active travel is supported by the CPA, however the standards used to direct this present two key issues:

1. The use of GEA does not reflect how many employees are in a building given it includes back of house areas, basements, plant rooms, cores etc. Tall buildings and retrofit schemes have lower NIA:GEA ratios, which results in them providing significantly more cycle parking relative to their occupiable floor area compared to simpler, less constrained building typologies.
2. The London Plan standard assumes a density of 1 employee per 12sqm GEA, as set out in the London Plan evidence base. Each office building varies; however, this translates to approximately 1 employee per 8/9sqm NIA. The 2023 Building Council for Offices (BCO) guidance is that office buildings should be designed for peak occupational density at 1 employee per 12.5sqm NIA. Employee densities have been reducing in the City of London as occupiers seek higher quality offices with additional spaces such as break out zones, meeting and conference rooms and areas for wellbeing, which do not translate to more desks and people. This means a typical day to day occupational density is often closer to 1 employee

per 15sqm - 20sqm NIA, less than half of the assumed density in the London Plan cycle parking standards.

These two issues combined result in a significant overprovision of cycle parking spaces in most City office buildings. As the London Plan has significantly over-estimated employee density it is expected that cycle parking in buildings such as 22 Bishopsgate and 100 Liverpool Street will never be fully used, even if the London Plan cycle mode share target of 19% is reached in future. This overprovision has wider implications for new developments, with a lack of space for long-stay cycle parking at ground level and the need to deliver extensive multi-level basements, which significantly increases embodied carbon emissions.

Recent surveys of the cycle parking at 22 Bishopsgate show the cycle mode share for the building is typically 6%, considering a usual daily occupancy of 1 person per 21sqm NIA. Assuming a theoretical future maximum scenario where the London Plan mode share target of 19% is reached, and occupational density increases to 1 employee per 15sqm NIA, the office development would generate a demand for 1,570 cycle parking spaces. This is 970 spaces fewer than the London Plan currently dictates as a minimum day one provision, equivalent to 3600 cubic metres (based on London design standards) of unrequired carbon intensive basement space.

It should also be noted that applying the 19% mode share target directly as a cycle parking standard does not take into account innovations around Micro-Mobility as a Service (MaaS) modes such as cycle hire and e-scooters, which will continue to replace some of the privately owned bike trips within the City.

Further work on commuting patterns and how this translates to cycle parking usage should be conducted to give a clearer picture as to what is required by new development and to minimise unnecessary basement excavation and embodied carbon. Whilst some surplus in cycle parking provision is supported to allow for future growth in cycling mode share, the gap between current usage and policy standards is considered excessive, and unsustainable.

We would suggest that the following approach is adopted:

1. Revise the methodology: To resolve current methodological issues we suggest updating the standard to use Net Internal Area (NIA) rather than Gross External Area (GEA) and update occupational density standards to reflect actual usage supported by BCO research and standards.
2. Adopt a phased approach: The current London Plan modal share target of 19% is likely to take many years to achieve in London. In the meantime, space is sitting empty that could be used for other purposes. Complimentary uses could include amenity and wellbeing space for employees such as fitness studios and gyms, which would contribute to healthy, active lifestyles. A monitoring regime secured through legal agreement/ Cycle Promotion Plan would enable cycle parking usage to be regularly reviewed such that temporary or meanwhile uses could be removed and additional cycle parking provided in the future, if and when needed.

## Chapter 11 – Heritage and Tall Buildings

### Policy HE1: Managing Change to the Historic Environment

The CPA recognises the importance of preserving the City’s rich and diverse heritage and supports the adoption of a robust local policy framework that will allow the City’s historic buildings and places to be preserved and enhanced, whilst adapting to new challenges, including those of climate change.

In our view, point 2 of the policy addressing balanced decision-making would benefit from redrafting. In its current form, the policy conflates different phrasing from chapter 16 of the National Planning Policy Framework (NPPF) in a manner which is at variance with and more difficult to interpret than the original national policy.

***“There will be a presumption against heritage harm and development causing harm to, or total loss of, the significance of designated heritage assets will be refused unless it is clearly demonstrated that the heritage and/or wider public benefits outweigh that harm or loss. Applicants should clearly demonstrate that all reasonable efforts have been made to sustain the existing use, find new appropriate uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long-term use of the asset”.***

Specifically, the CPA considers that the policy should be clear that any harm to a designated heritage asset requires a clear and convincing justification. Where the degree of harm is less than substantial, that harm should be weighed against the public benefit of the proposal. Where substantial harm or total loss of a designated heritage asset arises, that should require a corresponding reference to substantial public benefit, or the satisfaction of the separate and specific provisions laid out at paragraph 207 of the NPPF.

On the basis that this part of the policy is not intended to be at variance with national policy, the CPA believes that clear and consistent drafting would avoid unnecessary confusion and subsequent attempts to draw meaning from the apparent discrepancies.

Point 6 of the policy should also be amended as follows.

***“Development in conservation areas should preserve, and where possible, enhance and better reveal the character, appearance and significance of the conservation area ~~and its setting~~. The buildings and features that contribute to the character, appearance, setting or significance of a conservation area should be conserved and opportunities to enhance conservation areas should be considered”.***

It is generally accepted that development *in* a conservation area would have a direct effect on the designated heritage asset, as distinct from development outside the designated area, which may affect setting.

### Strategic Policy S12: Tall Buildings

The CPA recognises the detailed work undertaken in developing the tall buildings policy and we are broadly supportive of the proposed concentration of tall buildings in the City Cluster and Fleet Valley Tall Building Areas. Existing tall buildings exist outside of the identified tall building clusters and will be considered appropriate for intensification by reference to the criteria set out in London Plan Policy D9. This policy should recognise these sites coming forward over the plan period.

The CPA supports the policy approach to the locations and the strategic approach to clustering of tall buildings. The CPA feel that the approach of the draft policy reflects the criteria of London Plan Policy D9, the LVMF and

more local considerations of townscape and the historic environment. The CPA supports the removal of the City Corporation's presumption to refuse tall building development within conservation areas, as set out in adopted policies included within the City Plan. Policy CS14 sets out that conservation areas are deemed as inappropriate areas for tall buildings. The CPA consider that the City's conservation areas are characterised by the juxtaposition of scales and architectural styles, which is evidenced in the Tall Buildings Evidence Base Topic Papers and accordingly, they are appropriate for tall buildings. Therefore, the CPA support this amendment to the draft policy position.

Our outstanding concern in relation to this policy centres on the importance of flexibility in decision-making, and the need to optimise individual sites based on robust analysis at application stage.

The Plan acknowledges the need for a minimum of 1.2 million sqm of net additional office floorspace in the period to 2040. However, the evidence base indicating the potential capacity to accommodate that *minimum* quantum of development is limited (see Office Topic Paper, March 2024). The modelling which has been undertaken places heavy reliance upon delivery within the City Cluster (85%), with the Fleet Valley (5%) and the rest of the City (10%) making comparatively modest contributions to the overall total. For the reasons set out more fully in our representations under chapter 5, we believe the Plan must have sufficient flexibility to deliver a higher quantum of floorspace.

#### City Cluster 'Jelly Mould'

Against that background - and with the target floorspace delivery set as a *minimum* - we are concerned that the 'jelly mould' proposed for the City Cluster will prove unduly restrictive, allowing insufficient headroom to meet a range of realistic economic and employment growth forecasts over the Plan period. This is particularly important due to the City of London's unique role as a significant contributor to the London and UK economies.

The CPA is aware of instances where consented and emerging schemes would 'breach' the draft contour heights, and other sites where it may well be appropriate for sustainable development to exceed the draft contour lines. Additional contour lines could be explored by officers to provide further clarity on this position. Elsewhere, there may be opportunities for tall building development to be brought forward on sites adjacent to but outside the draft City Cluster tall buildings area. While the CPA does not make representations on a site-specific basis, we are keen to ensure that the Plan's strategic policy does not limit the potential for these sites to support growth unnecessarily, even where tall building development is justified by detailed and robust analysis.

#### Detailed Analysis

As the policy makes clear, each individual application for a tall building within the City will require comprehensive, site-specific analysis, including the provision of accurate three-dimensional computer models and Accurate Visual Representations. The analysis to be prepared by applicants will assess a wide range of environmental factors, including the effects of development on local and strategic views.

In order for this comprehensive analysis to support effective decision-making, it is essential for the policy to incorporate some degree of flexibility in professional judgment, to be exercised with the benefit of the detailed analysis undertaken.

The current policy wording fails to provide this, as it prescribes 'maximum permissible' heights across all sites within the tall building area. As a consequence, there is a very high likelihood that the policy will prevent specific sites within the identified tall building areas from being fully optimised.

The CPA considers that the consequences of inflexibility will be more severe if the CPA's economic and employment growth forecasts are borne out through the plan period. For the reasons set out more fully in the CPA's representations on chapter 5 of the Plan, the CPA anticipates demand far in excess of the 1.2m sqm minimum, and closer to a requirement for 1.9 sqm of net additional office floorspace. A plan led approach in accordance with London Plan Policy D9, a rigorous analysis of the Square Mile identifying two appropriate locations for tall buildings demonstrates that these areas can be optimised and maximised to accommodate additional office floorspace required. This is in excess of the minimum requirement on 1.2m sq m and the clusters provide the opportunity for the 1.9m sq to be delivered over the plan period, as set out in the evidence base. Given the Plan's heavy reliance on the City Cluster to meet this need, and in conformity with policy SD4 of the London Plan, the CPA recommends that the wording of the policy is amended as follows:

***"The ~~maximum permissible~~ tall building heights within the identified tall building areas are depicted as contour rings on Policies Maps C and D and Figure 15. Tall buildings should not **generally** exceed the height of the relevant contour rings. In areas between the contour rings, tall buildings should be designed to successfully mediate between the contour ring heights and should not exceed the next higher contour. Tall buildings should not necessarily be designed to maximise height; instead they should be thoughtfully designed to create built form that contributes positively to the skyline and townscape character, creating a coherent cluster form and a varied and animated skyline, and should have architectural integrity".***



## Chapter 12 - Open Spaces & Green Infrastructure

### Policy OS2: Urban Greening

Whilst the introduction of a City Urban Greening Factor score is welcomed, the CPA is of the view that it will not always be possible to achieve these targets in the City. There needs to be flexibility to take account of the circumstance of sites, particularly where roof space is constrained or can better serve other priorities in the draft Plan such as renewable energy or public access where these are feasible.

The highly urbanised nature of the City, and constraints in terms of availability of land, roof space and public realm, and proximity of neighbouring buildings must be recognised that this could restrict the ability to include features that will assist in achieving urban greening on all developments.

To help ensure it is sound, CPA recommends policy OS2 (2) is amended as follows:

***“Major development proposals will be required to - include an Urban Greening Factor (UGF) calculation demonstrating how the development will meet the City’s target UGF score of 0.3 as a minimum, unless site specific considerations make this undeliverable”.***

### Policy OS4: Biodiversity Net Gain

The CPA supports in principle the enhancement of biodiversity throughout the Square Mile. However, the CPA has concerns with draft policy OS4 on the grounds of inconsistency with the relevant statutory framework and National Planning Policy Guidance.

Policy OS4 requires major developments to meet the City Corporation’s biodiversity net gain (BNG) target score of achieving a minimum of three biodiversity units per hectare.

The Biodiversity Gain Requirements (Exemptions) Regulations 2024 which came into force on 12th February 2024 prescribe exemptions for categories of development to which biodiversity net gain does not apply. This includes development subject to the ‘de minimis’ exemption which is defined as development that does not impact an onsite priority habitat, and that impacts less than 25 sqm of onsite habitat with a biodiversity value of greater than zero, and on less than 5 metres of onsite linear habitat.

The draft policy does not allow for such exemptions. In addition to being contrary to the legislation, this approach is clearly resisted in the National Planning Policy Guidance as considered in further detail below.

The National Planning Policy Guidance (Paragraph: 006 Reference ID: 74-006-20240214) includes commentary on how plan-makers should deal with biodiversity net gain. The following points are of pertinence to draft policy OS4:

1. The guidance is clear that there is no requirement for policy makers to include planning policy relating to biodiversity net gain:

*“Plan-makers should be aware of the statutory framework for biodiversity net gain, but they do not need to include policies which duplicate the detailed provisions of this statutory framework.”*

2. The guidance clearly resists the application of biodiversity net gain to exempt categories, and the introduction of an alternative biodiversity metric:



*“... It will also be inappropriate for plans or supplementary planning documents to include policies or guidance which are incompatible with this framework, for instance by applying biodiversity net gain to exempt categories of development or encouraging the use of a different biodiversity metric or biodiversity gain hierarchy.”*

Policy OS4 applies biodiversity net gain to exempt categories of development and incorporates an alternative biodiversity metric. On this basis, CPA would welcome further discussion with officers so that biodiversity policy can be brought forward whilst not conflicting with national guidance.

## Chapter 13 – Climate Resilience

The CPA provides the following detailed comments on the relevant draft policies included in chapter 13. There are a number of points within the chapter which the CPA considers require clarification and / or amendment.

### Strategic Policy S15: Climate Resilience and Flood Risk

The CPA welcomes this strategic policy and endorses the position that buildings and public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events.

As a minor point, the formatting of temperatures in paragraph 13.1.10 is confusing. The CPA recommends reviewing the formatting to avoid any future confusion.

### Policy CR1: Overheating and Urban Heat Island Effect

The CPA acknowledges the City Corporation’s Cool Streets and Greening Programme and the interventions recommended for developments to alleviate heat stress on the ground and around buildings. The CPA recommends flexibility in the wording of policy CR1 part 1, to acknowledge that it may not be appropriate for individual developments to demonstrate implementation of all of the items on the list.

### Policy CR3: Sustainable Drainage Systems (SuDS)

The CPA recognises the merits of SuDS measures being incorporated into developments, but it is not always possible to achieve the rates sought in such a constrained location as the City. The CPA considers that part 1 of the policy should take a proportional approach to proposals. i.e., a change of use application cannot reasonably implement SuDS measures and is therefore not effective or justified.

We suggest part 1 of the policy is reworded as follows “1. **All major development, transportation and public realm proposals must incorporate SuDS principles and be designed to minimise the volume and discharge rate of rainwater run-off into the combined drainage network in the City, ensuring that rainwater is managed as close as possible to the development**”.

The supporting text as 13.4.2 should also be updated to reflect this position.

Section 13.4.6 states that “for example, intercepting the first 5mm of each rainfall event”. This is likely to be challenging particularly for retrofit projects, in terms of providing sufficient storage space. The CPA suggests that adding a line into the text of 13.4.6 stating that “for example, intercepting the first 5mm of each rainfall event where possible, and providing justification where this threshold cannot be met”.

### Strategic Policy S16: Circular Economy and Waste

The CPA acknowledges that the City Corporation will support businesses and residents in moving towards a Zero Waste City, by applying circular economy principles.

## Chapter 14 – The Temples, the Thames Policy Area and the Key Areas of Change

### Policy TP1 The Temple

The final paragraph of policy TP1 states that “*within the Temples, adjustments between professional and residential accommodation will be permitted*”. It is not clear what is meant by “*adjustments*”, and it is considered that this wording should be defined for the avoidance of doubt.

Supporting paragraph 14.1.2 refers to the rationalisation and refurbishment of chambers and notes that changes to the fabric of the historic buildings, especially for improved accessibility, may be required. However, no mention is made of the need for works to improve environmental performance. To account for climate change, it is considered that the wording should be amended to read “***To enable the continued use of the buildings in the Temples, physical changes to the fabric of the historic buildings, especially for the purposes of improved accessibility and environmental performance, may be required***”.

### Strategic Policy S18: Blackfriars

Paragraph 14.3.0 states that “*the area has a rich history including Dominican monastery and Blackfriars Theatres and likely archaeological remains, including those relating to Baynard’s Castle, which should be celebrated and better revealed as part of redevelopment*”. However, it is not clear what is meant by “*better revealed*” and additional clarity should be provided.

### Strategic Policy S19: Pool of London

Paragraph 14.4.6 states that “*existing car parks should be replaced with inclusive publicly accessible open spaces and proposals to restrict public access will be resisted*”. Whilst the desire and need for open space and a reduction in reliance upon the private car is acknowledged, this seems extremely onerous and undeliverable in a dense commercial environment. It is suggested that the wording is amended to read “***existing car parks should be replaced in part with inclusive publicly accessible open spaces or public realm ...***” which is considered more realistic and deliverable.

### Strategic Policy S20: Aldgate, Tower and Portsoken

It is considered that the first sentence of paragraph 14.5.2 should be removed as it repeats the final sentence of the paragraph immediately before.

### Strategic Policy S22: Fleet Street and Ludgate

CPA suggests amending the wording of part 8 of policy S22 to help ensure it is clear. Recommended amendments include: “***Retaining existing retail provision within the Fleet Street PSC and encouraging greater diversity of retail, culture and leisure and the including the extension of retail, leisure and cultural activity associated with these uses into the evening and weekends. and promote Pop-up and meanwhile uses will be promoted in suitable premises and sites***”.

### Strategic Policy S23: Smithfield and Barbican

CPA considers that part 1 of policy S23 be amended as follows to ensure it is clear: “***encouraging culture-led mixed-use development on major sites in the area, as well as cultural infrastructure and complementary uses,***”

~~and delivering art and cultural attractions and public realm improvements~~ *including art and cultural attractions, as well as associated cultural infrastructure and complementary uses, on major sites in the area”.*

Part 4 of policy S23 should cross refer to policy HS1 in terms of appropriate locations for residential development.

Part 9 of policy S23 states that the City Corporation will improve the area by “*supporting continued connections to the Citigen district heating and cooling network and ensuring that, where feasible, all new development is designed to enable connection to the Citigen network*”. However, it is considered that this should be removed as it is simply a repetition of policy IN1 (Infrastructure provision and connection) of the City Plan.

The CPA queries the need for paragraph 14.8.2, which simply states that a Neighbourhood Area and Neighbourhood Forum for the Barbican and Golden Lane area were designated by CoL on 18 July 2023, and suggests that it is removed.

## **Chapter 15 – Implementation**

In respect of draft strategic policy S26 – planning contributions – to ensure consistency, it is considered that “*where appropriate*” should be added to cultural provision. This would be consistent with other obligations noted in the list. We note that paragraph 15.2.2 states, “where appropriate, contributions towards cultural provision”. The CPA is concerned that there is no basis for seeking financial contributions toward cultural provision, and such a contribution formula needs additional scrutiny and to be the subject of consultation.

The CPA would welcome the opportunity to meet with officers to discuss the representation in further detail.

## **Appendix**

### **A**

#### **JLL: The transformation of office use**

##### **Hybrid working will lead to the rejuvenation of the office**

***Even before the pandemic, the drive toward productivity improvement, led Corporate Real Estate teams, to focus more intently on their workplace strategy.***

Offices were being curated to enable more flexible forms of working to support wider cultural change within their organisations, and to provide greater flexibility and larger volumes of on-demand space throughout the real estate portfolio.

As the office becomes a destination for employees as part of their hybrid workstyle, occupiers need to bring their workplace to life and increase their investments in places and people to guarantee long-term growth. These dynamic working patterns have profound implications for real estate strategy. Our research reveals that the most important strategic priority for CRE executives over the next three years will be to successfully operationalize hybrid working to enable their organisation to remain agile and flexible.

JLL surveyed just over 100 London based companies as part of the latest future of work study, and just over half (56%) placed operationalizing hybrid working among their top three strategic priorities.

As well as the short-term challenges of operational agility, resilience and efficiency, organisations are planning ahead for longer-term workplace changes. They are using this moment to reassess whether their portfolio is fit for purpose in light of market conditions and are pushing forward initiatives designed to address collaboration, performance and human experience for a dispersed workforce.

CRE teams now recognise that property-led workplace initiatives will not be effective unless they are accompanied by programmes that deliver wider cultural and behavioural change. Initiatives that address the form, function, effectiveness and experience of the workplace will become commonplace for more CRE professionals. As employees' expectations will play a leading role in driving future workplace strategies, the provision of quality space will be a top priority.

##### **Office utilisation – post Covid changes**

The British Council of Offices (BCO) have recently updated their key design criteria due to unprecedented influences affecting building design, including occupancy metrics.

The recommended occupancy density metric is now 1 person per 10m<sup>2</sup>, with an 80% utilisation rate. **This dedensification of offices, to accommodate greater collaboration space and greater amenities, along with an accelerated return to the office, suggests the future demand will not necessarily be reduced at lease events.**

##### **Demand for 'best in class' offices accelerating: supply risks mitigated**

One of the biggest drivers shaping the future of real estate over the next three years will be the flight towards quality office space. When asked about their attitudes towards space, 92% of those surveyed based in London stated that investing in high quality continued space is a more significant priority for their company than expanding the total occupied footprint.

This finding reflects concerns among corporates that not only do they need to have the best space available to encourage their workforce to spend time working from the office, but they also need the best space available to set themselves apart from their peers. Embedded in their thinking is a recognition that office space will remain central to the future work ecosystem. This mirrors how employees think about their own working patterns.

Looking over the longer term, London based occupiers are considering leasing more efficient space to accommodate hybrid working, which is reflected in 45% stating that they will need less space over the next five years. Albeit, nearly a third state that they will need more space, so there will be a mix of growth and contraction in anticipated office footprints. The focus on more sustainable and better designed space was a strong message coming from London firms, cited by 41% and 35% of occupiers, and this is a trend that is anticipated to gain momentum and impact on office design moving forward.

The office of the future will also be a place to encourage greater collaborative working, innovation and creativity and to provide opportunities for peer-to-peer learning, cited by 47%, 34% and 27% respectively across JLL's research. These priorities highlight the challenges of replicating spontaneous idea-sharing and fostering on-the-job learning experiences when employees are working away from the office. Decision-makers believe the office is the most effective place to achieve these outcomes consistently.

Our survey participants tell us they want their future office to be a collaborative, creative space that fosters employee wellbeing and maximizes productivity. As well as planning and delivering office spaces that enhance staff productivity, organisations want to create spaces that are welcoming, and which promote employee health and wellbeing. The most forward-thinking occupiers view their workplace as a space that can create unique, positive experiences for their people through improved amenities and best-in-class fit-outs, hence the flight towards quality space.

Demand for offices continues to be robust, despite the economic background. While many companies are still considering their longer-term occupational strategy, companies with lease events several years out are now starting to begin their search and are prepared to commit well in advance of when the space is needed. Occupiers are generally expanding rather than contracting, due to a combination of certainty around future office occupancy and changing office layouts.

Looking at the pre-lets over 100,000 sq ft across the City since 2017 many of these have expansion or contraction options built into the leases. Of the 16 pre-lets analysed, 9 of these exercised their expansions rights or stayed the same, with just two companies deciding to contract on their initial space take. The remaining five transactions are awaiting a decision.

Initial pre-let Date	Occupier	Building	Sq Ft Acquired	Option Space (+/- sq ft)	Outcome
<b>OUTCOME DETERMINED</b>					
2018 Q1	SMBC	100 Liverpool Street, EC2	160,000	25,000 (only expansion option)	Acquired expansion rights on Level 5
2018 Q3	TP ICAP	135 Bishopsgate, EC2	135,000	12,000	Acquired expansion rights on Level 11
2017 Q3	Deutsche Bank	21 Moorfields, EC2	600,000	Pre-PC contraction rights over levels 11 to 14 which have a combined area of 94,733 sq ft (17.2% over total office NIA). Rights existed on a floor by floor basis, top down. If exercised DB had to pay a penalty to compensate Landsec for the cost of reinstating certain pre-agree base modifications and lost rights in respect of reception, signage and management of the building.	Option to contract not exercised 18 months' before PC
2021 Q3	T Rowe Price	Warwick Court, EC4	131,000	14,000 (only expansion option)	Acquired option space
2020 Q1	Linklaters	20 Ropemaker Street, EC2	300,000	Expansion and contraction options - detail TBD	July 2022 - exercised option for 3 additional floors totalling 58,000 sq ft
2020 Q3	Baker Mackenzie	DUO, 280 Bishopsgate, EC2	144,500	Right to contract out of one floor which existed until December 2020 (NB deal agreed November 2019 and signed July 2020) and then expansion right over a single floor five years post PC.	Exercised their right to contract out of a floor and therefore option to take up a floor five years into the lease moved up a floor to be contiguous with their core take. NB should be noted that when the deal was agreed they knew they were acquiring too much space.
2022 Q2	Kirkland & Ellis	40 Leadenhall, EC3	214,000	Can contract out of 85k and expand up to a further 106k - rights exist up to May 2023	July 2023 - exercised option for 8 additional floors totalling 170,000 sq ft
2021 Q1	Latham & Watkins	One Leadenhall Street, EC3	200,000	Have right to reduce initial take by three floors and expand by two - ahead of PC. Two out of the 15 floors taken in the core take have break options at the end of 5th and 10th years	June 2023 - exercised option for 5 additional floors (16-20) totalling 77,000 sq ft
2022 Q4	Reed Smith	Blossom Yards & Studios, Norton Folgate, E1	127,000	Flexibility to drop floors, 8, 9 and 10 at any time up until PC.	Dropped top two floors (9-10) two months before PC
2017 Q1	Freshfields	100 Bishopsgate, EC2	251,000	Pre-completion option to acquire 1 1/2 additional floors	Did not exercise, but didn't have any post PC expansion options
2022 Q4	Clifford Chance	2 Aldermanbury, EC2	321,000	Clifford Chance has an option to hand back the first to fourth floors of the building (up to 89,000 sq ft) which expires on 1 March 2024.	Did not exercise the contraction option so will proceed to lease the entirety of office space
2022	Aviva	80 Fenchurch Street, EC3	75,000	Have options to contract and expand.	Exercised both options to expand and recently acquired additional space and new occupancy c. 120,000 sq ft.