



Planning and Transportation Committee

Date: WEDNESDAY, 30 SEPTEMBER 2026

Time: 9.30 am

Venue: LIVERY HALL - GUILDHALL

Members:

Deputy Tom Sleigh (Chair)	Charles Edward Lord, OBE JP
Deputy Madush Gupta (Deputy Chair)	Antony Manchester
Joanna Tufuo Abeyie	Tim McNally
Tana Adkin KC	Sophia Mooney
Deputy Emily Benn	Deputy Alastair Moss
Sheriff & Deputy Keith Bottomley	Aldерwoman Jennette Newman
Alderman Sir Charles Bowman	Deputy Deborah Oliver
Deputy John Edwards	Deputy Henry Pollard
Deputy John Fletcher	Deputy Nighat Qureishi
Deputy Marianne Fredericks	Gaby Robertshaw
Alderman Alison Gowman CBE	Alderman Sushil Saluja
Josephine Hayes	Deputy Oliver Sells KC
Deputy Jaspreet Hodgson	Naresh Hari Sonpar
Amy Horscroft	Matthew Waters
Shravan Joshi MBE	Jacqui Webster
Philip Kelvin	David Williams
Aldерwoman Elizabeth Anne King, BEM JP	

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Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA

NB: Certain items presented for information have been marked * and will be taken without discussion, unless the Committee Clerk has been informed that a Member has questions or comments prior to the start of the meeting. These for information items have been collated into a supplementary agenda pack and circulated separately.

Part 1 - Public Agenda

1. **APOLOGIES**
2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
3. **CITY CORPORATION RESPONSE TO THE 2026 DRAFT LONDON PLAN CONSULTATION**
Report of the Executive Director, Environment.

For Decision
(Pages 5 - 144)
4. **STOPPING UP APPLICATION - THAVIES INN HOUSE, HOLBORN CIRCUS LONDON 21/00885/FULMAJ (AS AMENDED BY S73 APPLICATION 24/00688/FULL)**
Report of the Planning & Development Director.

For Decision
(Pages 145 - 178)
5. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
6. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
7. **EXCLUSION OF THE PUBLIC**
MOTION – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

For Decision

Part 2 - Non-public Agenda

- 8. NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
- 9. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

Committee(s) Planning and Transportation Committee	Dated: 30/09/2026
Subject: City Corporation Response to the 2026 Draft London Plan Consultation	Public report: For Decision
This proposal: Provides statutory duties	This report relates to the statutory planning function
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	n/a
What is the source of Funding?	n/a
Has this Funding Source been agreed with the Chamberlain's Department?	n/a
Report of:	Katie Stewart, Executive Director of Environment
Report author:	Gudrun Andrews, Head of Planning Policy

Summary

In July 2026, the Greater London Authority (GLA) commenced consultation on a new draft London Plan. The 2026 is a new draft Plan which has been prepared to be in line with the newly published NPPF (August 2026) and follows an earlier consultation on a document called Towards a New London Plan in summer 2025. The new London Plan takes broadly similar approaches to planning the future development of the capital to earlier versions. However, it is somewhat slimmed down compared to the adopted London Plan, and has been informed by viability challenges facing development in London that has contributed (amongst other factors) to a slowdown in delivery.

The report asks Members to approve the City Corporation's response to the draft 2026 London Plan seeking targeted amendments, clearer evidence and stronger recognition of the Square Mile's international economic role and growth potential. Key concerns include underestimated office floorspace needs, a need to better recognise tall-building capacity in the City, an over-inflated housing target, unclear application of the optimisation and energy-use frameworks, increased waste apportionment, and potentially weaker approaches to carbon reduction, biodiversity, inclusion, transport and infrastructure delivery. Subject to approval, the response will be submitted by the deadline of 15 October 2026. Examination of the London Plan is expected in 2027 and anticipated adoption of the London Plan in early 2028.

Recommendation

Members are asked to:

- Agree the City Corporation's consultation response to the London Plan as at Appendix 1 and Appendix 2 and authorise its submission to the Mayor of London

Main Report

Background

1. The Mayor of London is preparing a new London Plan which, when finalised, will replace the 2021 London Plan and form part of the Development Plan for London, including the Square Mile. It covers the period to 2050.
2. The City Corporation provided consultation comments on the 'Towards a London Plan' direction of travel document consultation in June 2025. This report sets out detailed consultation comments on the new draft London Plan. Since then, officers have contributed informally to the evidence base supporting the draft London Plan, including input on the digital Strategic Housing Land Availability Assessment (SHLAA), jobs growth forecasts and town centre health checks. Officers were also given early sight of some Central Activities Zone (CAZ) designations.

Draft London Plan content and key changes

3. The London Plan consultation material is available at the following link: <https://www.london.gov.uk/sites/default/files/2026-07/Draft%20London%20Plan%202026%20web%20version.pdf>. The full proposed City Consultation response is included at Appendix 1; our position is broadly supportive but requests stronger recognition of the role of the City, seeks some targeted amendments and seeks clarification on some aspects of the evidence base.

Growth potential

4. The draft London Plan is broadly positive, recognising the role of the City as an internationally important location for financial, professional, business and technology services; acknowledges the City Cluster as a tall building location; and continues to recognise the importance of prioritising commercial development in the CAZ. However, it is considered that in some places the evidence base underplays this role, and this should have further influence over the direction and approach of the draft London Plan.
5. The GLA's [Employment Projections](#) estimate growth of around 192,000 jobs between 2024 and 2050 in the City of London. This is a substantial increase from previous jobs growth forecasts of 85,000 from 2021 to 2041. This is translated into demand for around 1.4 million sqm of office/R&D floorspace within the [Economic and Infrastructure Supply and Demand Study](#). The City Corporation's proposed response (see Appendix 2 for detail) highlights some significant concerns with the methodology within the Projections, including incorrectly applied utilisation rates. As these projections underpin the Supply and Demand Study, they lead to an inaccurate office floorspace requirement benchmarks for London. Our own analysis (see Appendix 2) suggests that this benchmark may potentially be in the region of between 2.2 and 3.0 million sqm

GIA (rounded) for the Square Mile, though this figure is a rudimentary estimate. The consultation response at Appendix 1 sets out these significant concerns.

6. Underestimation of office floorspace needs could constrain investment and development, and weaken the Square Mile's international competitiveness over the period to 2050. However, in time, we will need to develop our own evidence to determine the precise floorspace requirements in the City over the London Plan period to 2050.
7. The response also raises concerns that the draft Plan does not translate its evidence into clear, strategic-level Objectively Assessed Needs (OAN). Instead, it requires local plans to meet land and floorspace requirements informed by the London Growth Plan and local and London-wide assessments of supply and demand. The City Corporation's proposed response therefore questions the policy's effectiveness and warns that without the strategic direction within the London Plan itself by the inclusion of more ambitious benchmarks, it could constrain delivery and economic growth.

Tall buildings

8. The City Corporation's response is broadly supportive of Policy MBUL3 Tall Buildings in its approach to the identification of clear design criteria and the introduction of a new 'Metropolitan Scale tall buildings' category for any buildings taller than 100m.
9. However, it is considered that the [Metropolitan Scale Tall Building Study](#) which underpins this policy approach does not fully reflect the growth potential of the tall building areas identified in the City Plan 2040 or properly take into account the new jobs and floorspace projections. Officers' review of this evidence and the London View Management Framework supports the study conclusions in relation to the City Cluster, but concludes that Broadgate's potential has been underestimated and the Fleet Valley cluster has been wrongly excluded. The response therefore recommends recognising both locations as existing or potential future Metropolitan Scale Tall Building areas, and seeks amendments to the wording of MBUL3 to enable local plans to refine the boundaries and capacity through detailed local assessment. Appendix 2 provides further evidence supporting this position, suggesting that these amendments could yield in the region of 401,000sqm (NIA) of additional uplift. Additionally, it highlights potential for further clarifications to avoid confusion where a building above 30m would be considered tall under the London Plan policy but below the City's locally defined threshold of 75m.
10. Particularly in light of the concerns about the methodology for calculating employment jobs growth and floorspace requirements, failure to address the above matters in relation to tall buildings could restrict appropriate high-density development and undermine delivery of the growth aspirations of both the City Plan 2040 and the new London Plan to 2050.

11. It should be noted that a revised London View Management Framework was published on 11 September 2026. A response will be prepared to this consultation and brought to the November P&T committee meeting.

Economic emphasis

12. From an economic perspective the proposed response is broadly supportive of the approach to continuing to grow and promote the unique roles of the Central Activities Zone (CAZ). The reference to prime floorspace is new and welcomed as is the recognition of the City's international role (previously only referred to as being of national importance). The response, however, suggests that the policy framework could provide further support for the recognised functions of office-led growth and financial, professional and business services sectors within London and the Square Mile.
13. The introduction of two new CAZ categories, 'Core' and 'Mixed' is notable. The whole of the City is designated as Core CAZ, where strategic functions should be prioritised and enhanced.
14. There is also continued recognition of the role of the City of London as an internationally important location for financial, professional, business and technology services, with other CAZ clusters identified (at Figure 6.2):
- Financial, Professional and Business Services Cluster- City of London/ Cluster
 - Innovation and Life Sciences Cluster- whole of the City (Technology)
 - Legal Cluster- Temple, Royal Courts of Justice, Inns of Court
 - Class E/ Experience Economy Cluster- Cheapside, Moorgate/Liverpool Street, Leadenhall Market, Fleet Street
 - Internationally Significant Culture and Night-time Economy Cluster - Barbican/Smithfield
 - Creative Industries and Technologies Cluster- Smithfield
15. However, the draft Plan provides inconsistent detail on the role of these clusters beyond the broad aim to "promote and grow". The response therefore seeks further guidance on the functions of these clusters and how LPAs should support them, more closely reflecting the approach of the 2021 London Plan. It also requests greater clarity on the role and purpose of the new Liverpool Street Transformational Gateway Broad Location for Growth (BLG), including stronger links to the City Plan's proposed tall building location at Broadgate and the Class E Experience Economy cluster at Liverpool Street/Moorgate. The response further highlights that the designation provides less guidance on delivery expectations than other designations, such as Strategic Economic Clusters.

Optimisation Framework

16. The draft plan introduces a new Optimisation Framework (OF) as a means for making the most efficient use of land. This is mainly aimed at increasing residential densities, although it applies more broadly to development, including

non-residential schemes through height guidance. The OF uses a new Sustainable Access Measure (SAM) to replace Transport for London's Public Transport Accessibility Level (PTAL), combining this with a London Context Map. The result being a framework for building heights across different London 'settings' (A to F), and SAM levels 2 to 5B. The response highlights that further text confirming its application for non-residential uses would be helpful.

17. The City sits within the most accessible location (Setting 5B) and within large town centres and City core (Setting E), meaning that development should typically be between 5 and 11 storeys unless the site falls within a location identified for tall buildings. The GLA have stated that this is set as a minimum and not a ceiling, but the response suggests that this needs to be set out more clearly. While the main target of the policy seems to be densities that are too low, there is a risk that it constrains more ambitious development with its current wording.

Housing targets

18. The draft Plan sets out new housing targets London for the period from 2027/8 and 2036/7. This involves collective delivery of 558,000 homes, which is considerably below the OAN for housing. The ten-year target for the City of London is 1,716, which on an annual basis at 172 is an increase from the previous target (to 2028/9) of 146 per annum. However, the response does highlight some errors in the data and a lack of detail on some assumptions used for parts of the small sites target. Officers therefore feel that the target is over-inflated and potentially undeliverable alongside the required economic growth. Once these errors have been taken into account the target should, more realistically, sit in the region of 481 homes for the ten-year period.
19. The draft Plan retains the strategic target of 50% affordable housing and sets numerical requirements for low-cost rented and intermediate homes over the ten years to 2036/7 for the first time. It introduces location-based affordable housing threshold bands across London, with the City in the highest category, Band 1, where a minimum of 35% affordable housing is sought. Payments in lieu remain permissible in exceptional circumstances.

Carbon and Energy Use Intensity (EUI) approach

20. The Corporation's response supports the introduction of a new EUI approach as a move towards an approach that measures and reduces actual energy demand and performance rather than using notional carbon calculations. However, the response seeks further clarity on how these targets will apply to different development types, scales, typologies and uses, with risks that the approach is not fully reflecting the operational demands of high-density development within the Square Mile, and that it should not incentivise demolition over retrofit.
21. It is notable that this policy area appears to be the one topic which does not fully align with the approach of the new NPPF. Policy PM13 sets out that any standards for energy efficiency that go above Building Regulations should be expressed as a percentage of uplift of a dwelling's Target Emissions Rate (TER).

Therefore, the City Corporation's response also queries how this approach would work for commercial development. An unclear approach to energy in the context of the new NPPF could create uncertainty for applicants, increase viability and delivery risks, and unintentionally favour demolition over retrofit.

Infrastructure, transport and waste

22. The response is broadly supportive of the approach to infrastructure but identifies the need for stronger mechanisms to deliver the utilities policy. The full response calls for the transport modelling to be updated as the employment assumptions used do not align with the wider employment projections, reflecting the methodological concerns outlined in paragraph 5.
23. The draft plan continues the approach whereby waste planning authorities are responsible for providing waste capacity in line with their apportioned share, rather than their waste arisings. For the City this is substantially higher with a need to manage 2.1% of London's household, commercial and industrial waste to 2050, compared to 1.0% in the 2021 London Plan. The response highlights support for collaborative cross boundary working, but this support relies on capacity being met through the South East London Waste Planning Group (SELWP).

Inclusion and safety

24. Officers also consider that the approach to inclusion has been weakened and seek stronger design and transport policies. Healthy Streets requirements are similarly less robust, shifting towards a more discretionary approach that does not adequately address the needs of all users including those with protected characteristics.

Next steps

25. The new draft London Plan is out to public consultation until 15 October 2026. Following this, it is envisaged that submission to the Secretary of State and examination will take place in 2027 and final publication (ie adoption) in early 2028. At this it will form part of the Development Plan for the Square Mile, alongside the soon to be adopted City Plan 2040.
26. A new NPPF was also published on 16 July 2026, this and the new London Plan will influence the future timetable for a new City Plan, to be prepared under the new 30-month plan-making system.

Corporate & Strategic implications

27. The emerging City Plan 2040 has been prepared to be in general conformity with the 2021 London Plan. However, once the new London Plan is published in final form in early 2028 it will replace the 2021 London Plan and will form part of the Development Plan for the Square Mile. The 2026 draft has been prepared under the August 2026 NPPF and is broadly aligned with this approach. A review of the City Plan 2040 will need to align with both the new NPPF and the final London

Plan which is likely to involve planning for office floorspace and other uses up to the period of 2050.

Financial implications

28. No financial implications.

Resource implications

29. No resource implications.

Legal implications

30. The full consultation responses at Appendix 1 and 2 have been reviewed by legal.

Risk implications

31. None.

General implications

32. There are not considered to be any other implications relating to the content of the proposal.

Equalities implications

33. The Public Sector Equality Duty is an ongoing requirement which has been taken into account by officers throughout the preparation of comments. This has led to the identification of some further amendments to strengthen the approach of the London Plan.

Climate implications

34. The response has reviewed the implications of proposed strategic policies with climate implications and the response highlights matters of particular concern to the City Corporation, including in relation to the application of the City Plan 2040 and the ambitions of the Climate Action Strategy.

Security implications

35. The response has reviewed the implications of proposed strategic policies in relation to the security and safety aspects of the City Plan 2040.

Conclusion

36. The responses to the London Plan consultation raises matters of particular importance to the City Corporation and will be submitted by the deadline of the 15 October 2026.

Appendices

- Appendix 1 – Full London Plan consultation response
- Appendix 2 – Growth capacity and views analysis

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Appendix 1- Formal consultation response

This document splits each policy into two distinct sections:

- 1) the internal commentary focusses on the key matters included within each policy, the main changes from the approach of the 2021 London Plan and discusses any issues or concern
- 2) is the formal consultation response and has been formatted to reflect the consultation form itself.

The form does not allow for a comment if a 'Yes' is selected for sound, therefore where there is general support a comment is required the 'Don't know' category has been used.

[1. Overview of the Plan and Good Growth objectives | London City Hall](#)

INTERNAL COMMENTARY

Brief policy summary:

Good Growth Objectives

The London Plan will set the framework for development for Greater London over the next 20 years, running from adoption to 2046/7. The Plan continues the approach of Good Growth Objectives, setting out four sub-objectives and justifications, under: Making the best use of land; Delivering the homes and neighbourhoods Londoners need; Growing London's economy in a way that benefits all; Creating a greener, resilient and healthy city. The 2021 London Plan included six objectives, the main change being that housing and inclusive community objectives have been merged, as have the healthy, efficient and resilient objectives.

While all objectives are highly relevant to the Square Mile, the response as below reflects a particular interest in the objective relating to economic growth, which now more closely aligns with inclusive growth aspirations. The sub-objectives relate to securing sufficient space and infrastructure to support growth; supporting priority growth sectors and economic clusters; and improving access to skills and opportunities. The justification text makes reference to offices, lab space, industrial and creative workspace, experience, leisure and retail and data centres. As an over-arching principle this approach can be generally supported, subject to more detailed commentary against the policies in subsequent chapters.

Support can also be provided to other objectives, including making the most efficient use of land through meeting development and transport needs, delivered through optimised land use and ensuring infrastructure supports growth. Other sub-objectives aim to improve resilience to climate change, conserve and enhance the natural environment, create greener spaces and contribute to reduction of pollution while enabling improvements to mental and physical health – all of which align with key objectives for the City. It is also positive to see health inequalities outlined. The detailed policy response will provide further commentary on policies underneath each objective.

Approach to housing need and delivery

This section also sets the context for housing delivery across London and makes clear that capacity constrains delivery to such an extent that it is not possible to meet the overarching housing need of 84,844 per annum, instead planning for 528,000 over the ten-year period to 2037. This is based upon what could feasibly be deliverable based on the new Plan's policies alongside viability and build-out rates constraints. Responses to individual policies will highlight some concerns regarding the methodology applied to housing delivery and capacity, particularly in the City context, but as a whole support can be provided to the setting of realistic and deliverable housing targets based on capacity evidence rather than a demand-led approach alone. For the period post 2037 the Plan anticipates a move towards the 850,000 homes required through Opportunity Areas, Green Belt release and enhanced delivery linked to major infrastructure investment such as the West London Orbital and the Bakerloo line extension.

Some notable changes to the approach to planning for housing in the plan are: closer integration between land use and transport in terms of leveraging in housing delivery; small site design codes and suburban densification through new Optimisation Framework; a more restrictive approach to industrial land release; targeted Green Belt release; managing car parking to maximise land availability; and quality place-making.

Managing adverse effects

This identifies factors which constrain delivery timescales such as need for denser delivery, transport infrastructure delivery alongside development and utilities and supporting infrastructure expansion. The approach seeks to ensure that social infrastructure keeps pace with the rate of new development. The Plan is supported by a Viability Study which sets out the challenging viability context for London, focussed particularly on housing delivery.

Key GLA evidence base:

[London Plan Viability Study Phase 1 Report](#) -This focusses primarily on viability testing of housing and affordable housing requirements but includes detailed testing of affordable workspace policy options, indicating that affordable workspace should be generally viable in the CAZ, but more challenging to deliver in other areas. It recommends appropriate flexibilities in Draft London planning policy requirements to take account of viability, but further testing will be carried out in a number of areas as part of phase 2. However the timing of Phase 2 is not clear and how it will align with the submission timetable.

[London Growth Plan](#)- highlights the 'engine' of London's economy being Financial, professional and business services and technology; Creative industries including creative technologies; Experiences (visitor spend on culture, leisure, hospitality, retail and events); and International education (international students). Therefore, it is felt that this could be drawn out more readily within the London Plan, with added emphasis on the role of the City and the financial services sectors.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Y

Commentary: No comment

Modification sought? N

Commentary: No comment

FOR FORMAL CONSULTATION RESPONSE

Overall chapter comment:

The City Corporation supports the Good Growth Objectives, particularly those related to economic growth. However, it considers that the policies in Chapter 4 could do more to support delivery of this objective, as set out in separate comments against the policies this chapter. The City Corporation supports the approach to setting realistic and achievable housing targets.

Chapter 2 - Making best use of land and achieving Good Growth

MBUL1 - Spatial Strategy

Brief policy summary:

The aim of this policy is to meet London's development requirements and distribute growth in a manner that optimises the Good Growth Objectives (as above) . It sets out a more plan-led approach to where the tallest buildings should be developed, with 17 identified strategic locations. The spatial strategy is illustrated in a 10-year diagram which recognises the whole of the CAZ as a Broad Location for Growth (BLG) and Liverpool Street station as a 'BLG Transformational Gateway', with Brownfield First Opportunity Areas of the City Fringe and Strategic Economic Clusters at Whitechapel sitting just outside the City boundary. The 20-year key diagram adds in longer term potential including areas for Green Belt release or 'future candidates'. However, the practical implications of some designations are unclear, beyond general references to realising their potential with no analysis provided here of the potential capacity of the CAZ or BLG Gateways. This is in direct contrast to the Brownfield First Opportunity Areas (see Policy PV1) which set specific delivery expectations for homes and jobs. It is therefore unclear how these designations as BLG add to the remainder of the policy requirements which focus on making the most of these opportunities and supporting intensification across London more broadly. Therefore the City Corporation's response should suggest ways to reinforce the distinctive roles of these locations in meeting London's development requirement beyond the framework set by the plan as a whole and include specific indications of delivery expectations.

Additionally, the strength of the language used in relation to employment is somewhat diminished from that relating to housing which talks about 'required new homes'. The City

Corporation's response should therefore argue that the Plan should give greater emphasis to employment needs as a key requirement of the plan-led system.

The policy also provides the overarching framework for other policies in relation to infrastructure provision, nature recovery, and future opportunities for growth. It is aligned with the new NPPF in relation to the emphasis on use of site allocations and policies to optimise value generation. In combination this sets a future direction for plan-making within the City.

Key GLA evidence base:

General reference is made under this policy to the IIA Scoping, LNRS, LGIF and Clean and Healthy Waterways Plan, the Mayor's Transport Strategy, London Environment Strategy and the Mayor's Violence Against Women and Girls Strategy 2022-25. However there is no specific evidence which is referenced underpinning the approach to the identification of the BLGs as separate designations, or the capacity to be delivered from these locations within these documents so this is brought out in the consultation response below.

The commentary also draws on other key pieces of evidence to draw the conclusions set out in the proposed response, namely the [Central Activities Zone \(functions and capacity\) Study](#) and the [Economic and Infrastructure Supply and Demand Study](#). Both of these documents are summarised in further detail in relation to Policy PV1 and CBE1.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? N

Commentary:

Although the City Corporation strongly supports the continued identification of the CAZ and the new designation of Liverpool Street Transformational Gateway (TG) Broad Locations for Growth (BLG), Policy MBUL1 would benefit from further explanation of the rationale for these designations and their added value in supporting the delivery expectations of this policy.

As per comments relating to Policy PV2, it is noted that the [Central Activities Zone \(functions and capacity\) study \(July 2026\)](#) sets out the broad capacity for 617,000 jobs within the CAZ between 2024 and 2050, and 41% of this capacity (approximately 192,000 jobs) associated with the City of London. The [GLA Economic and Infrastructure Supply and Demand Study](#) also translates this into a demand for 2.4 million sqm of new employment floorspace within the CAZ by 2050, of which 1.4m is to be located within the City of London (figures which the City Corporation disputes; further commentary on this will be provided in response to Policy PV2). However, this level of detail is not included within the Plan itself. Given that local plans will be tested for 'general conformity' against the London Plan, rather than the plan's evidence base it would be beneficial to provide some further strategic guidance in paragraph 2.2 of the general delivery expectations of these areas and how their designation is intended to boost delivery from that of the general expectations of this policy. This would also help clarify how these designations should inform local evidence and Local Plans in relation to objectively assessed needs for economic growth.

The above evidence also underpins the new designation of Liverpool Street as a TG BLG in recognition of the redevelopment opportunity of the station itself. The City Corporation would

argue that Liverpool Street provides a different context to the other stations in this category (e.g. Paddington, Victoria) which have moved from Opportunity Areas (OA) designation to TG based on their 'maturing' OA status, whereas Liverpool Street has not previously been identified as an OA (see para 5.3.3 of the CAZ evidence that highlights this deliberate distinction from OA status). It should be noted that the Corporation's emerging City Plan 2040 proposes a new tall building area to the north of Liverpool Street station, which is complementary to the cluster of new tall buildings emerging within the LB of Hackney. However, this potential for Metropolitan Scale tall buildings is not reflected within the London Plan's [Greater London Metropolitan Scale Tall Building Study](#) (see comments relating to Policy MBUL3 Tall Buildings). It is therefore the City Corporation's view that the TG BLG designation needs to go beyond that of the station and relate to the growth potential of the vicinity of the station, and reflect the area's true 'gateway' to the City Cluster and the City of London. This also has potential to align more effectively with the approach of the Moorgate/Liverpool Street Class E/Experience economy Cluster in its support of office-led growth.

It is also considered that the wording of the policy could be strengthened to reflect the significance of the BLG designations, and as per the current draft, reference only to providing 'proportionate space for employment' in part B and lack of detail of what constitutes the 'full potential' of these designated areas (BLGs) in B (1) means that it does not sufficiently reflect the significant economic opportunity of these locations and does not clearly explain the added value of identifying BLG areas for economic growth within this Policy. Additionally, economic uses should be provided with the same emphasis as for housing so some suggested amendments are provided below. The City Corporation considers that further guidance on quantifiable delivery expectations for the CAZ BLG and Liverpool Street Transformational Gateway BLG should be included in a similar manner to Policy PV1: Brownfield First Opportunity Areas, and this will provide strategic guidance to be built upon and refined at a local level.

Review of the Integrated Impact Assessment (IIA) has not provided further explanation of how the options or opportunities of the BLGs have been assessed against options of non-designation within the spatial strategy. It is therefore not clear the resulting effects of the designation on the achievement of the sustainability objectives. The City Corporation also wishes to draw attention to references to residential or industrial BLGs only within this document. Therefore it is unclear how options relating to the CAZ BLG and in the City context the Liverpool Street Transformational Gateway have been assessed as neither residential nor industrial focussed BLGs but as mixed use locations, focussing on CAZ strategic functions. Further clarification would assist understanding of this.

Modification sought? Y

Commentary: As above, further clarification on the role of the various BLG designations and delivery expectations would be beneficial in the introductory text to this policy. However, specific amendments also proposed as below:

"B Local plans should plan to deliver at least 558,000 additional new homes, and meet the identified development requirements for proportionate space for employment and appropriate infrastructure (including health and other locally assessed social infrastructure) in a manner consistent with Part A of this policy; policies HN1 Increasing London's housing stock, GLE1

Sufficient and appropriate employment space and the Place-vision policies. This means local plans, with reference to the key diagram and Annex C, should:

(1) through site allocations and review of designations, give priority to and realise the full identified development requirements as potential for each of the growth corridors, the Central Activities Zone (CAZ) and the Northern Isle of Dogs (NIOD), BFOAs and other identified BLGs within the existing urban area, addressing their specific strategic opportunity where relevant, accommodating a significant proportion of required new homes and ~~maintaining a reservoir of well-located employment-land~~ to accommodate identified employment requirements”...

MBUL2 - Optimising the use of land and site capacity

INTERNAL COMMENTARY

Brief policy summary:

This policy seeks to deliver the plan’s spatial strategy as set out within Policy MBUL1, aiming to ensure all development makes the best use of land. The ‘Optimisation Framework’ (OF) utilises inputs from a new Sustainable Access Measure (SAM) (a successor to the Public Transport Accessibility Level (PTAL)) and a [London Context Map](#). The result being a framework for building heights across different London ‘settings’ (A to F), and SAM levels 2 to 5B. The aim being that any sites over 0.25ha should be designed to be within the relevant density (residential only) and height ranges stated in the OF, unless the site is covered by a design code, masterplan, or site allocation with design parameters; part of an Opportunity Area Planning Framework; in a local plan defined tall building area; or the Green Belt. Sites below 0.25 ha will be subject to a forthcoming London Small Sites Design Code. There is a clear direction in the policy that failure to meet the policy requirements should be given very significant weight in decision making.

This policy is extremely significant for the plan and for London as it will require many inner and outer suburban areas to develop at considerably higher densities. While not quite as significant for the City, it is still a fundamental part of the plan and development in the Square Mile will have to have regard to the height ranges, even if the density assumptions do not apply. The Optimisation Framework puts the whole of the City within the most accessible SAM location (Setting 5B) and in the Context Map within large town centres and City core (Setting E). This means that development should typically be between 5 and 11 storeys unless the site falls within a location identified for tall buildings. . It is notable that the heights associated with this policy relate to storeys, however the tall buildings policy (MBUL3) identifies anything over 30m tall in a London context to be a tall building. The response to MBUL3 highlights this point as a building can be both 11 storeys and above 30m, with potential conflicts in approach, with one broadly advocating this scale (MBUL2), where another seeks further justification.

Key GLA evidence base:

[London Context Map](#) This splits London into 6 ‘character settings’ that range from ‘low density land’ to ‘large town centres and central core’. Green belt, open space and infrastructure are counted separately. The character settings are based on 287 fine-grained typologies contained in the London Character Thesaurus. The character settings group the range of typologies into broad categories at a strategic scale resolution. Character setting is one of the two variables used in the

Optimisation Framework to determine the appropriate height and density range (the other being the SAM band outlined below)

The entire City is categorised as Setting E 'large town centre and central core', with the appropriate zones for green, blue and transport infrastructure. (There are a small number of isolated parcels categorised as 'predominantly flatted development' which either correspond to residential development (Golden Lane/Middlesex Street) or are potentially erroneous (Custom House). Nonetheless, these do not compromise the overall designation of the City as 'town centre and central core'. The City Corporation agrees with this characterisation.

[The Sustainable Access Measure \(SAM\)](#)-The SAM is a TfL developed measure that assesses how easily jobs, services and amenities can be reached from each 100m x 100m area by public transport and walking, based on journeys of up to 60 minutes by public transport. It replaces the Public Transport Accessibility Level (PTAL) and the whole of the City is categorised as 5B – the highest possible score. This is a significant change and removes the link between public transport alone and development densities. It aims to avoid the "cliff edge" often used to describe changes in PTAL levels but although the outputs are broadly supported for the City, it will involve significant changes to assumptions for many other parts of London, therefore is likely to attract quite a lot of borough-level comment. Therefore officers will ensure they remain aware of any changes as a result which could impact on the City.

[London Small Sites Design Code London Plan Guidance \(LPG\)](#)- The draft London Small Sites Design Code LPG was released on the Friday 11 September and a consultation will run until the 4th December. The Code supports the application of draft London Plan policy MBUL2 which states in Part C (2) that development proposals, on sites below 0.25ha, which meet the requirements of the Code are acceptable in-principle in design terms.

It uses three levels of analysis to provide design parameters for residential development only. Level one is the 'site type' which describes the nature of the development plot eg 'mid street infill' or 'mansard roof'; Level two is the character context e.g. suburban, terraced, high street; and level three is a set of dimensional and character context parameters, eg mandatory distances for spaces such privacy zones and overlooking, and standards for features such as car parking, refuse and materiality.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment.

Sound? N

Commentary:

The City Corporation supports the aim of this policy to ensure development makes the best use of land. Embedding the link between public transport, character areas and density/height in the centre of the plan through this policy is also supported. The City Corporation notes that the guides for development within the City (Context E, SAM 5B) to be of between 5 and 11 storeys, this reflects the character of the City and is therefore generally supported. However, the wording of the policy is not clear enough that the optimisation framework sets minimums. There are also some concerns around how this policy interacts with Policy MBUL3 (4) which suggests that across London tall buildings are defined as that over 30m (or 10 storeys), unless a local threshold is set.

In the City context this means that a development of 11 storeys would be both permissible and encouraged under MBUL2, but would also need to provide justification under MBUL3, unless further clarifications are made under Policy MBUL3 to ensure that it is clear whether developments that are above the London Plan threshold of 30m but below that set at a local level, e.g. 75m in the City of London, would need to meet the requirements of MBUL3. It is unclear whether this 10/11 storey overlap between the policies is the intention, but further clarity on this would assist. The City Corporation's position is that the interaction between MBUL2 and MBUL3 should work like the current London Plan Policy D9, where D9 is only engaged if the locally set tall building threshold is met or exceeded. This point will be elaborated in response to MBUL3.

The interaction between this policy and MBUL3 (Tall Buildings) raises a further issue. Part c of Box MBUL2 exempts buildings that fall under the tall building policy (MBUL3) from the Optimisation Framework, however it is not clear whether the 30m height or the locally-set threshold should apply.. For example, the City's draft local plan sets the threshold at 75m AOD and it is unclear whether a decision maker should apply the Optimisation Framework to a building in the City that is above 30m but below 75m. The City Corporation suspects the intention behind part c of box MBUL2 is to disapply the OF where a proposal is within a locally set tall building zone, regardless of the height threshold but further clarification and confirmation would assist.

The City Corporation notes that all 36 case studies used to generate the density/height ranges are residential. It would have aided the formation and calibration of the policy if some commercial developments in central core areas were also included.

Modification sought? Y

Commentary:

Box MBUL2

c. Local plan defined locations and policies for tall buildings of 30m and above (or locally defined threshold) in height (see MBUL3 Tall buildings)

...It is likely to ~~may~~ be acceptable to exceed the heights and densities expressed in the table above, particularly in better-connected locations.

MBUL3 - Tall buildings

INTERNAL COMMENTARY

Brief policy summary:

This policy sets out that plan making authorities should utilise detailed assessment processes to identify locations and heights for tall buildings of 30m and above, or a locally set threshold. Crucially it introduces a new category of 'metropolitan tall buildings' for buildings over 100m, and the locations are identified in Table 2.2 which includes the City Cluster

Applications are to be assessed against the requirements of the Development Management parts of the policy. Part A (1) refers to the locational and design criteria, directing tall buildings to locations identified in the plan and (2) directs development of over 100m to locations identified in the London Plan (eg City Cluster). Part (3) cross-references Box MBUL3 for any proposal for a

metropolitan tall building outside an identified cluster in Table 2.2, setting out the factors that should be considered, including where areas have been identified for significant growth in a local plan, are not unduly sensitive, character than can accommodate this, forms part of an existing or a planned cluster of tall buildings designated by the LPA and is proportionate response in height and shape.

This appears to suggest that other tall building locations identified in local plans could potentially be suitable for heights of over 100m, but there is a degree of circularity whereby the plan-making section A (4) already requires these areas to set “set appropriate or maximum heights”. Therefore, it is unclear how this policy will work in practice.

The response as below therefore suggests that the evidence (see below) has erred in its assessment of parts of the City (eg the Fleet Valley cluster and Broadgate tall building area). These should therefore be identified as Metropolitan tall building locations, or areas with the potential to be Metropolitan tall building locations, subject to designation in a local plan. The policy should also have added flexibility for local plans to further identify and refine these identified metropolitan tall building locations.

It should be noted that during the City Plan examination some Main Modifications were proposed to make clear when a proposal for a tall building outside an identified area may be acceptable, and this policy now introduces new considerations at a strategic level.

Part (4) continues the direction of current London Plan policy D9 in relation to exemplary design, positive skyline contributions, responding to context etc, but as drafted it would apply to all buildings above 30m rather than having this as a default where there is no local definition of tall buildings. Given prevailing heights within the City, this approach would not be appropriate, and the policy should be amended to apply to locally-set thresholds. The comments as below will also highlight the City Corporation’s work on suicide prevention and whether this should also be considered at a strategic level.

Key GLA evidence base:

[Metropolitan Scale Tall Buildings Study](#)- Identifies the locations for metropolitan scale tall buildings across London. Thirty locations for buildings >100m are identified and assessed against seven criteria: Alignment with Local Policy; in accessible locations; scale/size; development potential; sensitivity to Strategic Views; contribution to identity of London’s skyline; viability supports >100m scale. 17 locations are taken forward as Metropolitan Tall Building Locations in Table 2.2 the draft plan.

The City Cluster is identified as one such location however on review of the evidence document the response will suggest that this has made incorrect or out-of-date assumptions for parts of the City. For example, the Broadgate tall building area in the draft City Plan 2040 was assessed but discounted despite its identification as a tall building area in an emerging plan. The Fleet Valley location in the draft City Plan is also not assessed, though the City Plan designates a cluster here and the draft policy supports buildings up to 90 metres in this location. Further assessment and analysis of the LVMF has demonstrated that greater heights could potentially be possible here with limited impact, supporting the longer-term growth of the City (especially in light of the latest GLA employment projections) and therefore City officers would propose that this area be scoped

in as being suitable for 'Metropolitan' tall buildings. Further detail is provided of this assessment under Appendix 2.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment proposed.

Sound? N

Commentary:

The City Corporation supports the introduction of 'metropolitan scale tall buildings' category and the consolidation of the design criteria at part 4. The Corporation has some comments and seeks clarification on matters that would aid the effectiveness of the policy.

Part 4 of the policy applies the design criteria to all development proposals of 30m and above, however this should also refer to a locally-set criteria. In the absence of this inclusion proposals may be required to be assessed against part (4) criteria, despite not being identified as a tall building in the City context. A simple modification to the policy to include a reference to the LPA's locally set threshold would solve this issue. This change would also clarify the interaction between MBUL2 and MBUL3 (as discussed in previous response), as it would be clear that the contextual height for a tall building in the City is 75 m, and therefore a proposal could exceed the height range in the Optimisation Framework, without engaging MBUL3.

The City Corporation understands from part DM A (3) that metropolitan scale tall buildings can be supported outside the areas identified in table 2.2, including if there is an existing or planned cluster of tall buildings. However, to support a more plan-led approach, the City Corporation would seek the potential for local plans to identify further Metropolitan tall building locations and refine the extent of those identified in the London Plan, subject to local evidence and assessment.

The Metropolitan Tall Building Study has made a series of judgements to determine which areas across London could potentially be suitable for designation as a metropolitan tall building location. The City Corporation has looked into this evidence in detail and has concluded that the evidence has erred in its assessment of the Broadgate area and should also have looked at the potential of the City Plan 2040's Fleet Valley Cluster. This detailed analysis has been appended to this consultation response titled "Growth and Capacity in the Square Mile". Officers would be happy to discuss the outputs of this. Due to these errors, the London Plan has failed to fully assess the potential for the City to accommodate tall buildings of Metropolitan scale, diminishing the potential for central London to meet the challenging job projection figures produced by the GLA. While the City Corporation recognises that the specific approach to future tall building locations in the Square Mile will need to be subject to a more detailed local plan production process, we believe that the London Plan should include these as potential Metropolitan tall building locations.

Although it is appropriate to use the study to create the initial list in table 2.2, this should not be construed as the final and binding decree on the locations of 100m+ buildings for the entirety of the plan period; therefore the a further modification proposed as below suggests that the plan

should include added flexibility to allow for the identification of further metropolitan tall building areas at a local level.

The City Corporation would also like to draw attention to its work on suicide prevention and whether this should also be considered at a strategic level (see also MBUL10).

Modification sought? Y

Commentary:

PM A part 3: incorporate and refine the boundaries and appropriate heights of the locations (within their areas) for metropolitan tall buildings identified in Table 2.2 and Figure 2.8 for buildings of 100m and above, and use local evidence and assessment to identify any further opportunities for buildings of 100m and above, designating suitable areas as Metropolitan tall building areas

DM A part 2: Development of 100m and above in height should be limited to the locations identified in Table 2.2, as defined by the plan-making authority in their local plan, or other Metropolitan tall building areas identified in a local plan

DM A Part 4: Development proposals for tall buildings of (30m and above in height, or a higher threshold set by the LPA) (approximately 10 storeys and above), should meet the following criteria:

Table 2.2 Locations where metropolitan tall buildings may be appropriate

Metropolitan cluster tier	Location	Cluster specific guidance
<u>Potential metropolitan cluster</u>	<u>Fleet Valley</u>	<u>This location refers to the area to the north of Fleet Street broadly between New Fetter Lane to the west and Farringdon Street to the east</u>
<u>Potential metropolitan cluster</u>	<u>Broadgate/Liverpool Street</u>	<u>This location broadly refers to the area to the west of Appold Street and south of Worship Street</u>

MBUL4 - Utilities – capacity, connectivity, and resilience

INTERNAL COMMENTARY

Brief policy summary:

Policy MBUL4 seeks to ensure that utility infrastructure within London has sufficient capacity, connectivity and resilience to support planned growth. It promotes a ‘whole-systems approach’ to planning for energy, heat, gas, water, wastewater and digital connectivity, and is based on the principle of strategic sufficiency (planning for long-term utility needs, rather than immediate needs of individual developments). It encourages utility infrastructure requirements to be identified at an early stage. It highlights the importance of adopting a systems-based approach to digital connectivity, including how mobile and full-fibre connectivity deficiencies can be addressed through masts and signal-boosting infrastructure particularly on taller buildings and within the

public realm; and how fibre optic routing could enable connections through and beyond development sites.

Local Plans are expected to proactively identify utility infrastructure needs, deficiencies, constraints and opportunities, and to reflect these in site allocations and planning policies. This should include setting where utility infrastructure and future capacity upgrades will be accommodated and provide adequate space and access for required infrastructure. Plan-makers should identify and address barriers to utility infrastructure delivery, including constraints associated with heritage assets, conservation areas and other site-specific sensitivities, particularly where these affect digital connectivity. Box MBUL4 identifies a range of evidence, information and strategies for each utility type which would provide the basis for understanding infrastructure requirements and inform plan-making.

Development proposals are expected to demonstrate how utility infrastructure considerations have informed site design and how they meet the requirements of relevant utility policies and guidance and contribute proportionately to the strategic sufficiency of utilities through appropriate demand management, supply and distribution infrastructure, timely provision of information, and engagement with relevant utility providers.

The policy is particularly important given the scale of planned commercial growth within the Square Mile and the increasing demands this will place on electricity, heat, water, wastewater and digital infrastructure networks, and the need to support net zero objectives. The response as below will therefore support the principle that utility infrastructure should be planned strategically and integrated into plan-making. The Infrastructure Delivery Plan currently under preparation identifies the infrastructure required to accommodate future growth in the Square Mile over the plan period of the City Plan.

Key GLA evidence base:

[Utilities Impact Assessment](#) considers the implications of the Draft London Plan growth scenarios for electricity, water and wastewater infrastructure and concludes that the level of growth proposed can be accommodated by utility providers. However, this is dependent on continued infrastructure investment, early engagement between planning authorities, developers and utility providers, and stronger alignment between spatial planning and utility investment programmes.

It highlights the importance of safeguarding land for utility infrastructure, aligning growth with infrastructure delivery, and allowing sufficient lead-in times for network upgrades. It recognises the growing pressures on utility networks arising from housing and economic growth, decarbonisation, electrification and climate adaptation, as well as increasing demand from major energy users such as data centres. In particular, it identifies the need for significant investment in the electricity network to support planned growth and enable the transition to a low-carbon economy.

[Local Area Energy Plans \(LAEPs\)](#) and *Integrated Water Management Strategies (IWMSs)* are identified as important tools for understanding future infrastructure requirements, identifying capacity constraints, and planning future investment. The assessment specifically identifies the City of London as one of the areas where Local Area Energy Planning has been undertaken to understand future energy needs and support long-term infrastructure planning.

London Infrastructure Framework- identifies the strategic infrastructure required to support London's long-term growth, housing delivery and resilience. The Framework highlights the need for reliable energy, water, wastewater, digital connectivity and flood resilience infrastructure, and promotes an integrated approach to infrastructure planning across sectors rather than considering infrastructure in isolation.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Don't know

Commentary:

The City Corporation supports the overall direction of Policy MBUL4 including the principle of self-sufficiency. It also supports the principle that utility infrastructure should be planned strategically and integrated into plan-making. However it feels that this policy could be strengthened by making additional reference to the strategic, cross borough energy infrastructure identified in the London Infrastructure Framework and the Waste Heat Study. This approach will be essential to the development of local heat network infrastructure. Additional reference to working with the GLA and relevant LPAs for waste heat utilisation plans for large scale waste heat sources would be helpful.

The policy should therefore support the identification, safeguarding and delivery of strategic energy infrastructure required to connect heat sources with areas of demand, including infrastructure that extends across borough boundaries. Consideration should also be given to requiring major waste heat producers to work with the GLA, relevant local authorities and infrastructure providers to develop waste heat utilisation plans and identify opportunities to connect into existing and planned heat networks.

It should recognise the role of Infrastructure Delivery Plans (IDPs) in identifying infrastructure requirements and investment priorities. IDPs form a key evidence base for Local Plans, helping to identify infrastructure requirements and support the coordination of infrastructure provision over the plan period.

While MBUL4 refers to contributing positively to the strategic sufficiency of utilities infrastructure, it does not provide a clear requirement for applicants to demonstrate that sufficient capacity exists, or that the infrastructure required to support the development can be delivered alongside its implementation.

Modification sought? Y

Commentary: No comment

A. Local Plans should:

(1) use the latest information on infrastructure deficiencies and requirements (as set out in MBUL1 Spatial Strategy plus Box MBUL4), to inform Infrastructure Delivery Plans, and to proactively identify the relevant opportunities and acceptable design solutions that can address these and ensure the strategic sufficiency of utilities infrastructure.

(2) reflect these needs and opportunities and remaining constraints in site allocation requirements and other spatial and design policies, including identifying and safeguarding land for future utility infrastructure where necessary.

B. Development proposals ~~as specified in Box MBUL4~~ should contribute positively to the strategic sufficiency of utilities infrastructure in a manner proportionate to the scale and type of development, as specified in Box MBUL4. This means they should:

2.65A Strategic energy infrastructure required to support heat network expansion and waste heat utilisation across borough boundaries should be identified through the utility strategies. Large-scale waste heat producers should work with the GLA and relevant local authorities to develop opportunities for connecting waste heat sources to existing and future heat networks.

MBUL5 - Sustainable transport to enable London's growth

INTERNAL COMMENTARY

Brief policy summary:

The policy requires the identification of transport interventions that improve public transit, walking and cycling, reduce road traffic and enable growth ambitions and complement strategic transport infrastructure requirements. It also sets out a series of requirements for local plans including to include necessary developer contributions in site allocations to enable transport interventions, to be informed by evidence, maintain standards for cycle and car parking, provide transport options for the greatest range of people and safeguard land for required transport infrastructure. It also allows the identification of locations/circumstances in which contribution in-lieu of on-site short stay cycle parking will be sought. This is more flexible than the existing London Plan and aligns with our approach in the emerging City Plan, so will be supported in the response below.

Local plans should protect the operation, functionality and quality of existing and new rail and water freight facilities by including site allocations which identify both financial and physical developer contributions. There are already protections for Walbrook Wharf as it is a Safeguarded Wharf which are designated and protected through Safeguarding Directions issue by the Secretary of State.

The plan also sets out a series of requirements for development proposals including a need to mitigate against impacts on the transport network, design freight to be suitable for the scale and type of development, and be safe and complementary to the public realm.

Box MBUL5 lists out the forms of interventions sought, including public transport, walking and cycling and how they should be planned and mapped. This is in alignment with the City Corporation's Transport Strategy. The Transport Strategy includes maps of locations for pedestrian priority, walking improvements, and proposed cycling improvements.

The response as below will highlight some areas where the policy could be strengthened in relation to reducing transport barriers, specific recommendations on appropriate levels of EV charging infrastructure and how the accessibility of the language could be improved.

Key GLA evidence base:

[Strategic Transport Modelling Supporting Evidence Interim July 2026-](#) To understand future demands on the transport network out to 2036, TfL undertook strategic modelling of three scenarios. The reference case scenario includes housing and employment that are currently committed. The central case includes new sources of housing supply from the draft London Plan and is the most likely view of resulting transport impacts. Finally, the high case scenario includes the same housing supply growth as the central case but assumes a larger population increase.

The model sees high demand from public transport demand with increased congestion pressure at stations particularly in the AM peak with 7 of these 20 stations being located within the City.

It is notable that the central and higher scenarios plan for 6.2 million jobs in 2036 which is a different figure to that used within the GLA employment projections which show 6.8 million jobs in 2036. The jobs growth within the City of London is the highest at 87K from 2023 to 2026, however the source of this figure is not immediately clear as the increase from 2023-2026 in the GLA employment projections is only 20K jobs. Therefore, the response as below will highlight these concerns that the transport model does not accurately reflect the increase in employment growth.

However, this work is interim and further work will hopefully refine the conclusions and incorporate the accurate jobs growth. Next steps include updating the modelling inputs to further test impacts on the transport network. Including to test the potential to mitigate those impacts through packages of policies and interventions. This will happen ahead of the Examination.

Sustainable Access Measure (SAM)- (see Policy MBUL2 above).

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment.

Sound? Don't know

Commentary:

The City Corporation supports the direction of this policy, however there are concerns that the jobs figures in the Transport Modelling report are not aligned with the GLA's employment projections from March 2026- while the central and higher scenarios plan for 6.2 million jobs in 2036, the GLA employment projections show 6.8 million. The City of London jobs growth is also shown at 87K from 2023 to 2026, but the source of this figure is not clear. The City Corporation also has concerns that the Strategic Transport Modelling suggests increased congestion pressure at 20 stations in the AM peak (including 7 within the City of London) even with the lower jobs growth modelled, yet the Plan does not identify at Annex D any planned interventions to address this at a strategic level. While the Corporation understands that this modelling is interim, it expects that the next reiteration will remodel in alignment with the GLA's employment projections.

The City Corporation also considers that greater clarity would assist on what is meant by consolidation of freight. This should include requirement for consolidation of deliveries to developments as well as within.

There should also be some more specific recommendations on appropriate levels of EV charging infrastructure to support commercial vehicles, including cargo bikes (L1 category vehicles).

Currently there is a concern around safety standards in buildings this is effecting provision of safe charging for legitimate vehicles including cycles, due to lack of confidence and guidance. Also provision for mobility scooter charging within places of employment, should there be some standards/guidance. We support the position that we should be seeking traffic reduction rather than replacement with electric vehicles overall, but for those remaining vehicles, deliveries and cargo bikes included, they should be electric. It is also noted that the policy does not mention accessibility, and the language is not always as inclusive as it could be, for example could be improved through referencing wheeling in addition to walking and cycling. A more defined section on inclusive transport including data collection, expectation of the provision of disabled persons' parking, resting points, wayfinding in multiple formats and cycle and mobility scooter storage and charging could give this greater clarity. Part C (i), the policy could also make reference to reducing transport barriers experienced by disadvantaged and marginalised groups, and include consideration of heat resilience of transport and supporting infrastructure.

Modification sought? N

Commentary: No comment

MBUL6 - High quality design for a growing, changing city

INTERNAL COMMENTARY

Brief policy summary:

This policy aims to ensure that buildings and places maintain quality of life and place into the future and navigate the complexities of a dense urban context through good design. The draft policy is broadly aligned to existing design policies in London Plan 2021, but consolidates and refines existing policies, and introduces a greater emphasis on climate adaptation, neighbourhood amenity, mixed-uses, and long-term resilience, and specifies technical requirements to demonstrate good design in a changing climate and growing City.

The policy encourages design codes and guidance to promote good design (see policy MBUL2), use climate change risk modelling to inform spatial policies and design specifications, and plan positively for contrasting uses to co-exist and create mixed-use liveable neighbourhoods. This is broadly in line with emerging City Plan Policy S8 which supports an appropriate mix of uses that contribute to the creation of vibrant City, but recognises the complexity of contrasting uses in the Square Mile.

The policy sets out various design criteria a development should achieve, including but not limited to, delivering buildings that positively respond to local distinctiveness, are of high-quality architectural design, use high-quality robust materials, maximise active frontages, reduce negative impacts on neighbourhood amenity (wind, daylight, sun penetration, temperature conditions), reduce exposure to the impacts of wider neighbourhood activity (wind, air pollution), and incorporate external shading to prevent solar gains.

Key GLA evidence base:

The [London Context Map \(June 2026\)](#) positions the Square Mile in 'Setting E – Large town centres and Central Core' and recognises office development as one of the prevalent types within this area (see above)

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Y

Commentary: No comment

Modification sought? N

Commentary: No comment

MBUL7 - London's heritage INTERNAL COMMENTARY

Brief policy summary:

This policy consolidates the two heritage policies in the 2021 London Plan (HC1 and HC2). It is concise and does not duplicate any legislative or NPPF requirements. The policy is focused on London-specific heritage at a strategic scale.

It expects LPAs to use the Greater London Historic Environment Records (GLHER) and maintain up to date Archaeological Priority Areas for both plan making and decision taking. Part B encourages LPAs to develop their own heritage strategies and use design codes and Local Development Orders to streamline the process for alterations to historic buildings. The adoption of the Celebrating Heritage SPD is an example of a local 'heritage strategy' and the policy support for this in the draft plan is encouraging.

The new NPPF puts in place nuanced and directly applicable heritage policies, which build on the long-standing and well-established approach under previous NPPFs. Therefore the concise and non-duplicative approach in the new London Plan is welcomed. It is considered that this provides a similar and appropriate level of heritage protection.. The City Plan 2040 and the Celebrating Heritage SPD provide guidance and policy that is tailored to City's unique historic environment. This level of detail cannot be done at the London Plan's strategic scale, so it is correct that the draft London Plan delegates this to the boroughs in part B.

The new NPPF (August 2026) requires plans to include 'locally-specific policies needed to conserve the significance and Outstanding Universal Value of World Heritage Sites' and to identify opportunities for new development to enhance or better reveal the significance of WHS. However, the new London Plan uses slightly different terminology, requiring local plans to conserve, promote and actively protect World Heritage Site Outstanding Universal Value.

The inclusion of 'promote' in the draft London Plan seems to go beyond the NPPF requirement to 'conserve the significance'. It is not clear how a local plan can 'promote' the WHS OUV - and the shift in terminology could cause unnecessary confusion. The City Corporation therefore considers that (as with other parts of this policy) the London Plan should simply refer to national policy here, which is more than adequate in its approach to the protection of London's WHS.

It is notable that the word 'interpret' has been removed from the policy (compared with the 2021 Plan) and, at the GLA's the City Plan 2040 incorporates a Main Modification to introduce this into our World Heritage Site policy HE3.

The response as below also highlights a missed opportunity to encourage improvements to accessibility and therefore proposes some minor amendments.

Key GLA evidence base:

N/A

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary:

No comment proposed

Sound? No

Commentary:

The City Corporation supports the pared back approach to heritage as the legislative and NPPF context makes an additional layer of policy redundant. It supports the delegation of any further work to boroughs themselves, as they are best placed to introduce policy and guidance that responds to their specific circumstances.

The City Corporation is not convinced that the requirement in part C for LPAs with a WHS to have policies that 'conserve, promote and actively protect' OUV is effective or consistent with national policy. Para G –Whilst the focus on sustainability measures is welcomed, the City Corporation considers there is a missed opportunity here to encourage improvements to accessibility. We suggest rewording in the manner suggested below – incorporating these items as headlines rather than a list to allow for a broader scope of measures; examples of the measures could be given in the explanatory text. Rewording to focus on accessibility and sustainability would, in our minds, help to support the ongoing relevance of heritage assets to their communities and recognise that the built and landscape heritage of the city presents disproportionately significant barriers to a range of people. There are huge opportunities for change.

Modification sought? Y

Commentary:

Delete part C entirely (relying instead on NPPF policy HE2)

G. Where the following measures are proposed on heritage assets, they should be supported where such measures achieve an appropriate balance with conserving the significance of the heritage asset:

- (1) improvements to the energy-efficiency of a building
- (2) decarbonisation of energy sources
- (3) installation of renewable microgeneration
- (4) measures to minimise overheating
- (5) measures to improve accessibility and inclusive design.

MBUL8 - Inclusive design
INTERNAL COMMENTARY

Brief policy summary:

This policy seeks to ensure local plan and other strategies contribute to creating an inclusive environment, and that development proposals contribute to an inclusive built environment by accommodating the requirements of London's diverse population, have no disabling barriers and specific requirements for lifts and evacuation.

However, it reflects a weakened position from that of Policy D5 of the 2021 Plan, stating that proposals "should contribute to" inclusive design and be "designed to respond to and accommodate" rather than requiring the highest standards as previously. The language relating to inclusive design is also considered to be passive and responsive, rather than active and ambitious. Both these matters will be drawn out in response as below.

Design and Access Statements are required to include concept design, standards, engagement and evacuation. Although this is a positive move, the response as below will highlight that there is a lack of detail on what this policy expects for compliance, in particular in relation to creating an inclusive and equitable city accommodating the needs of the diverse population of London.

The response as below will support the greater clarity on emergency evacuation but suggests this should also reference a need to accommodate a range of people. It also highlights some concern that the emphasis on lifts and evacuation is somewhat at the expense of a focus on interventions that could have a positive effect on the experience of all building users.

Key GLA evidence base:

N/A

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary:

Sound? / Don't know

Commentary:

The City Corporation supports the emphasis on inclusive design and accessible environments, however considers this the approach of this policy to be a considerable weakening of the approach within Policy D5 of the 2021 London Plan which required the "highest standards of inclusive design". The City Corporation also considers that the language of inclusive design is passive and responsive, rather than active and ambitious.

Further consideration should also be given to a broader range of users across the protected characteristics, including neurodivergent people, older people, and people with temporary or fluctuating conditions or impairments. An intersectional lens would be more usefully applied. Further supporting guidance on how inclusive design principles should be applied in dense urban environments and major transport interchanges would strengthen the effectiveness of the policy.

Additionally, the inclusion of greater clarity on emergency evacuation is welcomed but greater guidance on the need to accommodate a range of people who may not safely evacuate. The policy appears to focus on wheelchair users, so could be widened to include people with a range of conditions or where disabled people may be present in greater numbers.

The City Corporation notes that there is emphasis in the policy on lifts and evacuation but this is somewhat at the expense of a focus on interventions that could have a positive effect on the experience of all building users. A statement on achieving more equitable experiences of development for the greatest range of people would provide a useful counter to the loss of much of the detail of the 2021 Plan. Greater clarity on how this policy interacts with the NPPF and the Public Sector Equality Duty would also make this more usable.

In the context of the new NPPF the City Corporation also recommends that reference is also made to an inclusive arrival experience, entrances and uses within the building. It also notes that part C (1) refers to 'different end users' however it is not clear whether this is intended to mean a range including those with protected characteristics.

Modification sought? Y

Commentary:

A. Plan-making authorities should ensure their local plans, area strategies, masterplans and design codes contribute to creating an inclusive built environment, developing policies informed by evidence of the diverse needs of their resident, visitor and worker populations to meet the highest standards of inclusive design.

B. Development proposals should contribute to an inclusive built environment and meet the highest standards of inclusive design, achieving the following criteria: ...

MBUL9 - Healthy streets and public realm

INTERNAL COMMENTARY

Brief policy summary:

The policy sets out that development management proposals and the public realm should be designed with the Healthy Streets approach in mind. This is a change to the 2021 Plan which placed an obligation for doing so. Instead, the policy outlines a number of considerations for how new, improved and redeveloped public realm should be designed. It also now makes explicit mention of the Mayor's ending Violence Against Women Strategy (VAWG), however it is notable that other groups with protected characteristics are not included here.

A change from the approach of the 2021 London Plan is that the 10 Healthy Streets Indicators are identified within the Glossary rather than specifically referenced within the policy itself. (The Healthy Streets approach is reflected within the City Corporation's Transport Strategy.)

The implementation section references TfL guidance and toolkits for Healthy Streets including DfT guidance on Inclusive Mobility and pedestrian comfort guidance, citing research that should be taken into account by applicants, plan-makers, decision-makers and others including Making London Child-Friendly, Expanding London's Public Realm, Safety in Public Space, and Designing with Disabled Experience, GLA Public Art Commissioning guidance, and Safety in Public Space:

Women, Girls and Gender Diverse People. This is guidance that is currently used in the City uses in public realm design, research and policy making.

The response as below will highlight that the policy should consider referring to micromobility instead of / as well as dockless cycles and scooters. This will futureproof if new forms of micromobility emerge during the plan period.

Key GLA evidence base:

No new evidence was produced relating to this topic

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment.

Sound? Y

Commentary:

The City Corporation broadly supports this policy.

To future-proof the policy it may be beneficial to refer to micromobility instead of / as well as dockless cycles and scooter.

Modification sought? N

Commentary:

MBUL10 - Security and safety

INTERNAL COMMENTARY

Brief policy summary:

This policy seeks to ensure that buildings and places are designed to be safe, secure and resilient. It requires plan-making authorities to work with key stakeholders including the Metropolitan Police Service, Counter Terrorism Security Advisors and relevant agencies, including the London Fire Commissioner, the City of London Police, the British Transport Police, and the Ministry of Justice, to identify community safety needs and infrastructure requirements, and make reference to hazard mapping.

For development proposals the policy now makes explicit mention of the need to address the safety of women, girls and other vulnerable groups, as well as counter-terrorism measures as and fire safety requirements for major developments. The policy also recognises the importance of considering safety and security at the outset of the design process. Measures should be inclusive, well integrated with buildings and the public realm, and should not shift vulnerabilities elsewhere. The response as below will support this approach but set out that 'vulnerable groups' may need review and assessment at a local level.

The policy is of particular importance to the City Corporation, given the City's concentration of tall and commercial buildings, major transport hubs, high pedestrian footfall and heavily used public spaces. However, the response as below will highlight that the safety elements of the policy are

narrow in scope, and there is potential to embed approaches such as suicide prevention in the approach to tall buildings and the built environment.

The response will also highlight that safety is experienced differently by different groups and provide support for the Mayor's work on women, girls and gender-diverse people. This policy is aligned with the City's wider inclusion objectives so will be supported.

Key GLA evidence base:

Safety in Public Space: Women, Girls and Gender Diverse People - promotes a gender-inclusive approach to planning, design and public realm management, recognising that safety is influenced not only by crime and security, but also by usability, accessibility and a sense of belonging. It encourages safety considerations to be embedded from the earliest stages of project development and emphasises the importance of understanding the lived experiences of women, girls and gender-diverse people.

MBUL10 specifically requires plan-makers to refer to *Health and Safety Executive mapping of hazard zones* when considering the nature and design of development. This is therefore an important technical evidence source for the policy.

The fire safety requirements are informed by *Approved Document B and the Building Regulations*, which provide statutory guidance on fire safety in and around buildings, including means of escape, internal and external fire spread, and access for fire services. This guidance is particularly important in addressing fire safety risks associated with London's dense built environment and concentration of tall buildings, while also taking into account the lessons from the Grenfell Tower fire.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Don't know

Commentary:

The City Corporation welcomes the recognition of the Mayor's work relating to the safety of women, girls and gender-diverse people. Given the strategic nature of these issues, it considers that Local Plans should be expected to consider safety, inclusion and perceptions of belonging as part of place-making and public realm planning, rather than addressing these solely through individual development proposals.

The City Corporation supports the policy's focus on safety, inclusion and accessibility at night. However, it should more clearly reflect the evidence on the importance of night-time workers, particularly given the City's substantial night-time workforce (see response to GLE4). Greater emphasis should be placed on safe and adequate public transport and the infrastructure, servicing, facilities and services needed to support night-time activity. The policy should also recognise the role of this provision in sustaining the night-time economy and London's appeal as a visitor destination.

Modification sought? Y**Commentary:**

Plan-making authorities should:

- (1) Work with Metropolitan Police Service, Counter Terrorism Security Advisors, and with agencies including the London Fire Commissioner, the City of London Police, the British Transport Police, and the Ministry of Justice, to identify community safety needs ~~and the sites and policies required for their area and~~ to support provision of necessary infrastructure to maintain a safe and secure environment
- (2) Utilise this local evidence and perceptions of belonging, including those of women, girls and other vulnerable groups, to identify the policies and sites required for their area

FOR FORMAL CONSULTATION RESPONSE**Overall chapter comment:**

To be deleted: Anyone contributing to this chapter may also add comments here. Use this box for overarching chapter-level issues, cross-cutting comments, cumulative impacts, key City Corporation concerns, or points that do not sit neatly under a single policy.

The Strategic Transport Modelling Supporting Evidence (July 2026) models growth scenarios to test the transport network. The central and higher scenarios only plan for 6.2 million jobs in 2036, however, the GLA employment projections show 6.8 million jobs in 2036. This is a cause for concern whether the transport network has been tested against the actual planned growth. The report forecasts public transport demand to be the strongest with increased congestion pressure at stations in the AM peak experiencing severe congestion indicating discomfort and operational concerns. 7 of these 20 stations are located within the City. As the City will be growing by the most amount jobs in London, the increased congestion will be the worst in the Square Mile. We are concerned that without TfL and the GLA improving the existing stations that comfort on transit for the GLA's projected 780,500 workers in the City will be compromised.

We would be very interested to see how accessibility and cycling is incorporated into the SAM methodology.

Chapter 3 - Delivering the homes and neighbourhoods Londoners need

Housing is a key focus of the London Plan and the introduction to this chapter specifically identifies the issues and the challenge. It identifies the extent of the housing challenge and that affordable housing need is very high, potentially up to 60% of total need in some scenarios (which vary due to different levels of household formation). It sets out how the inclusion of specific policies relating to alternative housing, products such as Built to Rent, Shared Ownership and Co-living ensure delivery is more resilient in a context where market (for sale) homes are exposed to market absorption delays.

HN1 - Increasing London's housing stock**INTERNAL COMMENTARY**

Brief policy summary:

This policy sets the housing target that each LPA must plan for over a ten year period (2027/8 to 2036/7). The City Corporation's target is 1,716 which incorporates expected delivery from extant permissions and assumptions around small sites capacity. The components of the City's target are shown below:

Site type	Target	
Land4LDN (SHLAA) sites	1,033	
Small Sites	601	
	Multi-unit Infill	544
	Single Unit Infill	0
	Intensification Units	4
	Industrial	18
	Change of Use	22
	Discounted Conversions	14
Additional industrial release	0	
Green Belt	0	
Missing large site permissions	0	
Additional permissions (delayed completions)	82	

Officers have identified two significant errors in the composition of the City's housing target. Firstly, the SHLAA component is made up of a single permission at 65 Fleet Street, which includes 856 student bedspaces. However this is incorrectly included within the SHLAA as having capacity for 1,036 homes, but when the student ratio is applied this should translate to 342 homes.

Secondly, as set out in the table above the target is composed of 544 homes capacity from 'multi-unit' infill yet this has not been defined, and it is not clear what sort of sites this capacity could be delivered from within the City as there is a separate category for conversion and changes of use. This is reflected in the response as set out below, however once the permission error has been

accounted for the 10-year target would fall to 1,025. If the multi-unit infill was removed this would be 481.

Key GLA evidence base:

[Strategic Housing Land Availability Assessment \(SHLAA\)](#)-This calculates the available capacity for housing in London. It takes into account existing permissions, applications, site allocations, emerging site allocations, and small sites (<0.25ha). Other sources of supply are estimated either via a model that uses the optimisation framework and a set of constraints or figures provided by the LPA.

Small site capacity is estimated based on the typologies used for the forthcoming small sites design code. Capacity assumptions are inherent in the typology classification, and these are brought into the SHLAA with a delivery rate modifier for each typology based on the SAM bands. Unviable locations were discounted and delivery rates adjusted to take into sites with marginal viability.

It concludes that the total capacity for London over the ten-year period from 2027/8 to 2036/7 is 558,451 (55.8k annually).

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment.

Sound? N

Commentary:

The City Corporation recognises that a balance must be struck between meeting objectively assessed needs and deliverability. Broadly, the City Corporation accepts that it should contribute appropriately to housing delivery across London, however this needs to be proportional to its location entirely within the Core CAZ and the critical function the City plays in supporting the economic growth of the capital within a very small and highly constrained area.

However, there are errors within the SHLAA evidence which over-estimate housing capacity in the City over the ten-year period from 2027/8 to 2036/7 and the City Corporation disputes the findings of the small sites capacity work.

Firstly, the extant permission at 65 Fleet Street (24/00648/FULMAJ) has not been documented correctly. This planning permission is under construction for 856 student bedspaces, and when the student ratio of 2.5:1 is applied this makes a capacity of 342, not 1,033 as is currently included.

Secondly a large proportion of the capacity identified in the SHLAA (544 homes) comes from multi-unit infill, which is defined in the SHLAA as “empty or vacant sites with identified capacity for multiple dwellings”. The City Corporation are unaware of any empty or vacant sites in the Square Mile that have capacity (identified or otherwise) for multiple dwellings. While there are a (relatively small proportion of) vacant offices in the City, the strong expectation is that these would be redeveloped as offices, given the market dynamics in the City – let alone the policy position in the Development Plan that (broadly speaking) supports the commercial function of the Square Mile above housing delivery. This is therefore unjustified.

Further, the SHLAA only superficially explains how the densities for this category have been estimated beyond the statement at paragraph 8.23 that it utilised a 'predefined lookup table' based on a proprietary model, with paragraph 8.8 of the SHLAA states that capacity assumptions are embedded within type definitions and paragraph 8.9 explains that these notional capacities are modified by SAM band to account for delivery rates. But this does not seem to account for character setting E being 'large town centres and central core' type areas that are (particularly in the case of the City) inherently more constrained with competition for land uses that does not exist in residential and more mixed character settings.

The City Corporation therefore considers that a correction should be made to the SHLAA identifying capacity from SHLAA sites of 342 and removing the multi-unit infill contribution, unless this can be adequately justified. This would make the City's ten year target **481** homes.

Modification sought? Y

Commentary:

Table 3.1 (and any subsequent London wide cumulative targets)

Local Planning Authority	Brownfield housing target	Greenfield housing target	Total housing target
City of London	1,716 <u>481</u>	0	1,716 <u>481</u>

HN2 - Protecting and reshaping housing

INTERNAL COMMENTARY

Lead: Alex

Supported by / additional input: Sophie Courtright, Peta Caine

Brief policy summary:

This policy protects against the loss of housing and the loss of affordable housing. Loss of social rent homes requires at least the same floorspace of social rent tenure to be re-provided and loss of other low-cost and intermediate homes requires at least the same amount of floorspace to be re-provided, or floorspace of a more affordable tenure.

This policy will apply to any development site that has existing housing on it, including any City owned housing estates. In practice, it is very similar to the equivalent policy in the current London Plan (policy H8). Both require the replacement of floorspace of the same tenure, except the current policy (H8) only requires social rent to be re-provided where this facilitates a right of return for existing tenants (otherwise it could be as London Affordable Rent instead). The new policy requires re-provision of social rent in all circumstances.

Proposals for the demolition and replacement of affordable homes weigh the benefits of demolition and replacement against the wider social and environmental impacts of this style of development, and can follow the fast track route only when 50% of the *additional* homes are affordable as per the requirements as HN3. This is a slight relaxation of the current policy position

which requires demolition of affordable housing to follow the viability tested route in all circumstances.

Key GLA evidence base:

SHMA (see response to HN7) and SHLAA (see response to HN1)

[London Housing Strategy](#) and [Implementation Plan](#), a strategy from 2018 that has five priorities:

- building homes for Londoners;
- delivering genuinely affordable homes
- high-quality homes and inclusive neighbourhoods;
- a fairer deal for private renters and leaseholders;
- tackling homelessness and helping rough sleepers.

[Housing in London Annual Report](#)-Summarises patterns and trends relevant to housing. It also include monitoring indicators for the London Housing Strategy

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment.

Sound? Y

Commentary: The City Corporation notes the similarities between this policy and the existing London Plan policy H8. The protection of the existing housing stock is supported and so are the safeguards for affordable housing.

Modification sought? N

Commentary: No comment

HN3 - Delivering affordable housing

INTERNAL COMMENTARY

Brief policy summary:

The approach of this policy continues that of the existing London Plan meaning that the fast track (FTR) and viability tested routes remain. However, this policy is now considerably more complex with three location bands (35%, 25%, or 20%) which set the FTR thresholds, separate thresholds for Green Belt land (50%), public sector land (40%) and industrial land (35%), and another separate fast track threshold for small schemes of 10-35 homes. This also involves lowering of the thresholds in line with the emergency package of support for housebuilding in London announced by the GLA and the Government in March 2026. This provided a new 'time-limited planning route' that allows applications to proceed without viability testing at reduced affordable housing percentages: on private land the 35% threshold is reduced to 20%. These are available up to 31 March 2028, by which time the new London Plan is expected to be adopted.

A large proportion of the housing delivery within the City relates to specialist housing products, such as purpose-built student accommodation (PBSA) and large-scale Purpose-built Shared Living

(LSPBSL). This policy also sets out specific requirements for each of these. It assumes that PBSA will provide affordable accommodation on site so can follow the FTR when the threshold is met, whereas

LSPBSL must follow the viability tested route and provide a payment in lieu.

For the first time the policy sets a quantitative target for the number of low-cost rent and intermediate homes rather than a general tenure split. It expects to deliver 238,430 low-cost rent and 129,020 intermediate homes by 2037. The City Corporation response below seeks clarity on what is expected within local plans to reflect this mix, whether it should be reflected as a quantifiable figure. There are now more incentives to deliver social rent homes as this can reduce the overall fast track requirement. Another new provision is that priority access to intermediate homes should be given to key workers. The policy wording in relation to off-site provision and payment-in-lieu is unclear. Part J (3) sets out that *“ensure off-site provision or payment-in-lieu contributions deliver affordable homes that are additional to those required under C and D [the threshold route] on any associated site”*. There is some concern that this could be interpreted to mean that sites have to deliver on site *as well* as through payment-in-lieu. It seems unlikely that this is the intention but the response will raise this matter, calling for further clarification in relation to the application of this policy. Paragraph 3.43 also sets out that LPAs may set a tariff approach to off-site payments, which will need to be investigated. .

Key GLA evidence base:

SHLAA (see response to HN1) and SHMA (see response to HN7).

[London Plan Viability Study – Phase 1](#) Shows how challenging viability is for housing developments across London and provides some of the evidence for the varied affordable housing thresholds. In central areas 35% affordable housing is potentially possible with grant and the emergency CIL relief announced by the government. The more peripheral a location, the more it struggles with viability, with most outer London locations unviable in all instances, including with 0% affordable housing.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment.

Sound? Don't know

Commentary:

The City Corporation supports the retention of the option for payment in lieu for PBSA and LSPBSL typologies.

The City Corporation is concerned about the wording of Part J in relation to off-site provision and payments in lieu of affordable housing, which appears to imply that off-site/PIL is *additional* to on-site affordable provision, ie that both must be provided. We assume this is not what is intended but the wording should be revised.

Modification sought? Y

Commentary:

J (3) Development should ... ensure off-site provision or payment-in-lieu contributions deliver an equivalent or greater number of affordable homes that are additional to those to that required under C and D on any associated site.

HN4 - Gypsy and Traveller accommodation

INTERNAL COMMENTARY

Brief policy summary:

The policy sets out that LPAs should adopt the targets for net additional pitches and plots for Gypsies, Travellers and Travelling Showpeople. The City of London's target is zero.

Part B says LPAs 'should allocate a Gypsy and Traveller transit site and/or make provision for negotiated stopping.' This is not appropriate and not possible in the City, so an exception for the City will be proposed in the consultation response.

Key GLA evidence base:

[Gypsy and Traveller Accommodation Needs Assessment](#)-The GTANA assesses accommodation needs at local planning authority, subregional and London-wide levels, for Gypsies and Travellers, Roma, and Travelling Showpeople, from 2022-23 to 2031-32. It presents findings from surveys of households and stakeholders; and outlines considerations for the GLA, boroughs and others who work with Gypsy, Roma, Traveller, and Travelling Showpeople (GRTTS) communities when planning to meet accommodation needs.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment.

Sound? Don't know

Commentary:

Part B of this policy states that 'should allocate a Gypsy and Traveller transit site and/or make provision for negotiated stopping'. Paragraph 3.61 notes that there is an estimated need for 87 transit pitches or negotiated stopping arrangements, but the type of provision is left to 'local circumstances'

The City Corporation is concerned that the policy as drafted is too loose as it applies to all LPAs. The City of London is not an appropriate place for a transit site or a negotiated stopping arrangement, and this should be recognised in the plan. More widely, the entire CAZ area is unlikely to be appropriate, so this should be recognised.

The City Corporation's preferred modification is to include an additional sentence at paragraph 3.61 that clarifies how central London is unlikely to be an appropriate location.

Modification sought? Y

Commentary:

Para 3.61 – '.... will depend on local circumstances. This need for this provision correlates with the

demand for pitches and therefore the Central Activities Zone is unlikely to be an appropriate location.

HN5 - Managing specialist accommodation

INTERNAL COMMENTARY

Brief policy summary:

This policy sets targets for the number of Purpose Built Student Accommodation (PBSA) bedspaces. These targets are included within the overall housing target set in HN1. The PBSA element for the City of London is zero as the Central Activities Zone has been exempted due to competition for land use. This does not mean that the City cannot deliver student housing to assist with meeting the overall housing target for the City. Officers anticipate that a portion of the overall target will be fulfilled via student housing, particularly since there are student bedspaces under construction at 65 Fleet Street and 60 Holborn Viaduct (as recognised in the SHLAA).

The policy also requires LPA's to plan for specialist, supported and older person's accommodation, providing some 'starting points' for delivery (Transitional supported housing = 5; Long-term supported housing = <5; Older person's housing = 55). Although these are not targets, they are a substantial increase from the ten-unit older persons housing benchmark of the 2021 London Plan. The City Corporation need to develop local evidence on the need for this type of housing to refine this figure, and it is likely this would draw on the Core CAZ location of the City alongside information on the level of need and demand. The Supported Housing (Regulatory Oversight) Act 2023 (SHROA) places a statutory duty on local authorities in England to develop and deliver Local Supported Housing Strategies by March 2027. This strategy will assess likely need for five years and is expected to be the basis for addressing housing need for supported/specialist/older person's housing.

Part B of the policy also sets out that Specialist, supported and older person's accommodation should be in areas that are well connected to local services, facilities and social infrastructure by public transport. It is noted that the whole of the City would be considered 'well connected', and while theoretically, any of the identified residential areas in the City could contain this housing type they have not been designed with this specific possibility in mind.

The policy sets out some locational and design criteria for PBSA and LSPBSL: connectivity to local service and higher education providers, impacts on local neighbourhood; make an affordable housing contribution in line with HN3. It provides further criteria for developments to qualify as LSPBSL (be under single management, minimum 3 month licences, management plans).

The response below therefore raises only minor comments against this policy. Including clarity on the definitions.

Key GLA evidence base:

[Student accommodation need: analysis and review of evidence](#)-Estimates the student bedspace need based on the growth in the student population and ratio of bedspaces that should be provided, given that not every student will live in PBSA (London based students who live at home,

2nd and 3rd year students in the PRS etc). The overall requirement is estimated at 31,500 bedspaces over the next 10 years (3,150 per annum) for London.

It then explains how this need has been apportioned based on the availability of town centres, opportunity areas, and green belt BLGs that could accommodate PBSA. The CAZ has been excluded so the City Corporation's target is 0.

[The Supply and Demand for Supported Housing in London](#)- This estimates the needs for transitional housing, long term supported housing, and supported older persons housing (not older persons housing for private rent/sale). This is a statistical model that uses the existing stock and population change to estimate the additional stock needed to accommodate growth and to meet the current unmet need across the three housing categories.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment.

Sound? Don't know

Commentary:

The City Corporation recognises the needs of older people. It owns and manages two sheltered housing schemes for people aged 60 and over outside of the Square Mile, providing 72 dwellings for older people, and given the demand for land in the Square Mile, these are the most efficient method for the City Corporation to deliver older person's housing.

The City Corporation notes that the City is a challenging location for older persons housing. The intense competition for land use means there is unlikely to be locations for low rise dwellings with significant outdoor space. High rise dwellings with lifts present more challenges for older person's accommodation, as would the lack of outdoor space. The policy should explicitly acknowledge the challenge of delivering older person's accommodation in a 'core CAZ' context. Further clarification on the definition of older persons accommodation is also sought, as the supporting text says that it is for ages 55+ with support needs but excludes any for sale or rent on the private market; however, the glossary defines 'older person's accommodation' as homes designed for people over 55 who may or may not include some element of care, and where care is provided the resident has a choice over the provider (hence excluding traditional care homes from this definition).

Modification sought? N

Commentary: No comment

HN6 - Build to rent

INTERNAL COMMENTARY

Brief policy summary:

This policy requires plan-making authorities to take a positive approach to Build To Rent development and its role in meeting the housing targets. It sets out some parameters being that they should remain in BTR use for at least 15 years; provide self-contained homes let separately;

consider the impact of service charges on affordability; and provide affordable housing in line with Policy HN3.

Key GLA evidence base: N/A

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment.

Sound? Don't know

Commentary: The City Corporation notes the requirements of this policy.

Modification sought? N

Commentary: No comment

HN7 - Housing size mix

INTERNAL COMMENTARY

Brief policy summary:

This sets out that for affordable homes size and mix LPA's should draw on information from local housing registers and for market homes, this should be based on the London SHMA.

This approach is similar to that of the current London Plan but for market homes, policy (H10) refers to use of 'robust local evidence' or the 2017 SHMA. The policy also condenses eight contextual criteria for the assessment of housing mix into a single phrase at part C(3) to have regard to the site's relationship to its surroundings, including transport connectivity, services, and the range and types of homes already present.

The inability for plan makers to use local evidence to set a housing size mix would mean that any local policy on housing size would have to prescribe a mix that is substantively the same as the one in the 2026 SHMA. As the table below shows, this would mean a mix that is heavily skewed towards 1 bed homes. 65% of all homes would have to be 1 bed and 35% two bed. Overall, the number of 3 bed or larger homes would remain constant.

When segmented by tenure, the size mix would vary as below:

- For low cost rent the size mix is 31% 1 bed, 42% 2 bed, and 27% 3+ bed.
- For intermediate tenures the size mix is 37% 1 bed, 38% 2 bed, and 25% 3+ bed
- For market rent and sale the size mix is 125% 1 bed, 23% two bed, -49% 3+ bed

Key GLA evidence base:

[Strategic Housing Market Assessment \(SHMA\)](#)- This assesses the overall need for housing in London and determines the tenure and size mix that this need requires. The model is calibrated to give roughly the same overall need as the Standard Method. The table below shows the annual need.

Tenure	1 bed	2 bed	3+ bed	Total	Per cent
Low-cost rent	10,700	13,000	7,600	31,300	35%
Intermediate tenures	5,500	5,200	3,400	14,200	16%
Market rent & sale	33,100	11,000	- 300	43,800	49%
Total	49,300	29,200	10,700	89,300	
Per cent	55%	33%	12%		

The table below shows the results when the planned for target of 55.8k is modelled.

55.8k scenario					
Tenure	1 bed	2 bed	3+ bed	Total	%
Low-cost rent	7,482	10,023	6,338	23,843	43%
Intermediate	4,807	4,897	3,198	12,902	23%
Market rent & sale	24,007	4,346	- 9,298	19,055	34%
Total	36,295	19,266	238	55,800	
	65%	35%	0%		

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comments

Sound? Don't know

Commentary: The City Corporation notes that this policy uses the SHMA to set the housing size mix. The SHMA is a strategic document that should not be solely used to set the local housing mix, so the policy should allow for the use of local evidence as per the requirements of the current London Plan. The City Corporation acknowledges that there is more flexibility for LPA's to develop their own evidence of need for the affordable tenure size mix, but this does not go far enough, especially since it does not apply to market homes.

Modification sought? Y

Commentary:

Part B- Where an LPA wishes to prepare local policy or supplementary plans on housing size mix for market homes, this should be based on London's Strategic Housing Market Assessment and/or local evidence of need.

HN8 - Housing design

INTERNAL COMMENTARY

Brief policy summary:

This policy sets out preferences for dual aspect dwellings, good natural lighting, openable windows, active ground floors, 10sqm of playspace per child, and tenure blind design.

It utilises the Nationally Described Space Standards for internal space, and for external space, requires 5sqm of outdoor space for 1-2 occupant, plus 1sqm for each additional occupant. The 10sqm of playspace per child is also the same as the current London Plan.

Key GLA evidence base: N/A

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment.

Sound? Don't know

Commentary: The City Corporation notes that this policy primarily maintains the standards in London Plan policy D6 and the playspace standards in S4. The Corporation supports the reference to the NDSS, rather than detailing all the requirements in the policy text itself. This makes the policy cleaner and easier to read.

Modification sought? Y / N

Commentary:

**HN9 - Accessible housing
INTERNAL COMMENTARY**

Brief policy summary:

This policy sets out requirements for wheelchair dwellings, which are:

- 10% affordable homes to be M4(3)(2b) (wheelchair accessible)
- 10% market homes to be M4(3)(2a) (wheelchair adaptable)
- All other homes to be M4(2) (accessible and adaptable dwellings)

There are further requirements for M4(3) homes that they should be delivered across a range of housing sizes; be prioritised on the ground floor and only on upper floors when serviced by two lifts; meet the necessary floor areas; when not allocated by the Local Authority, actively market the homes to disabled people first for at least 4 months prior and two months post completion. The approach within this policy is much clearer than that of the 2021 London Plan and clearly sets out what level of accessibility is required from the outset. However, there is some potential to expand this policy to reflect the needs of people with physical, sensory, cognitive and wider neurodivergent needs. This will be reflected within the response below.

Key GLA evidence base: n/a

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Don't know

Commentary:

The City Corporation supports this policy and the increased clarity on the requirements. There is

some potential to expand this policy to reflect the needs of people with physical, sensory, cognitive and wider neurodivergent needs. However, it does wish to raise a minor matter which may be in conflict with the approach of HN5. Para 3.120 states that wheelchair accessible kitchen facilities should be located on the same floor as the wheelchair accessible units. There is a risk of either over provision of communal facilities owing to multiple smaller kitchens on each floor, or the clustering of the accessible units limiting choice and creating an inequitable offer.

Modification sought? N

Commentary: No comment

HN10 - Burial space

INTERNAL COMMENTARY

Brief policy summary:

Policy HN10 seeks to ensure the long-term provision of burial space across London by requiring boroughs to plan proactively and collaboratively for future burial needs. The policy establishes a sequential approach to meeting demand, prioritising grave reuse, intensification and expansion of existing burial sites before considering new sites within the urban area and, where necessary, Green Belt locations. It also requires boroughs to consider cultural and faith-based burial needs and to work across administrative boundaries where appropriate to secure sufficient long-term capacity.

The policy is particularly relevant to the City of London because it has no burial provision within its administrative boundary and relies on the City of London Cemetery and Crematorium in Newham to meet burial needs. The City of London Cemetery plays a strategic role in serving both the City and wider East London and has been at the forefront of grave reuse under faculty jurisdiction to expand burial capacity. The policy's emphasis on grave reuse, long-term planning and cross-boundary collaboration is therefore critical to ensuring sufficient burial provision can continue to be maintained for the City and London more widely.

Key GLA evidence base:

Audit of London Burial Provision (2026) identifies that there is a strategic need for additional burial capacity across London and highlights the uneven distribution of burial space, pressure on existing provision and challenges associated with securing new burial land. It concludes that many parts of London will face increasing capacity constraints over the long term and that proactive planning is required to address future needs.

The Audit confirms that the City of London has no burial provision within its administrative boundary but is expected to require 309 new burial spaces between 2010/11 and 2030/31 and relies on the City of London Cemetery and Crematorium in Newham. The audit highlights the cemetery's strategic role in serving both the City and wider East London and identifies it as the only cemetery in London operating a grave reuse programme under faculty jurisdiction. The audit concludes that the City of London Cemetery's grave reuse programme has significantly increased burial capacity and could provide a model for addressing burial space shortages elsewhere in

London. These findings reinforce the importance of long-term strategic planning, grave reuse and cross-boundary collaboration to ensure future burial needs can continue to be met.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Don't know

Commentary:

The City Corporation supports the overall approach to Policy HN10 and the evidence underpinning it. However, given the significant variation in burial provision between boroughs and the reliance of some authorities on capacity outside their administrative boundaries, it would be helpful to provide greater clarity on how future burial need and capacity will be monitored and coordinated at a strategic London-wide level. This is particularly relevant to the City of London, which has no burial provision within its boundary and relies entirely on provision elsewhere.

Modification sought? N

Commentary: No comment

Chapter 4 - Growing London's economy in a way that benefits all

Chapter 4 starts with a reasoned justification for setting out the growth ambitions for London as a global city including increased productivity, inclusion, green growth, and increasing services exports. It highlights how the labour market projections suggest the largest growth employment sectors will continue to be in professional, scientific and technical and real estate activities and London will still need prime office space in highly accessible locations.

GLE1 - Sufficient and appropriate employment space

INTERNAL COMMENTARY

Brief policy summary:

Policy GLE1 sets out that local plans policies should meet the diverse land and floorspace requirements for all economic uses by providing for a range of suitable business space for different types, sizes and price points. Instead of setting out benchmarks of strategic level targets it states that these policies should be informed by the London Growth Plan and London-wide and local assessments of supply and demand. The full response below will highlight that this is considered to be a failing in the effectiveness of the policy, setting a low bar for the assessment of 'general conformity' of local plans against this policy. This failure to provide quantifiable benchmarks or indicative targets within the Plan itself does not provide enough strategic direction for local plans, and could result in cumulative, London-wide employment floorspace requirements to fall well short of the indicative requirements set out within the evidence supporting this policy (see section below). The City Corporation's commitment to, and capacity for growth needs to be supported by the provision of other economic demand, any failure to deliver across London as a whole could have negative impacts within the City.

Additionally, the Plan does not effectively draw out the conclusions of the evidence (see below), which recognises the importance of office-based jobs to London, with 56% of the office jobs across all of London being within the CAZ and the City of London accounting for 28% of all London office jobs. It is also notable that this approach is a change from that within the 2021 London Plan which includes demand figures for how much office floorspace was required for Outer London, Inner London and the CAZ/NIOD.

As set out within the policy, and in support of a future City Plan, the Corporation will need to prepare its own evidence utilising the London Growth Plan and London Plan evidence.

Part B of the policy also seeks to design flexibility between the E class uses. Although offices are class E uses, in the Square Mile given the strategic nature of the office stock it would be both inappropriate as well as physically challenging to convert these to other uses within class E. Therefore the response as below calls for recognition of this for prime or best in class floorspace, particularly in the Square Mile. Part E of the Development Management section allows the use of conditions to prevent a change of use between Class E uses in circumstances where they are justified for example to maintain a balance of uses appropriate to an area.

Key GLA evidence base:

[Economic and Infrastructure Supply and Demand Study](#) -assesses supply and demand for office and other employment floorspace, industrial floorspace, Class E uses and other infrastructure such as nurseries/creches. The GLA intends this to be used by Boroughs in preparation and implementation of local plans and related evidence, however as set out below there are some concerns regarding the approach to this evidence and the conclusions reached. Chapter 7 of the study is concerned with converting the jobs projections contained within the Employment Projections to indicative floorspace requirements for office, industrial and research and development floorspace. This involves conversion of Full Time Equivalent (FTE) jobs into floorspace requirements and then applying a frictional vacancy. This concludes a demand for 1,393,300 sqm GIA in the City between 2024-2050. Given that the planned growth of a minimum of 1.2m sqm NIA relates to jobs growth of 66,000 jobs, it is surprising that the Study suggests such a low number; it appears likely that the GLA have incorrectly applied the utilisation rate within the evidence, which would give a much greater (and more realistic) office growth figure for the City (and London as a whole).

Despite recognition of some of the unique City circumstances through a bespoke NIA to GIA calculation, officers have also looked in detail about the job density and utilisation rates contained within the study and consider that the methodology is flawed; this is also included within the response. The response as below (and as included in Appendix 2) seeks further clarification and for the evidence to be revisited. A key conclusion of the study is that delivery of high-quality office space should be prioritised in the CAZ, NIOD and key town centres, while retaining a sufficient supply of more affordable secondary offices for growing businesses elsewhere. This is reflected within the Plan at GLE1 and PV2 (CAZ).

[London Growth Plan](#)- encourages local plans to make reference to the London Growth Plan in their assessment of detailed local employment floorspace requirements. The London Growth Plan states that the Square Mile, West End and Canary Wharf are globally important to financial, professional and business services and technology. It discusses how London must continue to be the place

where the world's biggest and most ambitious businesses choose to locate, because the world's best talent wants to work there. This includes continuing to build and retrofit commercial offices of the highest standards and making sure the city centre is a vibrant and exciting place to work.

The London Growth Plan aims to raise productivity growth rates to 2% average per year from 2025-2035 and grow London's services exports by an average of 6% per year. The London Growth Plan references support for the City Corporation's Vision for Economic Growth, the strategy to grow financial and professional services and recognises that the West End and the Square Mile relates to 11% of the entire UK economy (West End and Square Mile). Its aim is that London remains a services exporting superpower across financial, professional and business services, creative industries, the experience economy and international education. It also outlines an inclusive talent strategy which includes things such as increase SME productivity, scale businesses in the growth sectors, making London the springboard to global growth for innovative companies across the UK.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment.

Sound? N

Commentary:

Firstly the City Corporation wishes to acknowledge its support for the London Growth Plan and its support for the City Corporation's Vision for Economic Growth and its recognition of the Square Mile as globally important to financial, professional and business services and technology.

However, the City Corporation considers that GLE1 (A) is too generically worded on 'economic uses' and is currently protectionist towards other sectors, such as industrial land, without a balanced approach for supporting office based economic growth. The evidence in the Growth Plan, Employment Projections and Economic Uses study highlight the importance of the City of London in delivering the most productive office-based jobs in London, yet the policy approach does not translate this evidence to the policy appropriately.

The Corporation notes that the policy does not contain any strategic level benchmarks for office employment, similar to that set out in the 2021 London Plan, and that provided for industrial land in GLE2. Without this, the effectiveness of the policy is put in question, as it does not give confidence that cumulatively delivery across London will seek to meet the indicative requirements as set out in the Economic and Infrastructure Supply and Demand Study. Some modifications are proposed as below to address this. Local plans are to be tested for general conformity with the London Plan itself and not the evidence base behind it, therefore without specific inclusion of the benchmarks local plans tested for future 'general conformity' will not need to demonstrate delivery to meet this strategic need, setting a low bar for this assessment.

The City Corporation has significant concerns about the calculation of the demand for new office floorspace within the City of London (and elsewhere). Table 7-7 of the Economic Infrastructure Supply and Demand Study concludes a demand for 1,393,300 sqm GIA of office floorspace in the City projected from 2024-2050. However, this would appear to be based on an incorrect

application of the BCO utilisation rates, which has in turn given rise to unrealistically high employment densities for office uses.

Under the central scenario, the report claims that the densities and utilisation combined gives an implied job density of 6.7 sqm NIA per FTE (see Table 7-2). However, this is based on a methodology that treats BCO utilisation rates as an indicator of how intensively workstations are shared. This is a misapplication of the utilisation rate, which (as is clear from the cited BCO (2025) report) is an observed measure of the proportion of time that desks are occupied, a number that has always been well below 100% and which has decreased significantly post-pandemic. Using this as the basis for a sharing ratio flips this completely on its head; such an approach implies that the aim of planning for office capacity is to fill all desk spaces to their maximum all of the time - something that is unrealistic and undesirable. Desk sharing is already accounted for in the utilisation rates and does not need to be factored into space calculations. Applying the utilisation rates properly means dividing by (not multiplying by) the utilisation rate. If the density was 10 sqm/worker NIA with a utilisation of 66% (both figures as per the GLA's central scenario) then the effective density should in fact be 15 sqm/worker. Using the lower density scenario (12sqm/worker NIA), with the lower utilisation (59%) gives effective density of 20.3 sqm/worker (NIA). This latter figure aligns better with the observed densities by the City Property Association in a recent survey of occupied Class A buildings in the City of London, reflecting the flight to quality trend.

This also unfortunately calls into question the outputs of the London Employment Sites Database (LESD, which uses the same methodology regarding densities and utilisation rates) and therefore the latest GLA employment projections, which bases borough-level employee projections on an average between projected trend and capacity. If those capacities should be significantly lower, because of the higher effective densities as a result of applying utilisation rates differently, then this may significantly change the employment projections for London boroughs.

There is also no rationale given for the bi-angulation of trend and capacity being a simple average; this is a new approach in this year's employment projections, which have historically been 'at capacity' where this is above trend. It may be more appropriate to take an 'at capacity' approach for central areas – but this will need to be considered carefully by GLA colleagues once the employment projection outputs are re-run.

Further summary on this is provided in a second document accompanying this submission titled the **Growth capacity and view analysis**.

It is also notable that the draft London Plan includes notional targets for industrial land but not other economic uses. The City Corporation is also concerned that part B seeks to design flexibility between the E class uses. Although offices are class E uses, in the Square Mile given the strategic nature of the office stock it would be both inappropriate as well as physically challenging to convert these to other uses within class E. This should be recognised within the supporting text.

Modification sought? Y

Commentary:

A. Plan-making authorities should set out policies in local plans to meet the identified diverse land and floorspace requirements for all economic uses by:

- (i) providing for a range of suitable business space of different types, sizes and price-points having regard to the needs of SMEs, larger firms and third sector organisations, ~~and~~
- (ii) Building on the indicative benchmarks contained within Table X, to produce local assessments of demand for economic use floorspace, informed by the London Growth Plan and London-wide ~~and local~~ assessments of supply and demand.

New Table X: to include indicative benchmarks for office and research and development floorspace.

GLE2 - Supply of industrial land

INTERNAL COMMENTARY

Brief policy summary:

The policy asks plan-making authorities to plan positively to provide and maintain sufficient industrial capacity to meet the strategic needs in the most suitable locations with good freight transport access. The development management section of the policy promotes industrial intensification and is a rolling back of the previous London Plan's approach in terms of co-location of uses. Industrial land in London is required to support the growth of the Square Mile so the response below supports this approach.

The policy requires plan-making authorities to review boundaries of existing industrial designations of SIL and LSIS. The Corporation does not have any such designations.

Walbrook Wharf as a waste transfer facility is a safeguarded wharf but this falls outside of this policy.

Key GLA evidence base:

Economic and Infrastructure Uses Supply and Demand study including separate technical annex (GLA) – July 2026

Table 7-7 shows that there is a negative floorspace demand for industrial and light industrial in the City but the study assigns 50,500 sqm of demand for R&D floorspace. The Corporation notes this but given the nature of the Square Mile, low density R&D floorspace would be highly unlikely to be suitable or deliverable within the City. It is likely that the figures in the GLA evidence are a result of the relatively high level at which SIC codes have been applied to use classes. Businesses involved in R&D do operate in the City but are more likely to be operating as offices than as low density lab or research space. This is an example of where locally-developed evidence will be critical in developing local plans.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment.

Sound? Don't know

Commentary:

The City Corporation supports the approach of this policy which recognises the role of industrial in supporting economic growth, including economic uses within the Square Mile.

Modification sought? N

Commentary: No comment

GLE3 - Data centres

INTERNAL COMMENTARY

Brief policy summary:

Policy GLE3 seeks to support the delivery of data centres in suitable locations whilst ensuring that their environmental, infrastructure and community impacts are appropriately managed. It requires plan-making authorities to proactively identify suitable locations for data centres, taking account of electricity network capacity, water supply, opportunities for clustering, heat recovery potential, and the potential impact on housing, employment and infrastructure needs. Part B sets out that where suitable locations cannot be identified within an authority's boundary, they should collaborate with neighbouring authorities before considering Grey Belt or edge-of-Green Belt locations. As large-scale data centres are exceptionally unlikely to be proposed in the Square Mile. However as written there is a concern that part B (2) may require us to assess locations within the Green Belt to meet any unmet needs- this will be reflected in the response below.

Data centres in identified suitable locations should be supported in principle but must justify the site choice, how impacts on infrastructure capacity will be mitigated and minimise disruption from electricity connections and street works.

The policy requires all data centres to be designed as clean and sustainable developments through incorporating heat recovery infrastructure, measures to improve electricity and water efficiency, including innovative cooling technologies, and renewable energy generation where feasible. Proposals should minimise back-up generator testing, use the lowest-emission technologies and fuels available, and minimise air quality impacts and exposure.

Key GLA evidence base:

The [Forecasting Data Centre Growth in London](#) highlights that data centres are now recognised as Critical National Infrastructure, with national policy requiring local plans to identify suitable locations and streamlining approvals for strategically important projects. The London Growth Plan also identifies digital infrastructure, including data centres, as critical to London's economic growth, innovation and AI ambitions. London's operational data centre capacity currently stands at around 1GW with potential to increase to 8 - 11GW by 2050, reflecting substantial growth in demand driven by digitalisation, cloud computing, artificial intelligence and increasing data storage requirements.

The spatial analysis shows that data centre development is highly concentrated within established clusters along the east-west corridor, connecting areas such as the Isle of Dogs, Park Royal, Hayes/Hillingdon and Islington/Hackney. This corridor aligns with major fibre and electricity routes, demonstrating the relationship between physical infrastructure availability and location choice and proximity to key demand centres such as Canary Wharf and the City of London.

Market analysis identifies strong growth drivers but also significant constraints. Electricity grid capacity is the primary constraint, while fibre connectivity remains critical to site selection and water demand is expected to increase significantly. The study also highlights increasing pressure on industrial land with most existing and proposed developments located on strategic industrial land or locally significant industrial sites, reflecting the sector's need for large sites, utility connections and separation from sensitive uses. There is growing competition between data centres and other industrial uses.

The evidence also suggests value in distinguishing between different types of data centre facilities. Large-scale hyperscale campuses are typically located on industrial land, while smaller, specialised edge facilities supporting AI and latency-sensitive services could be located in central London, including Islington, Hackney, the City and Westminster, potentially within multi-storey or mixed-use developments.

Looking ahead, the report concludes that future growth will depend primarily on the availability of electricity capacity and suitable land. Existing clusters are expected to remain attractive locations for development, although increasing activity is anticipated in outer borough locations such as Havering, Barking and Dagenham, Enfield and parts of South London.

The evidence notes that the City currently hosts relatively few operational facilities compared with major clusters such as Tower Hamlets or Hillingdon, but demand from finance, legal services and other highly connected business sectors remains a key driver of London's overall market. Understanding whether future demand is likely to take the form of dedicated facilities, distributed edge infrastructure or simply increased reliance on facilities elsewhere in London could help inform policy and infrastructure planning, which can be explored in detailed local evidence.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? N

Commentary:

The City Corporation supports the overall approach to Policy GLE3 and recognises the importance of data centres in supporting London's economy and digital infrastructure. However it notes that Part B sets out that where suitable locations cannot be identified within an authority's boundary, they should collaborate with neighbouring authorities before considering Grey Belt or edge-of-Green Belt locations. As written the City Corporation is concerned that part B (2) may require it to assess locations within the Green Belt to meet any unmet needs. This effectiveness of this approach therefore is questioned as it potentially requires authorities to work outside their powers. A minor amendment is proposed below to address this.

There remains uncertainty regarding how future need should be assessed and coordinated across London, particularly where authorities may be unable to accommodate significant data centre

capacity within their own boundaries but remain reliant on capacity elsewhere. This is particularly relevant to the City of London, where there is limited scope to accommodate significant additional data centre capacity despite continued demand from key business sectors. Future needs are therefore likely to be met through a combination of smaller edge facilities within the City and larger facilities elsewhere in London and the wider region. The policy does not explain how future demand should be assessed and distributed across London.. The London Plan should therefore provide a clearer and more robust strategic framework for assessing need and coordinating provision across London, while boroughs continue to identify suitable locations where appropriate.

The principles of Defra's 2024 interim planning guidance for PM2.5 should be incorporated into this chapter ensuring that appropriate mitigation measures are implemented from the design stage, ensuring the minimum amount of pollution is emitted and that exposure is minimised. Part F of the policy refers to data centre proposals being clean and as sustainable as possible. Conversely, point (3) of Part F promotes the use of electricity generation on-site, such as gas turbines, which would introduce a significant source of air pollution. This would not align with 4.41 relating to clean, green and efficient facilities. Point (3) of Part G relating to best practice recommends that testing hours are considered to minimise human exposure. The development of data centres in London, the city with the highest population density in the UK, seems to be at odds with this statement.

Modification sought? Y

Commentary:

B- If no suitable locations can be identified within the boundaries of the plan-making authority, it should:

- (1) first, collaborate with neighbouring authorities within and outside London
- (2) second, where relevant, work with other authorities to seek to identify suitable locations in the grey belt or on the edge of BLGs in the Green Belt, taking into account the criteria in part A.

GLE4 - Night-time economy

INTERNAL COMMENTARY

Brief policy summary:

Policy GLE4 continues to support growth in the night-time economy to boost economic activity in these sectors, positive impact on London's reputation as tourism destination, support 24 hour operation of industry and coordination with licensing regimes. For development proposals it strengthens the application of the Agent of Change (AoC) through additional requirements for technical assessment. These should include evidence on how nearby night-time uses and their access routes could cause nuisance, and how impacts will be mitigated and measures secured through planning conditions.

As the Square Mile lies entirely within the Central Activities Zone (CAZ) and Policy PV2 applies the NTE classifications contained within Annex B do not cover any of the identified CAZ clusters in the City. It is notable that the West End and Knightsbridge however are assigned NTE1 and 2 categories

respectively. As per comments on PV2, the CAZ clusters contained within Figure 6.2 will have a varying degree of night-time emphasis. This policy does not reflect that the Barbican is identified in PV2 as an Internationally Significant Night-time Economy cluster. The response as below will raise concerns about this inconsistent approach which is considered to downplay the role of the NTE in the City, particularly given the Class E/Experience Cluster at Moorgate/Liverpool Street. This policy therefore does not support the Corporation's Destination City aims.

The Policy however does not draw out the conclusions of the evidence base in relation to the importance of night-time workers who rely on safe transport, services and accessible public spaces outside traditional office hours.

Key GLA evidence base:

[London Nightlife Taskforce \(2026\)](#)- examines the challenges facing London's nightlife sector and building on the Mayor of London's Taskforce argues that nightlife should be recognised as a cultural activity, not simply an economic one. It defines nightlife as activities, events and spaces that support social and cultural participation between 6pm and 6am. The Square Mile is only listed as having strong night bus accessibility and the closest average walking distances (in metres) from night venue to next night bus station.

The study identifies night time hotspots but does not list Moorgate/Liverpool Street or give detailed methodology for how these areas have been identified other than reference to footfall data.

[London at Night: An Updated Evidence Base for a 24 Hour City \(March 2024\)](#) - states that the night-time economy extends beyond nightlife to include professional services, healthcare, transport and logistics which is reflected in 1.3 million people (25% of the workforce) working 6pm-6am and over two million out on a typical evening. This has been utilised by GE4 approach to protect the full range of night-time activity within the CAZ. Although the report references that the industries with the highest number of night workers include professional services, health and transport/storage which account for more than 40% (560,000) of London's night workers this is not sufficiently drawn out through into the policy, so will be highlighted in the response.

The report also highlights Liverpool Street as one of London's busiest evening destinations (Figure 48). It is identified as the single densest night-time visitor hotspot in London for the 6pm-12am period. Therefore the conclusions are not aligned with the above and therefore it is unclear how these two evidence base outcomes have contributed to the policy approach.

[Think Night: London's Neighbourhoods from 6pm to 6am](#) - sets out a vision for London as a successful 24-hour city, arguing that activity between 6pm and 6am should be planned for in the same way as daytime activity.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Don't know

Commentary:

The City of London broadly supports objectives of Policy GLE4 and its recognition of London's diverse night-time economy and welcomes the strengthened implementation of the Agent of Change (AoC) principle through new technical assessment requirements. However it would be helpful if some direction was provided on the expectations of these technical assessments, including the treatment of servicing, deliveries, noise, dispersal of patrons, cumulative impacts and the long-term effectiveness of mitigation measures.

The City Corporation supports the policy's focus on safety, inclusion and accessibility at night. However, it should more clearly reflect the evidence on the importance of night-time workers, particularly given the City's substantial night-time workforce. Greater emphasis should be placed on safe and adequate public transport and the infrastructure, servicing, facilities and services needed to support night-time workers.

The City Corporation also considers that the policy should better recognise the role of the night-time economy within the Square Mile. Annex B provides NTE classifications for centres elsewhere in London, but aside from the West End and Knightsbridge it does not recognise the NTE role of the CAZ clusters, despite some being identified as Class E/Experience locations. The City Corporation also questions the consistency and outcomes of the evidence base, in particular in the recognition of the NTE role of Moorgate/Liverpool Street which is, in the City Corporation's view an important location for NT uses. It is also noted that despite identification as an Internationally Significant Night-time economy cluster in PV2 (Figure 6.2), this is not recognised within this policy and Annex B.

Modification sought? Y**Commentary:**

A (3) Support the 24-hour operation of SILs and LSIS and other clusters of economic activity, including through adequate public transport availability, services and facilities to support night-time workers

4.43 London's strategic town centres and clusters within the CAZ contain night-time economic activities that function at different scales and have different catchments. They have been classified, as set out in Annex B Town centre network, Table B1, into four broad categories:

- NT1 – Centres of international or national significance
- NT2 – Centres of regional or sub-regional significance
- NT3 – Centres with more than local significance
- NT4 – Centres with local significance.

**GLE5 - Culture and creative industries
INTERNAL COMMENTARY****Brief policy summary:**

Plan making authorities should protect and promote clusters of cultural uses and consider requiring the replacement of cultural facilities where they are lost. They should protect Creative

Enterprise Zones and include policies to support their objectives, with a particular emphasis on cultural production uses.

Development proposals should protect existing cultural facilities, support the development of new facilities, and provide/re-provide the equivalent floorspace of existing cultural uses with a similar end user affordability. Cultural consumption uses in the CAZ and town centres, and the use of vacant properties/land for meanwhile use, should be supported

Key GLA evidence base:

[Culture Strategy 'Culture for all Londoners' \(2018\)](#)- has four aims:

- 'Love London' – more people experiencing and creating culture on their doorstep
- 'Culture and Good Growth' – supporting, saving and sustaining cultural places and spaces
- 'Creative Londoners' – investing in a diverse creative workforce for the future.
- 'World City' – a global creative powerhouse today and in the future.

Page 163 sets out the 'pro-culture planning framework' that the Mayor will create:

- Produce a Cultural Infrastructure Plan
- Protect culture through the London Plan
- Use the London plan to ensure culture can co-exist with other land uses (Agent of Change)
- Support culture at risk

[Cultural Infrastructure Map 2023](#)- This is an interactive map of all the cultural production and consumption uses in London

[Cultural Infrastructure Plan \(2019\)](#)- A plan that draws together all of the Mayor's strategies for protecting and enhancing cultural infrastructure. This includes:

- Guidance on s106 agreement
- The designing space for culture toolkit
- The Cultural Infrastructure Map
- Creative Enterprise Zones
- Funding

[Designing Space for Culture Toolkit](#)- Provides bespoke design parameters and examples for the most common cultural production and consumption spaces.

A suite of nightlife focused documents: Think Night: London's Neighbourhood from 6am to 6pm; London at Night: An Updated Evidence Base for a 24-Hour City; London Nightlife Taskforce 2026 Report.

These provide policy recommendations, and the data that supports them, to enhance London's nighttime economy. The most recent of these is the London Nightlife Taskforce's Report. Recommendations relevant to planning include:

- Create an independent 'Nightlife Commission'
- Introduce a '24-Hour City Test' into all of the Mayor's policies.

- Strengthen the 'Agent of Change'

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Y

Commentary:

The City of London Corporation supports this policy.

The Mayor's cultural infrastructure plan states at paragraph 3.1 that 'London's cultural infrastructure is under huge pressure' due to a 'perfect storm' of five factors: land value increases; national planning system (PD rights and loss of industrial land); business rate increases; licensing restrictions; funding reductions. In response to this, the Mayor's culture strategy implementation plan states that the Mayor will 'deliver a pro- cultural planning framework and help to safeguard existing cultural facilities'

Given the extreme pressure cultural infrastructure is under in London and the Mayor's ambition to create a pro-culture planning framework, it is right that this policy seeks to robustly protect existing cultural production and consumption spaces, and seek to address affordability of re-provided space.

Modification sought? N

Commentary:

GLE6 - Visitor infrastructure

INTERNAL COMMENTARY

Brief policy summary:

The policy asks local plans to promote sustainability and inclusive access of London's visitor economy day and night. The policy promotes new and existing visitor attractions, enhancements to legibility, historic environment, serviced accommodation, toilets and access by sustainable modes of transport. There is no reference here to the evidence (see below) quantifying the need over the London Plan period, which is a change from the 2021 plan which identifies this within the supporting text.

The development management portion promotes serviced accommodation in the CAZ, town centres and high streets, and intensification by areas with well-connected public transport. The policy requires 10% new bedrooms to be wheelchair accessible or 15% of new bedrooms to be accessible rooms. This is consistent with the existing London Plan. The supporting text references that wheelchair-accessible rooms and accessible rooms should be designed in accordance with the relevant British Standards. Although this approach which goes above Building Regulations will be supported, in light of the changes within the NPPF which restrict local standards it should be noted that this approach may be difficult to deliver through the London Plan.

The policy does recognise the potential conflicts within the CAZ around the retention of office space and the promotion of new office uses. The response as below seeks to support this but it

may need to be strengthened for Core CAZ areas and specifically for the City of London and/or clusters of FPS sectors. The draft London Plan removes wording from London Plan 2021 which says that serviced accommodation should be promoted subject to the impact on office space and other strategic functions.

Key GLA evidence base:

[Visitor Accommodation in London: Post-pandemic recovery and supply-demand forecasts to 2050](#)

The study highlights that overnight visits to the capital rose from 33.7 million in 2019 to 36 million in 2024 (+6.8%). The number of nights visitors spent in the city rose from 146.4 to 153.9 million (+5.1%). The recovery was led by domestic visitors: domestic nights rose 33.2% while international nights fell 1.5%. The supply of serviced accommodation rooms also grew 8.9% (160,115 to 174,384) – with growth largely in Inner London. Westminster alone accounted for around a third of London’s net serviced room additions, and the five boroughs with the most growth (all Inner London) together accounted for 69% of the total increase.

The study projects visitor nights to rise from 154 million in 2024 to 224 million by 2050 (+45%). Assuming the serviced accommodation share of total nights holds, this is forecast to lift the number of serviced rooms demanded from roughly 166,000 in 2025 to 232,000 by 2050 - an additional 66,000 rooms (+40%), or 2,600 net additional rooms per year. This concludes that the required number of serviced accommodation rooms is forecast to grow from 166,000 in 2025 to 232,000 by 2050 - an increase of 66,000 rooms (+40%), equating to roughly 2,600 net additional rooms per year.

For the Square Mile, from 2019-2025 hotel rooms have grown by 1,198 rooms (16.2%). This uses two methods for forecasting, one being borough level demand using the pipeline and a blended method which relies more on historical delivery. In the blended method, COL is projected to need 5,709 rooms and in the pipeline method 14,736 rooms out to 2050. There are currently 5,427 rooms in the pipeline (Dev Mon 2025/26). However as above it is notable that the outcomes of this study are not directly reflected as a benchmark within the plan itself.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Don’t know

Commentary:

The policy approach to accessible hotel bedrooms is positive and is supported. The City Corporation notes that this requires the design of wheelchair-accessible rooms and accessible rooms in accordance with the relevant British Standards. Having regard for the British Standards and Building Regulations is an essential tool for design officers to rely on for achieving the highest levels of inclusive design.

Modification sought? N

Commentary: No comment

GLE7 - Affordable workspace
INTERNAL COMMENTARY

Brief policy summary:

The policy encourages plan-making authorities to include policies to support the delivery of affordable workspace, triggered by applications for new office, research and development or light industrial uses, data centres and/or storage and distribution uses where justified by strategic and local evidence of need and an assessment of viability. It sets out that affordable workspace should be targeted towards uses that deliver cultural, social and economic value, including charities, creative and cultural uses, hospitality, education and opportunities for disadvantaged or under-represented groups in the labour market.

Compared with the 2021 London Plan, this policy provides a shift in focus away from targeted provision towards more general encouragement. It provides specific direction to Local Plans to include local policies on locations, thresholds and percentage affordable workspace requirements, with rents and discounts also to be set locally. It is considered that the wording of this policy is flexible enough to allow for the unique circumstances of the Square Mile and does not mandate a minimum threshold or provision at a strategic level.

The policy also protects existing affordable workspace, but crucially also sets out how in prime locations in the CAZ off-site provision or payment in lieu may be suitable. The response as below support this.

Key GLA evidence base:

[Economic Uses Supply and Demand Study](#)-(2026) In relation to affordable workspace requirements this suggests that the following types of business have a particularly significant need for affordable workspace: Micro and small businesses; Social enterprises, charities and community organisations; Start-ups and early-stage businesses; and creative and urban production businesses (which require studios, workshops and production space – offices, light industrial and general industrial). This is perhaps a moving away from the approach of the 2021 London Plan which had a considerable and targeted evidence base in support for affordable workspace.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Don't know

Commentary:

The City Corporation notes that this policy shifts focus towards encouragement of affordable workspace alongside commercial uses, and targets specific sectors. The City Corporation supports the direction for local plans and that detailed requirements in relation to locations, thresholds and rates are to be set at the local level. It also supports the flexibility for off-site provision and payments in lieu in certain circumstances, including within the CAZ.

Modification sought? N

Commentary: No comment

GLE8 - Access to employment and skills**INTERNAL COMMENTARY****Brief policy summary:**

This policy does not include any directions for plan-making rather just for development

management to secure skills and training opportunities in the construction and completed phase for major development proposals.

The policy encourages opportunities secured through planning obligations to ensure the greatest possible level of take-up by Londoners, provide opportunities for Londoners who are out of work or under-employed and increase the proportion of under-represented groups in the built environment industry workforce and other relevant sectors, and enable Londoners training to complete their training and apprenticeships across borough boundaries.

Key GLA evidence base:

The policy cites the Mayor's Good Work Standard: [The Good Work Standard \(GWS\) | London City Hall](#)

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Don't know

Commentary:

The City Corporation supports the objective of widening access to employment and skills opportunities and would welcome a stronger emphasis on improving outcomes for groups currently under-represented within the built environment sector, including women, disabled people, ethnic minority groups and people from lower socio-economic backgrounds.

It is encouraging that part B mentions reciprocal arrangements between local authorities to facilitate the conclusion of apprenticeships. In the Skills for Sustainable Skyline Taskforce research undertaken by the Corporation and through the current s106 Apprenticeship Sharing pilot with other Central London Forward boroughs, it suggests that this is a major barrier to attracting and retaining more Londoners in the built environment sector.

Explicit mention in the Implementation section of Apprenticeship Units and non-Apprenticeship training (National Vocational Qualification and Vocational Qualifications) for shorter term construction projects (12 months or less) would be helpful to mention as they are easier to deliver. This can aid in recognising the sector's barriers to producing trained and competent workers.

Modification sought? N

Commentary: No comment

GLE9 – Aviation

INTERNAL COMMENTARY

Lead: Garima

Supported by / additional input:

Brief policy summary:

Policy GLE9 seeks to ensure that London's aviation sector supports sustainable and equitable economic growth whilst fully addressing its environmental and health impacts. The policy recognises London's six airports as a single aviation system and supports making the best use of

existing airport capacity, subject to improved public transport access, walking and cycling provision, and measures to reduce reliance on car travel.

The policy takes a precautionary approach to aviation expansion, by resisting proposals for airport expansion unless unacceptable environmental, transport or congestion impacts can be avoided. It also resists new heliports, except for emergency services, and requires aviation-related development mitigate environmental and health impacts.

Part F-G introduces a framework for assessing Advanced Air Mobility (AAM) proposals, including drones and electric vertical take-off and landing (eVTOL) vehicles, requiring considerations of safety, accessibility, environmental and public health impacts.

Key GLA evidence base:

The [Airports National Policy Statement \(ANPS\)](#) is the primary decision-making framework for nationally significant airport infrastructure projects in the South East of England. It identifies a new north-west runway at Heathrow Airport as the preferred option for future capacity needs and sets out requirements for development consent.

Aviation Policy Report assesses the implications of Heathrow Airport expansion and the emerging role of Advanced Air Mobility (AAM) in London. The report concludes that Heathrow expansion could place significant pressure on transport infrastructure and generate more than 55,000 additional highway trips per day unless substantial investment is made in public transport connectivity and capacity. The report also highlights the wider environmental and public health impacts associated with aviation, including air pollution, noise, carbon emissions and transport congestion, and the need for these to be fully assessed and mitigated. In relation to AAM, the report identifies potential opportunities associated with drones and electric vertical take-off and landing (eVTOL) aircraft, while recognising concerns relating to noise, privacy, visual impacts and equitable access.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Y

Commentary: No comment

The policy has limited direct relevance to the City of London, as there are no airports within its administrative boundary. However, international aviation connectivity, particularly through Heathrow and London City Airport, plays an important role in supporting the Square Mile's position as a global financial centre. The City Corporation therefore supports the policy's balanced approach, which seeks to maintain the economic benefits of aviation while ensuring environmental, public health and transport impacts are appropriately managed.

Modification sought? N

Commentary: No comment

GLE10 - Safeguarded Wharves
INTERNAL COMMENTARY

Brief policy summary:

Policy GLE10 seeks to protect and support London's safeguarded wharves as strategic infrastructure for waterborne freight uses and resists redevelopment or alternative uses that would prejudice their operational capacity, unless exceptional circumstances apply. It also requires development proposals near safeguarded wharves to avoid adversely affecting their operation and supports the continued intensification and modernisation of wharf activities.

The overall policy aim is to maintain the Thames' role as a strategic freight corridor, reduce reliance on road transport, and contribute to London's wider environmental and resilience objectives. The response as below will welcome the protection the policy provides for Walbrook Wharf as strategic infrastructure.

Key GLA evidence base:

[Safeguarded Wharves Review 2018-2019](#)- assesses the operational status, viability and strategic need for London's safeguarded wharves and concluded that a network of safeguarded wharves should be retained to support future freight, construction and waste management needs. It found that river transport plays an important role in reducing road congestion, emissions and pressure on the highway network, while supporting sustainable freight movement and waste transfer. The Review also recognised the need for wharves to remain operationally flexible and capable of adapting to changing market and freight requirements. Walbrook Wharf is identified as an operational safeguarded wharf that performs an important waste management function within this network.

[Safeguarded Wharves Demand and Capacity Study](#)- assesses future demand for wharf capacity across London. The study concluded that safeguarded wharves remain an important part of London's freight and waste infrastructure and that sufficient capacity should be retained to accommodate future demand. It highlights that wharves operate as part of a wider strategic network and contribute collectively to the movement of construction materials, waste and freight across London. Walbrook Wharf is recognised as an operational wharf contributing to London's waste transfer capacity and supporting the movement of waste by river.

Together, the evidence highlights the importance of taking a strategic, London-wide approach to managing wharf capacity and waste movements. While individual wharves are safeguarded, they operate as part of a wider network supporting London's waste and freight infrastructure.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Don't know

Commentary:

The City Corporation supports the overall direction of Policy GLE10 and the continued safeguarding of strategic wharves. However, the policy could be strengthened by promoting a more coordinated, London-wide approach to managing wharf capacity, freight movements and waste infrastructure.

The City of London contains Walbrook Wharf, which plays a strategic role in the transfer of municipal waste and helps reduce freight movements on the City's road network. The City Corporation notes that while the policy protects individual wharves, it provides limited recognition of their role within a broader strategic waste and freight network and does not sufficiently encourage a coordinated approach to planning and managing wharf capacity across London. Nonetheless the City Corporation welcomes the protection the policy provides for Walbrook Wharf as strategic infrastructure as it contributes not only to waste management within the City but also to the wider functioning of London's river-based waste transport network.

Greater recognition of the strategic network function of safeguarded wharves would strengthen the supporting text and better reflect the evidence base underpinning the policy.

Modification sought? Y

Commentary:

Implementation

4.86 The Mayor has, and will continue to, keep the London-wide network of safeguarded wharves under review, recognising their role in maintaining wharf capacity and facilitating the movement of freight and waste across London, given that many are in areas where land is highly desirable for a number of competing uses.

GLE11 - Circular economy
INTERNAL COMMENTARY

Brief policy summary:

Policy GLE11 supports the transition to a circular economy by reducing London's resource footprint, promoting the efficient use and reuse of materials, and reducing embodied carbon. It applies to all development, with proposals expected to minimise waste and maximise opportunities for reuse and recycling.

Referable development proposals should aim to achieve net zero waste at the construction stage and are required to submit a Circular Economy Statement (CES) demonstrating how circular economy principles have been embedded across the design, construction, operation and end-of-life stages of development. The policy sets strategic benchmarks of 95% reuse, recycling or recovery for demolition and construction waste, 95% beneficial reuse of excavation waste, and 20% reused or recycled content by value. It also promotes the retention and reuse of existing buildings and structures where feasible to reduce embodied carbon, supports the provision of circular economy infrastructure, and encourages alignment between CES and Whole Life-Cycle Carbon Assessments where relevant. The response as below will highlight some concerns about the use of the recycled content by value metric, as it is not considered a robust indicator of circular economy performance.

The policy is particularly relevant to the City of London given the scale of development and redevelopment activity within the Square Mile and the significant proportion of waste arising from construction and demolition activity. It aligns with the City Corporation's objectives to promote a retrofit-first approach, reduce embodied carbon, minimise waste and embed circular economy

principles, as set out in the City Plan 2040, Planning for Sustainability SPD and WLC Carbon Options Guidance.

It should be noted that City Plan Policy S16 and Policy GLE11 apply different thresholds. While GLE11 applies circular economy principles to all development and requires Circular Economy Statements (CES) for referable development, City Plan Policy S16 primarily applies to major and EIA development. The City Plan therefore has a narrower overall scope but applies CES requirement to a broader range of development.

Key GLA evidence base:

[Circular Economy Infrastructure Report \(WP1\)](#) - examines the infrastructure, facilities and spatial requirements needed to support London's transition to a low-carbon circular economy. It considers a range of waste streams and identifies the physical and digital infrastructure needed to support greater reuse, repair, refurbishment, redistribution, processing and recycling of materials. The report concludes that additional circular economy infrastructure and space will be required to support London's growth while reducing waste, increasing material reuse and improving resource efficiency.

The [Circular Economy Metrics Study](#) provides the evidence base for the policy's Circular Economy Statement requirements and performance benchmarks. It establishes metrics and targets for construction, demolition and excavation waste, material reuse and recycled content, and highlights the importance of consistent reporting and monitoring to improve circular economy outcomes and support future policy development.

Together, the evidence demonstrates that achieving a circular economy in London requires both the infrastructure needed to facilitate material reuse and recycling, and a robust framework for measuring and monitoring performance. The evidence highlights significant opportunities to reduce construction and demolition waste, retain materials in use for longer and improve resource efficiency across the development lifecycle.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? N

Commentary:

The City Corporation supports the overall direction of Policy GLE11 and welcomes its emphasis on reducing waste, improving resource efficiency and embedding circular economy principles throughout the development lifecycle. However, the policy could be further strengthened by requiring development proposals to demonstrate how circular economy outcomes have been maximised (part A).

The City Corporation notes that while the Circular Economy Infrastructure Report identifies the need for infrastructure and space to support the storage, repair, refurbishment, redistribution, processing and reuse of materials, the policy itself does not explicitly set out how this will be delivered. The policy could be strengthened by requiring development proposals to prepare a site-specific reuse strategy, setting out how opportunities for deconstruction, storage, reprocessing and redistribution of materials have been considered. The GLA could facilitate implementation through

the updated Circular Economy Statement guidance, including a standard template for reuse strategies, to provide applicants with a clear and consistent framework for demonstrating how opportunities for material reuse have been considered and maximised.

In paragraph 4.91, referable applications are expected to provide a commitment and evidence demonstrating how they will meet circular economy objectives and, where possible, exceed these targets. The commitment and evidence requirement should be clearly explained or defined in the forthcoming guidance.

The strategic circular economy targets in Table 4.2 should better reflect the waste hierarchy by distinguishing between material outcomes. The current combined reuse, recycling and recovery targets do not differentiate between retention and reuse of materials and lower value outcomes such as downcycling and energy recovery. The GLA should consider introducing a retention category and reporting reuse, recycling and recovery separately. This would provide a more meaningful measure of circular economy performance and incentivise the retention and reuse of buildings and materials.

It considers that the policy supports the provision of circular economy infrastructure but does not clearly define the types of infrastructure required. The supporting evidence identifies measures such as reuse and repair hubs. The policy should more explicitly recognise these forms of infrastructure and provide clearer support for their delivery.

More broadly, the London Plan should provide stronger support for the establishment of reuse, refurbishment and material use hubs across London. The current market for material reuse and repair remains fragmented and stronger policy levers could help facilitate the infrastructure needed to support the wider delivery of circular economy objectives.

Finally the City Corporation considers that the recycled content by value metric is not always a robust indicator of circular economy performance, as results are heavily influenced by material costs and calculated inconsistently. It suggests consideration of replacement with a metric based on embodied carbon avoided, which better reflects the environmental benefits of material reuse and recycled content.

Modification sought? Y

Commentary:

Development management

A. All development proposals should ~~promote~~ demonstrate how circular economy outcomes are optimised/maximised and referable proposals should aim to be net zero-waste at the construction stage.

C Development proposals which seek to provide Circular Economy infrastructure such as reuse and repair hubs on appropriate sites, including as a 'meanwhile use', should be supported.

Add a new bullet point D:

D. Development proposals should be required to submit a site-specific reuse strategy demonstrating how opportunities for the deconstruction, storage, reprocessing and redistribution of materials have been maximised, including through on-site meanwhile uses where appropriate.

Paragraph 4.91, “All development proposals should be able to demonstrate some consideration of how they can advance considerations of how the proposals address circular economy objectives. Referable applications should provide a commitment and provide evidence that demonstrates how they will meet and where possible, exceed these targets.”

GLE12 - Waste

INTERNAL COMMENTARY

Brief policy summary:

Policy GLE12 seeks to ensure that London has sufficient waste management capacity to manage the waste it generates and move towards net self-sufficiency in waste management. The policy requires Local Planning Authorities to plan positively for waste infrastructure, safeguard existing waste sites and identify sufficient capacity to manage future waste arisings. It supports the waste hierarchy by prioritising waste prevention, reuse, recycling and recovery over disposal, and promotes the proximity principle to ensure waste is managed as close as practicable to where it is produced.

The policy establishes new borough-level apportionments for household, commercial and industrial waste for the period 2024-2050. This is a continuation of the approach which was highly contested within the 2021 London Plan on delivery grounds. For the City, this means a significant increase from a need to manage 1.0 % of London’s household, commercial and industrial waste in 2021 to 2.1% in the 2026 London Plan. This equates to an increase from approximately 84,000 tonnes per annum to 165,000 tonnes per annum, rising further over the plan period as set out below.

% apportionment for the City of London in draft London Plan 2026	2024	2030	2040	2050
2.1%	165 kt	175 kt	196 kt	220 kt

Key GLA evidence base:

[London Waste Infrastructure Capacity Study](#)- assesses current and future waste arisings across London and the infrastructure capacity required to manage municipal, commercial and industrial, and construction, demolition and excavation waste streams over the plan period. It considers future waste management needs under different scenarios and evaluates London’s capacity to manage waste in accordance with the waste hierarchy and the objective of net self-sufficiency. It concludes that London has sufficient overall waste management capacity to meet projected waste management requirements to 2050. However, it should be noted that:

- Maintaining this position will depend on safeguarding existing waste sites and infrastructure, maintaining operational flexibility within the waste management network, and ensuring that waste continues to be managed in accordance with the waste hierarchy.

- The study emphasises the importance of waste prevention, reuse, recycling and recovery in reducing demand for disposal capacity. Whilst London may have sufficient overall waste management capacity, the evidence is less clear on whether there is sufficient infrastructure to support the reuse element of the circular economy. Greater consideration should be given to the provision of reuse, repair, refurbishment and material redistribution facilities, as these will be essential to achieving circular economy objectives and moving waste management further up the waste hierarchy.

The study highlights the importance of the proximity principle, whereby waste should be managed as close as practicable to where it is generated, helping to reduce transport impacts and improve the efficiency and resilience of the waste management system. It also identifies waste infrastructure as a critical component of London's strategic infrastructure network and supports a strong policy approach to safeguarding waste facilities from competing development pressures.

These findings are particularly relevant to the City of London given its limited capacity for new waste infrastructure, continued reliance on strategic waste facilities beyond its boundaries, and the importance of safeguarding strategic infrastructure such as Walbrook Wharf.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant: Y

Sound: Don't know

Commentary:

The City Corporation notes that the policy has been strengthened in relation to the need for boroughs to work collaboratively across administrative boundaries to demonstrate capacity availability, to secure sufficient waste management capacity and support London's wider objective of increased waste self-sufficiency. The City of London is a member of the South East London Joint Waste Planning Group (SELJWPG), through which waste apportionment requirements are planned and delivered collectively across the sub-region. Under existing arrangements, the London Borough of Bexley assumes responsibility for meeting the City's waste apportionment requirement. Given the proposed increase in the City's apportionment, continued engagement with the SELJWPG will be important to ensure sufficient capacity remains available within the partnership area to accommodate future requirements. Existing evidence indicates that the sub-region has historically maintained capacity above its apportioned requirements.

It is likely that borough-level concerns will focus on whether the forecasts correctly estimate future waste arisings, based on planned development, the availability of suitable land and infrastructure to meet these requirements and the extent to which the proposed apportionments are deliverable and equitably distributed across London.

Modification sought? N

Commentary: No comment

GLE13 - Aggregates and mineral resources

INTERNAL COMMENTARY

Brief policy summary:

Policy GLE13 seeks to ensure a steady and adequate supply of land-won aggregates in London up to 2050 and establishes a policy presumption against hydraulic fracturing ('fracking'). Although the City contains no mineral extraction resources and is not subject to a landbank apportionment, it relies heavily on a continued supply of aggregates to support construction activity. This is reflected in the response below.

Key GLA evidence base:

The [London Local Aggregates Assessment](#) concludes that London is heavily dependent on imported aggregates to meet its construction needs, with local land-won aggregate production making only a limited contribution to overall supply. It also highlights the strategic importance of safeguarding wharves, railheads and aggregate handling infrastructure to maintain a resilient supply chain. The assessment also identifies that demand for aggregates is expected to remain high, due to housing delivery, commercial development and major infrastructure projects across London.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Don't know

Commentary:

The City Corporation supports this approach which recognises the importance of aggregate availability to meet London's development requirements, including that of commercial development over the plan period.

Modification sought? N

Commentary: No comment

FOR FORMAL CONSULTATION RESPONSE

Overall chapter comment:

The City Corporation also considers that the commentary surrounding toilets in the draft London Plan is of particular concern. There is need for greater clarity on toilet provision across all uses including and beyond the public realm when publicly accessible toilets should be provided. The Plan should include a policy approach that requires major developments to provide publicly accessible toilets onsite to be maintained by the building operator. The policies around toilet provision should be clear that that provision should be in alignment approved document part M and part T. If not included in the London Plan, separate guidance on toilets would be helpful to planning officers.

GHR1 – Energy efficiency

INTERNAL COMMENTARY

Brief policy summary:

The aim of the policy is to ensure high levels of energy-efficiency, minimise energy consumption and occupier bills, and reduce greenhouse gas emissions towards a net zero-carbon London. The policy applies to all local plans and all major development.

Part A of the policy states that energy-efficiency or emission reduction standards should not be set by plan-making authorities in their local plans. The rationale behind this policy was to align with draft National Planning Policy Framework (NPPF) policy PM13 which states that development plan policies should not set quantitative standards that are already addressed by building regulations. However, following consultation, adopted NPPF policy PM13 exempts energy efficiency standards. In the City Corporation's proposed response below, a modification proposes that part A of the policy GHR1 is amended to align with the adopted NPPF, and to allow energy efficiency targets to be reflective of local circumstances.

The energy hierarchy approach and carbon-based baseline from policy SI 2 of the previous London Plan 2021 have been removed. Rather, policy GHR1 has introduced Space Heating Demand (SHD) targets for all building typologies, and Energy Use Intensity (EUI) targets for different building typologies. Space Heating Demand is the amount of heat energy needed to heat a building over a year (per sqm) and Energy Use Intensity is the total energy (regulated and unregulated) used by a building over a year, measured in kWh/m²/yr. The introduction of SHD and EUI reporting is supported as it provides a holistic picture of both regulated energy (controlled, fixed services and systems such as heating, cooling, ventilation, water and lights) and unregulated energy (includes plug-in devices such as fridges, TVs, cooking appliances and lifts). The proposed energy modelling is therefore more accurate than the current methodology of reporting against Building Regulations. EUI reporting is better aligned with metering, monitoring and design, and will help close the performance gap between planning and operation. The evidence base recommends that predictive energy performance modelling is conducted to demonstrate policy alignment with the EUI and SHD targets at planning submission, pre-commencement and pre-occupation. The use of predictive energy modelling provides greater accuracy, is increasingly common in industry practice, and aligns with the Planning for Sustainability SPD. In the City Corporation's proposed response below, a modification proposes that predictive energy modelling is specifically referenced in the supporting text of the policy.

Both baseline and aspirational targets have been introduced for SHD and EUI, as reflected in the tables below. The baseline targets reflect a low-energy building that would be achievable for most development types without significant restriction of form factor or orientation. The baseline targets are estimated to result in ~3.2% uplift construction costs for an office building in comparison to the current London Plan, whilst delivering ~30% reduction on energy bills. The aspirational target is considered an ultra low-energy building and is broadly aligned with the UK Net Zero Carbon Building Standard (UK NZCBS) 2050 limits, it is estimated to have ~7% additional construction costs for an office building than the current London Plan, whilst delivering ~50% reduction on energy bills.

The tables below set out the minimum energy use intensity and space heating demand standards:

kWh/m²/yr (GIA)	Baseline target	Aspirational target
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All typologies,	20	15
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Table showing Space Heating Demand targets

kWh/m²/yr (GIA)	Baseline target	Aspirational target
Residential	40	35
Office	90	70
Hotel	120	80
Student accommodation	65	50

Table showing Energy Use Intensity targets

The introduction of energy metric methodology and targets are supported. For information purposes for Members, analysis of energy assessments submitted at planning stage suggests that since 2024, ~39% of City applications' energy modelling aligned to the EUI baseline target and ~8% aligned to the aspirational target. In particular, hotel, residential and student accommodation schemes struggle to achieve the targets. Since 2024, ~88% of City applications' energy modelling aligned to the SHD baseline target, and ~82% aligned to the aspirational target.

The City Corporation's response will recommend that further information is included to support implementation of the policy and how planning authorities should enforce the targets, particularly as carbon offsetting would be removed. The carbon offsetting mechanism is removed from the policy due to the continued decarbonisation of the grid and in some instances, applicants find it cheaper to carbon offset rather than deliver carbon reduction measures on-site. With the shift to EUI targets, offsetting was not included in the policy as it was considered a risk of undermining a key policy. The City Corporation currently requires all major development with residual carbon emissions to contribute carbon offsetting on completion of the development. The carbon offsetting funds are placed in the City Corporation's Carbon Fund for carbon reduction projects. It is expected that the City will still collect offset payments upon completion of schemes that were approved under London Plan 2021, but no new carbon offset commitments would be agreed upon adoption of the new London Plan.

Consistent with policy SI 2 of London Plan 2021, this policy states development should maximise the opportunities for the provision of renewable energy by producing, storing and using renewable energy on-site.

This policy should be considered alongside relevant policies such as GHR2 Low-cost low-carbon heat, GHR3 Whole-life-carbon, and GHR4 Heat Risk. The policy requires development to monitor and report post-construction figures for annual in-use energy demand for a minimum 5-years. Information reporting requirements for applicants will be streamlined and set out in energy strategy guidance and proforma.

Key GLA evidence base:

[Evidence base for operational energy and carbon policies \(September, 2025\)](#) introduces the evidence to why the new London Plan should include requirements to minimise operational energy use. It includes energy modelling, energy data analysis, and cost assessment on the introduction of the Space Heating Demand and EUI targets, which was modelled on three scenarios. Further evidence on renewable energy generation (PVs), energy offsetting, predictive energy modelling, and post-completion reporting is included in the evidence base.

The policy reflects the Mayor of London's specific legal duties to minimise carbon dioxide and greenhouse gas emissions in accordance with the GLA Act 1999 (as amended by the GLA Act 2007).

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Don't know

Commentary:

The City Corporation supports the overall direction of Policy GHR1, the transition to energy use metrics and the introduction of targets. The evidence base recommends that predictive energy performance modelling is conducted to demonstrate policy alignment with the EUI and SHD targets at planning submission, pre-commencement and pre-occupation. A modification proposes that predictive energy modelling is specifically referenced in the supporting text of the policy. The reference to predictive energy modelling is considered to provide enough flexibility in modelling applied but would ensure results with greater accuracy.

Part A of the policy states that energy-efficiency or emission reduction standards should not be set by plan-making authorities in their local plans. The rationale behind this policy was to align with draft National Planning Policy Framework (NPPF) policy PM13 which stated that development plan policies should not set quantitative standards that are already addressed by building regulations.

However, following consultation, adopted NPPF policy PM13 clearly exempts energy efficiency standards and states that any efficiency standards that go beyond Building Regulations should be expressed as a percentage uplift calculated using a specified version of a Building Regulations approved dwelling calculation methodology. A modification proposes that part A of the policy GHR1 is amended to align with the adopted NPPF, and to allow energy efficiency targets to be reflective of local circumstances.

To note, the introduction of energy use metrics in new London Plan policy GHR1 could conflict with NPPF policy PM13 as it introduces an alternative calculation methodology to Building Regulations. However, the NPPF specifically references 'dwellings', which draws into question how non-residential energy efficiency standards may be calculated. It's recommended that advice is sought to ensure alignment between the London Plan and NPPF policies.

Modification sought? Y

Commentary:

- A. This policy sets the energy-efficiency requirements as a minimum target for development in London; plan-making authorities should only set their own energy-efficiency or emissions reduction standards in local plans when evidenced by a clear and robustly costed rationale.
- B. (1) Development should minimise both annual and peak regulated and unregulated energy demand by meeting the following minimum energy use intensity (EUI) and space heating demand (SHD) standards (subject to local variation):

5.13 EUI is the total energy (regulated and unregulated) used by a building over a year, measured in kWh/m²/yr. SHD is the amount of heat energy needed to heat a building over a

year measured in kWh/m2/yr. The design of a building's form, fabric and ventilation systems affect SHD. Predictive energy modelling should be conducted to demonstrate policy alignment with the EUI and SHD targets at planning submission, pre-commencement and pre-occupation.

GHR2 – Low-cost low-carbon heat

INTERNAL COMMENTARY

Brief policy summary:

This policy aims to ensure that developments are supplied with the lowest cost, lowest carbon heating source and ensure that the best use is made of waste heat. The policy applies to all local plans, major developments and developments that generate significant waste heat.

The policy requires plan-making authorities to clearly set out identified Heat Network Zones in local plans. Heat Network Zones will supersede 'heat network priority areas' that are referenced in existing London Plan policy SI 3 'Energy Infrastructure'. Heat Network Zones are more clearly defined, less extensive than heat network priority areas, and should provide clearer signals to developers and planners about where connection to a heat network is genuinely viable and strategically encouraged. In line with this policy, the City Corporation has recently completed a 6-week consultation on the proposal to designate the whole of the Square Mile area as a Heat Network Zone, a work programme advancing through the Climate Action Strategy. The City Corporation has been one of 22 urban authorities taking part in the Government's Advanced Zoning Programme (AZP).

The policy requires all major developments to submit a Low Carbon Heat Appraisal to establish the optimum low carbon and low-cost heating solution for a site. Evidence suggests there is now a wide range of low carbon solutions available and there isn't a robust evidence base for a heating system hierarchy, as previously applied in policy SI 3. The shift to the Low Carbon Heat Appraisal introduces a flexible and context-sensitive process that would help identify the most appropriate heating system that delivers low carbon heat and low running costs, and enable this rationale to be shared transparently with the local borough and GLA for decision-making. Reference to gas-fired Combined Heat and Power (CHP) and gas boilers have been removed from the policy.

The policy is considered quite flexible to allow for alignment with emerging national legislation, including the Heat Network Zoning Regulations. It notes that if national regulations mandates connection to District Heat Networks, a low carbon heat appraisal would not be required. The policy states that LPAs and, in time, Zone Coordination Bodies will be important intermediaries between heat users, heat network operators and heat generators, with their advice drawing on their LAEPs. In the City Corporation's proposed response below, a modification proposed states that major developments within a Heat Network Zone should prioritise connection (or enable future connection) to the Heat Network.

The policy introduces a specific requirement for development proposals that would generate waste heat, requiring engagement with the LPA (or zone coordination body once established) and the preparation of a waste heat utilisation plan. This policy is considered a good opportunity to help align heat networks with waste heat sources such as data centres and commercial buildings, however is considered less relevant to the Square Mile as there aren't many large-scale waste heat sources within the City.

Key GLA evidence base:

Evidence base for operational energy and carbon policies (September, 2025) includes a review of existing policy SI 3 and Building Regulations to identify opportunity areas and gaps. It proposes a reporting frameworks and performance areas that the Low Carbon Heat Appraisal could include. It provides assessment of how the emerging policy can align to the heat network zones policy.

Heat Network studies are included in the evidence base. Including:

- The [London Heat Map](#) shows the locations of existing and proposed heat networks along with related assets such as potential sources of waste heat.
- The [Waste Heat Study \(2024\)](#) identifies known recoverable waste heat sources to examine how they could integrate with heat networks and support the decarbonisation of heat supply in London. None of the strategic areas are within the Square Mile.
- The *River Thames Study (2024)* assesses the opportunities of utilising heat from the River Thames to decarbonise both heating and cooling in areas close to the banks. The study identified that heat could be utilised from the river via Water Source Heat Pumps (WSHP) would be capable of supplying circa 5% of London's annual heat demand. However, the study assessed the challenges and implications of abstracting heat from the river, and concluded that heat networks in London that have access to alternative strategic waste heat should, where practical prioritise these.
- [Local Area Energy Plans for West, South, Central, Inner East and North London](#) (GLA 2023/2024). The City of London is within the Inner East and North London subregional LEAP.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary:

Sound? N

Commentary:

The City Corporation supports the overall direction of Policy GHR2, the application of heat network zones and alignment to emerging Heat Network Zoning regulations. However, recommended modifications to the proposed policies seek to further strengthen and support the prioritisation of Low Carbon Heat Networks, continuing the policy ambition of the previous London Plan.

It is recommended that the policies could be strengthened to support the GLA in cross-borough coordination on heat networks. A modification recommends that developments of a strategic interest and result in the significant generation of waste heat would engage with the GLA as well as LPAs. This engagement, as well as waste utilisation plans, would support GLA waste heat mapping exercises and help coordinate strategic sites that could share and transit waste heat into district heat networks across LPA boundaries. Supporting guidance should provide more detail on this, with reference to the GLA Waste Heat Study. Additionally, it's plan making policies could recommend that local plans safeguard space and potentially identify strategic sites for energy centres, to support heat networks.

Modification sought? Y

Commentary:

B. All major developments, should submit a Low Carbon Heat Appraisal to establish the optimum low carbon and low cost (considering upfront, whole life and end user costs) heating solution for their site. On-site solutions should only be electric (fossil fuel free).

C. Where relevant, it is expected that this optimum solution would comply with the government's Heat Network Zoning Regulations. All major developments within a Heat Network Zone should consider connection to the Heat Network as the starting point when assessing optimal solutions and if another solution is proposed should robustly demonstrate why that is preferred. hose developments that don't propose a connection should enable future connection.

D. Development proposals that will result in the generation of waste heat should engage with the LPA⁷⁵ for an opinion on whether the waste heat will be of an appropriate scale and temperature for supply into a heat network, as well as at a location of interest to a heat network develop. Development proposals that are of strategic interest and may be of an appropriate scale to supply multiple networks or LPAs areas should engage with the GLA in addition to the LPA. Where directed as a consequence of this opinion, a waste heat utilisation plan should be prepared, and the development proposal should incorporate design and specifications that optimise the opportunity for heat capture, storage and distribution infrastructure as required, to enable cost effective and timely heat supply to an existing or future heat network.

5.29 Development proposals that generate heat should be considered for their suitability to connect and contribute to local heat networks; the LPA (zone coordinator) is best placed to advise on this, with coordination with the GLA for development proposals of an appropriate scale to supply multiple networks.

GHR3 - Whole life-cycle carbon INTERNAL COMMENTARY

Brief policy summary:

The policy aims to ensure the assessment and reduction of up-front whole life carbon associated with development and construction. It applies to all referable planning applications.

Part A of the policy requires referable schemes to explore whether the existing structures can be retained to minimise embodied carbon emissions. Where development takes place on site with existing buildings and structures, re-use and retrofit, in part or as a whole, should be prioritised before considering substantial demolition. A pre-redevelopment audit should be submitted to inform decisions on the appropriateness of demolition in line with policies GHR3 and GLE11 Circular Economy. This policy is supported as it aligns with the emerging City Plan 2040 retrofit first policy. However, emerging City Plan 2040 retrofit policies are flexibly worded to account for all development, recognising minor applications as an important development type that delivers a large proportion of successful retrofits. Additionally, major applications should be encouraged to retain existing structures. Modifications to the policy are recommended to reflect this. The evidence base to policy GHR3, recommends that a definition for major refurbishment/major renovation is adopted and included in the London Plan to determine which schemes comply with the policy. The consultation response also recommends that a definition to support the implementation of this retention policy value is included in paragraph 5.33 policy implementation, or if not within the London Plan should be included in the WLC Guidance.

Both policy GHR3 and existing London plan policy SI 2 require the calculation and reporting of upfront and WLC emissions for referable developments. Emerging City Plan 2040 requires all development proposals to minimise whole life-cycle carbon emissions, and requires major developments to submit a whole life-cycle carbon assessment. Therefore, in the City Corporation's proposed response below, a modification proposes the scope of policy GHR3 is expanded so that all major developments consider upfront embodied carbon reductions, and major developments report WLC emissions (recognising that the London Plan covers the whole capital, where application of this to minor schemes may be less achievable).

Part C of the policy builds on policy SI 2 by introducing clear baseline and aspirational targets for upfront carbon, as outlined in the table below. In existing practice, City planning applications are compared to GLA benchmarks which are embedded within the WLC Assessment London Plan Guidance. This proposed policy would elevate these benchmarks into policy targets. The baseline target for class E use reflects a carbon and cost optimised solution, it allows a typical palette of materials to be used, but requires some thought about material efficiency measures. The aspirational target is broadly aligned with the UK Net Zero Carbon Building Standard (UK NZCBS) 2025 limit, plus an average for Cat A emissions. Cost modelling suggests that some design and material changes to reduce upfront carbon deliver cost savings, and that the cost £m² is lower for lower carbon solutions, however it's acknowledged this could affect the look and feel of a building both externally and internally. The introduction of embodied carbon targets is supported, however the consultation response to the GLA highlights that further guidance on the implementation and enforcement of these targets is required in WLC Guidance.

Type	Baseline target	Aspirational target
Residential <11m	500kgCO ₂ e/m ²	400kgCO ₂ e/m ²
Residential ≥11m	700kgCO ₂ e/m ²	565kgCO ₂ e/m ²
Use Class E	700kgCO ₂ e/m ²	605 kgCO ₂ e/m ²

For members' information, analysis of planning stage WLC assessment results indicate that 61% of all major City of London applications achieved the proposed baseline upfront embodied carbon target, 71% are within 10% of achieving them, and 85% of major retrofit schemes achieved the proposed baseline. This demonstrates that the proposed targets are more stringent than existing upfront carbon benchmarks and may present a challenge for more complex development applications City, but would be broadly achievable for developments across Greater London.

The evidence base suggests that due to predicted material decarbonisation, policy GHR3 should include a mechanism to reduce upfront carbon limits so they retain their purpose, and the policy doesn't get easier over time. This approach is similar to the UKNZCBS upfront carbon limits. The approach to stepped upfront carbon limits is supported and is recommended to be incorporated within the policy.

It should be noted that the draft policy does not appear to propose a change to the underlying assessment methodology. The current GLA approach is aligned with RICS Whole Life Carbon Assessment Methodology Version 1, whereas more recent industry guidance has moved towards Version 2, which is generally considered to provide a more accurate assessment of WLC impacts and can result in higher reported emissions. The evidence base recommends the use of RICS V2 methodology and reporting templates which is supported. It's recommended in the policy

consultation response that the wording in the WLC Guidance should be flexible to account for further industry updates and futureproof the methodology.

Key GLA evidence base:

Evidence base for embodied and whole life carbon policies (September, 2025) provides evidence on why planning policy should focus on embodied carbon as well as operational carbon. It identifies where there is a policy gap in national policy and building regulations, and why it needs to be filled in London Plan policy. It includes a policy review of existing GLA policies, local planning authority policies and industry standards to suggest a policy framing that would minimise embodied carbon emissions. It provides an evidence base on the upfront embodied carbon limits, using data analysis of previous planning applications, the UKNZCBS and other industry performance targets, and draft/emerging local plan targets. It explored the application of embodied carbon offsets, which were not introduced in the proposed policy. It includes recommendations on the process and implementation of the policy, including refined submission documentation proportionate to the scale of development to improve consistency of reporting, suggests a third party verification process (similar to the established third party review process in the City for carbon optioneering and WLC Assessments), and including pre-commencement and post-completion stage conditions. It's expected that these process-related recommendations would be integrated within the WLC Guidance, which is supported. However, whilst linked to WLC policies, research into 'retrofit first' policies and consideration of non-major refurbishment schemes were out of scope for this evidence base.

A [Low-Carbon future for London: Lessons from leading cities on Whole Life Carbon policy](#) (September, 2025) informs the London Plan policy development by analysing four cities, Helsinki, Oslo, Toronto and Vancouver, with additional insights from Stockholm and the Pacific Coast Collaborative. The case study cities began by embedding WLC limits, and reinforces that the London Plan should move from reporting to introducing policy targets. The study also suggested that a successful strategy for reducing WLC is not led by a single policy, but an ecosystem of reinforcing actions. It recognises the City's optioneering approach and retrofit first policy has shifted market behaviour effectively, and recommends the London Plan adopt the retrofit first principle.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? N

Commentary:

As recognised in other proposed London Plan policies on density and context, it is evident that the majority of London includes existing buildings and structures. Policy GHR3 recognises that retention, reuse and redevelopment of existing buildings and structures is important to reduce embodied carbon emissions. However, a retrofit first policy could and should be strengthened. Firstly, containing this policy to referable applications is a missed opportunity, given the potential for many major applications to retain existing structures. Therefore, modifications are sought to apply this policy to all major applications including the more stringent document requirements (submission of a pre-redevelopment audit and Whole Life-Cycle Carbon assessment), which have been viable and useful document requirements in the City since the previous London Plan.

Secondly, the evidence recommends that a definition for major refurbishment/major renovation is adopted. Thirdly, 'retrofit first' policies and consideration of non-major refurbishment schemes were out of scope in the Embodied and whole life carbon policies (September, 2025) base, however the prioritisation of retention and retrofit was a key theme raised in the draft London Plan consultation report, and should therefore be properly addressed in the evidence base and policy.

The evidence base for embodied and whole life carbon policies (September, 2025) recommended that the policy should include a stepped-mechanism to reduce upfront carbon limits to factor in predicted material decarbonisation, so the targets retain their purpose, and the policy doesn't get easier over time. This approach is similar to the UKNZCBS upfront carbon limits. This approach is supported it's recommended that the policy introduces a stepped-mechanism for upfront carbon limits.

Modification sought? Y

Commentary:

Applies to: Major development

- A. ~~Referable~~ Major applications on sites that include existing buildings and structures should assess the potential for retaining and retrofitting those existing structures as part of redevelopment proposals to minimise embodied carbon emissions. ~~A All major developments should submit a pre-redevelopment audit should be submitted~~ to inform decisions on the appropriateness of demolition in line with Policy GLE11 Circular Economy.
- C. Major developments should calculate and reduce upfront embodied carbon emissions.
 - 1) As a minimum, proposals should meet the relevant baseline targets and aim to meet the aspirational targets. To account for material decarbonisation, a stepped-mechanism should be integrated in the policy:

5.33 Considerations of building retention should be set out as part of a pre-redevelopment audit that considers alternative development options for the site and aligns with requirements of GL11 Circular Economy and related WLC and CE guidance. For the purpose of measuring and encouraging the retention of existing buildings and structures in pre-redevelopment audits, the retention and reuse of at least 50% of the existing floor slabs should be prioritised.

GHR4 - Heat risk

INTERNAL COMMENTARY

Brief policy summary:

This policy aims to reduce contributions to the Urban Heat Island (UHI) effect and reduce and mitigate overheating. It applies to all major developments. The ambition of the policy is supported as 'overheating' is identified as a key risk in the City Corporation's Climate Action Strategy and Adaptive Pathways Study.

Compared to the previous London Plan, part A of the policy introduces a stronger focus on the UHI effect and how master planning and design strategies should reduce contributions to and mitigate impacts of the UHI. Key measures focus on green and blue infrastructure, use of high albedo materials, consideration of how built form, orientation and layout impacts the microclimate, and minimising the rejection of waste heat align. These measures align to City Plan policy CR1 and the

Planning for Sustainability SPD. The proposed policy goes further to suggest that conditions should be used to secure these measures where appropriate.

To address overheating risks, part B of the policy requires applicants to justify how the design of the development maximises passive design measures, and minimises energy use associated with cooling. Rather than applying the cooling hierarchy from the previous London Plan, this policy focuses on measures to reduce solar gains and reduce and remove excess heat (through ventilation strategies), to minimise the need for active cooling such as air conditioning. This structure, and the proposed measures align to policy CR1 of emerging City Plan 2040 and are broadly supported. There's a focus on external shading and minimising glazing which links to policy MBUL6. It recognises that this policy doesn't prevent the use of air conditioning but it must be demonstrated all feasible passive design measures have been incorporated, and active cooling is designed to maximise efficiency. Dynamic thermal modelling and overheating assessments will be required, and further guidance is expected on the how these documents and datasets should be used. This aligns with the emerging City Plan 2040 and Planning for Sustainability SPD which states that all developments should consider future weather projections to consider overheating impacts over the development lifespan, and references CISBE future weather data for London files.

To strengthen the policy, the City Corporation response suggests that a plan-making policy is introduced to ensure that heat risk policies are incorporated into Local Plans to address context specific risks and improve the resilience of local areas. This would respond to NPPF policy CC1 and reflect emerging City Plan policies S15 and CR1.

Key GLA evidence base:

[London Climate Risk Maps](#) - analyses climate exposure and vulnerability across Greater London. The map overlaps exposure to climate impacts with vulnerable populations, as high climate risk coincides with areas of income and health inequalities. Due to the social overlay of the map, the majority of the Square Mile is considered to have a lower-overall climate vulnerability to heat risk and flood risk, with the exception an area bordering Tower Hamlets (Houndsditch Street to Minories). The map still demonstrates the City has the lowest levels of tree canopy cover, blue/green land cover, and access to public open space.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Y

Commentary:

The City Corporation supports the ambition of policy GHR4, particularly the stronger focus on the Urban Heat Island effect and passive design measures that would reduce overheating risk and reduce the reliance on active cooling.

NPPF policy CC1 notes that development plans to take a proactive approach to adapting to climate change, taking into account risks such as overheating. It's therefore recommended that policy GHR4 could be strengthened by the introduction of a plan-making policy to ensure that heat risk policies are incorporated into Local Plans to address context specific risks and improve the resilience of local areas.

Modification sought? N

Commentary: No comment

GHR5 Flood Risk and drainage

INTERNAL COMMENTARY

Brief policy summary:

This policy would consolidate existing London Plan policies SI 12 Flood Risk Management and SI 13 Sustainable drainage. The purpose of the policy is to ensure that new developments contribute to reducing London's surface-water flood risk, improving resilience in a targeted way. Part A of the policy requires planning authorities to plan for Sustainable Urban Drainage Systems (SuDs) at a neighbourhood scale by using the latest evidence to identify priority areas for surface water management or flood risk interventions, and ensure planning-based levers secure SuDs in an integrated manner across areas of significant change.

The policy applies to all planning applications and responses should be set out in design and access statements if a separate assessment is not required. All development proposals should not increase surface-water run-off and should maximise opportunities to reduce surface-water risk in a manner that is consistent with an integrated water management approach. The drainage hierarchy in Box GHR5 is consistent with the drainage hierarchy from existing London Plan policy SI 13, which is referenced in policy CR3 in the emerging City Plan 2040.

Expectations are higher for referable development, which should aim to achieve on-site greenfield run-off rates through a combination of onsite measures (prioritised) and (contributions to) off-site sustainable drainage measures. This requirement is more specific than City Plan policy CR3 which states proposals should demonstrate run-off rates are as close as possible to greenfield rates.

Policy GHR5 introduces off-site contributions, to be calculated using the greenfield runoff rate, an established metric in National Standards, and applying a London-wide reference rate of £4,600/m³ or as updated by the GLA, or at a locally established rate set out in a Local Plan and as agreed in consultation with the GLA. Due to London's typical development plot areas, density and context, the policy recognises that off-site contributions may be strategically preferable as they could deliver wider benefits where on-site solutions are not achievable.

The off-site contributions is a new planning lever that would be particularly applicable to the Square Mile due to the dense context and challenges of delivering on-site SuDs. It would enable SuDs to be delivered in an integrated way at a neighbourhood scale through developer contributions. However, there are concerns about potential unintended consequences of the offsetting policy, which are outlined in the chapter summary consultation response. Firstly, the policy states that on-site contributions should be prioritised, which is critical to ensure applicants focus on improving the flood resilience of their own development the site in the first instance. As evidenced in the removal of carbon offsets in GHR1, the use of offsetting to provide flexibility within policy can be contentious as it is a way for an applicant to be deemed compliant with a policy without necessarily meeting the intent of the policy. Secondly, the cost of delivering SuDs is expensive within the constrained environment of the Square Mile and the London-wide reference rate is unlikely to deliver an equivalent offset for the equivalent cost of on-site SuDS provision through the delivery of off-site contributions. A locally established rate would likely need to be established and would need to be set at a prohibitively high rate to ensure applicants do not

default to off-setting in the majority of developments. Finally, further guidance is required on the governance and implementation of the off-site contributions, such as what authority would manage the offset fund and the delivery of off-site contributions. Guidance on where off-site contributions would be located in terms of proximity to the development is required, for example whether it should be delivered within the borough, or could be delivered in a wider catchment area.

Key GLA evidence base:

SuDs Opportunity Mapping identified locations for SuDs schemes that could achieve the greatest benefits in terms of surface water flood risk resilience, sewer capacity and natural capital.

[London Regional Flood Risk Assessment: Part 1](#) (March 2026) and [Part 2](#) (July 2026) provides an overview of all sources of flooding in London and addresses its probability and consequences. It was prepared by the GLA in collaboration with the Environment Agency, Transport for London, London Resilience and Thames Water.

[London Surface Water Strategy \(GLA\)](#) is a vision of how the risk of surface water flooding can be addressed. It has created ten new Surface Water Catchment Partnerships (SWCPs) to bring together organisations to plan jointly, share resources and manage flood risk effectively. The City of London is in the Central London SWCP, with Tower Hamlets, Hackney, Islington, Camden, Westminster, RBKC and Hammersmith and Fulham. The SWCPs will develop Surface Water Catchment Action Plans (SWCAPs) to set out policies and actions to plan, design, and deliver flood reduction measures.

The evidence base also includes other policy documents that are referenced in the City Plan 2040 and Planning for Sustainability SPD such as the Thames Estuary 2100 (Environment Agency 2023) and Thames River Basin District Management Plan (Environment Agency 2022).

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary:

Sound? Y

Commentary:

Modification sought? N

Commentary:

GHR6 - Trees, biodiversity and geodiversity

INTERNAL COMMENTARY

Brief policy summary:

This policy continues much of the approach of the existing London Plan including the identification of areas of deficiency in access to nature and the protection and improvement of the SINC network. The response as below will highlight some long-standing concerns that the AoD methodology of 1k in the context of the Square Mile.

The Policy now makes specific mention to the Local Nature Recovery Strategy (LNRS), a new requirement of the 2021 Environment Act. This is a spatially-mapped framework for habitat creation and biodiversity priorities for London and includes the identification of new Areas that

Could Become of Particular Importance to Biodiversity (ACB), which includes an 'arc' across the City. Practically this means that any applications in these areas requiring statutory BNG are encouraged to deliver particular priority habitats. The policy also states that development should use the LNRS to inform habitat creation proposals, informed by the London Green Infrastructure Framework (LGIF) and where possible a Local Nature Recovery Action Plan or Biodiversity Action Plan. This provides CoL further opportunity to scope out what is or could be ecologically important for development in the Square Mile.

It is notable that part E directly references the national Biodiversity Net Gain (BNG) requirements and does not set out any bespoke approach for London. The new NPPF now severely limits the ability for local plans to go above the statutory 10% requirement or seek contributions which would otherwise be exempt. This is highly disappointing as it means that no or 'limited weight' can be applied to the City Plan's emerging Policy OS4 BNG, and the biodiversity gains that we have been achieving through development to date will have to drawn out through the Urban Greening Factor alone. While the UGF provides a useful framework, it can encourage a compliance-based approach rather than the delivery of high-quality, biodiverse green infrastructure. This is likely to result in a decrease in provision and the delivery of such space will lack the rigour of the statutory process. The response below will highlight this concern and suggest that some strategic direction on the application of the UGF in this context would be helpful.

Parts D and E state that proposals should contribute to London's nature recovery, and be prioritised in London, this should avoid impact to SINCs and where required deliver off-site compensation to better biodiversity value. Without being able to deliver a bespoke BNG policy to support this, sites in dense urban areas like CoL could face impacts with limited mitigations. The response as below makes the point that at a strategic level it would be helpful if further research focussed upon how species and habitats to survive in dense urban contexts, e.g. high-level green roofs to make the best use and positive impact of urban greening on a variety of sites.

Some aspects of the policy, such as ancient woodland protection have limited direct relevance within the Square Mile due to its size and urban character. However, the underlying objectives of protecting trees, protecting priority habitat, improving biodiversity and increasing climate resilience remain important, including ensuring the four veteran trees identified in the Square Mile are preserved and enhanced. The policy is also relevant to the CoL Corporation's wider landholdings and assets, including Epping Forest and other open spaces which extent beyond the Square Mile. It is also noted that the policy increasing tree canopy coverage in 'strategic locations' but these are undefined so further detail is requested.

Policy could benefit from greater clarify on the additional strategic value it provides beyond national policy and BNG requirements. Supporting evidence (LNRS) Annex 2 Description of Strategy area touches on the pressures that are expected to impact London's nature in the future. It could be concluded that the approach of following national policy severely limits the opportunity to secure biodiversity gains in dense urban areas and manage pressures on existing sites due to this limited provision. With updated regulations enforcing exemption on development below 0.2ha, which is a large proportion of sites put forward in central London, further exacerbating this.

Key GLA evidence base:

[London Local Nature Recovery Strategy \(LNRS\)](#)- identifies where and how nature recovery should be prioritised across London. It establishes six overarching principles, 30 biodiversity priorities and

a range of measures to support nature recovery, alongside a Local Habitat Map identifying Areas of Particular Importance for Biodiversity (APIB) and Areas that Could Become of Importance for Biodiversity (ACB).

[London Green Infrastructure Framework \(LGIF\)](#)- offers a spatial evidence base for green and blue infrastructure planning, including canopy cover priorities and areas deficient in access to nature. The idea is to collate key data of green infrastructure so it is contained within one place and provide a steer for decision makers such as LPAs.

For the City both the LNRS and LGIF identify the following:

- LNRS: ACB1267 and PM154 – Green corridors to restore, expand and connect terrestrial and linear habitats within central London
- LGIF: the Square Mile is of Medium Need of GI and Low Provision of GI across the LGIFs combined objectives.
 - Scoring higher in need for objectives such as increased access to green space and clean air.

London Wildlife Sites Board Advice Note (2026) - sets out principles for SINC review, designation and grading, recommending moving to one unified SINC Borough grade

Natural England's Green Infrastructure Framework Process Guide for Local Planning Authorities (2024), promotes a strategic and multifunctional approach to green infrastructure delivery.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Don't know

Commentary:

The City Corporation broadly supports Policy GHR6, particularly its integration of the London Local Nature Recovery Strategy (LNRS). However, given the context of the NPPF's changes in relation to BNG the UGF now will be the primary policy tool to deliver significant biodiversity enhancements within the Square Mile, therefore some further strategic direction on its application would be helpful. This could include guidance on practical measures for the delivery of biodiversity in central London/CAZ, such as through biodiverse green roofs, etc and guidance for how meaningful biodiversity gains can be achieved where opportunities for ground-level habitat creation are limited. Further to this it should reference the use of site allocations in determined areas to deliver biodiversity above the statutory target to further support securing biodiversity in London and particularly Central London/CAZ.

The policy would benefit from further clarification on the definition of "strategic locations" these are not defined in the context of this policy. The Corporation also does have some long-standing concerns that the AoD methodology of 1k is not always appropriate within the Square Mile and some flexibility of application in this context would be helpful.

Modification sought? N

Commentary: No comment

GHR7 - Green infrastructure and the Urban Greening Factor

INTERNAL COMMENTARY

Brief policy summary:

Policy GHR7 promotes the delivery of multi-functional green infrastructure across London through continued use of the Urban Greening Factor (UGF) and the new London Green Infrastructure Framework (LGIF). The approach is largely the same as that contained within the current London Plan but it is notable that it now includes a separate target for industrial development. In the context of the NPPF changes for BNG, the UGF does not factor in loss of existing biodiversity habitats (which BNG approach does) and therefore it is considered that in the context of many sites within the City being exempt from BNG more could be done within this policy to seek out meaningful biodiversity outcomes. The response as below will therefore highlight broad support but, as above, will highlight that in combination of the paired back approach to BNG within national policy, further strengthening or additional guidance on how the UGF can deliver more meaningful biodiversity enhancements.

Key GLA evidence base:

London Green Infrastructure Framework (LGIF)- (see above)

[Urban Greening Factor \(UGF\) Report](#) - reviews the effectiveness of the current UGF approach. It suggests broad support for UGF as a simple and effective tool for securing greening in development, particularly on highly urbanised sites where baseline biodiversity is low and confirms that UGF continues to have a key role alongside BNG. However it is notable that this pre-dates the new NPPF so the response as below will also highlight this.

The report notes that UGF and BNG are complementary, with UGF providing the “land use and function” framework for greening while BNG focuses on “character and diversity”, but that the two are often prepared by different specialists and considered at distinct stages of the design process. The report therefore recommends stronger alignment between the two approaches, including the use of combined UGF and BNG masterplans to support more coordinated green infrastructure delivery.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary:

Sound? Don't know

Commentary:

The City of London broadly supports Policy GHR7 and its focus on delivering urban greening through the Urban Greening Factor (UGF). However, in the context of the NPPF changes for BNG, the UGF alone does not factor in loss of existing biodiversity habitats therefore further strengthening or additional guidance on how the UGF can deliver more meaningful biodiversity enhancements would be beneficial. It is notable that the evidence in support of this policy pre-dates the change in the NPPF therefore the City Corporation suggests that this should be updated to provide additional policy recommendations.

Modification sought? N

Commentary: No comment

GHR8 - Accessible green space

INTERNAL COMMENTARY

Brief policy summary:

Policy GHR8 sets out a number of requirements for local plans in relation to the requirement to designate and assess the availability of accessible green space provision, address any identified deficiencies and to identify opportunities to make enhancements. It makes direct reference to the use of national standards of greenspace provision but usefully, reflecting the approach of the new NPPF, sets out that a justification for deviation from these standards may be appropriate. The response will support this in the context of the applicability of the national standards to the Square Mile. The policy also supports off-site contributions where site constraints limit delivery which is relevant to many areas located in the CAZ. This approach will be supported in the context of the constraints of the Square Mile, however this is likely to involve setting a cost-per-hectare for any off-site provision which will then be secured through a S106 agreement.

The 2021 London Plan formerly used the terminology of 'Public Open Space' but has replaced by AGS in 2026 to align with terminology used nationally. It should be noted that the focus on green space is narrower than that of the City Plan 2040 Policy OS1 which recognises that much of the Square Mile's open space network comprises small historic churchyards, gardens, plazas and other public spaces, many of which are hard-landscaped rather than traditionally 'green'. This will be brought out in the response. It will also suggest that the term 'accessible' should also be defined in the context of inclusion.

It is also noted that Table 5.2 no longer includes a category for 'Linear Open Spaces', and the response as below will therefore raise concerns about the impacts of this in the deficiency conclusions. Figure 5.3 which shows a London-wide map applying these standards suggests that a large proportion of the City would be considered deficient. Officers will need to work with GiGL to understand the implications of this change.

Key GLA evidence base:

[Public London Charter \(2021\)](#) and the *Public Open Space Mechanisms Review (2026)*. These documents provide the strategic basis for identifying accessible green space priorities, targeting greening interventions, assessing deficiencies in provision, and informing the management and maintenance of publicly accessible green space.

The [Public Open Spaces, Policy Mechanisms Review](#) - reviews how Public Open Space (POS) and Accessible Green Space (AGS) are planned and secured across London and explores alternative methods for identifying Areas of Deficiency (AoDs). This change in emphasis towards green space may mean that more of the open space in the Square Mile would not meet the criteria of designation.

The report recommends the refined accessibility hierarchy as contained within Table 5.2 and greater emphasis on improving the quality and functionality of existing open spaces. The response will welcome these conclusions, particularly the recognition that LPAs require flexibility to develop locally appropriate standards where London-wide metrics are not achievable.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Don't know

Commentary:

The City Corporation broadly supports Policy GHR8 and its aim of improving access to green space through a flexible approach that prioritises on-site provision but allows off-site contributions and enhancements where delivery is constrained. This is particularly important within the dense urban environment of the Square Mile located in the heart of the CAZ. It also supports emphasis of improving the quality and functionality of existing open spaces.

However, the policy's renewed focus on Accessible Green Space (AGS) does not fully reflect the City's unique network of historic churchyards, pocket parks, gardens and other publicly accessible spaces that make a significant contribution to the public realm but may not always be considered to be 'green'. Due to the Square Mile's compact size, dense urban form and large daytime population, standardised open space and Areas of Deficiency (AoD) measures do not always reflect local circumstances, therefore flexibility from the application of national standards in this policy is supported. The City Corporation also considers that the term 'accessible' should also be defined in the context of inclusion.

The City Corporation is concerned about the impacts of the removal of the 'Linear Open Space' category on the areas of deficiency outcomes. Given that much of the accessible open space within the Square Mile is currently within this category it is likely to draw considerably different conclusions at a local level. The rationale for this change should be clearly explained.

Modification sought? N

Commentary: No comment

GHR9 - Clean and healthy waterways

INTERNAL COMMENTARY

Brief policy summary:

This policy aims to secure clean and healthy waterways that positively contribute to London's recovery, health, resilience, inclusivity, character and identity.

Local Plan policies should support waterways become more visible, accessible and positively integrated with development by incorporating elements of joint Thames Strategies and Thames Estuary 2100 (TE2100) project. Box GHR9 introduces Riverside strategy principles that align to TE2100 requirements. Policy CR4 of the emerging City Plan integrates the flood defence principles

within GHR9, however, a future plan could be expanded to incorporate principles focused on strengthening community access and broader habitat improvements. The emerging City Plan 2040 spatial strategy identifies the riverside walkway, riverside open spaces and proposes walking improvements along the entire bank of the Thames.

Development management policies apply to all developments with a spatial or functional existing or potential relationship with one of London's waterways (the Thames in the context of the Square Mile). Development proposals should minimise the potential for misconnections between foul and surface-water networks (in line with MBUL4), conserve and enhance the open character and heritage of waterways, ensure sufficient space is provided between developments and waterways to provide natural corridors, provide safe and inclusive access to and along the waterway, and protect and enhance existing moorings. Policies are introduced for new or expanded moorings. Referable schemes should use a water quality assessment to inform development and mitigation measures, including SuDs, that would be implemented to improve water quality.

Key GLA evidence base:

The *Thames Estuary 2100* (Environment Agency, 2023) provides recommendations to manage tidal flood risk in the Thames until the end of the century and beyond. It also seeks to enhance the riverside environment, create flood resilience communities, support economic growth and provide environmental gain.

The [Mayor's Clean Rivers and Waterways Plan](#) (GLA, 2026) is a 10-year plan for London's waterways which establishes 48 actions and 17 goals under four themes: water quality, nature, access, and inclusion and engagement. Early investment and delivery will be concentrated in 10 strategic locations, none located within the Square Mile.

The [Thames Strategy London Central](#) is being developed by the Thames Estuary Partnership (TEP), to close the gap between other joint Thames strategies. It will include recommendations on how to enhance the riverside and protect it from future flood events. Whilst the strategy hasn't been released yet, policy GHR9 states Local Plans should embed the planning levers to deliver the Joint Thames Strategies.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Y

Commentary: No comment

Modification sought? N

Commentary: No comment

GHR10 - Air quality

INTERNAL COMMENTARY

Brief policy summary:

The policy aims to ensure that local air quality is improved, to reduce exposure risk associated with air pollution and poor air quality, and work towards meeting the World Health Organisations air-quality guidelines. The policy applies to all developments.

According to Part A, local planning authorities should use the latest evidence available regarding poor air quality, vulnerability and exposure to review and identify areas of concern on the policies map, prioritise interventions, and inform area-based approaches to plan for air quality improvements and exposure reduction. City Plan policy HL2 recognises that due to the Square Mile's location at the heart of London, it has high levels of air pollution and has been declared an Air Quality Management Area (AQMA). Policy HL2, the Air Quality SPD and Air Quality Strategy aim to ensure that air quality in over 90% of the Square Mile meets the WHO second interim target for NO₂, the WHO Guideline for PM₁₀ and the national target for PM_{2.5} by 2030. These are higher than the Mayor of London's targets.

Part C requires major developments in identified AQMAs to undertake Air Quality Assessments iteratively from an early stage, this is consistent with existing London Plan policy SI 1 and City Plan 2040 policy HL2, however aims to bring these assessments earlier in the planning process.

Part B and D apply to all developments. All developments should meet NRMM Low Emission Zone (LEZ) requirements and all developments that could have operational (transport and or/building plant) air quality impacts should be demonstrably Air Quality Neutral (AQN). Both policies align with City Plan 2040 policy HL2. Part D specifically states that emissions from generators should be minimised by meeting EU standards as a minimum, and emissions from backup generators should be included as part of AQN assessments. As a key focus in the City, this goes some way to support the Air Quality SPD.

Part E applies to developments subject to an Environmental Impact Assessment (EIA) and include air quality within the scope. It requires these developments to go beyond AQN benchmarks and deliver air quality improvements through different features and measures. This aligns with City Plan 2040 policy HL2 which requires developments subject to an EIA should adopt an air quality positive approach, as defined in the Air Quality SPD.

The draft policy retains a compliance-based and Air Quality Neutral focussed framework at a time when national policy has moved towards minimisation of emissions and exposure through design. Therefore, the response below suggests that the chapter should be reframed around the principle that emissions of PM_{2.5}, its precursors and other pollutants should be reduced as far as reasonably practicable and exposure minimised wherever possible. Without this shift, the policy risks being less ambitious than current national guidance and may not drive further improvements in air quality across London.

The response as below will also highlight that poor air quality does not affect all Londoners equally and can have disproportionate impacts on children, older people, disabled people and those with existing health conditions.

It is noted that a time-bound PM_{2.5} target is included in paragraph 5.107 rather than the policy itself, and consideration whether a longer-term trajectory towards the full WHO guideline should may assist.

Key GLA evidence base:

The [London Environment Strategy](#) (2018) includes air quality objectives that are reflected in this policy. Poor air quality is defined in relation to World Health Organisation guidelines for PM_{2.5} and national air quality objectives (DEFRA) for PM₁₀ and NO₂.

Air Quality Neutral is existing London Plan Guidance that sets air quality benchmarks for all development, in order to ensure that their transport and building emissions do not worsen air quality in London.

Air Quality Positive is existing London Plan Guidance that provides good practice guidance on how developments can go beyond compliance with both the AQN benchmarks and the minimum requirements of an air quality assessment.

The Non-Road Mobile Machinery (NRMM) Low Emission Zone (LEZ) standards apply across Greater London. It recognises construction machinery as a major contributor to air pollution and applies EU Directives with a staged approach.

London Atmospheric Emissions Inventory (LAEI) is a London-based system that estimates and reports on emissions of various pollutants from different sources within Greater London. A sustained and substantial reduction in total emissions has been observed since the introduction of Mayoral air quality policies in 2016.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary:

Sound? Don't know

Commentary:

The air quality chapter is built around the previous London Air Quality Neutral (AQN) / Air Quality Positive (AQP) framework, areas of concern and legal compliance testing, whereas national policy has moved away from this. The City Corporation considers that this overall approach is reactive rather than preventative, and is target driven rather than health driven. Defra's 2024 interim planning guidance for PM_{2.5} and its precursors focuses on minimising emissions and exposure from the earliest design stage, regardless of whether legal limits are exceeded. Consequently, air quality requirements for development across the rest of England are tighter than those required by the draft London Plan.

In the interim guidance, Defra states:

"The new approach moves away from a requirement to assess solely whether a scheme is likely to lead to an exceedance of a legal limit and instead ensures that appropriate mitigation measures are implemented from the design stage, ensuring the minimum amount of pollution is emitted and that exposure is minimised."

The City Corporation considers that the policy should align with Defra's PM_{2.5} interim planning guidance by requiring applicants to demonstrate that emissions of PM_{2.5}, its precursors and other pollutants (NO₂ and PM₁₀), and exposure to them, have been minimised as far as reasonably practicable through the design process. Compliance with national or London specific concentration-based objectives/limits/targets should not be the primary test.

The policy aim does not match policy tests and therefore the City Corporation considers that the policy objective and development management criteria are not aligned. The objective implies London-wide air quality improvement, but the policy tests are primarily benchmark and compliance based.

The definition of “poor air quality” is also inconsistent and difficult to apply. Paragraph 5.107 defines poor air quality as the WHO Interim Target 4 for PM_{2.5} (10 µg/m³) whilst the less ambitious national objectives are used for NO₂ and PM₁₀. This is also relevant to paragraph 5.108 where “higher” Mayoral air quality guidelines are referenced.

A single clear description should be adopted with all Mayoral ambitions for PM_{2.5}, PM₁₀ and NO₂ stated. The draft Plan suggests that Greater London is adopting less ambitious thresholds than some boroughs, including the City of London Corporation.

The “areas of concern” approach is unclear as Policy C only requires iterative Air Quality Assessments in “identified areas of concern”. It is unclear what these are. Limiting detailed consideration to “areas of concern” appears contrary to the objective of reducing PM_{2.5} emissions and exposure across the whole of the country, including London.

Paragraph 5.112 states development must not cause new exceedances; and not delay attainment of limits. If this approach is to be retained, as a principal decision-making test it should appear in the policy itself rather than being buried in supporting text. Additionally, this approach doesn’t align with the Defra interim planning guidance and is unambitious given that paragraph 5.121 states that adverse health impacts occur at levels below existing national air quality objectives.

Paragraph 5.121 should be revised so that the evidence on health impacts below existing objectives provides a clear justification for requiring emissions and exposure to be minimised through design, rather than only supporting a general policy aspiration to reduce emissions.

Point B of the development management section says: *Demolition, construction and ongoing operations deploying non-road mobile machinery (NRMM) should be planned to minimise dust and plant emission impacts*. Currently the requirements of the NRMM LEZ do not apply to “ongoing operations”, only during the deconstruction/demolition/construction phases of a development.

In relation to EU Stage V Emission Standards, Regulation 2016/1628 (and previous regulations) are specific to non-road emission standards. Stating “EU Stage V” would cause confusion as this terminology is not relevant for permanently installed generators.

The definition of an “emergency” and a non-emergency should be clearer in paragraph 5.116. Using terminology such as Business Continuity, and a definition of this, would aid the explanation. It is extremely important for AQN that it is clearly defined what is in-scope and what is out of scope.

References to Environmental Impact Assessment development should be reviewed and broadened to reflect the transition to Environmental Outcomes Reports, so the policy and supporting text do not become outdated quickly.

References to building plant are behind current regulations. The supporting text should place less emphasis on boilers and routine combustion plant and more emphasis on likely future sources of emissions, including vehicles, standby generators, data centres and associated transport impacts.

Finally, the City Corporation acknowledges that poor air quality does not affect all Londoners equally and can have disproportionate impacts on children, older people, disabled people and

those with existing health conditions. The Plan should recognise these distributional impacts more explicitly.

Modification sought? Y

Commentary: Replace “WHO Guidelines 2024” with “WHO Air Quality Guidelines 2021”.

GHR11 - Cycle and car parking

INTERNAL COMMENTARY

Brief policy summary:

This introduces cycle parking minimums based on a percentage of full-time staff. The City is located in Band 2 which requires cycle parking provided for 10% of the staff, but the response as below will highlight that there is no justification or evidence behind this. Tower Hamlets and Camden are the only of the City’s neighbours to also be in this Band. Within Band 1 cycle parking has to be provided for 15% of staff, Bands 2 and 3 are 10% and Band 4 is 7.5%.

The policy sets out circumstances where it would be acceptable to provide less than the required minimum parking, including viability impacts for basements, small building footprint relative to the overall floorspace and whether the amount of cycle parking generated has a disproportionate effect on requiring what could otherwise be lettable floorspace. The response as below will provide support to this approach.

Comparing the London Plan 2021 and the Draft London Plan 2026, this policy approach would result in a 64% reduction in long-stay cycle parking in offices. The response as below supports a policy that strikes a more appropriate balance between providing for needs the facilitate a modal shift and the cost and carbon impacts of extensive basement excavation. For calculating the number of staff to provide cycle parking spaces for, paragraph 5.122 states that one member of staff per 15 sqm NIA should be assumed, which aligns with the typical flight to quality densities seen in City offices. For shared-living and student accommodation Band 2 requires 0.7 spaces required per unit.

For short stay cycle parking, amounts are required for shops, services, sale of food and drink and dwellings. It gives boroughs direction on where the level of provision for short stay should have regard to: local cycle mode share, anticipated demand and TfL and national guidance. Band 2 for shops, services and sale of food or drink is 1 per 70 sqm NIA. The policy provides specific direction on where long or short stay cycle parking cannot be met how alternative locations, provision or in contributions should be sought.

The policy does not specify short-stay or visitor cycle parking for offices or hotel uses. Part GHR11 (D) states that when uses are not listed then the level of provision should have regard to borough or local cycle mode share, anticipated demand and TfL guidance. The Corporation will need to determine what level of short-stay and visitor cycle parking would be asked for in planning applications.

The policy does not change the design and layout of cycle parking, continuing to reference the existing London Cycling Design Standards.

Part E of the policy is new compared to London Plan 2021. London Plan 2021 did not have flexibility for long-stay non-residential cycle parking. Part E of the policy provides flexibility to provision of cycle parking but it is use agnostic.

Parking is now in one policy. For car parking, the Square Mile is within SAM 5 so the maximum car parking provision is 0. But part K of the policy states that disabled persons' parking should be available for new non-residential development. However, Clause H says that 'if a need for car parking for a development is identified, the use or control of existing on-street, other public or shared parking should first be considered' which is inconsistent with the City Plan 2040.

Key GLA evidence base:

No new evidence appears to have been developed for this policy. Cited works include:

- <https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit>
- <https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120>
- <https://www.gov.uk/government/publications/inclusive-mobility-making-transport-accessible-for-passengers-and-pedestrians>
- [GLA](#) Employment Sites Database, March 2026
- <https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m>
- <https://www.gov.uk/government/publications/inclusive-mobility-making-transport-accessible-for-passengers-and-pedestrians>
- British Standards Institution, 'BS 8300-1:2018: Design of an Accessible and Inclusive Built Environment: Part 1: External Environment—Code of Practice' (2018)

The GLA did not cite this report but the GLA are aware of it: cityoflondon.gov.uk/assets/Services-Environment/REP-R0176-003A-City-Property-Association-CPA-Appendix-1-to-Hearing-Statement-Matter-16.pdf

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Don't know

Commentary:

The City Corporation notes that part D does not specify short-stay cycle parking for office uses. Additionally, short-stay space is required for cargo cycles to make sustainable deliveries in the Square Mile. As stated in the City Corporation's 2026 City Streets Summary, cargo cycles have more than double since 2023. Developers should be required to provide space for short-stay cycle parking to support the trips produced by offices.

Part K of the policy should be clear at the outset that disabled persons' car parking does not negate a car-free development. The policy should acknowledge that a minimum of one space is required for disabled persons. The policy should require that the disabled persons' car parking space should be on-site and designed in line with section 8.2 of 'Inclusive Mobility'. Without inclusive transport metrics included in the SAM analysis, it is not possible to know the extent to

which public transport in the City is inclusive or not to support continued employment growth for a wide variety of users.

In table 5.7 short-stay cycling provision should be added for office uses.

Part K of the policy should be clear at the outset that disabled persons' car parking does not negate a car-free development. The policy should acknowledge that a minimum of one space is required for disabled persons. The policy should require that the disabled persons' car parking space should be on-site and designed in line with section 8.2 of 'Inclusive Mobility'

Modification sought? N

Commentary:.

FOR FORMAL CONSULTATION RESPONSE

Overall chapter comment

The operational and upfront embodied carbon targets are supported within policies GHR1 and GHR3. In addition to the upfront embodied carbon targets introduced in the policy, it's considered important that the supporting guidance still includes whole life-cycle carbon reporting, and benchmarks for life-cycle embodied carbon (A-C) and whole life-cycle carbon (A-C, incl. B6-B7). It's recommended that further guidance under 'implementation' of each policy is provided to guide planning authorities on how to enforce the targets. For example, if a planning application exceeds the baseline EUI or upfront embodied carbon target, would it be expected that the application would be refused or would the non-compliance be reported and managed in the planning balance? If not specified under the policy implementation, it's recommended that this is outlined in supporting guidance.

In addition to the policy modifications outlined in response to policy GHR2, the City queries whether the low-cost low-carbon heat policy could be expanded to include cooling. The 'Be Clean' chapter in the existing Energy Assessment Guidance includes good detail about connecting to existing networks and futureproofing buildings for connection to planned heat network. It's recommended that similar guidance is prepared to support policy GHR2. The guidance should include detail about the compatibility of VRF systems with heat networks, to assist applicants and LPAs in futureproofing future connections.

The evidence base for embodied and whole life-cycle carbon policies (September, 2025), recommends the use of RICS Whole Life Carbon Assessment Methodology Version 2 calculation methodology and reporting templates. This is supported to align with the most recent and accurate industry guidance, and it is expected that this would be incorporated within the WLC Guidance. It is recommended that references to the industry standard and version is worded flexibly to account for further industry updates and to futureproof the methodology. The evidence also includes recommendations on the process and implementation of the policy, including refined submission documentation proportionate to the scale of development to improve consistency of reporting, suggests a third party verification process (similar to the established third party review process in the City for carbon optioneering and WLC Assessments), and including pre-commencement and post-completion stage conditions. The integration of these process-related recommendations within the WLC Guidance is supported. The evidence base includes exploration of upfront embodied carbon offsetting, and the City queries whether this lever could provide further opportunity of implementing and supporting policy GHR3 over time.

Regarding GHR5, there are concerns about potential unintended consequences of the SuDS off-site contributions policy. Firstly, the policy states that on-site contributions should be prioritised, which is critical to ensure applicants focus on improving the flood resilience of their own development site in the first instance. As evidenced in the removal of carbon offsets in GHR1, the use of offsetting to provide flexibility within policy can be contentious as it is a way for an applicant to be deemed compliant with a policy without necessarily meeting the intent of the policy. Secondly, the cost of delivering SuDs is expensive within the constrained environment of the Square Mile and the London-wide reference rate is unlikely to deliver an offset for the equivalent cost of on-site SuDS provision.. A locally established rate would likely need to be established and would need to be set at a prohibitively high rate to ensure applicants do not default to off-setting in the majority of developments. Finally, further guidance is required on the governance and implementation of the off-site contributions, such as what authority would manage the offset fund and the delivery of off-site contributions. Guidance on where off-site contributions would be located in terms of proximity to the development is required, for example whether it should be delivered within the borough, or could be delivered in a wider catchment area.

The City welcomes the new approach to long-stay cycle parking for offices. This is a positive outcome for City developments to enhance viability and still support cycle mode share.

Chapter 6 - Place visions and place-based approaches

PV1 - Brownfield First Opportunity Areas

INTERNAL COMMENTARY

Brief policy summary:

Although no Brownfield First Opportunity Areas (BFOA)s are identified within the City, the City Fringe BFOA/Strategic Economic Cluster (SEC) is located just outside the boundary. Further detail on the delivery expectations for homes and jobs is provided for these locations in Annex E, eg for the City Fringe (which lies wholly outside the Square Mile) this identifies capacity for 11,000 homes and 75,300 jobs. As per the response to MBUL1 it is considered a missed opportunity to omit this level of specificity in relation to the CAZ BLG and the Liverpool Street Transformational Gateway BLG, so this comment will be repeated against this policy.

Key GLA evidence base:

The Opportunity Areas are supported by evidence within the Opportunity Area Pen Portraits, Opportunity Area residential dashboards, Opportunity Areas non-residential and Opportunity Area Monitoring Data.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Don't know

Commentary:

As per the City Corporation's response to Policy MBUL1, it is considered that a similar level of

detail on delivery expectations to that provided within PV1 should be attributed to other BLG locations such as the CAZ and the Liverpool Street Transformational Gateway.

Modification sought? N

Commentary: No comment

PV2 - Central Activities Zone

INTERNAL COMMENTARY

Brief policy summary:

This policy seeks to strengthen the Central Activities Zone (CAZ) as London's 'city centre', the primary location for economic, commercial, cultural and visitor uses. It seeks to protect and enhance these 'strategic functions' and as the City of London falls entirely within the CAZ this policy is crucial to setting an appropriate planning policy framework for the Square Mile.

The policy supports the CAZ by seeking to promote and grow its international and national roles, functions and specialist clusters; provide for net additional prime office and other commercial spaces; and enhance the heritage assets within it. Critically part A (4) recognises the strategic role of the City of London as an internationally important location for financial, professional, business and technology services as well as (6) recognising the growth potential of a new Liverpool Street Transformational Gateway BLG. This is a positive move, as the 2021 Plan previously only referred to it being of national importance.

However, as set out within the commentary on MBUL1, the Transformational Gateway approach is not considered to be as effective without further direction on the scale of growth or benchmarks for growth capacity similar to that provided by other designations, such as the Strategic Economic Clusters.

It is notable that this policy now includes two separate categories for the CAZ, identifying areas as 'Core' and 'Mixed' CAZ. The Core CAZ prioritises CAZ strategic functions (as defined within BOX PV2¹) and the Mixed CAZ areas aim to create areas that are more mixed commercial and residential in character. The entirety of the City of London is classified as Core CAZ. The City Plan 2040 reflects the current London Plan by identifying 'residential areas' where the balance of uses is in favour of a more mixed approach, but despite this the response as below concludes that the Core CAZ designation is right for the City as a whole. However, it should be noted that part B (2) allows local plans to further refine boundaries of these areas which we could utilise if we felt appropriate.

The policy also promotes an inclusive CAZ economy through a wide variety of business space and affordable workspace. And the policy supports delivering enhancements to public transport and digital connectivity infrastructure.

The policy supports the redevelopment and refurbishment of office space to improve the quantity, quality and energy-efficiency of the stock. The policy suggests that where this is not possible, change of use to other CAZ strategic functions should be promoted in line with strategic and local policies for Core CAZ areas. However, part C states that development proposals should not lead to

¹ One addition- frontier innovation and deletion of use and enjoyment of the River Thames and heritage, built environment and other green and open spaces

a net loss of floorspace (GIA) in CAZ strategic functions unless there is no reasonable prospect of continued use or an alternative CAZ use; that exceptional circumstances mean that the property is obsolete and unviable for other CAZ functions; or allocated for housing. Although it not clear whether all of these criteria would be required, we have recently tightened the approach to the protection of office through the City Plan and the Offices SPD. This only allows a change of use to other CAZ strategic functions in limited circumstances. It is notable that this approach encourages housing allocations within the CAZ.

The policy aims to 'promote and grow' the CAZ strategic functions in Figure 6.2, however, there is detail lacking on what this should entail. Figure 6.2 CAZ diagram sets out several specialist clusters within the City as set out below. This includes a new categorisation as a innovation and life sciences cluster and a redesignation of the CAZ retail clusters as 'Class E/Experience Economy'. This now reflects the new Use Classes Order however it is notable that these clusters are no longer listed as key locations for retail (and other E class uses in Annex B of the plan).

- Financial, Professional and Business Services Cluster- City of London/ Cluster
- Innovation and Life Sciences Cluster- whole of the City (Technology)
- Legal Cluster- Temple, Royal Courts of Justice, Inns of Court
- Class E/ Experience Economy Cluster- Cheapside, Moorgate/Liverpool Street, Leadenhall Market, Fleet Street
- Internationally Significant Culture and Night-time Economy Cluster - Barbican/Smithfield
- Creative Industries and Technologies Cluster- Smithfield

However there is an inconsistent level of detail as what each cluster typology is seeking to achieve, which will be reflected in the response below. Only paragraph 6.14 discusses the Night Time Economy cluster in the Barbican area but there is no detail on other clusters. However, as requested the legal cluster now aligns with the City Plan 2040 boundaries.

Key GLA evidence base:

[Central Activities Zone \(functions and capacity\)](#) This- sets out how employment in the CAZ is projected to grow from 2.5 million in 2024 to almost 2.9 million by 2050, an increase of 405,000 or 16 per cent. Drawing on sites identified in the London Employment Sites Database (LESD) 2024, the CAZ had an estimated employment capacity of more than 617,000 jobs for the period 2024 to 2050, accounting for 54 per cent of the London total. Office use accounts for 94 per cent of the employment capacity in the CAZ and NIOD combined. The City of London is recognised as an internationally important location for financial, professional, business and technology services. Figure 2.1 shows that almost the entirety of the Square Mile is shown as having the highest job density of over 200,000 jobs/ sqkm.

The description of the designations in the evidence is general only stating what is already existing in the designations to contribute. For the Transformational Gateways the evidence states that it is envisioned that planning for these locations would be led by the relevant local planning authority, in collaboration with the GLA, Transport for London, Network Rail and other stakeholders.

[Economic Uses Supply and Demand Study \(2026\)](#) - This conclusions of this study in relation to office and other employment uses is set out against Policy GLE1 above. However it also provides a strategic base for assessing retail, food and beverage, leisure and other Class E floorspace needs. For retail and food and beverage (F&B) uses, the GLA assessment identifies Class E(a) retail

floorspace, Class E(b) F&B floorspace, and Sui Generis F&B floorspace (includes drinking establishments and hot food takeaways).

For retail and food and beverage uses, the GLA assessment employs a spend and turnover-based methodology (for retail), drawing on population and expenditure forecasts, market share analysis and floorspace productivity assumptions to identify needs, set against the development pipeline for those uses. Table 9-1 identifies demand in the City of London of 17,701sq.m of Class E(a) retail floorspace, 82,274sq.m of Class E(b) food and beverage (F&B) floorspace, and 86,414sq.m of Sui Generis F&B floorspace, giving a combined requirement of 186,389sq.m to 2050 (GIA). The Sui Generis category includes drinking establishments and hot food takeaways.

Although useful on a strategic level the response as below recognises that a population-based approach is not entirely helpful for determining needs for E Class uses within the Square Mile. Our own Retail Needs Assessment recognises that demand in the City is driven primarily by workers, visitors and tourists rather than by its resident population. However, the conclusions are comparable to that of this study of 192,200sq.m (GIA) to 2040. Further local evidence will need to be developed to refine the requirements for Class E uses in support of a future Local Plan.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment.

Sound? Don't know

Commentary:

The City Corporation notes that part C states that development proposals should not lead to a net loss of floorspace (GIA) in CAZ strategic functions unless there is no reasonable prospect of continued use or an alternative CAZ use; that exceptional circumstances mean that the property is obsolete and unviable for other CAZ functions; or is allocated for housing. The Corporation is unclear whether all the criteria in part C are to apply, but supports the protection of CAZ functions at a strategic level. However, it has some concerns that the approach may need to make reference to the role of detailed policies within local plans as without this it could potentially limit the ability to deliver (under distinct circumstances) appropriate changes of use to housing in the CAZ, without a housing allocation. Student accommodation is a form of housing and, under defined circumstances, it can be a complementary use to the 'business city'. The City Corporation has recently tightened its approach to changes of use away from offices within its Offices SPD, therefore the modification below makes some suggestions for how the first issue may be resolved, through reference to local plans.

The City Corporation also seeks further clarifications on how local plans should 'promote and grow' the strategic functions in the absence of any quantifiable benchmarks. The CAZ clusters as set out in Figure 6.2 CAZ diagram do not also provide enough direction and the level of detail provided in sometimes inconsistent. For the City, only paragraph 6.14 discusses the Night Time Economy cluster in the Barbican area. It is acknowledged that this detail is contained within the evidence but it would be beneficial to draw this out more effectively in the London Plan itself.

The City Corporation supports reworking of the CAZ retail clusters to form Class E/Experience Clusters in the context of the Use Classes Order, however as above there is a lack of detail compared to the previous plan as to what this should achieve, and their lack of inclusion in Annex B may be considered to downplay their role, even though contained within the heart of the CAZ.

Further clarification and confirmation of the importance of these locations would assist and guide policies in local plans.

The City Corporation notes the retail and leisure requirements for the City of London but notes the omission of the of Sui Generis F&B floorspace category within Table 15-2 and 15-3.

Modification sought? Y

Commentary:

C (4) meets the detailed and localised change of use considerations within a Local Plan.

PV3 - Town centres and high streets

INTERNAL COMMENTARY

Brief policy summary:

Policy PV3 sets out the approach for town centres, high streets and markets. It set out the town centre hierarchy (international/metropolitan/major/district), however it is notable that Annex B to this policy no longer refers to the retail/Class E clusters in the CAZ. On one hand this is helpful, providing much needed clarity on how this policy relates to the requirements of the NPPF but unlike the existing 2021 London Plan there is no text against this policy which makes clear that this policy does not apply to locations within the CAZ (as London's city centre). Therefore, the response as below will make this request.

The preamble to Policy PV3 states that this does apply to markets. The response as below will seek clarification that this applies to markets within town centres.

Key GLA evidence base:

Policy PV3 is supported by the Economic and Infrastructure Uses Supply and Demand Study (2026), the London Town Centre Health Check Analysis (2017), and the High Streets for All research. These have been utilised to draw conclusions on the strategic demand for E Class uses across London and inform the centre hierarchy in Annex B. As noted above however Annex B no longer includes retail/E class locations within the CAZ. Please see PV2 above for analysis of this evidence.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Don't know

Commentary:

The City Corporation broadly supports the recognition of the wider role of town centres in the context to the changes to the Use Classes Order. Although it is noted in the text immediately preceding this policy that it applies to the identified locations in Annex B only, it would be helpful if this could also be clarified in the supporting text that in relation to the CAZ only PV2 applies. The City Corporation also presumes this policy is to apply to markets within the Annex B centres only, and confirmation of this would assist.

Modification sought? Y

Commentary: 6.19 This policy does not apply to the CAZ, which is covered by PV2.

PV4 - Strategic Economic Clusters and corridors

INTERNAL COMMENTARY

Brief policy summary:

The policy requires plan-making authorities to designate, define boundaries and develop policies for strategic economic clusters in table 6.1 These are existing or potential new clusters outside of the CAZ, NIOD, town centres or SILs. There are none in the Square Mile, however, 'Tech City' is identified within Hackney, Islington and Tower Hamlets.

Due to the above this policy requires no comment. It is not felt that a strategic economic cluster is needed in the Square Mile as the CAZ policies support the unique agglomerations of the sectors in the Square Mile.

Key GLA evidence base:

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment.

Sound? Y

Commentary: No comment

Modification sought? N

Commentary: No comment

PV5 - Industrial land supporting housing growth

INTERNAL COMMENTARY

Brief policy summary:

The policy asks for plan-making authorities to consider release of parts of SIL and LSIS in consultation with the Mayor for release to housing. The Corporation supports the retention of SIL and LSIS where appropriate to maintaining an efficient supply of industrial land which supports the economic function of the City as a whole, however a formal response is not required against this policy.

Key GLA evidence base:

[Industrial Evidence Paper – July 2026](#) Section 3 details the balance of industrial need and housing need. The section outlines a methodology for plan-led industrial release for housing. This is not considered to be relevant for the City as none of the industrial release locations are located in the City.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment.

Sound? Y

Commentary: No comment

Modification sought? N
Commentary: No comment

PV6 - Metropolitan Open Land
INTERNAL COMMENTARY

Brief policy summary:

The policy seeks to protect designated Metropolitan Open Land as open and distinct in character, including areas such as Queen Elizabeth Olympic Park and Crystal Palace Park. No such designations are present in the City, but it does include Hampstead Heath and Highgate Wood.

Key GLA evidence base:

The policy is supported by Metropolitan Open Land Opportunity Review which focusses on opportunities for additional MOL designation, rather than a review of existing.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? No comment

Commentary: N/A

Sound? No comment

Commentary: N/A

Modification sought? No comment

Commentary: N/A

PV7 - Sustainable development and enhancement of the Green Belt
INTERNAL COMMENTARY

Brief policy summary:

The policy aims to focus Green Belt release to the most sustainable locations and any release optimised to minimise the amount of land required to address unmet need. This is the first time the London Plan has attempted to facilitate the planned release of Green Belt land, but leaves the individual boundaries for the areas identified to local plans. No response will be submitted to this policy from a local planning authority perspective. However, a separate response is being prepared by the Natural Environment department to address matters relating to sites within the City Corporation's ownership within the London Green Belt. This will be brought to the Natural Environment Board.

Key GLA evidence base:

The policy is supported by Metropolitan Open Land Opportunity Review. This highlights potential locations for targeted Green Belt release.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? No comment

Commentary: N/A

Sound? No comment

Commentary: N/A

Modification sought? N

Commentary: No comment

PV8 - Strategic and local views

INTERNAL COMMENTARY

Brief policy summary:

This creates the development plan policy hook for the view management system detailed in the LVMF. It combines policies HC3 Strategic and Local Views and HC4 London View Management Framework of the 2021 London Plan as part of the overall aim to make a more streamlined plan. The policy designates 28 strategic views (that are detailed in the LVMF). These are the same 27 views that are designated in the current London Plan, plus one extra: 'Trafalgar Square to the Palace of Westminster'. This new view does not affect the City.

The views that are relevant to the City are: 1 Alexandra Palace to Central London; 2 Parliament Hill to Central London; 3 Kenwood to Central London; 4 Primrose Hill to Central London; 5 Greenwich Park to Central London; 6 Blackheath Point to Central London; 8 Westminster Pier to St Paul's Cathedral; 9 King Henry VIII's Mound, Richmond Park to St Paul's Cathedral; 10 Tower Bridge; 11 London Bridge; 12 Southwark Bridge; 13 Millennium Bridge and Thames side at Tate Modern; 14 Blackfriars Bridge; 15 Waterloo Bridge; 16 The South Bank; 17 Golden Jubilee/Hungerford Bridges; 25 Queen's Walk to the Tower of London. The response below will highlight that the LVMF consultation response will explore the justification for the continuation of all these views in their current form.

The policy is similar to the two existing policies it replaces. For plan makers the approach to view management remains the same, with designated strategic views, and St Paul's Cathedral, the Palace of Westminster, and the Tower of London identified as 'Strategically Important Landmarks'. As per the current system, the 'Strategically Important Landmarks' have 'Protected Vistas' and 'Protected Silhouettes' which are detailed in the LVMF. Plan makers are also still encouraged to identify the most important local views, and to ensure LVMF viewing locations are well maintained and free of obstructing vegetation. However, the new policy states that local plan policies should be "consistent with the London View Management Framework". This implies an extra layer of general conformity (ie conformity with the LVMF) that goes beyond the statutory framework. The LVMF is not a development plan document, is only subject to consultation, and is guidance, not strategic policy. It therefore isn't appropriate for the London Plan to require consistency with the LVMF.

For the decision-making elements there has been some slight loosening of the wording. Development proposals still require assessment against the impact they make on a designated view, whether in the foreground, middle ground, or background. The existing policy has a direction that proposals 'should not harm' the characteristics and composition of a strategic view, whereas this has been omitted from part E of the draft policy. The other requirements to 'make a positive contribution', 'preserve', and 'where possible enhance' strategic views remain. The controls for a protected vista are substantively the same: proposals that exceed the threshold height of the

viewing corridor should be refused; development in the wider setting consultation area should preserve, and where possible enhance the strategic landmark; they should not cause a 'canyon effect'; development in the background should not harm the composition of the vista or the viewers ability to recognised the strategically important landmark.

Policy text specific to the three types of strategic view (London Panoramas, River Prospects, Townscape and Linear views) has been removed. This is supported since detailed guidance on each type of view is in the LVMF and does not need to be duplicated and summarised in the policy itself. Specific reference to the silhouettes of World Heritage Sites has been omitted from the draft policy, instead the policy refers to the LVMF which identifies the silhouettes of landmark elements that need to be protected. A separate consultation on a new LVMF commenced on 11 September, and a full response will be brought to the November P&T committee.

The response below makes some targeted suggested amendments for clarity, but the approach is generally supported.

Key GLA evidence base:

[London View Management Framework](#) - This was released for consultation on 11 September. This contains the same views as the existing 2012 version but there is one new view (Trafalgar Square) that has been added to the extant 27.

The main changes are to the technical guidance and descriptions given to each view. The draft document now assigns a 'view type' to each view: static, kinetic, or panorama. It also now includes a 'guidance area' that indicates the areas where the visual management guidance should be applied (which is broader than the protected vistas and protected silhouettes).

The other changes amount to somewhat more restrictive approaches in views of World Heritage Sites and the Strategically Important Landmarks identified in the London Plan (St Paul's Cathedral, Palace of Westminster and Westminster Abbey, Tower of London), These include: a refinement of the background consultation areas for most protected vistas; additional viewing places within existing viewing locations; a new vista from Queens Walk towards the Tower of London; updated guidance on the preparation of accurate visual material.

A full response will be prepared and brought to a future committee meeting before the closing date of 4 December 2026.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Don't know

Commentary:

It is not currently clear whether the inclusion of all of the views in their current forms continues to be justifiable, and the City Corporation will reserve its position on this matter for the LVMF review consultation. There are also concerns that the approach taken in the new LVMF has underplayed the contribution made of new tall buildings to the skyline, or sought to manage this in a positive manner.

Part B of the policy requires local plan policies to be consistent with the LVMF. This wording goes further than the adopted London Plan and sets a concerningly high bar for general conformity with the London Plan. The LVMF is not a development plan document and is only guidance. The wording of the policy should be amended.

The City Corporation considers that E and F read very similarly and are potentially repetitive, so suggest that there may be merit in condensing them into one more succinct limb. Part E may also set the bar for policy compliance too high – though a laudable aim, it may not always be possible for a proposal to make a clearly positive contribution in the way suggested. It is also considered that the wording of H (2)) to be unnecessarily detailed and therefore could also be amended. The suggestions of the second sentence are inherent in preserving the ability to recognise and appreciate and don't need to be repeated here. This will help to ensure the LVMF continues to read as a strategic and proportionate policy approach.

PV8 (I) -The City Corporation reserves comment on this policy wording until we have fully reviewed the revised draft LVMF SPG and the kinetic assessment paths illustrated therein.

Suggest alternative wording as below.

Modification sought? Y

Commentary:

B. '...LPAs should ~~include~~ have regard to all relevant LVMF Viewing Locations, Protected Vistas and Protected Silhouettes in developing their Local Plans and ensure that their own policies ~~are consistent with~~ have regard to the ~~London View Management Framework (LVMF) which provides detailed Visual Management Guidance in the LVMF.~~

H (2) Development in the Wider Setting Consultation Area should preserve, and where possible enhance, the viewer's ability to recognise and to appreciate the Strategically Important Landmark. It should not cause a canyon effect around the Landmark Viewing Corridor or damage/detract from the viewer's ability to recognise and to appreciate the Strategically-Important Landmark

Annexes A–G

Annex A - Monitoring

INTERNAL COMMENTARY

Brief annex summary:

This sets out the KPIs against each of the Good Growth Objectives. A majority of which however are housing focussed with core KPIs being number of homes approved and completed; & of affordable housing approved and completed; number and proportion of wheelchair accessible homes approved and completed. Relevant KPIs for the Square Mile are also: office space under construction and remaining pipeline, however it is not clear what 'remaining' means for office floorspace only; net loss of cultural venues and pubs as part of approved referable developments; approved referable developments meeting or below EUI targets; proportion of approved referable

applications achieving greenfield runoff rate; hectares of new AGS secured through referable development consents; and proportion of applicable approved developments achieving at least Air Quality Neutral standards. This means we will need to ensure we capture these within our monitoring processes, and we will continue to work with the GLA to do so. However, no comment to be made

Key GLA evidence base:

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Y

Commentary: No comment

Modification sought? N

Commentary: No comment

Annex B - Town Centre Network

INTERNAL COMMENTARY

Brief annex summary:

Table B1 set out in Annex B entitled 'London town centre network: strategic town centres' establishes the town centre hierarchy (210 in total). It includes both a 'town centre classification', and a 'night-time economy classification'. The town centre classification includes International (2), Metropolitan (18), Major (42) and the remaining 30% as District (146). 'Local and Neighbourhood are to be identified locally in Local Plans.

As the CAZ clusters are no longer listed in this Annex those within the Square Mile are also no longer assigned a NTE classification. However, it is noted that the West End (City of Westminster, LB of Camden and Oxford Street Development Corporation) and Knightsbridge (LB of Kensington & Chelsea) are identified due to their international significance.

Key GLA evidence base:

See response for Policy PV2 and PV3.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Don't know

Commentary:

As per comments to Policy PV3 the City Corporation notes that Annex B no longer includes the now Class E Cluster (formally CAZ Retail Clusters). However clarification is required as below for how this relates to the Night Time Economy uses promoted through policy GLE4.

Modification sought? Y

Commentary:

Annex B Town centre network and Class E/Experience Economy locations

NB- the whole of the CAZ is also considered to have a NTE role for London and apart from where specifically identified as having an international/national or regional/sub regional level CAZ Clusters with a Class E/Experience Economy role, Internationally Significant Culture and Night-time Economy and Creative Industries and Technologies role are considered locations where the NTE of more than local significance and should be promoted and grown in accordance with Policy GLE4.

Annex C - Green Belt sustainable locations

INTERNAL COMMENTARY

Brief annex summary:

This sets out a list of Green Belt sustainable locations for residential development. As per above, a separate response will be taken to NE Board in relation to the approach to Green Belt.

Key GLA evidence base:

As above.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Y

Commentary: No comment

Modification sought? N

Commentary: No comment

Annex D - Transport interventions

INTERNAL COMMENTARY

Brief annex summary:

The Annex lists out major and other transport interventions across London with as early as 2030 timelines and as late as 2050. Major projects that would impact COL workers/commuters/residents include: devolution of Great Northern Inners services to Moorgate, DLR extension to Thamesmead, higher frequency from SE London to Charing Cross and south central London to London Bridge, Crossrail 2.

Key GLA evidence base:

The key evidence is the Mayor's Transport Strategy. Many of the listed projects have already been announced previously.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Y

Commentary: No comment

Modification sought? N

Commentary: No comment

Annex E - Brownfield First Opportunity Areas strategic growth visions

INTERNAL COMMENTARY

Brief annex summary:

This annex sets out further detail for each Brownfield First Opportunity Areas. This includes the number of homes, jobs and OA status of 'ready to grow', 'nascent', 'underway' and 'maturing'. It also describes each OA and the potential, for example for the City Fringe/Tech City OA (outside the City boundary) recognises the role of recent transport upgrades, including the Elizabeth Line and how development should further strengthen east–west linkages, reinforce and sustain very high levels of active travel.

Key GLA evidence base:

The Opportunity Areas are supported by evidence within the Opportunity Area Pen Portraits, Opportunity Area residential dashboards, Opportunity Areas non-residential and Opportunity Area Monitoring Data.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? No comment

Commentary: N/A

Sound? No comment

Commentary: N/A

Modification sought? No comment

Commentary: N/A

Annex F - Public service infrastructure

INTERNAL COMMENTARY

Brief annex summary:

Annex F sets out projected strategic public service infrastructure requirements across London to support planned population and employment growth. It covers health infrastructure, emergency services and criminal justice facilities and is intended to help plan-making authorities identify and plan for cross-boundary infrastructure needs through Local Plans.

Requirements for schools, early years provision, social care facilities and libraries will be planned at a borough level by local authorities using local evidence and GLA population projections.

Health: The NHS 10 Year Plan promotes a shift towards integrated, neighbourhood-based care through larger Neighbourhood Health Centres, bringing together primary care, community health,

social care and voluntary sector services to provide more integrated care closer to home. Local authorities are encouraged to work with Integrated Care Boards (ICBs) to plan for future needs.

Criminal justice: The Ministry of Justice forecasts a need for additional prison capacity and is seeking land for future prison provision.

Emergency services: The Metropolitan Police Service anticipates requiring additional estate capacity to support population growth and modern policing requirements.

Key GLA evidence base:

Annex F sets out the strategic infrastructure requirements for Policy MBUL4, ensuring sufficient health, emergency services and criminal justice infrastructure is planned alongside growth.

The NHS London Healthy Urban Development Unit (HUDU) model is used to assess the health infrastructure required to support projected population growth, providing the evidence base for forecasting future healthcare floorspace and service needs across London.

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? No comment

Commentary: N/A

Sound? No comment

Commentary: N/A

Modification sought? No comment

Commentary: N/A

Annex G - Strategic Industrial Locations

INTERNAL COMMENTARY

Brief annex summary:

This annex lists out Strategic Industrial Locations across London. None of the areas are within the Square Mile. No action is required on this list but the Corporation supports industrial land within London as it can ensure short journey times and support deliveries by cargo bike.

Key GLA evidence base:

Industrial Evidence paper July 2026 – no sites identified in the City of London

FOR FORMAL CONSULTATION RESPONSE

Legally compliant? Y

Commentary: No comment

Sound? Y

Commentary: No comment

Modification sought? N

Commentary: No comment

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Appendix 2: Growth capacity and views analysis

1. Introduction

This document expands upon the City Corporation response to the London Plan in relation to policies MBUL 3: Tall Buildings, PV8 Strategic and Local Views and GLE1 Sufficient and appropriate employment space.

The fundamental argument of this document is as follows:

- The evidence underpinning the London Plan has significantly **under-estimated the demand for commercial floorspace** in the City over the longer term.
- The evidence has also **not fully recognised the potential for tall buildings** in the Square Mile, particularly around the Fleet Valley area.
- There is therefore a strong case to be made to **designate a future potential metropolitan tall building cluster at Fleet Valley**.
- Modifications to at least three LVMF views should be explored in order to optimise the future growth potential of the Fleet Valley area. .

This document draws upon detailed analysis of the [Metropolitan Scale Tall Building Study](#), the London View Management Framework (2012), the [Employment Projections](#), and the [Economic and Infrastructure Supply and Demand Study](#) (EISDS), as set out in Annex A and B to this document. It also summarises the outcomes of some high level capacity analysis for the City.

This document and the annexes will be submitted as an attachment to the London Plan consultation response, and the City Corporation will also ask to discuss the findings with the GLA.

This document makes a case for the London Plan to identify additional potential metropolitan tall buildings in the City of London and related amendments to Policy MBUL3. It also seeks corrections to the methodology contained within the Employment Projections and the EISDS and additional strategic-level quantification of the floorspace requirements over the plan period in GLE1.

Following detailed capacity modelling the City Corporation suggests that the delivery of the required floorspace within the City of London may be challenging, however with some minor revisions to the LVMF this could more easily be accommodated.

A separate and detailed response to the new LVMF will also be prepared to the LVMF consultation which launched on 11 September 2026. This will draw out the more detailed analysis of all of the LVMF views and provide detailed comment against the proposed wording.

2. Metropolitan Tall Buildings

The City Corporation has reviewed the GLA's Metropolitan Scale Tall Building Study, with a particular focus on the analysis within and adjacent to the City of London.

As set out in Annex A and as below it is considered that the study has drawn inaccurate conclusions for the Broadgate area, and it should also have assessed the Fleet Valley area.

As a general point it is also not entirely clear what the distinction between criteria 3 and 4 are, and it is noted that almost exclusively (e.g. bar Waterloo) all areas analysed draw the same 'traffic light conclusions' for both these categories. There is a lack of information in the study on methodology and therefore it is also not clear from section 4.2 whether the 7 criteria are equally weighted, or not. Clarification on these points of detail would assist in using and applying the evidence.

Moorgate and the City Cluster

The Corporation agrees with the conclusions in relation to Moorgate and the City Cluster, and therefore the City Cluster's inclusion within Table 2.2 of the London Plan as a location for metropolitan scale tall buildings is supported.

Broadgate

Annex A has looked at the detailed analysis of the Broadgate area as contained within pages 132-135 of the Study. The Annex suggests some amendments to the Study, including reference to the new tall building area of up to 160m in height within the emerging City Plan 2040, which can accommodate several tall buildings of metropolitan scale. The City Corporation believes that these updates could shift the dial of the conclusions towards that this area should be identified as a location within Table 2.2. This classification would also assist with the effectiveness of policy MBUL1 and could lead to some quantification of the growth capacity within the identified Transformational Gateway BLG at Liverpool Street. The Corporation's wider comments suggest that further guidance on the role of this designation would assist and would complement the Class E Cluster at Moorgate/Liverpool Street.

Fleet Valley

The City Corporation also notes that despite identification of a tall building area within the City Plan 2040 in the Fleet Valley, this area has not been considered within the Study. Although the heights proposed in the City Plan at a (current) maximum of 90m fall below the 100m threshold it is noted that other clusters without detailed height parameters have been included within the analysis. Initial analysis by the City Corporation to inform longer-term growth potential suggests that this area may have potential for significant capacity uplift, subject to further detailed analysis through the local plan-making process. The City Corporation consider that it should have been assessed in the GLA evidence due to its character as a central, highly accessible location, the designation of a tall buildings cluster here in the City Plan 2040, and the significant increase in employment projections for the Square Mile identified by the GLA.

The City Corporation has conducted its own analysis of the Fleet Valley Cluster using the same criteria-based methodology of the Study and this is also included in Annex A.

This concludes that if scoped into the Study, the analysis would have most likely concluded that there is potential for Metropolitan designation at this location by way of its accessible location (SAM 5B), capacity for several development plots of height, and its contribution to the skyline. However, this would then need to be further assessed at a local level to be able to draw definitive conclusions. Therefore, the City Corporation suggests that the MBUL3 of the London Plan should identify potential future locations for tall buildings of Metropolitan scale, and should allow for local refinement and identification, subject to more fine-grained assessment, within Local Plans. This

approach could be similar to the approach taken in the London Plan to 'future candidate' locations for Green Belt release, and application of a consistent approach to this could reinforce the aims of MBUL2 in terms of making the most efficient use of land, and the brownfield first principle.

3. Economic floorspace demand assumptions

The City Corporation has significant concerns about the calculation of the demand for new office floorspace within the City of London (and elsewhere). Table 7-7 of the Economic Infrastructure Supply and Demand Study concludes a demand for 1,393,300 sqm GIA of office floorspace in the City to accommodate jobs growth of 160,800 projected from 2024-2050. When converted to NIA (at a 75% ratio) this gives a demand figure of 1.04m sqm (NIA).

The City Plan 2040 aims to deliver 1.2m sqm (NIA) over a shorter time period, and is based upon jobs growth of 66,000, therefore the City Corporation would have expected an office jobs growth of over 160,000 to require substantially higher floorspace than is set out within the study.

The City Corporation believes that the job densities in the study are too small. They are not reflective of the flight to quality trend that is experienced in offices in the Square Mile, which are in many cases occupied by nationally and internationally renowned businesses who are looking for the highest quality of space to occupy. But there is a wider concern that because of the methodology applied, the overall calculations for London as a whole are incorrect. The study would appear to be based on an incorrect application of the BCO utilisation rates, which has in turn given rise to unrealistically high employment densities for office uses.

Under the central scenario, the report claims that the densities and utilisation combined gives an implied job density of 6.7 sqm NIA per FTE (see Table 7-2). However, this is based on a methodology that treats BCO utilisation rates as an indicator of how intensively workstations are shared. This is a misapplication of the utilisation rate, which (as is clear from the cited BCO (2025) report) is an observed measure of the proportion of time that desks are occupied, a number that has always been well below 100% and which has decreased significantly post-pandemic. Using this as the basis for a sharing ratio flips this completely on its head; such an approach implies that the aim of planning for office capacity is to fill all desk spaces to their maximum all of the time - something that is unrealistic and undesirable. Desk sharing is already accounted for in the utilisation rates and does not need to be factored into space calculations. Applying the utilisation rates properly means dividing by (not multiplying by) the utilisation rate. If the density was 10 sqm/worker NIA with a utilisation of 66% (both figures as per the GLA's central scenario) then the effective density should in fact be 15 sqm/worker. Using the lower density scenario (12sqm/worker NIA), with the lower utilisation (59%) gives effective density of 20.3 sqm/worker (NIA). This latter figure aligns better with the observed densities by the City Property Association in a recent survey of occupied Class A buildings in the City of London, reflecting the flight to quality trend.

This also unfortunately calls into question the outputs of the London Employment Sites Database (LESDB, which uses the same methodology regarding densities and utilisation rates) and therefore the latest GLA employment projections, which bases borough-level employee projections on an average between projected trend and capacity. If those capacities should be significantly lower, because of the higher effective densities as a result of applying utilisation rates differently, then this may significantly change the employment projections for London boroughs. In previous iterations of the

LESD, central London has struggled to identify sufficient capacity to meet trend-based calculations and this has been reflected in boroughs' final employment projections.

There is also no rationale given for the bi-angulation of trend and capacity being a simple average; this is a new approach in this year's employment projections, which have historically been 'at capacity' where this is above trend. It may well be more appropriate to take an 'at capacity' approach for central areas – but this will need to be considered carefully by the GLA once the employment projection outputs are re-run.

Given the issues raised above, the City Corporation have sought to identify a more justifiable employment floorspace requirement for the Square Mile over the London Plan evidence base period.

Because of the questions over bi-angulation and the doubts raised over how capacity has been calculated to inform the LESD, the trend based projection of additional 130,500 jobs between 2024 and 2050 has been used to calculate the jobs growth need in the City. To turn this into an estimate of the number of office-based jobs requires a breakdown of trend-based projections by sector; however, the GLA employment projections only provide this for the final projections (which include capacities), Therefore for this exercise we have simply used a proportion, derived from dividing the number of office-based jobs in table 7-1 (160,800 additional jobs) by the total number of additional jobs (192,100), which gives 83.7% of the jobs increase being office-based. Applying this proportion to the trend-based projection (130,500 additional jobs) gives a trend-based projection of **109,237 additional office-based jobs** (rounded to 109,200 for this exercise). This figure is recognised to be a likely under-projection, given the need to factor in capacity to some degree, but it provides a useful starting point for a minimum office-based employment floorspace need for the City over the longer term. It also has not factored in the need for frictional vacancy. The outputs – a need of between 2.2m and 3.0m sqm GIA – are significantly higher than the 1,393,300 sqm (GIA) of new office floorspace over the period between 2024 and 2050 set out in the GLA evidence.

Table 1 – Provisional calculations of additional office floorspace requirement for City of London (2024-2050)¹

Additional office-based jobs	Baseline densities (NIA; sqm/worker)*	Utilisation rate**	NIA to GIA conversion	Effective densities (GIA; sqm/worker)	Office floorspace requirement (sqm GIA)
109,200	12	59%	75%	27.1	2,959,000
109,200	10	66%	75%	20.2	2,206,000

**The central and low-density figures from the Economic and Infrastructure Supply and Demand Study report have been used, to reflect the likely baseline densities in the Square Mile.*

¹ These figures should not be used as a material consideration in the determination of planning applications. They have been calculated purely for the purposes of responding to the London Plan consultation and are based on a series of assumptions.

***The lower utilisation rates from the study have been used, reflecting that City offices are likely to have lower utilisation rates compared to other areas.*

For clarity, table 1 uses the following calculation (correcting the economic and infrastructure supply and demand study which *multiplies* by the utilisation rate):

$$\text{Floorspace requirement (GIA)} = \text{additional office-based jobs} \times \text{baseline density} / \text{utilisation rate} / \text{NIA to GIA conversion}$$

The City Corporation will be preparing its own evidence when it comes to prepare its next City Plan to determine demand for new office floorspace in the Square Mile during the plan period.

4. London View Management Framework analysis

Annex 1 includes some analysis of the LVMF Views in the context of the Fleet Valley Tall Building area. It concludes that parts of the wider background setting consultation areas for Views 4A.1 (Primrose Hill), 5A.2 (Greenwich) and 6A.1 (Blackheath) could accommodate more substantial growth in this area while broadly complying with the current LVMF guidance.

These views largely overlap across the west of the City, around and including the Fleet Valley Cluster of the City Plan. Consequently the City Corporation considers it critical that the opportunity is taken, through the imminent LVMF review, to revisit the geometric definition and guidance wording of these views in order to release additional capacity within the City to deliver the floorspace requirements identified in the GLA study above.

The City Corporation is concerned that without the amendments to the LVMF its ability to meet the requirements (when calculated as set out in this document) would be significantly constrained and its ability to maintain sufficient supply to meet demand more challenging.

5. Development capacity within the Square Mile

The City Corporation has sought to understand the capacity of the Square Mile to deliver additional floorspace over the London Plan period to 2050.

As part of the City Plan examination the City Corporation identified capacity to deliver between 1,350,000 sqm and 1,428,000sqm NIA (1,690,000sqm and 1,795,000sqm GIA) (against a minimum requirement of 1.2m sqm) up to 2040. Taking into account the potential for a new Metropolitan Scale Tall Building Area at the Fleet Valley the City Corporation has looked again at the model in relation to quantifying the uplift that could be achieved through these targeted amendments. These amendments could potentially deliver circa 401,000sqm (NIA)/535,000sqm (GIA) of additional floorspace. This is a substantial amount of additional capacity which would contribute to meeting these identified requirements within the City, however this is still below the upper range of anticipated requirements (see Section 3 above).

The City Corporation fully expects to refine and revisit the conclusions of this work as and when it develops a new City Plan against the new London Plan framework. This work would also need to take into account the timescale of delivery, past delivery trends, viability, and other site-specific factors, as well as the outcomes of any future SEA process. In the meantime, it would welcome the opportunity to discuss the approach and conclusions with the Greater London Authority.

Conclusion

For the purposes of responding to the London Plan within the timeframe available, this exercise has demonstrated the importance of considering capacity, tall building policy and employment demand in the round, not as isolated exercises, and the need to ensure the London Plan fully recognises the growth potential of the Square Mile, especially in relation to Metropolitan tall building clusters. The analysis concludes that the evidence supporting the London Plan under-estimates demand for new office floorspace to 2050. Without limited, targeted amendments as proposed within the City Corporation's consultation response, the London Plan is likely to be less effective in meeting identified strategic level requirements.

The City Corporation will provide a more detailed analysis of the constraints of the LVMF during its consultation period. It will also develop further local evidence on demand and capacity supported by Characterisation and Tall Buildings studies to support the development of a future City Plan.

Attachments

Annex A- Commentary on the Metropolitan Tall Buildings Study

Annex A- Commentary on the Metropolitan Tall Buildings Study

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City of London

GLA METROPOLITAN SCALE TALL BUILDING STUDY REVIEW

September 2026

EXECUTIVE SUMMARY

This document reviews the Greater London Authority's Metropolitan Scale Tall Building study, which has been prepared as evidence for the Draft London Plan. The City Corporation has undertaken this exercise in response to GLA Employment Projections and in anticipation of an updated LVMF SPG, to illustrate the relationship between growth, densification and protected views in the City, and to assist in the formation of emerging London Plan Policy MBUL3 (Tall Buildings).

Buildings over 100m in height are defined as "Metropolitan Scale Tall Buildings" in the Draft London Plan, Policy MBUL3 (Tall Buildings), which lists, at Table 2.2, locations across the capital where buildings of this scale may be suitable.

The GLA study has analysed three locations in the City of London: the City Cluster (referred to as City of London), Moorgate and Broadgate. Assessing their capacity against seven criteria. Moorgate and Broadgate are not defined as Metropolitan Tall Building Clusters in the emerging London Plan.

In the emerging City Plan, the Broadgate Tall Building Area, Fleet Valley and the City Cluster are designated as tall building areas (over 75m).

The City Corporation has assessed the suitability of a fourth location in the GLA Metropolitan Tall Building Study (over 100m), an expanded Fleet Valley Cluster, currently identified as suitable for buildings up to 90m in height in the emerging City Plan 2040.

BACKGROUND

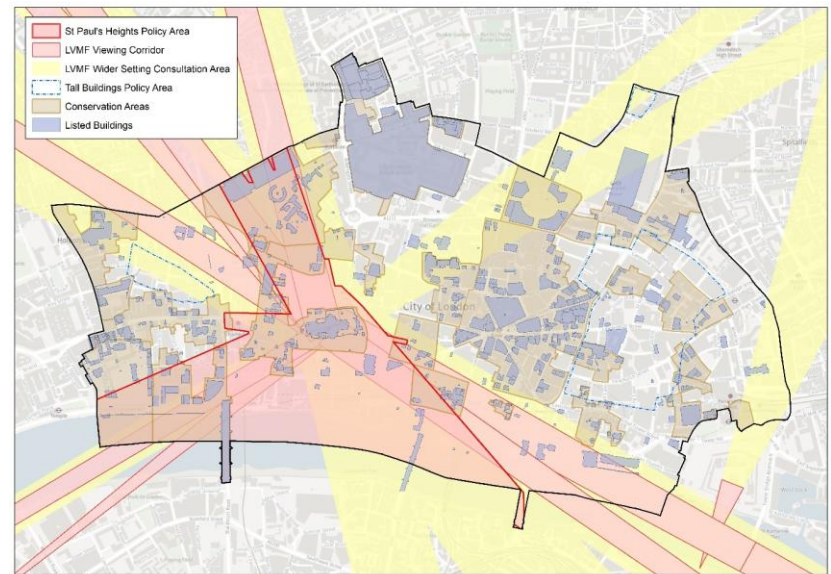
GLA Employment Projections suggest that the City will need to accommodate 192,000 additional jobs up to 2050, above existing policy provision (see separate response to GLE1 and document). The Employment Projections are significant, and the City of London Corporation is committed to continue delivering growth, however, the City Corporation are mindful of the scale of development required to meet these figures and the extent of protected views which cover the City.

The diagram on the right illustrates the Protected View and Heritage constraints which cover a substantial portion of the City. It is worth noting that the area between the City Cluster and Aldgate falls in the background of LVMF River Prospect views of the Tower of London (not shown on the diagram); as a result, this part of the City has limited capacity for densification beyond the existing building heights. Similarly, buildings significantly taller than existing in the area north of St Paul's Cathedral, around the Barbican, would be seen behind the Cathedral in River Prospect views (also not shown on the diagram), again limiting capacity for significant densification.

As the diagram on the right and the GLA's assessment of Moorgate and Broadgate study begins to suggest, there are no areas with significant enough

capacity for densification with 5 or more Metropolitan Scale Tall Buildings, beyond the existing City Cluster or an expanded Fleet Valley Cluster, which can absorb significant growth demand, without likely causing unacceptable or controversial heritage impacts to either the Tower of London or St Paul's Cathedral.

All the views assessed in this document relate to the 2012 London View Management Framework.



ASSESSMENT CRITERIA

The following text is an extract from the GLA Study, later in this document there is an assessment of a Fleet Valley as a Metropolitan Tall Building Cluster against these criteria.

Criteria 1: Aligns with local policy Recognised as an appropriate location for Metropolitan Scale Tall Buildings in Borough's adopted or emerging Development Plan and / or does not conflict with local policy

Criteria 2: Is in an accessible location Minimum SAM band 5A

Criteria 3: Has scale / size Has potential to accommodate a minimum of five Metropolitan Scale Tall Buildings as part of a group that also includes tall buildings of a lesser scale

Criteria 4: Has development potential Offers opportunity for further Metropolitan Scale Tall Buildings (i.e. area is not already built out)

Criteria 5: Location is sensitive to Strategic Views Can be delivered without impacting adversely on LVMF Views

Criteria 6: Contributes to identity of London's skyline Marks a location or destination of London Wide Significance (cultural, economic or social)

Criteria 7: Build values support Metropolitan Scale Tall Buildings Is within an area that supports higher values (minimum Value Band D).

The scoring criteria use a traffic light colour coding. Should a potential cluster score any reds against the scoring criteria it is not considered suitable as a location for a Metropolitan Scale Tall Building Cluster.

This does not mean that the location is not suitable for tall buildings but rather that it is not considered suitable for 5+ Metropolitan Scale Tall Buildings (i.e. a cluster of Metropolitan Scale Tall Buildings).

Some of the potential tall building clusters are already well established on London's skyline whilst others are only emerging.

Each assessment also recognises the status of a potential cluster on a scale from emerging to built out. This is important when considering the potential opportunity for growth that a cluster may offer.

ASSESSMENT CRITERIA

Table 4.1: Scoring Criteria against which potential Metropolitan Scale Clusters have been assessed

Criteria 1: Aligns with Local Policy	Full policy support	Partial policy support (part of area)	Policy doesn't define heights or suggests slightly lower max heights	Policy not supportive of Very Tall Buildings
Criteria 2: Is in an accessible location	SAM Score 5B	SAM Score 5A	SAM Score 4	SAM Score 3 or below
Criteria 3: Has scale / size	Potential for 10+ Metropolitan Scale Tall Buildings	Potential for 5+ Metropolitan Scale Tall Buildings	May be potential for 5 Metropolitan Scale Tall Buildings	Potential for >5 Metropolitan Scale Tall Buildings
Criteria 4: Has development potential	Significant potential for more Metropolitan Scale Tall Buildings	Development potential for more Metropolitan Scale Tall Buildings		Limited or no development potential for Metropolitan Scale Tall Buildings
Criteria 5: Location is sensitive to Strategic Views	Not visible in LVMF views	Visible in LVMF views but limited impact on development potential	LVMF Views have some impact on potential and or height of Very Tall Buildings	LVMF Views preclude establishment of a Metropolitan Tall Building cluster
Criteria 6: Contributes to identity of London's Skyline	Significant London Destination (Centre, mixed use area with citywide / national attractions, excellent public transport)	Minor London Destination (centre, some mixed uses and attractions, good public transport)	Local destination / focus only	
Criteria 7: Build values support Metropolitan Scale Tall Buildings	Value Band A or B	Value Band C or D	Value Band E or F	

17. MOORGATE (CITY OF LONDON / LONDON BOROUGH OF ISLINGTON)

Page 124

Site Aerial - Moorgate © Google Satellite

MOORGATE



Figure A.129: Moorgate - Bird's eye view (VU City)



Figure A.130: Moorgate - Town Centres



Figure A.131: Moorgate - Opportunity Areas and Land for London



Figure A.132: Moorgate - Heritage Sensitivities

MOORGATE



Figure A.133: Moorgate - Tall Buildings and Tall Building Zones



Figure A.134: Moorgate- London SAM (2041) Bands



Figure A.135: Moorgate - PTAL (2031) Bands



Figure A.136: Moorgate - Value Bands

GLA ASSESSMENT: MOORGATE

CRITERIA	ASSESSMENT
Criteria 1: Aligns with local policy Recognised as an appropriate location for Metropolitan Scale Tall Buildings in Borough's adopted or emerging Development Plan and / or does not conflict with local policy	Neither City Plan 2040 or Islington Local Plan 2023 identifies the area as being appropriate for tall buildings
Criteria 2: Is in an accessible location Minimum SAM band 5A	SAM Band 5B
Criteria 3: Has scale / size Has potential to accommodate a minimum of five Metropolitan Scale Tall Buildings as part of a group that also includes tall buildings of a lesser scale	There are 3 existing Metropolitan Scale Tall Buildings (100m +) up to 127m and 0 consents for buildings over 100m+ within the Area of Search. There are 3 existing and 1 planning consents for tall buildings of 60-100m. Further tall buildings in this location are likely to be below the 100m+ threshold
Criteria 4: Has development potential Offers opportunity for further Metropolitan Scale Tall Buildings (i.e. area is not already built out)	There is limited potential for Tall and Metropolitan Scale Tall Buildings in this location

CRITERIA	ASSESSMENT
Criteria 5: Location is sensitive to Strategic Views Can be delivered without impacting adversely on LVMF Views	Visible in some London Panoramic views. The cluster is located in the backdrop of views to St. Paul's Cathedral from Westminster Pier and the location and height of buildings in this view must be carefully managed.
Criteria 6: Contributes to identity of London's skyline Marks a location or destination of London Wide Significance (cultural, economic or social)	• City Fringe Opportunity Area • Within Central Activities Zone • Edge of City location • Served by mainline railway and London Underground
Criteria 7: Build values support Metropolitan Scale Tall Buildings Is within an area that supports higher values	Value Band A / C



Summary of Assessment	Not recommended for designation as a Metropolitan Tall Building Cluster
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CoLC COMMENTS: MOORGATE

CRITERIA	ASSESSMENT
Criterion 1: Align with policy Recognised as an appropriate location for Metropolitan Scale Tall Buildings in Borough's adopted or emerging Development Plan and / or does not conflict with local policy	Neither City Plan 2040 or Islington Local Plan 2023 identifies the area as being appropriate for tall buildings.
Criterion 2: Is in accessible location Minimum SAM band 5A	Sam Band 5b
Criterion 3: Has scale/size Has potential to accommodate a minimum of five Metropolitan Scale Tall Buildings as part of a group that also includes tall buildings of a lesser scale	There are 3 existing Metropolitan Scale Tall Buildings (100m +) up to 127m and 0 consents for buildings over 100m+ within the Area of Search. There are 3 existing and 1 planning consents for tall buildings of 60-100m. Further tall buildings in this location are likely to be below the 100m+ threshold The area has potential for 0 buildings over 100m. And 8 buildings in the 50-80m height range, below the height threshold of a Metropolitan Scale Tall Building.
Criterion 4: Has development potential Offers opportunity for further Metropolitan Scale Tall Buildings (i.e. area is not already built out)	There is limited potential for Tall and Metropolitan Scale Tall Buildings in this location. This area has also recently been largely built out, redevelopment in the medium-long term future is unlikely.

CRITERIA	ASSESSMENT
Criterion 5: Location is sensitive to Strategic Views Can be seen within significant views identified by the London View Management Framework.	Metropolitan Tall Buildings (over 100m) would be visible in several LVMF River Prospect Views (15, 16 and 17) and Panoramas (8 and 9), and would form a cluster which backdrops St Paul's Cathedral potentially causing a controversial and unacceptable visual impact. Metropolitan tall buildings here are likely to appear behind the Dome of the Cathedral in riparian river views, conflicting with the City of London Protected Views SPD, and the Draft London Plan Policy PV8 Part I – and would likely exceed the skyline profile along the defined Kinetic Assessment Path of the Protected Silhouette of the Cathedral. All of this would likely be unacceptable and certainly controversial.
Criterion 6: Contributes to identity of London's skyline Marks a location or destination of London Wide Significance (cultural, economic or social)	City Fringe Opportunity Area • Within Central Activities Zone • Edge of City location • Served by mainline railway and London Underground
Criterion 7: Build Values support Metropolitan Scale Tall Buildings Is within an area that	Value Band A / C
Summary of Assessment	Not recommended for designation as a Metropolitan Tall Building Cluster. CoL Officers have modified some of the analysis but we broadly agree.

Cluster Status:



**18. BROADGATE
(CITY OF LONDON / LONDON BOROUGH OF HACKNEY)**

BROADGATE



Figure A.137: Broadgate - Bird's eye view (VU City)

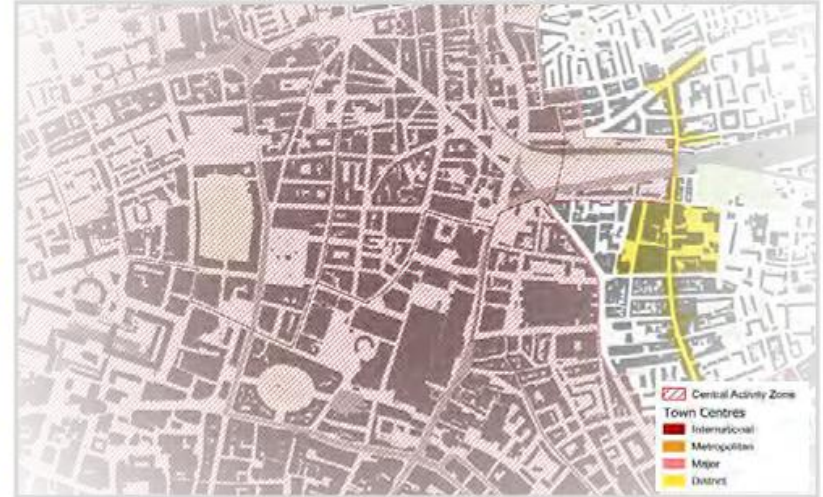


Figure A.138: Broadgate - Town Centres

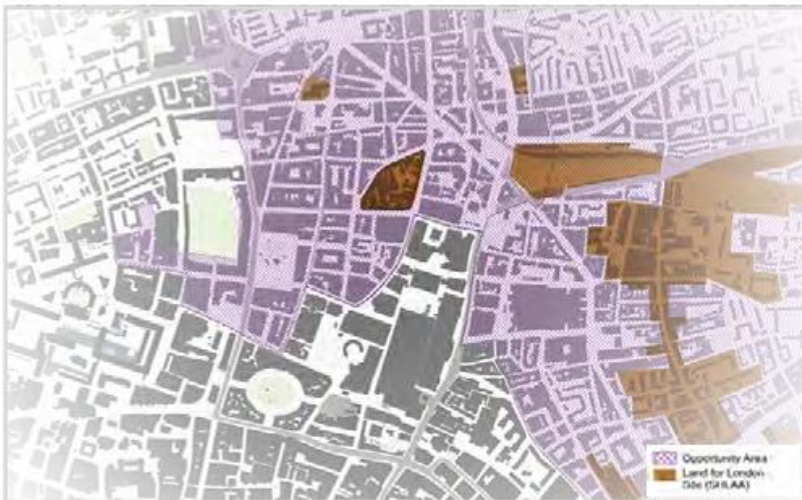


Figure A.139: Broadgate - Opportunity Areas and Land for London



Figure A.140: Broadgate - Heritage Sensitivities

BROADGATE

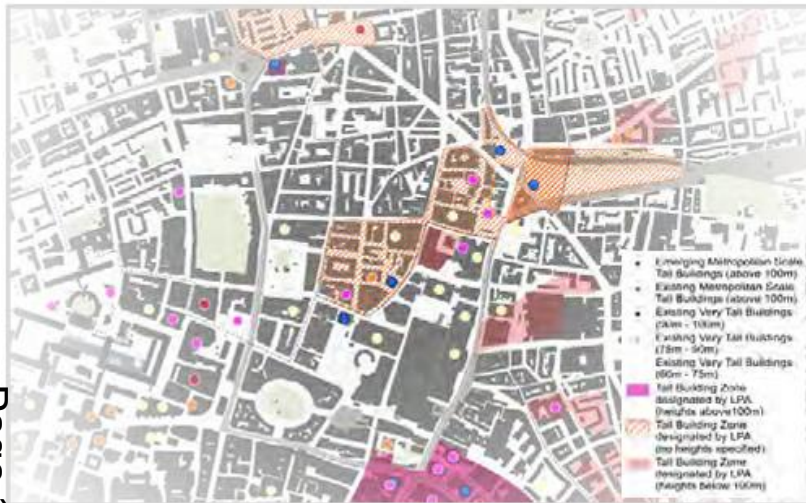


Figure A.141: Broadgate - Tall Buildings and Tall Building Zones



Figure A.142: Broadgate- London SAM (2041) Bands



Figure A.143: Broadgate - PTAL (2031) Bands



Figure A.144: Broadgate - Value Bands

GLA ASSESSMENT: BROADGATE

CRITERIA	ASSESSMENT
Criteria 1: Aligns with local policy Recognised as an appropriate location for Metropolitan Scale Tall Buildings in Borough's adopted or emerging Development Plan and / or does not conflict with local policy	The Future Shoreditch Area Action Plan 2026 identifies the area as a tall building zone with maximum building heights up to 90m
Criteria 2: Is in an accessible location Minimum SAM band 5A	SAM Band 5B
Criteria 3: Has scale / size Has potential to accommodate a minimum of five Metropolitan Scale Tall Buildings as part of a group that also includes tall buildings of a lesser scale	There are 4 existing Metropolitan Scale Tall Buildings (100m+) at up to 161m and 4 consents for buildings over 100m+ (up to 155m) within the Area of Search. There are 7 existing and 5 planning consents for tall buildings of 60-100m. Further tall buildings in this location are likely to be below the 100m+ threshold.
Criteria 4: Has development potential Offers opportunity for further Metropolitan Scale Tall Buildings (i.e. area is not already built out)	The majority of sites within the cluster have already been developed or are subject to planning consents. However these consents could deliver further Tall and Metropolitan Scale Tall Buildings in this location

Cluster Status



CRITERIA	ASSESSMENT
Criteria 5: Location is sensitive to Strategic Views Can be delivered without impacting adversely on LVMF Views	Visible in some London Panoramic views. Very Tall Buildings in this cluster could appear in the backdrop of views towards St. Paul's Cathedral when viewed in River Prospect views from Waterloo Bridge and Hungerford Bridge and in the linear view from King Henry VIII's Mound in Richmond Park and view from Westminster Pier. The location and height of buildings must be carefully managed to avoid impact and this constrains the opportunity in this cluster
Criteria 6: Contributes to identity of London's skyline Marks a location or destination of London Wide Significance (cultural, economic or social)	• City Fringe Opportunity Area • Within Central Activities Zone • Edge of City location • Served by mainline railway terminus, the Elizabeth Line and London Underground
Criteria 7: Build values support Metropolitan Scale Tall Buildings Is within an area that supports higher values	Value Band B

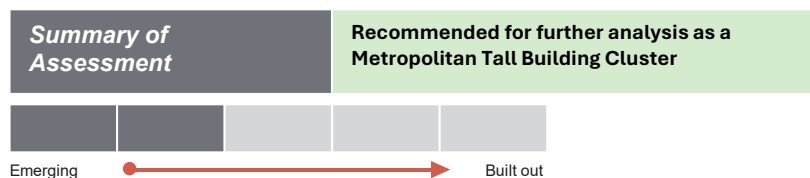
Summary of Assessment

Not recommended for designation as a Metropolitan Tall Building Cluster

CoLC COMMENTS: BROADGATE

CRITERIA	ASSESSMENT
Criterion 1: Align with policy Recognised as an appropriate location for Metropolitan Scale Tall Buildings in Borough's adopted or emerging Development Plan and / or does not conflict with local policy	The Future Shoreditch Area Action Plan 2026 identifies the area as a tall building zone with maximum building heights up to 90m. The CoL emerging City Plan 2040 identifies one site in this area as suitable for development up to 160m in height.
Criterion 2: Is in accessible location Minimum SAM band 5A	Sam Band 5b
Criterion 3: Has scale/size Has potential to accommodate a minimum of five Metropolitan Scale Tall Buildings as part of a group that also includes tall buildings of a lesser scale	There are 4 existing Metropolitan Scale Tall Buildings (100m +) at up to 161m and 4 consents for buildings over 100m+ (up to 155m) within the Area of Search. There are 7 existing and 5 planning consents for tall buildings of 60-100m. Further tall buildings in this location are likely to be below the 100m+ threshold, although their location, form, massing and height would need to be sculpted to avoid appearing behind the Cathedral in views from the south of the river. The area within the City of London Boundary, between Bishopsgate and Appold Street which could theoretically accommodate 4-5 additional Metropolitan tall buildings. The wider area, including the wider Broadgate Area directly west of Liverpool St station, and directly north of Liverpool Street Station, could accommodate tall buildings between heights of 70-95m (separate to those areas above which could accommodate buildings taller than 100m.
Criterion 4: Has development potential Offers opportunity for further Metropolitan Scale Tall Buildings (i.e. area is not already built out)	The majority of sites within the cluster have already been developed or are subject to planning consents. However these consents could deliver further Tall and Metropolitan Scale Tall Buildings in this location

CRITERIA	ASSESSMENT
Criterion 5: Location is sensitive to Strategic Views Can be seen within significant views identified by the London View Management Framework.	This area is in the background setting consultation area of LVMF views 8 and 9, and in the background River Prospect Views 15, 16 and 17 behind the Cathedral, however, Metropolitan tall buildings could be accommodated here, with careful siting, massing and sculpting to be set away from of the Dome of the Cathedral in riparian river views. Metropolitan tall buildings could appear here behind the Protected Silhouette of the White Tower of the Tower of London World Heritage Site in LVMF 10A.1 from Tower Bridge, if above a certain height , approximately 160m+ depending on location. The nature of the opportunity here, then, is that isolated heights of 100m+ may be possible on some sites, subject to view testing, but that generally a much lower range of >100m heights would be most realistic.
Criterion 6: Contributes to identity of London's skyline Marks a location or destination of London Wide Significance (cultural, economic or social)	• City Fringe Opportunity Area • Within Central Activities Zone • Edge of City location • Served by mainline railway terminus, the Elizabeth Line and London Underground
Criterion 7: Build Values support Metropolitan Scale Tall Buildings Is within an area that supports higher values	Value Band B



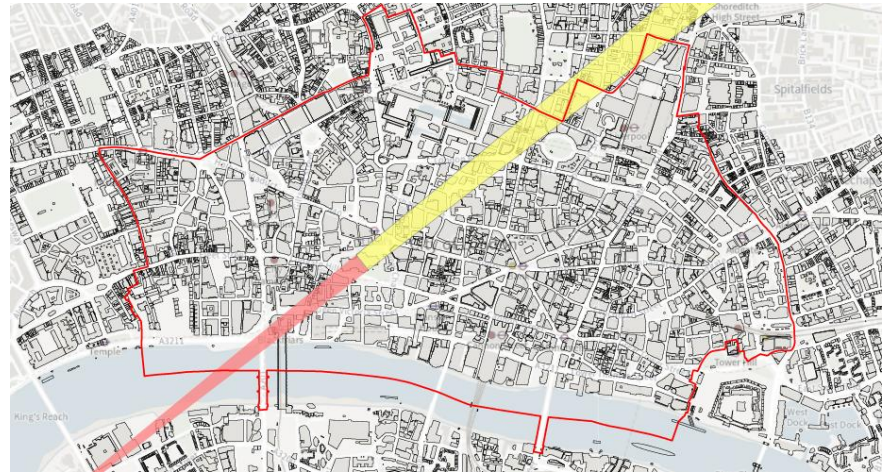
LVMF VIEW COMMENTARY

Westminster Pier – LVMF 8

This view is difficult to appreciate and compromised in quality. The sky silhouette of the Cathedral has been eroded in the background by the presence of the Manhattan Loft Gardens development in Stratford.

The Viewing Corridor terminates at St Paul's Cathedral, which is a considerable distance away from the observer. In the foreground of the view, trees in Jubilee Gardens almost wholly block the Cathedral, and the silhouette of its Peristyle and Dome is crowded by buildings in the foreground of the view.

As the Background Wider Setting Consultation Area leaves the City, it covers part of the Broadgate Estate and modern commercial buildings to the north of Liverpool Street Station. Although it only clips the very north of this area. This part of Liverpool St and Broadgate would be affected by other LVMF River Prospect Views which would preclude buildings of a metropolitan scale.



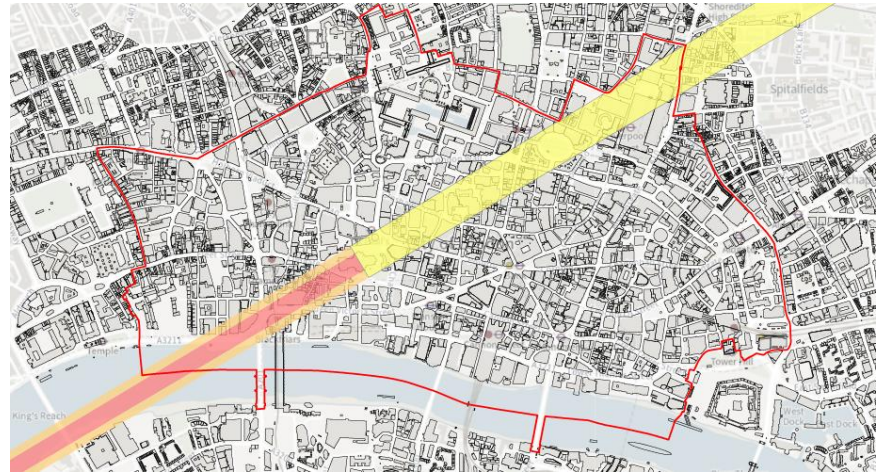
LVMF VIEW COMMENTARY

King Henry VIII's Mound – LVMF 9

Similar to Westminster Pier, this view is difficult to appreciate in certain weather conditions and is compromised in quality.

The background setting consultation area of this view exits the City over the Broadgate and Liverpool Street area. The sky silhouette of the Cathedral and the background of the view has been largely compromised by the presence of the Manhattan Loft Gardens development in Stratford.

There are a small number of large development plots north of Liverpool Street Station which could accommodate significant densification, subject to testing, siting and sculpting of the form and massing. Buildings of a 100m+ could be located accommodated here and concealed by the Dome of the Cathedral. LVMF River Prospect 10A.1 (Tower Bridge), also covers this area of Liverpool St, limiting potential building heights.



LVMF VIEW COMMENTARY

River Prospects – LVMF 15, 16 and 17

The key features of this view, and the principal landmark of the view, St Paul's Cathedral, exerts great influence over the Broadgate and Liverpool Street Area. Densification of the Liverpool Street Broadgate area could affect the background of these views, most notably LVMF 16B.1/2, shown on the right hand side, this view follows a broadly similar orientation to LVMF 8 Westminster Pier and LVMF 9 King Henry VIII's Mound.

Sites within Broadgate and Liverpool Street are geometrically orientated close to and behind the Cathedral silhouette in these viewing experiences. Potential for densification is only moderate, however, a small handful of carefully picked sites might achieve some uplift (circa 90m AOD in Moorgate, circa 100m+ AOD in north of Liverpool Street Station). Where carefully modelled around the Cathedral's silhouette, neighboured by a few others which may achieve more limited uplift of circa 75m AOD.

These views affect some areas of the City that have some growth potential, but the delivery of this growth would need to be very carefully negotiated to avoid unacceptable impacts upon the Cathedral.

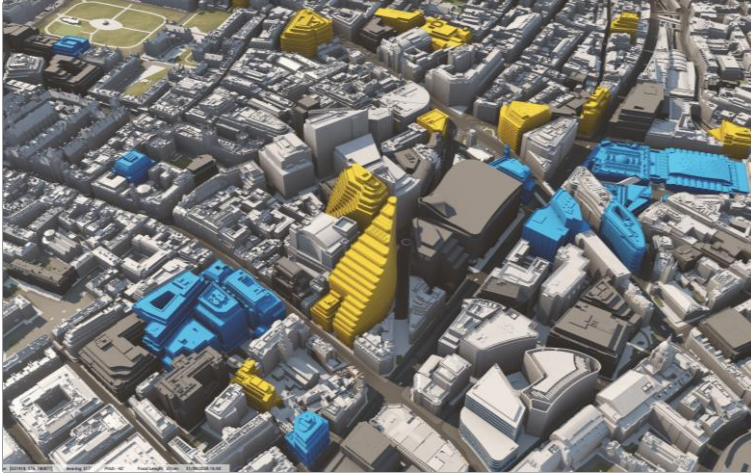


LVMF 16B.1 & B.2

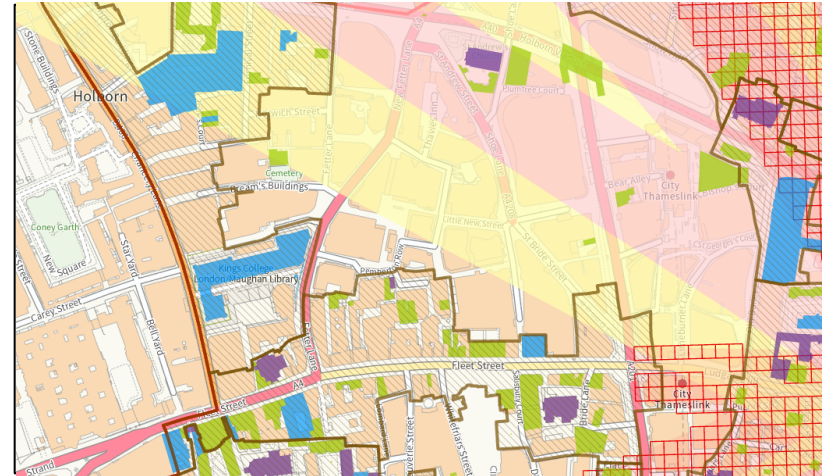


Fleet Valley Cluster

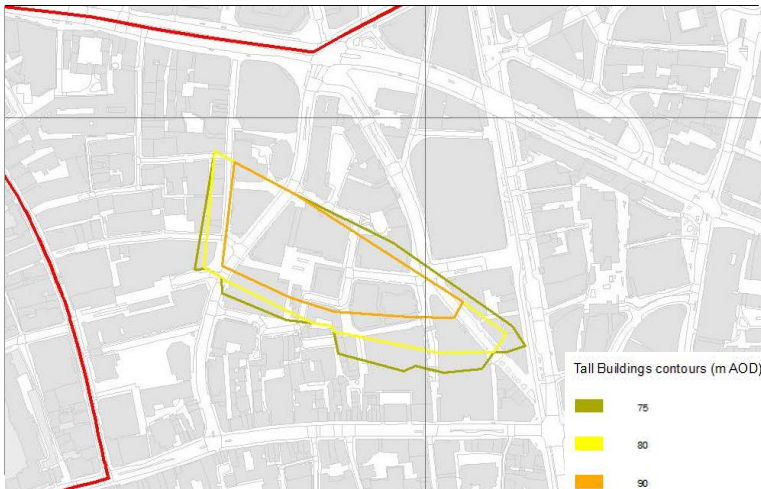
VuCity Aerial



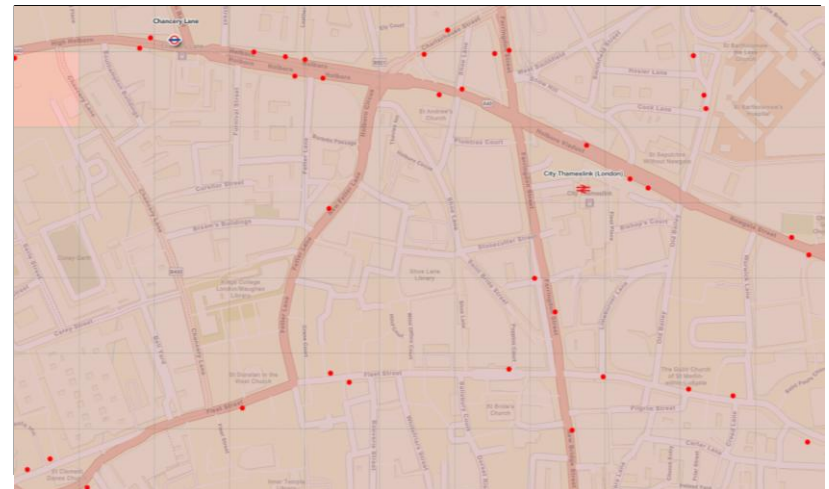
Heritage Sensitivities



Tall Buildings & Tall Building Zones



SAM 5B



Fleet Valley Cluster

CRITERIA	ASSESSMENT
Criterion 1: Aligns with Local policy Recognised as an appropriate location for Metropolitan Scale Tall Buildings in Borough's adopted or emerging Development Plan and / or does not conflict with local policy	The City Plan 2040 identifies an area suitable for tall buildings, with height contours between 75 and 90m. This area could be expanded, both in extents and heights parameters to accommodate metropolitan tall buildings and a cluster form with tall buildings (not metropolitan scale) on the periphery. This area could accommodate significant densification with a relatively limited impact on Protected Views and Local Policy, in contrast to the Broadgate and Moorgate Areas assessed by the GLA.
Criterion 2: Is in accessible location Minimum SAM band 5A	Sam Band 5b
Criterion 3: Has scale / size Has potential to accommodate a minimum of five Metropolitan Scale Tall Buildings as part of a group that also includes tall buildings of a lesser scale	There is 1 existing Tall Building (approx. 90m) and 2 consents for buildings over at (approx. 92m) within the area bound by Holborn, Fetter Lane, Fleet Street and Snow Lane. This area has large development plots which could accommodate significant densification. It has 11 development plots which could accommodate building heights over 100m, with approximately 5 which could accommodate building heights of 50-75m towards the periphery to create a well formed cluster.
Criterion 4: Has development potential Offers opportunity for further Metropolitan Scale Tall Buildings (i.e. area is not already built out)	The existing area is built out but there is significant potential for Tall and Metropolitan Scale Tall Buildings beyond the extents of the Fleet Valley Cluster identified in the Emerging City Plan 2040.

Cluster Status:



CRITERIA	ASSESSMENT
Criterion 5: Location is sensitive to Strategic Views Can be seen within significant views identified by the London View Management Framework.	The northern extents of this area has the LVMF View 6A.1 Blackheath Point background setting consultation area, 4A.1 Primrose Hill wider setting consultation area and 5A.2 Greenwich Park background wider setting consultation area, in close proximity. 6A.1, Blackheath, stretches furthest into this area. This is described in further detail on the following pages. Tall (75m+) and Metropolitan Tall Buildings (100m+) could be accommodated in the current Fleet Valley cluster area its immediate surrounds. A cluster form with heights ranging from 75m around the periphery, to 200m towards the centre, where development plots are the largest, could be accommodated, to create a sculpted form, which would preserve the viewers' ability to recognise and appreciate the Cathedral and simultaneously maintain its clear sky gap, in accordance with the guidance in the LVMF SPD. This cluster would be visible in River Prospect Views (11A.1, 12A.1 17B.1 and 18B.1), but would not be seen against the Cathedral in these views. Given its location to the west of the City, this cluster would not have the potential to impact the setting of the Tower of London World Heritage Site.
Criterion 6: Contributes to identity of London's skyline Marks a location or destination of London Wide Significance (cultural, economic or social)	• Within Central Activities Zone • Adjacent to London Plan Legal Cluster • Adjacent to London Plan Class E Experience Cluster • Served by mainline railway and London Underground
Criterion 7: Build Values support Metropolitan Scale Tall Buildings Is within an area that supports higher values	Value Band B
Summary of Assessment	This area should be assessed as a Metropolitan Tall Building area

LVMF VIEW COMMENTARY

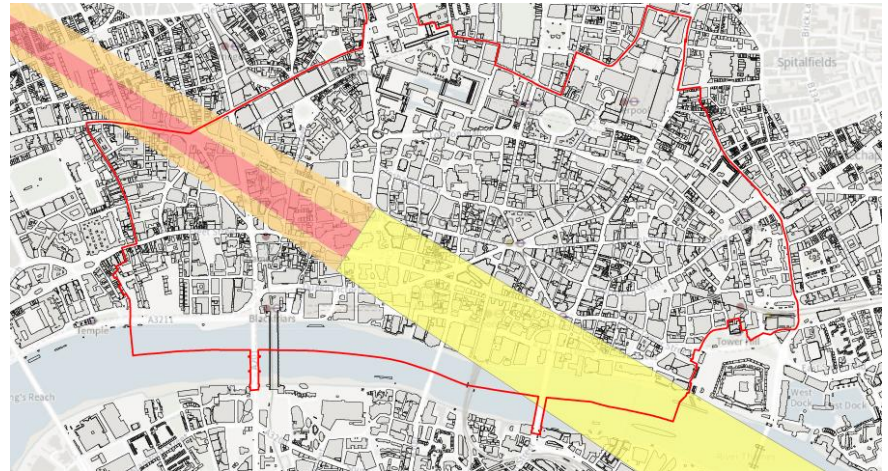
Primrose Hill – LVMF 4A.1

The area to the north of the Fleet Valley Cluster designated in the emerging City Plan 2040, affected by this view has significant capacity for additional growth. This area is partially covered by the orange, wider setting consultation area, which is drawn to align to go beyond the extents of the western clocktower.

There is a group of large modern development plots around the designated Fleet Valley Cluster area which are obvious candidates for densification.

The current wording of LVMF guidance would suggest that additional development seen in these views might be accommodated, as long as it does not significantly erode the sky space around the Cathedral, additional densification could be accommodated in an expanded Fleet Valley cluster without doing so, and comply with the wording of the LVMF guidance.

Views of the dome of the Cathedral could be maintained and protected, whilst allowing for the shaping of a larger tall building cluster than is proposed in the emerging City Plan 2040.



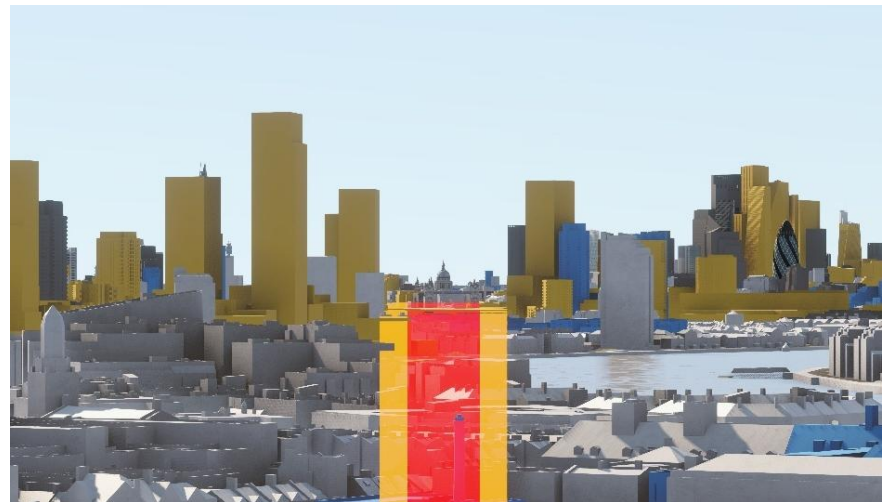
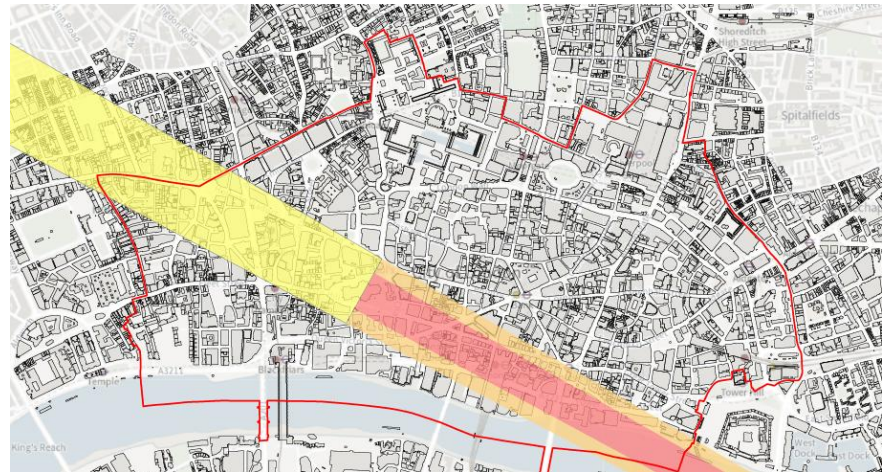
LVMF VIEW COMMENTARY

Greenwich Park – LVMF 5A.1

The LVMF Guidance recognises the importance of the viewers ability to recognise and appreciate the Cathedral, in paragraph 147 of the LVMF guidance, it is stated that “...Development that exceeds the Wider Setting consultation area in the background of this view should preserve or enhance this level of definition.”

The background setting consultation area is broad and extends over areas much greater than are needed to preserve sky space around the Cathedral.

Additional densification could be accommodated in the Background Setting Consultation area without significantly affecting the quality, composition, or the key elements of the view, and would comply with the guidance as currently written.

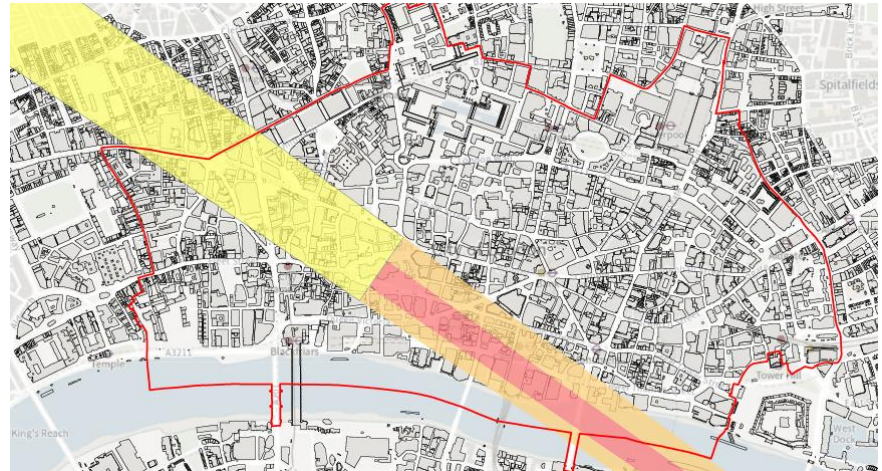


LVMF VIEW COMMENTARY

Blackheath – LVMF 6A.1

The area to the north of the Fleet Valley Cluster is in the Background Wider Setting Consultation Area of the view. The southernmost edge, where there is a cluster of large plots, significant densification could be accommodated without compromising the quality of the view.

Almost half (the southern half) of the Background Wider Setting Consultation area is positioned behind the western Clock Towers of St Paul's Cathedral. Additional densification could be sited away from the western towers, with a clear sky gap, therefore without significantly affecting the quality, composition, of any features of the Cathedral in the view and comply with the LVMF guidance as currently written.



CONCLUSION

The Fleet Valley Cluster has the potential to meet the criteria for designation of a Metropolitan tall building area, and should have been included in the GLA's evidence base. This area is included in the emerging City Plan 2040. Building heights of up to 90m in this area have been through rigorous examination as part of the City Plan examination, and additional expansion of this area would be the most logical location to accommodate the level of growth required. Fleet Valley is highly accessible, it has the scale, size and number of large building plots appropriate for tall building agglomeration. It has great growth potential with minimal impact on strategic views, when compared to other parts of the City with a similar size and scale of building plots. LVMF views of the Cathedral and the Tower of London could be preserved by expansion in this area.

The City Corporation broadly agrees with the GLA's assessment of the suitability of Moorgate for a Metropolitan Scale Tall Building Cluster, but disagrees with the assessment of the Broadgate Cluster. The City Corporation requests that the GLA considers the evidence within this document and reviews the conclusions for Broadgate and includes Fleet Valley within the Metropolitan Scale Tall Building Study.

This has been used to draw the conclusions within the City Corporation's main consultation response to Policy MBUL3.

This identifies some amendments to allow for future Metropolitan Scale Tall Building outside the prescribed list in Table 2.2 of Policy MBUL3 – Tall Buildings.

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City of London Corporation Committee Report

Committee(s): Planning and Transportation Committee	Dated: 30/09/2026
Subject: Stopping up application – Thavies Inn House, Holborn Circus London 21/00885/FULMAJ (as amended by s73 application 24/00688/FULL)	Public report: For Decision
This proposal: provides statutory duties	
Does this proposal require extra revenue and/or capital spending?	No.
If so, how much?	Not Applicable
What is the source of Funding?	Developer Funded
Has this Funding Source been agreed with the Chamberlain's Department?	Not Applicable
Report of:	Planning & Development Director
Report author:	Transport Planning

Summary

An application for stopping up of public highway has been received for areas of St Andrew Street, New Fetter Lane and Thavies Inn relating to the development of Thavies Inn House the site bound by these streets for which this committee resolved to grant planning permission on 1 July 2022, planning reference 21/00885/FULMAJ (as amended by s73 application 24/00688/FULL).

A copy of the draft order together with its associated plan is included in Appendix 1.

Following the grant of planning permission, officers commenced the highway stopping-up process upon receipt of the applicant's stopping-up application and legal costs undertaking.

Notice of the proposal to make an order was advertised, from 12 May 2026 to 9 June 2026, and served as required by the Town and Country Planning Act 1990 ("the Act").

The statutory consultation period for the application has expired, and two objections were received. One objection was submitted internally and subsequently withdrawn, while the other, submitted by a member of the public, remains unresolved.

Officers do not have delegated authority to make stopping up orders where there are unresolved objections. Under Section 247 of the Act, the City of London Corporation may authorise the stopping up of a highway if satisfied that it is necessary to do so in

order to enable development to be carried out in accordance with a planning permission granted under Part III. Where the City is minded to make an order authorising the stopping up but there is an outstanding objection from a person that appears to be affected by the order, in some instances the City must notify the Mayor for London and arrange for a local inquiry to be held unless the Mayor decides that a local inquiry can be dispensed with. This report sets out why this is not considered necessary in this instance.

The London Local Authority (Charges for Stopping Up Orders) Regulations 2000 permits the City to impose a charge on the applicant for an order to stop-up highway, having regard to the City's expenses in considering the application for the order and the steps to make the order, including any costs incurred in holding a local inquiry into the making of the order.

Recommendation(s)

It is recommended this committee:

1. considers the objection received to the proposed stopping up order; and
2. agrees that the Comptroller and City Solicitor's Department can proceed to make and give notice of the stopping up order.

Background

1. This Committee resolved to grant planning permission for the development of the site Thavies Inn House, 1-6 Holborn Circus, London, EC1N 2HP on 1 July 2022 ("the Site").
2. The development proposal is the following:

Demolition of the existing building at 1-6 Holborn Circus (known as Thavies Inn House) and the erection of a ten storey Class E building for office use with Class E retail use at part ground floor level with works to include reinstatement and new pedestrian routes through the site; hard and soft landscaping works including removal and replacement trees within the public highway, and creation of pocket park in Thavies Inn; widening of the footway on St Andrew Street; and other works incidental to the proposed development.

3. Notice of the proposal to make an order was advertised and served in accordance with S252 of the Act. The consultation period ran from 12 May 2026 to 9 June 2026.
4. During the consultation period, the following expressions of interest in the proposals were received and are set out in Appendix 3 below.
5. An objection was received from the City Corporation, in its capacity as Highway Authority, on 12 May 2026. The objection raised concerns that the proposed stopping up to the north (St Andrews Street 2) would leave a very narrow route

for pedestrians should the private space become obstructed, unless unhindered public access was safeguarded. The objection stated:

"to the north (St Andrews Street 2) would leave a very narrow space for people walking if the private space is obstructed (unless unhindered public access has been safeguarded), so I would oppose this stopping up proposal."

6. The applicant and the City Corporation, acting as Highway Authority, subsequently liaised directly to address and resolve these concerns and to clarify matters relating to the proposed stopping-up areas.
7. The internal objection was formally withdrawn on 11 June 2026 on the basis of the following points, which satisfied the concerns of the City Corporation as Highway Authority:
 - The main stopping-up area is the paved section of St Andrews Street, where the two plane trees were previously located.
 - The land has been granted to the developer and will be occupied by the new building as part of the revised scheme.
 - There is an existing permissive path, which is effectively replicated within the new development.
 - The new building layout follows the same permissive-path arrangement as the current site.
 - This reflects the existing situation, where there is adopted highway on either side of the site but not through the centre of Thavies Inn.
 - To mitigate the stopping up and loss of the trees, the scheme proposes an additional permissive alleyway linking New Fetter Lane to Thavies Inn Pocket Park.
 - The existing permissive route will also be retained.
 - The Pocket Park will be landscaped for public use and enjoyment.
 - The Pocket Park will remain City of London land/public highway.
8. In addition to the above, representations were received during the advertisement period from members of the public and the following utility companies: Openreach, Sky Telecommunications Services Ltd, and AtkinsRéalis on behalf of Vodafone. No objections were raised; however, the respondents confirmed that they have apparatus in close proximity to the areas proposed to be stopped up.

Objections

9. A second objection was received from a member of the public on 9 June 2026. The objection is summarised below and set out in full in Appendix 4. Several of the issues raised relate to planning matters that were considered as part of the planning application process and are not material to the determination of this stopping-up application.
10. The objection remains unresolved.

	Objection Comments
Objection 2	1. Queries which plan revision is correct, as different versions appear in the notice. 2. Requests a copy of the draft order and confirmation of the correct plans. 3. Notes that the notice refers to a new highway area, but no corresponding plan has been provided. 4. Questions the need to stop up 89.9 m² of highway, particularly where the two former TPO-protected plane trees stood. 5. Raises concerns that the trees appear to have been removed despite the TPO. 6. Questions the rationale for replacing public highway with a permissive route through open space rather than retaining it as public highway. 7. Suggests that if the space is intended for public use, it should be managed and maintained as public highway. 8. Requests that the objection be formally registered. 9. Considers that insufficient regard has been given to: • Public open space; • The necessity of stopping up large areas of highway; and • Whether adequate replacement measures, including new TPO-protected trees, will be delivered. 10. Highlights the recognised value of the two mature plane trees, including their: • Contribution to the townscape and views of St Andrew Holborn; • Long life expectancy and high amenity value; and • Role in climate resilience.

Assessment

11. When assessing applications for the stopping up of public highway, officers must be satisfied that the proposal meets both the necessity test (that the stopping up is necessary to enable development to be carried out in accordance with planning permission which has been granted) and the merits test (that the benefits of the proposal outweigh any disadvantages).
12. Officers are satisfied that the physical interference of the proposed building with the highway satisfies the legal test of necessity for the stopping up of all the proposed areas shown on the plan in Appendix 1. The proposed stopping up is required to facilitate the implementation of the development in accordance with the planning permission. The majority of the highway land proposed to be stopped up will be built upon as part of the approved scheme. The exception is an area measuring approximately 32.6 sq. m, identified as the orange-coloured area on the Proposed Permissive Path Plan (Appendix 2), appended to the Section 106 Agreement Deed of Variation. Incorporating this area into the permissive path was considered the most appropriate solution, as it creates a single continuous permissive route maintained by the developer, rather than introducing a small section of public highway with separate maintenance responsibilities. This area will form the replacement permissive path for the existing route and will remain publicly accessible.
13. Accordingly, the proposal satisfies the necessity test, as the stopping up is required to enable the approved development to proceed in the form for which planning permission was granted. Furthermore, the scheme will deliver a new pocket park at Thavies Inn in place of the existing surface car park. The pocket park will provide new greenery, seating, and publicly accessible open space, which will be maintained as public highway at public expense. These public realm improvements are considered to outweigh the loss of the existing highway areas proposed to be stopped up and will provide a wider public benefit.

Size of the area to be stopped up

14. The stopping-up order plans form part of the development approved under planning permission 21/00885/FULMAJ (as amended). The extent of the areas proposed to be stopped up were considered as part of the planning application process. The report also referred to the fact that land was to be dedicated as highway and the permissive path and public realm that would be secured as part of the application. The stopping up order will stop up 118.2m² of existing highway but will require an area of 136.82m² to be dedicated as new highway, resulting in no net loss in highway.
15. In granting planning permission, the Committee was aware of the distinction between public highway and permissive routes. Planning permission was granted with full knowledge of the proposed status and extent of the various routes and spaces within the development. The existing route through the site is permissive path and whilst the route will move slightly, a permissive route from Thavies Inn through to St Andrew Street will remain, along with a new permissive route from

Thavies Inn to New Fetter Lane. These permissive routes are secured within the s106 agreement entered into at the time planning permission was granted.

Removal of trees subject to a Tree Preservation Order

16. Matters relating to the removal of the existing trees, the Tree Preservation Order (TPO), and the landscaping strategy were considered through the planning application process that resulted in the grant of planning permission.
17. In granting planning permission, the Committee considered the impacts of the development, including those relating to the existing trees, the proposed public realm works, and the wider implications of the scheme.
18. Where works to trees subject to a Tree Preservation Order, including the felling of trees, are necessary to implement a planning permission that has been granted, those works may proceed and do not constitute a breach of the Town and Country Planning (Tree Preservation) (England) Regulations 2012.
19. Officers acknowledge that the loss of the trees was not taken lightly by the Committee. Members were advised of the proposed tree removals and the justification for them before determining the application.
20. In reaching its decision, the Committee also gave consideration to replacement tree planting. Through the Section 278 highway works and obligations secured by the Section 106 Agreement, the development is required to deliver 23 new trees within the public highway to compensate for the loss of the two TPO-protected London plane trees.
21. It should be noted that the stopping-up order application itself did not result in the removal of the trees; their removal was authorised through the planning permission.

Proposed permissive path and public highway routes

22. The proposed permissive path from Thavies Inn to St Andrew Street replaces the existing permissive route through the site.
23. The decision to retain this route as a permissive path and secure an additional permissive route, is consistent with the City Corporation's approach to similar routes delivered through other planning permissions. It allows for a degree of future flexibility and for the public to have the benefit of new routes without the City Corporation becoming responsible for the maintenance costs associated with an increasing number of routes.
24. Consideration was given during the planning application process as to whether the route should become public highway. Given that it would function as a through-route within a privately owned development and replace an existing permissive route, it was considered acceptable for the route to remain permissive in nature.

25. The Section 106 Agreement sets out detailed requirements for the construction and operation of the permissive path. The specification for the route must be approved by the City Corporation before implementation, and the development cannot be occupied until the route has been completed to the reasonable satisfaction of the City Corporation.
26. The Section 106 Agreement also requires the owner to clean, maintain, repair, and keep in good order the surface, lighting, drainage, hard and soft landscaping, street furniture, and structures associated with the permissive path.
27. The owner is required to keep the route unobstructed and available for public access on foot, free of charge, at all times following completion, except in cases of force majeure, maintenance works, or occasional temporary closures permitted under the agreement.

Consideration of public pace, necessity for stopping up, and replacement provision

28. The extent of the stopping up and the associated loss of public highway were fully considered as part of the planning application process. The City Corporation assessed the necessity and acceptability of these changes, and appropriate mitigation was secured through planning conditions and planning obligations.
29. The approved development includes hard and soft landscaping works, replacement tree planting within the public highway, new pedestrian routes through the site, and the creation of a pocket park within Thavies Inn. Replacement highway has also been sought.
30. These publicly accessible routes and spaces were incorporated into the approved scheme to mitigate the loss of existing highway land affected by the redevelopment and to provide enhanced pedestrian connectivity, permeability, and movement through the site.

Current Position

31. The notice of intention to stop up areas of highway at New Fetter Lane, Thavies Inn and St Andrew's Street was advertised in the London Gazette and City AM.
32. The statutory consultation period ran for 28 days, from 12 May 2026 to 9 June 2026.
33. One objection from a member of the public remains unresolved.
34. Under the Scheme of Delegations, only unopposed stopping-up orders may be approved and made under delegated authority.
35. The concerns raised in the objection have been considered insofar as they relate to matters relevant to the stopping-up application. Many of the issues raised were considered in detail through the planning application process and by the Planning and Transportation Committee when determining the planning application.

Appropriate planning conditions and planning obligations were imposed to mitigate the impacts identified.

36. The concerns raised through the objection received do not demonstrate how the proposed stopping up order would directly affect the objector. The objection primarily relates to the loss of the amenity value of trees previously located within the area, questions the rationale of land being permissive route as opposed to highway and questions whether sufficient regard has been given to number of matters which were considered in detail at the planning stage. However, the removal of the trees was considered and approved through a separate planning process and is not a consequence of, nor authorised by, the stopping up order itself.
37. The procedure for making a stopping up order is set out in Section 252 of the Town and Country Planning Act 1990. This section sets out the circumstances in which an authority proposing to make a stopping up order, are required to notify the Mayor of London of an objection which has been received during 28 days allowed following publication of the notice of intention, but not withdraw. Primarily this applies where the objection received is from another local authority or an undertaker on who notice had to be served, but it also applies where the objection is received from any other person appearing to the City Corporation to be affected by the order. The objection does not suggest that the objector will themselves be affected by the stopping up order and no evidence has been provided to indicate that the order would adversely affect the objector's access rights, ability to use existing routes, or result in any material inconvenience. In this context, officers consider that the statutory test of a person "appearing to be affected by the order" would generally apply where an individual's access to premises/land, use of a route, or travel arrangements would be materially impacted by the stopping up.
38. In order to give the objector the opportunity to provide any further comments before a decision was made whether to refer this stopping up order to the Mayor of London, the objector was invited to provide further details as to whether and how they considered themselves to be affected by the order; however, no further response was received. Accordingly, and taking into account the nature and location of the highway to be stopped up, officers do not consider that the objection demonstrates that the objector would be directly affected by the order and therefore do not consider it necessary to refer the objection to the Mayor of London before proceeding.

Options

39. Should the Committee consider the relevant tests and the objection and decide not to make the order, there is no further action to take and the proposed development would not be able to proceed in its current form.

Proposals

40. It is proposed that the Committee reviews the objection and agrees that the Order should proceed to being made notwithstanding the outstanding objection. This would enable the stopping-up process to progress to the sealing of the Order and the subsequent advertisement of the made Order.
41. Following the making of the Order, a further statutory notice will be advertised. This provides an opportunity for any person who may be affected by the Order to challenge its validity by applying to the High Court within the 6-week statutory period.

Key Data

Corporate & Strategic Implications

Strategic implications

42. None.

Financial implications

43. The London Local Authority (Charges for Stopping Up Orders) Regulations 2000 permits the City to impose a charge on the applicant for an order to stop-up highway, having regard to the City's expenses in considering the application for the order and the steps to make the order, including any costs incurred in holding a local inquiry into the making of the order.
44. Accordingly, any costs arising from the application, including any costs to the City arising from a potential local inquiry, will be recovered from the applicant.

Resource implications

45. None.

Legal implications

46. Comptroller and City Solicitor has been consulted in the preparation of this report. Section 247 of the Act authorises the City Corporation to make an order authorising the stopping up of areas of highway necessary to implement a planning permission. Section 252 of the Act sets out the procedures to follow in making an order.
47. The City Corporation has followed the procedure to the stage where the consultation process is complete, but one objection is outstanding. To proceed, the Committee must consider the objection and whether the legal test of necessity for the stopping up order and the merits test has been met. If the Committee agrees that the stopping up order should be made, the draft order will be sealed and dated, and notice of the making will be given and published in accordance with the legal requirements.

Risk implications

48. None.

Equalities implications

49. When making decisions, the City Corporation must have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good relations between persons who share a protected characteristic and those who do not (the public sector equality duty). A proportionate level of equality analysis is required to discharge the duty. The stopping up order is not expected to have any equalities implications in this instance.

Climate implications

50. None.

Security implications

51. None.

Conclusion

52. An application has been received to stop up highway land at St Andrew's Street, New Fetter Lane and Thavies Inn all in order to enable the development at Thavies Inn House London, EC1N 2HP.

53. The statutory consultation required on the draft stopping up order has been completed and one objection remains unresolved.

54. To progress the stopping up order Committee needs to consider whether the legal tests have been met and whether it is minded to make the order in the light of the objection.

55. Should Committee decide not to make the order there is no further action to take and the proposed development would not be able to proceed in its current form.

56. Otherwise, it is recommended that this committee:

- (a) considers the objection received to the proposed stopping up order;
and
- (b) agrees that the Comptroller and City Solicitor's Department can proceed to make and give notice of the stopping up order.

Appendices

- Appendix 1 – Draft Order, Stopping up plan and Dedication of land plan
- Appendix 2 – Proposed Permissive Path plan
- Appendix 3 – Expression of interest in the proposals
- Appendix 4 – Member of the public Objection⁵
- Appendix 5 – Response

Background Papers

Planning and Transportation Committee Paper, Thavies Inn House 3-4 Holborn Circus, London EC1N 2HA, dated 1 July 2022.

Agreement under Section 106 of the Town and Country Planning Act 1990 dated 2 December 2022 (which was later varied by agreement dated 1 July 2025)

Gwyn Richards

Planning and Development Director

Environment

E: gwyn.richards@cityoflondon.gov.uk

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DRAFT ORDER

The Common Council of the City of London

Town and Country Planning Act 1990

The Stopping Up of Highways (City of London) (Number X) Order 2026

Made [date of making]

The Mayor and Commonalty and Citizens of the City of London ("the City") make this Order in exercise of their powers under section 247 of the Town and Country Planning Act 1990, as amended by section 270 of and Schedule 22 to the Greater London Authority Act 1999 ("the Act"), and of all other powers enabling them in that behalf, in order to enable development to be carried out in accordance with the planning permission granted under Part III of the Act on 2 December 2022 under reference number 21/00885/FULMAJ (as amended).

1. The City authorises the stopping up of the six areas of highway described in the First Schedule to this Order and shown in zebra hatching on Deposited Plan 1.
2. The Owner shall to the satisfaction of the City provide or secure the provision of the new highways described in the Second Schedule to this Order and shown by stipple on Deposited Plan 2 pursuant to obligations which shall be contained within the Agreement.

3. Any highways provided under paragraph 2 of this Order shall for the purposes of the Highways Act 1980 be a highway maintainable at the public expense and the City shall be the highway authority for that highway.
4. Where, immediately before the date of this Order there is any apparatus of statutory undertakers under, in, over, along or across any area of the highways authorised to be stopped up pursuant to this Order, then in accordance with section 247(4)(b) (subject to section 261(4)) of the Act, those undertakers shall have the same rights as respects their apparatus after that area of highway is stopped up as they had immediately beforehand.
5. In this Order the following terms shall have the following meanings:
 - "Agreements"** means the Highways Agreement and/or the Planning Agreements;
 - "Deposited Plan 1"** means the **attached** plans numbered TIH-MTC-XX-00-DR-H-0001 Rev P04 and entitled "Stopping Up Areas Plan – New Fetter Lane, St Andrew Street, Thavies Inn".
 - "Deposited Plan 2"** means the **attached** plan numbered TIH-MTC-XX-00-DR-H-0011 Rev P04 and entitled "Highways to be provided and added to the highways immediately adjacent to them".
 - "Highways Agreement"** means an agreement to be entered into pursuant to sections 38 and 278 of the Highways Act 1980 between (1) the City and (2) the Owner in accordance with the provisions of the Planning Agreements;
 - "Owner"** means TIH Limited (incorporated in Jersey under number 121374) (company registration number E000429) with registered office at 26 New Street, St Helier, Jersey JE2 3RA;
 - "Planning Agreement"** means the agreements dated 2 December 2022 and 1st July 2025 made pursuant to section 106 of the Town and Country Planning Act 1990 and entered into between (1) the City and (2) the Owner.
6. This Order may be cited as the Stopping Up of Highways (City of London) (Number X) Order 2026.

First Schedule

Description of Highways to Be Stopped Up (shown in zebra hatching on Deposited Plan 1)

The areas of highway to be stopped up are in New Fetter Lane, St Andrew Street, and Thavies Inn in the City of London as detailed below:

- 1 Irregularly shaped areas of land on the south side of St Andrew Street, with an approximate area of 1.5 square metres.
- 2 A triangular shaped area of land on the east side of St Andrew Street, with an approximate area of 89.9 square metres.
- 3 An irregularly shaped area of land on the north side of Thavies Inn, with an approximate area of 14.8 square metres.
- 4 An irregular shaped area of land on the north side of Thavies Inn, with an approximate area of 0.8 square metres.
- 5 An irregular shaped area of land on the north side of Thavies Inn, with an approximate area of 1.8 square metres.
- 6 An irregular shaped area of land on the northwest side of Thavies Inn, with an approximate area of 0.1 square metres.
- 7 Nine irregular shaped areas of land on the east side of New Fetter Lane, with an approximate area of 9.3 square metres.

Second Schedule

Description of Highways to Be Provided and Added to the Highways Immediately Adjacent to Them (shown by stipple on Deposited Plan 2)

The areas of highway to be provided and added to the highways immediately adjacent to them and to be maintainable at the public expense, for which the City shall be the highway authority, are in St. Andrew Street, Thavies Inn and New Fetter Lane, as detailed below:

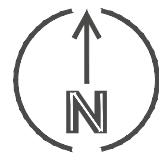
1. A triangular shaped area of land on the northeast side of St Andrew Street, with an approximate area of 2.14 square metres.
2. A rectangular shaped area of land on the centre of Thavies Inn, with an approximate area of 131.38 square metres.
3. Irregular shaped areas of land on the west side of New Fetter Lane, with an approximate area of 3.30 square metres.

Dated [date of sealing]

The Common Seal of the Mayor
and Commonalty and Citizens
of the City of London
was hereunto affixed
in the presence of:

Authorised Officer

ISO FULL BLEED A3 420 X 297 MM



Cycle Hire

NEW FETTER LANE

ST ANDREW STREET

ST ANDREW CHURCH

Reference	Area (m²)
New Fetter Lane	9.5
St. Andrews Street 1	1.5
St. Andrews Street 2	89.9
Thavies Inn 1	14.8
Thavies Inn 2	0.8
Thavies Inn 3	0.1
Total	116.6

St. ANDREWS STREET 1 (1.5m²)
St. ANDREWS STREET 2 (89.9m²)

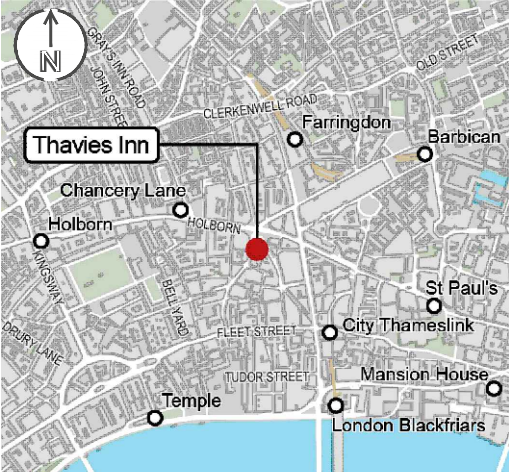
NEW FETTER LANE (9.5m²)

THAVIES INN 1 (14.8m²)

THAVIES INN 2 (0.8m²)

THAVIES INN 3 (0.1m²)

THAVIES INN



OVERVIEW PLAN

NOTES

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2. Highway boundary information is indicative only and has been transposed based upon interactive mapping available from the City of London.
3. Some areas of highway are shown to be beyond physical constraints on site. This is due to the varying levels of accuracy associated with OS mapping compared to topographical survey information. The area included within this plan aims to ensure that all relevant highway is included within the stopping up application without prejudice.
4. This drawings is based on WEA plan 'TIH-WEA-XX-00-DR-A-101000-P14-Proposed Level 00' dated 07/11/25 and topographical survey received from Avison Young, referenced as 49626-PCL-TO-XX-M2-Y-00001-S3-P01.dwg, dated 19/12/24.

KEY

- Existing building outline
- Existing adopted highway
- Adopted highway to be stopped up (116.6m²)

P03	29/01/26	Updated following CoL's comments	CD	DM	DM
P02	08/01/26	Revision to First Issue	CD	PS	DM
P01	05/12/25	First Issue	CD	PS	DM
REV	DATE	REVISION DESCRIPTION / DETAILS	DRN BY	CHKD BY	APRVD BY

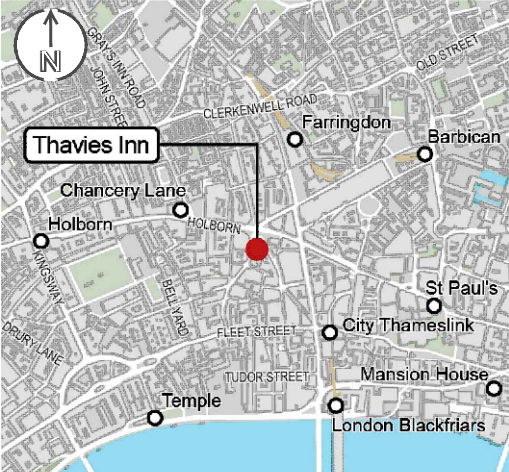


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DRAWING TITLE: STOPPING UP AREAS PLAN SHEET 1 OF 6

STATUS: FOR INFORMATION

DRAWING NO: TIH-MTC-XX-00-DR-H-0001	REV: P03	SCALE AT A3: 1:350
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OVERVIEW PLAN

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REV	DATE	REVISION DESCRIPTION / DETAILS	DRN BY	CHKD BY	APPRD BY



CLIENT:

Evans Randall Investors

JOB TITLE:

THAVIES INN

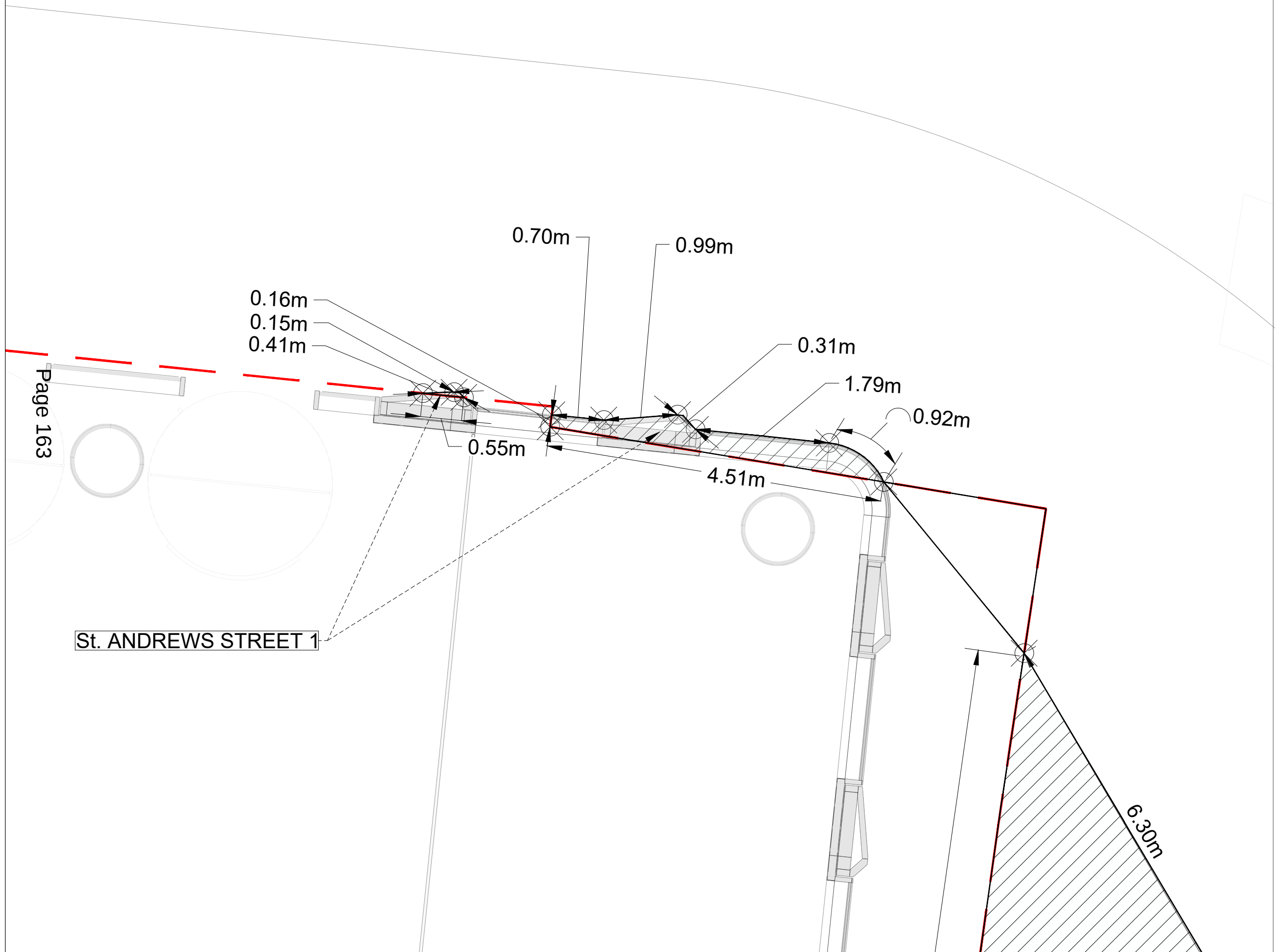
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STOPPING UP AREAS PLAN
SHEET 2 OF 6

STATUS:

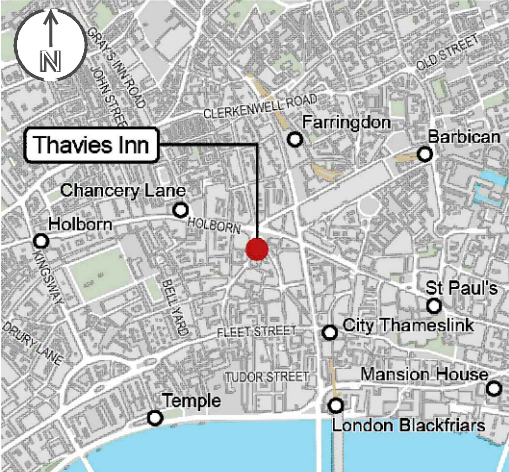
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Page 163

St. ANDREWS STREET 1



OVERVIEW PLAN

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P01	05/12/25	First Issue	CD	PS	DM
REV	DATE	REVISION DESCRIPTION / DETAILS	DRN BY	CHKD BY	APRVD BY



CLIENT:

JOB TITLE:

THAVIES INN

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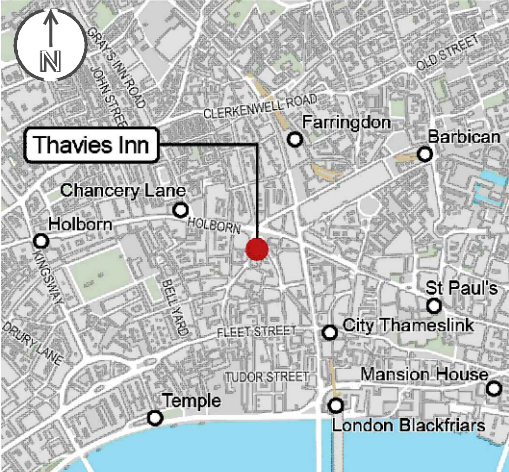
STOPPING UP AREAS
SHEET 3 OF 6

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ISO FULL BLEED A3 420 X 297 MM



OVERVIEW PLAN

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REV	DATE	REVISION DESCRIPTION / DETAILS	DRN BY	CHKD BY	APRVD BY



CLIENT:



THAVIES INN

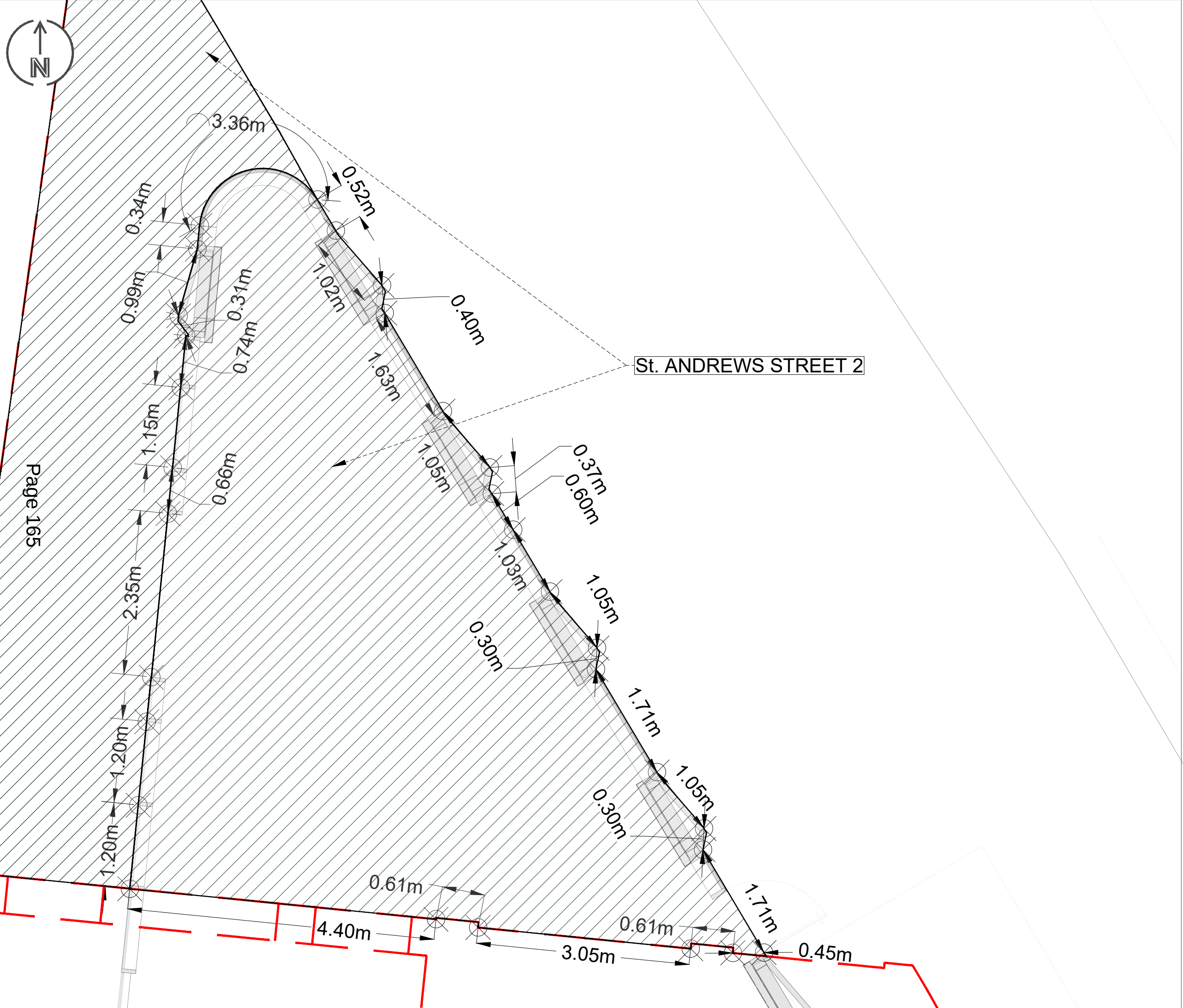
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STOPPING UP AREAS
SHEET 4 OF 6

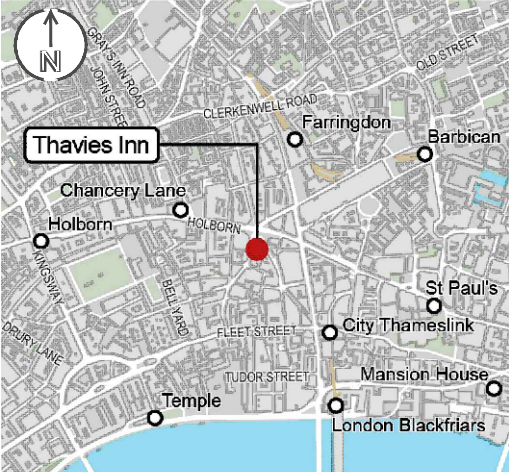
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Page 165



OVERVIEW PLAN

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3. Some areas of highway are shown to be beyond physical constraints on site. This is due to the varying levels of accuracy associated with OS mapping compared to topographical survey information. The area included within this plan aims to ensure that all relevant highway is included within the stopping up application without prejudice.
4. This drawings is based on WEA plan 'TIH-WEA-XX-00-DR-A-101000-P14-Proposed Level 00' dated 07/11/25 and topographical survey received from Avison Young, referenced as 49626-PCL-TO-XX-M2-Y-00001-S3-P01.dwg, dated 19/12/24.

KEY

- Existing building outline
- Existing adopted highway
- Adopted highway to be stopped up (116.6m²)

P03	29/01/26	Updated following CoL's comments	CD	DM	DM
P02	08/01/26	Revision to First Issue	CD	PS	DM
P01	05/12/25	First Issue	CD	PS	DM
REV	DATE	REVISION DESCRIPTION / DETAILS	DRN BY	CHKD BY	APPRVD BY



CLIENT:



Evans Randall Investors

JOB TITLE:

THAVIES INN

DRAWING TITLE:

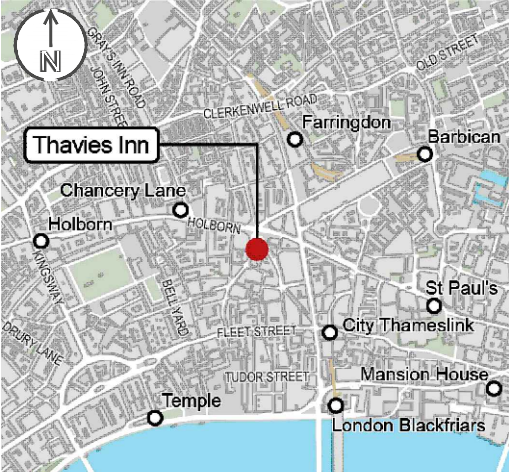
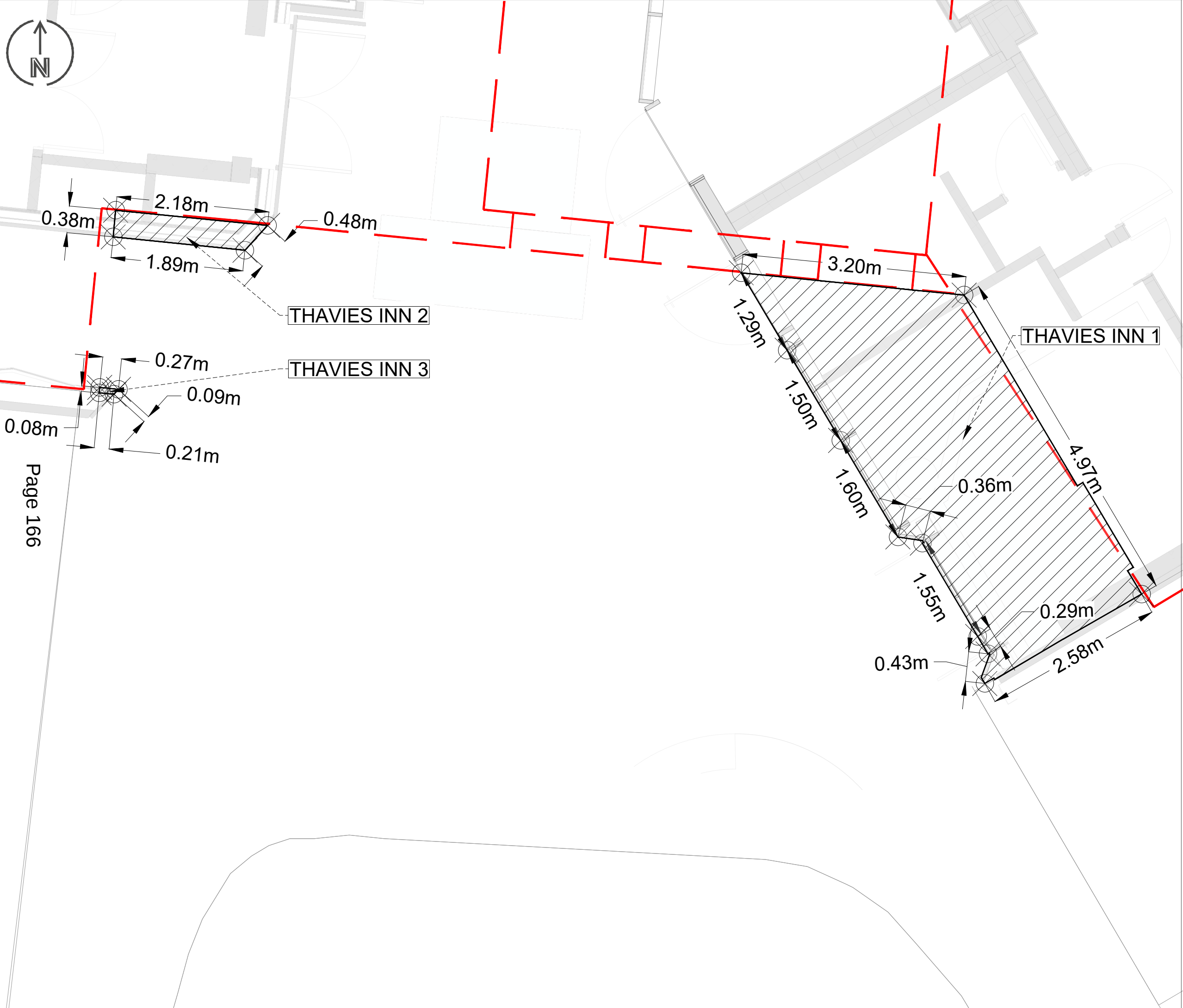
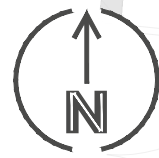
STOPPING UP AREAS
SHEET 5 OF 6

STATUS:

FOR INFORMATON

DRAWING NO:	REV:	SCALE AT A3:
TIH-MTC-XX-00-DR-H-0005	P03	1:50

ISO FULL BLEED A3 420 X 297 MM



OVERVIEW PLAN

NOTES

1. Do not scale from this drawing
2. Highway boundary information is indicative only and has been transposed based upon interactive mapping available from the City of London.
3. Some areas of highway are shown to be beyond physical constraints on site. This is due to the varying levels of accuracy associated with OS mapping compared to topographical survey information. The area included within this plan aims to ensure that all relevant highway is included within the stopping up application without prejudice.
4. This drawings is based on WEA plan 'TIH-WEA-XX-00-DR-A-101000-P14-Proposed Level 00' dated 07/11/25 and topographical survey received from Avison Young, referenced as 49626-PCL-TO-XX-M2-Y-00001-S3-P01.dwg, dated 19/12/24.

KEY

- Existing building outline
- Existing adopted highway
- Adopted highway to be stopped up (116.6m²)

P03	29/01/26	Updated following CoL's comments	CD	DM	DM
P02	08/01/26	Revision to First Issue	CD	PS	DM
P01	05/12/25	First Issue	CD	PS	DM
REV	DATE	REVISION DESCRIPTION / DETAILS	DRN BY	CHKD BY	APPRD BY



CLIENT:



Evans Randall Investors

JOB TITLE:

THAVIES INN

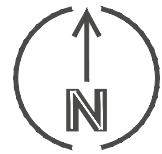
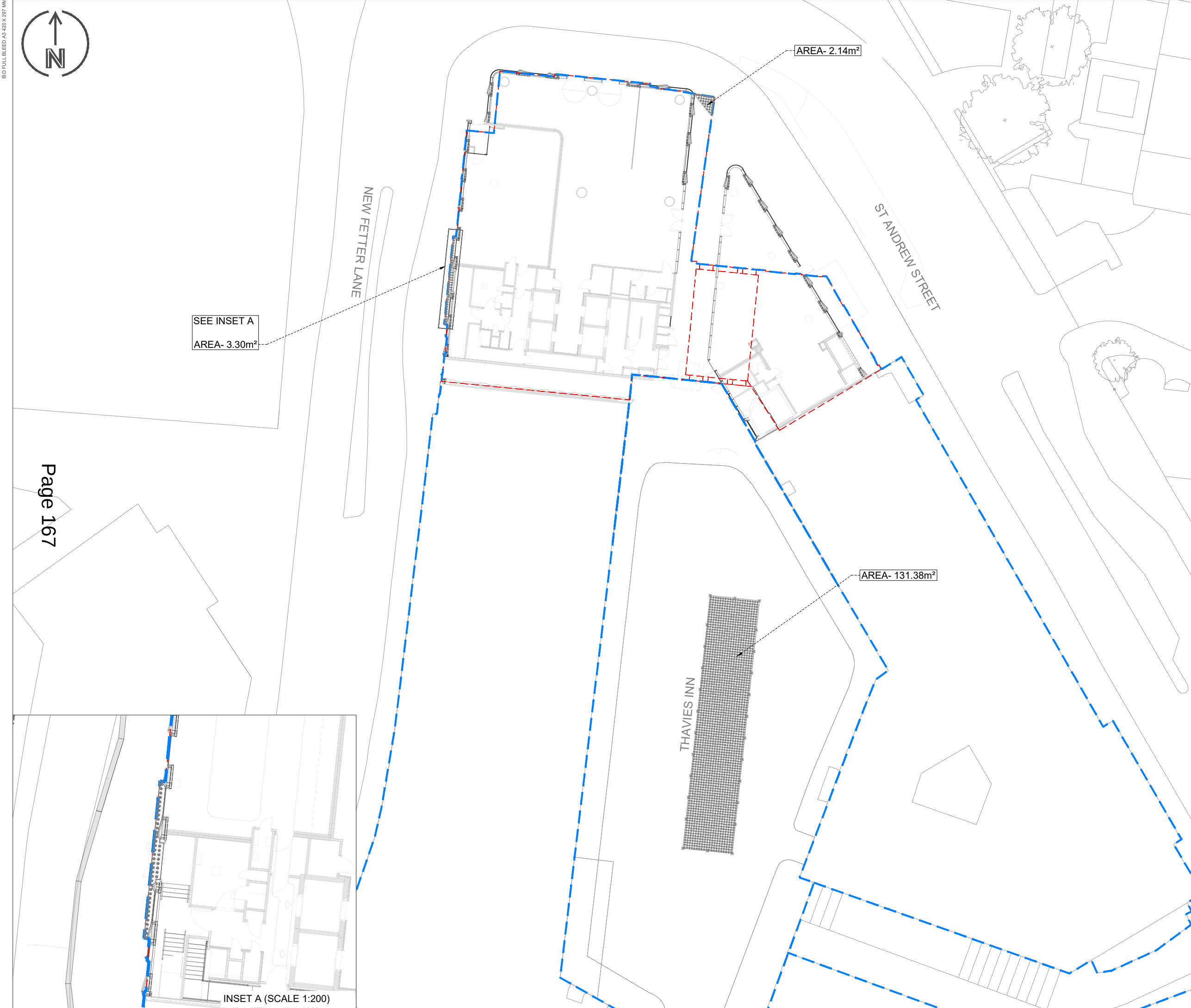
DRAWING TITLE:

STOPPING UP AREAS
SHEET 6 OF 6

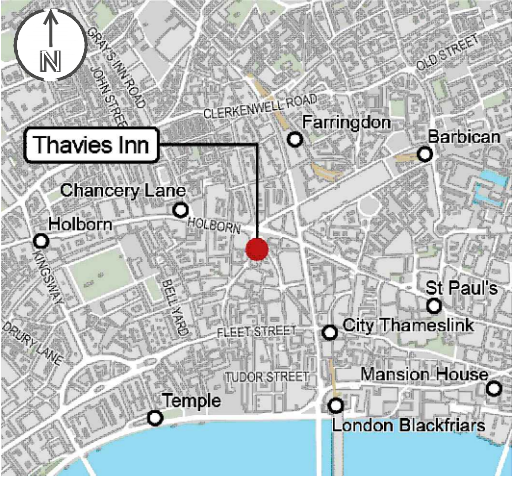
STATUS:

FOR INFORMATON

DRAWING NO:	REV:	SCALE AT A3:
TIH-MTC-XX-00-DR-H-0006	P03	1:50



INSET A (SCALE 1:200)



OVERVIEW PLAN

NOTES

1. Do not scale from this drawing
2. This plan is based on Wilkinson Eyre ground floor plan referenced as 'TIH-WEA-XX-00-DR-A-101000-P14-Proposed Level 00' dated 07/11/2025 and OS mapping information. Accuracy is not guaranteed.
3. Some areas of highway are shown to be beyond physical constraints on site. This is due to the varying levels of accuracy associated with OS mapping compared to topographical survey information. The area included within this plan aims to ensure that all relevant highway is included within the Oversailing application without prejudice.
4. Scheme includes stopping up of existing highway and new highway elements. Oversailing will take place of the existing and proposed highway boundaries

KEY

- Existing building outline
- Existing adopted highway
- Proposed area intended to be offered for adoption (136.82m²)

P03	29/01/26	Updated following CoL's comment	CD	DM	DM
P02	08/01/26	Revision to First Issue	CD	PS	DM
P01	05/12/25	First Issue	CD	PS	DM
REV	DATE	REVISION DESCRIPTION / DETAILS	DRN BY	CHKD BY	APRVD BY



CLIENT:



Evans Randall Investors

JOB TITLE:

THAVIES INN HOUSE

DRAWING TITLE:

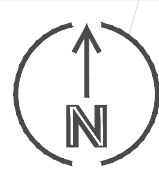
Adopted Highway Plan

STATUS:

FOR INFORMATON

DRAWING NO:	REV:	SCALE AT A3:
TIH-MTC-XX-00-DR-H-0011	P03	1:350

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NEW FETTER LANE

NEW FETTER LANE

ST ANDREW STREET

THAVIES INN



1

6



OVERVIEW PLAN

NOTES

1. Do not scale from this drawing
2. This plan is based on Wilkinson Eyre floor plans referenced as '01557-WEA-XX-00-DR-A-1000' & '01557-WEA-XX-07-DR-A-1070' dated 05/12/2024 and OS mapping information. Accuracy is not guaranteed.
3. Some areas of highway are shown to be beyond physical constraints on site. This is due to the varying levels of accuracy associated with OS mapping compared to topographical survey information. The area included within this plan aims to ensure that all relevant highway is included within the Oversailing application without prejudice.
4. Scheme includes stopping up of existing highway and new highway elements. Oversailing will take place of the existing and proposed highway boundaries

KEY

- Existing Permissive Pathway Removed: 49.5m²
- Existing Permissive Pathway Retained: 26.0m²
- Existing Highway Stopped Up to become Permissive Pathway: 32.6m²
- New Permissive Pathway: 94.3m²
- Indicative Outline of Existing Building
- Outline of Proposed Building above

A	05/12/24	First Issue	CD	PS	JT
REV	DATE	REVISION DESCRIPTION / DETAILS	DRN BY	CHKD BY	APRVD BY



CLIENT:  Evans Randall Investors

JOB TITLE: THAVIES INN HOUSE

DRAWING TITLE: Stage 2 - Proposed Permissive Pathway

STATUS: **FOR INFORMATON**

DRAWING NO: M000522-2-1-DR-020	REV: D	SCALE AT A3: 1:200
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Appendix 3 – Expression of interest in the proposals

PC630 Thavies Inn House: Consultation Track

Objector	Objection? Yes/No	Date Received	Date Response Provided	Objection Withdrawn? Yes, when?	Objection Resolved?	Comments
City Corporation Highways Authority	Yes	12 May 2026	13 May 2026	Yes, 11 June 2026	Withdrawn	1. Opposes the proposed stopping up at St Andrews Street 2 due to concerns that it could leave an unacceptably narrow pedestrian route if the adjacent private space becomes obstructed. 2. Requests clarification on why the stopping up is required, as this is not apparent from the statutory notice. 3. Asks whether there are any approved planning application drawings/plans that demonstrate the need for the stopping up. 4. Notes that although tables and chairs are not currently proposed, a future occupier could seek permission for them.

						5. Seeks reassurance on how pedestrian access would be safeguarded in the future, or whether adoption as public highway would be a better solution. 6. Queries why the strip of highway to the west, which appears to be outside the new building footprint, also needs to be stopped up.
OneSearch	No.	15 May 2026	29 May 2026	N/A	N/A	Request of copy of the draft order and plans.
St Andrew Holborn Church Foundation & Associated Charities <i>St Andrew Holborn Trading Limited</i> (Member of the public)	No.	03 June 2026	05 June 2026	N/A	N/A	Request of information on the proposals.
AtkinsRéalis	No.	25 May 2026	8 June 2026	N/A	N/A	Confirmation email that there is apparatus within the proposed area to stop up.

Openreach	No.	6 June 2026	Not required	N/A	N/A	Confirmation email that there is apparatus within the proposed area to stop up.
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Appendix 4 – Member of the public Objection

First Correspondence

From: Details Removed

Sent: 22 June 2026 10:04

To: Environment - Transport Planning <Transport.Planning@cityoflondon.gov.uk>

Subject: Re: PC630 THAVIES INN OBJECTION

Importance: High

CAUTION: This email is from outside the Corporation. Do not open attachments, click on links or scan QR codes in this email unless you recognise the sender's e-mail address and know the content is safe.

Sirs

Any update?

Thanks,

Details Removed

From: Details Removed

Sent: Tuesday, June 9, 2026 10:46 PM

To: transport.planning@cityoflondon.gov.uk <transport.planning@cityoflondon.gov.uk>

Subject: PC630

Dear sir/madam

Can you forward the plans relating to the notice advertised on site?

Also register my objection to the proposal.

Thanks,

Details Removed

Second Correspondence

From: Details Removed

Sent: 23 July 2026 21:33

To: Details Removed

Subject: Re: Stopping Up Order - St Andrews St / Thavies Inn - Objection

CAUTION: This email is from outside the Corporation. Do not open attachments, click on links or scan QR codes in this email unless you recognise the sender's e-mail address and know the content is safe.

The plans you sent show different revisions. The notice you sent shows not only the area to be stopped up, but two different revisions of those plans. Which is the correct plan? Are both plans to be included in the draft order? Can the City confirm this and share a copy of the draft order? The notice also says that a new highway area is to be provided; however, I cannot see a plan attached showing that area. Can clarification be provided on this?

There is a large area of 89.9 square meters to be stopped up, in the location where the two TPO-protected London plane trees outside Thavies Inn House appear to have been removed to accommodate the new building. I am surprised to see this order proceeding when the trees do not appear to have been preserved in accordance with the Tree Preservation Order (TPO)! I understood the purpose of the TPO was to protect against exactly this happening. The last time I walked past the site, the trees had been removed, apparently by the developer, from what is a public pavement. I would also like to understand the reasoning behind stopping up existing highway in order to turn it into a permissive path that funnels people through to the pocket park. This is shown in the public records, and it makes little sense: if the open space is intended for public use, the route through it should also be managed and maintained by the City of London as public highway.

I would like this objection formally registered. It appears that the City of London has not given sufficient consideration to the public open space, to the necessity of stopping up such large areas of public pavement, or to whether a proper replacement, including new TPO-protected trees, will actually be provided. This is especially concerning given that the minutes of the Planning and Transportation Committee acknowledge that these two 75-year-old trees "hold a significant role in the townscape form of Holborn Circus," "frame an important view of the Grade I listed Church of St Andrew Holborn," are "in fair to good health with a life expectancy in excess of 40 years," have "high amenity value," and, as mature trees, "play a significant part in climate change resilience." As a result, the report went on to recommend the making of a Tree Preservation Order (TPO) in respect of them.

Appendix 5 – Response

Dear,

I can confirm that your objection has been received and will be taken into account as part of the stopping-up order process in accordance with the relevant statutory procedures. I thought it might be helpful to set out how the issues you have highlighted have been considered by the City Corporation in advance of the publication of the notice.

The stopping-up order relates to the development approved under planning permission 21/00885/FULMAJ (as amended). The notice refers to the plans accompanying the draft order, which identify both the highway proposed to be stopped up and the areas of replacement highway. The draft order and associated plans have been made available for inspection at the Guildhall as part of the statutory consultation process. For ease of reference, I have attached the stopping-up and adoption drawings.

The proposed order does not solely stop up existing highway. It also secures the provision of new highway areas and provides that these areas will be maintainable at public expense by the City of London, as Highway Authority. The purpose of the stopping-up process is to facilitate the implementation of the approved development while ensuring that appropriate replacement highway is provided where necessary.

The matters relating to the removal of the existing trees, the Tree Preservation Order, and the landscaping strategy were considered through the planning application process that resulted in the grant of planning permission by the City of London.

The redevelopment proposals were presented to and approved by the City of London's Planning and Transportation Committee in May 2022 under planning permission reference 21/00885/FULMAJ. In granting permission, the Committee considered the impacts of the development, including those relating to the existing trees (which, as you have noted, were the subject of a Tree Preservation Order), the proposed public realm works, and the wider implications of the scheme.

Where works to trees that are subject to a Tree Preservation Order, including the felling of a tree, are necessary to implement a planning permission that has been granted, those works can proceed and do not constitute a breach of the Town and Country Planning (Tree Preservation) (England) Regulations 2012. The acceptability of the loss of the trees was therefore considered at the planning stage.

Whilst there will naturally be some overlap in considerations, the stopping-up order process is separate from the determination of the planning application. It is not a process for revisiting the planning merits of the approved scheme or reconsidering matters assessed through the planning application process, including the treatment of the existing trees, the landscaping strategy, public realm improvements, and the overall design of the proposal. The proposed stopping-up of highway was itself

considered as part of the planning application and formed part of the development proposals assessed when planning permission was granted.

The proposed stopping-up is necessary to enable the delivery of the consented redevelopment scheme. The planning permission includes the creation of publicly accessible routes and open space, including a pocket park, as part of the wider public realm improvements associated with the development. As noted above, the replacement highway secured through the order will be maintained at public expense by the City of London.

In addition, new areas of greenery, including the planting of new trees (subject to feasibility), are currently being designed by the City of London Corporation's Highways Team as part of the Section 278 works secured through the Section 106 Agreement.

The approved development also includes hard and soft landscaping works, replacement tree planting within the public highway, new pedestrian routes through the site, and the creation of a pocket park within Thavies Inn. These publicly accessible routes were incorporated into the approved scheme to compensate for the loss of existing highway areas affected by the redevelopment and to provide enhanced pedestrian connectivity, permeability, and movement through the site. The permissive routes have been secured through the Section 106 Agreement and must be provided by the owner.

If any of the above information changes your view and you feel that you are now able to withdraw your objection, please let us know. If you maintain your objection, it will be taken into account when deciding the way forward. However, we would be grateful if you could clarify whether you will be personally affected by the proposed stopping-up, taking into account the further information provided above.

If you are able to come back to us by 20 August 2026 so that we can determine the appropriate way forward, that would be very much appreciated.

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