

By email only

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Development Plans Team
Environment Department, City of London Corporation
Guildhall
London
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6 February 2026

Dear Sir/Madam,

City Property Association consultation response to City of London City Plan 2040 Main and Additional Modifications

I am writing on behalf of the City Property Association (CPA), the membership body for the owners, investors, professional advisors and developers of real estate in the City of London. A link to our 162 member companies can be found [here](#).

We support and welcome the City Corporation's City Plan 2040 which we believe sets out a clear framework for the built environment in the Square Mile, underpinned by a clear and bold vision to ensure that it retains its crown as a number one choice for businesses to locate and invest.

We have been actively involved throughout the preparation of the City Corporation's emerging City Plan 2040, including submitting detailed representations to the Regulation 19 consultation in June 2024, and participating in the Examination in Public (EiP) held during spring and summer 2025.

Throughout our engagement during this period and since, including our [Supporting the City's economic growth and development pipeline](#) paper, we have consistently highlighted development viability, impacted by soaring construction, labour and finance costs are combining to create a perfect storm for the future of development in the Square Mile. It is our view that viability is the single biggest barrier to future development coming forward in the City of London, particularly for large scale schemes and towers, with longer construction cycles that carry higher levels of risk. The impact of this risk is at a greater level now due to fewer contractors in the market with adjusted lower levels of risk. This is coinciding with strong demand for the highest-quality and best-connected workspaces in the City, alongside record low vacancy rates, demonstrating the long-term need for new office space.

It is therefore imperative that these proposed modifications do not create an additional burden or another layer of policy that could prevent the vital new net office space needed to sustain the Square Mile's position as a globally leading destination for business from coming forward. Indeed, the City of London is the single largest contributor to the UK economy by local authority area, contributing over £100 billion in economic output every year. It is strategically important that it continues to be an attractive place for businesses and talent to work, visit and invest and the delivery of high-quality workplaces is central to this.

Having reviewed the Inspectors' proposed list of Main Modifications (MMs) and Additional Modifications (AMs) published for consultation our comments include:

- We strongly maintain our position that the City Plan should target a **minimum requirement of 1.9 million sqm (20 million sq. ft) net additional office floorspace by 2040**. The evidence underpinning the City Plan points towards **1.9 million sqm** being a more appropriate target and

which we believe better reflects current attendance trends, market demand, rental growth, occupancy patterns and employer behaviour. Our most recent research by Knight Frank ([Space for Change: City of London Deep Dive](#)) on the City of London office market reinforces this point, revealing that Prime and Grade A offices are experiencing vacancy rates of 0.6% and 1.1% respectively. Large floorplates are especially scarce, with only two options over 40,000 sq ft available in the Square Mile.

- We believe that cultural provision on developments over 10,000 sqm regardless of uplift is disproportionate and **should relate to floorspace uplift only and not gross floorspace, to ensure that refurbishment and retrofit schemes are not burdened by obligations which are unrelated to the scale of change proposed.**
- The proposed cultural matrix risks being overly prescriptive and reduces flexibility needed to respond to site-specific operational, design and viability considerations. **Cultural facilities could be better delivered through the pooling of financial contributions, proportionate to each of the relevant developments.**
- We believe that the **matrix at 7.3.4 should be amended to be more flexible in its approach to allowing financial contributions for cultural infrastructure, where this would deliver more meaningful cultural space.**
- We welcome the flexible policy intent introduced by MM27 but **clarification should be provided on the meaning of 'substantial embodied carbon impact'**. Whilst the introduction of flexibility is supported, the policy does not set out how 'substantial' will be interpreted or assessed which creates considerable uncertainty for applicants and decision-makers alike. Without sufficient clarity, this could risk deterring investment.

Our full representations can be found in our appendix below and we would welcome the opportunity to discuss these points with you in greater detail.

Yours faithfully,



Charles Begley
Chief Executive
City Property Association

APPENDIX

1. Chapter 1 Strategic Priorities – MM1

We acknowledge that the amended text clarifies the 1.2 million sqm office floorspace target as NIA and in the detailed offices policy includes the GIA figure. This clarification is welcomed. It is crucially important that the City of London maintains its status as a global commercial centre and this must be supported by ensuring that the City Plan properly plans for and supports sustainable economic growth.

We maintain the position set out in our Further Matter Statements and at the EiP hearings last year that the City Plan should include a minimum requirement of **1.9 million sqm (20 million sq ft) of net additional office floorspace by 2040**.

The evidence underpinning the City Plan, including *Future of Office Use* (Knight Frank and Arup, July 2023) and the *Offices Topic Paper* (March 2024) demonstrates that **1.9 million sqm** is a more appropriate target than **1.2 million sqm**. This figure better reflects current attendance trends, market demand, rental growth, occupancy patterns and employer behaviour, all of which point to a sustained growth in office-based working within the Square Mile.

In addition, the London Property Alliance (compromises both the City Property Association and Westminster Property Association) has published further updated evidence through their reports [Space for Change: Office space dynamics in central London](#) (December 2025) and [Space for Change: City of London Deep Dive](#) (January 2026), which further demonstrates the scale of undersupply in the City's office market and the urgent need to plan for significantly higher levels of both new and refurbished office floorspace. The report identifies:

1. A continuing shortfall between active demand and available high-quality supply, driven by professional, financial and creative sectors.
2. Extremely low Prime and Grade A vacancy, with only two floorplates over 40,000 sq ft available in the City.
3. Over 56% of the City's stock sitting in EPC bands C–G, much of which requires substantial retrofit or redevelopment.
4. A pipeline heavily weighted towards refurbishment, with limited net new space capable of meeting large-scale occupier requirements.

This evidence reinforces the CPA's position that the 1.2 million sqm (NIA) target is insufficient and that a higher minimum requirement of 1.9 million sqm (NIA) is essential to ensure the City can continue to accommodate growth, maintain its global competitiveness, and avoid a long-term shortage of high-quality office floorspace.

Accordingly, **we continue to strongly advocate that the Vision and Strategic Priorities and associated office policies (S4) should incorporate 1.9 million sqm (NIA) as the minimum net additional office floorspace target**, to ensure the Plan is aligned with the evidence base and able to meet the City's long-term economic and employment growth.

In relation to Part 3 of the new Vision ('A more sustainable City'), **further clarification should be provided regarding the reference to achieving net zero emissions**. As currently drafted, it is unclear whether the requirement relates specifically to operational carbon emissions, whole life carbon emissions or both. It is important that the City Plan clearly defines the scope of its net zero expectations as without such clarification, there is a risk of inconsistency in how the policy is interpreted and applied.

2. Chapter 3 Health, Inclusion and Safety – MM5, MM6 & MM7

MM5 amends part 2 of Policy HL7 to remove reference to “public”, effectively extending policy protection for all sport and recreational facilities, not just public facilities. MM6 amends the associated supporting policy wording at paragraph 3.8.1. While additional wording has been introduced to clarify the position on private facilities (*“However, the loss of private facilities may be acceptable in certain circumstances to allow suitable responses to market demand and effective business planning”*), further flexibility to enable the change of use/redevelopment of private facilities is essential. It does not appear that additional evidence/justification has been provided to justify the extension of the policy to private facilities. Private sports and recreation facilities often operate under commercial, operational and market driven conditions that differ significantly from public provision. It is therefore important that policy does not inadvertently constrain opportunities for investment in sites where private facilities may no longer be viable or aligned with business needs. In addition, it is important that policies do not disincentivise private facilities from being brought forward, due to future concerns over policy protection.

We support an approach that continues to enable appropriate change and does not impose unintended restrictions on privately operated facilities. Therefore, **we do not support the changes made to Policy HL7 (MM5) and paragraph 3.8.1 (MM6) – the policy should only provide policy protection to existing public sports and recreation facilities.**

MM7 amends the supporting wording at paragraph 3.10.1 to clarify that ‘for the application of this policy a rapid HIAs will be required where developments involve an uplift of 1,000 sqm’. We welcome this clarification, as it provides greater certainty regarding when rapid Health Impact Assessments are required. However, the wording needs to go further to make clear that the 1,000 sqm threshold relates to net new floorspace created by a development and not uplift generated through refurbishment or reconfiguration of existing buildings. Applying the requirement to uplift within existing floorspace envelopes would create an unnecessary and potentially onerous burden on many schemes, particularly within the City context. **To ensure proportionality and effectiveness, para 3.10.1 should clarify that:**

- **The requirement to submit a rapid HIAs applies only to new net floorspace uplift; and**
- **Assessments should remain proportionate to the scale and nature of the proposal, avoiding duplication with other planning documentation.**

3. Chapter 4 Housing - MM8

MM8 introduces text to Policy S3 acknowledging the Mayor’s approach to the provision of affordable housing. We support the City Corporation’s approach to reflect the Mayoral position however we note that the City Plan does not reference the ‘emergency measures’ package consultation recently introduced by the Government and Greater London Authority (GLA). In order to avoid ambiguity and remain positively prepared and consistent with regional planning policy and guidance, **we suggest that the City Plan (Policy S3) refers to the City adopting the threshold approach as set out within the London Plan and relevant associated guidance.** Should the ‘emergency measures’ be formally brought forward via the adoption of new London Planning Guidance, Policy S3 would therefore not conflict, and should a revised London Plan come forward during the lifespan of the City of London City Plan likewise this should not give rise to a policy conflict.

4. Chapter 7 Culture and Visitors - MM20 & MM21 & AM40

We note the additional clarification provided through MM20 and MM21 to the provision of new cultural infrastructure, including the updated reference to the Cultural Planning Framework (CPF) (MM20) and the matrix for onsite and offsite cultural provision (MM21).

As previously set out in our CPA representations to the draft City Plan (June 2024), the CPF has not been the subject of consultation and scrutiny and accordingly should not be given weight in decision-making. The reference introduced by MM20 continues to rely on a non-statutory document, which is inconsistent with the NPPF requirement for policies to be justified and evidence based. **Reference to the document at para 7.1.5 suggests that weight should be given to the document – this should be removed.** The status of the CPF is also unclear in a scenario where further guidance on culture is brought forward as part of an SPD.

MM21 sets out the requirement for cultural provision on developments over 10,000 sqm regardless of uplift, which remains disproportionate as previously set out in our CPA's representations. **We request that the cultural requirements as set out within para 7.3.4 should relate to floorspace uplift only and not gross floorspace, to ensure that refurbishment and retrofit schemes are not burdened by obligations which are unrelated to the scale of change proposed.**

Furthermore, we consider the proposed matrix risks being interpreted as overly prescriptive and reduces flexibility needed to respond to site-specific operational, design and viability considerations, as well as achieving the goal of ensuring that the cultural infrastructure which is delivered within the City is meaningful and not simply responding to a binary policy requirement. We maintain their position that cultural facilities could be better delivered through the pooling of financial contributions, proportionate to each of the relevant developments.

The wording within the matrix at para 7.3.4 is too binary for where financial contributions will be accepted. For schemes of under 10,000 sqm, it should not be the case that a “specific project” has to be identified for financial contributions to be justified. The point at which a decision would need to be made between on-site provision or payment in lieu would need to be early on in feasibility/pre-application discussion, at which point there may not be a specific project identified. The risk with forcing provision on-site is that cultural infrastructure comes forward which is not necessarily meaningful or responding to a demand. **The matrix at 7.3.4 should be amended to be more flexible in its approach to allowing financial contributions for cultural infrastructure, where this would deliver more meaningful cultural space.**

This is not only the case for schemes of under 10,000sqm and **the matrix included at para 7.3.4 should be amended to allow financial contributions for schemes of over 10,000 sqm as well where this can be justified.** This should also not be tied to only where a specific project has been identified.

We note AM40 has made changes to supporting paragraph 7.3.5 in respect of the provision of an outline operational and management plan to be provided at pre-application stage and completed in detail at application stage. Whilst the replacement of a “robust management” plan with “outline” plan is a step in the right direction, this still poses an issue for the preparation and submission of applications. As noted above and in our representations (June 2024), cultural operators are not able to commit to projects at pre-application stage, nor at application stage. Accordingly, details relating to operation and management can rarely be provided at the application stage and any information to be provided at this stage must be proportionate. **It is suggested that paragraph 7.3.5 be amended to require management plans to be completed at detail at post-permission stage and secured via condition.**

5. Chapter 9 Design - MM27 & MM35

We welcome the flexible policy intent introduced by MM27 but **clarification should be provided on the meaning of ‘substantial embodied carbon impact’.** Whilst the introduction of flexibility is supported, the practical implications of this term are unclear and in its current form, the policy does not set out how ‘substantial’ will be interpreted or assessed which creates uncertainty for applicants and decisionmakers.

Given the importance of embodied carbon considerations within planning, it is essential that the policy provides a clearer indication of the term.

In relation to MM35, which requires all tall buildings to provide 'free to enter' publicly accessible spaces, the CPA strongly considers that **additional wording is included to clarify that this requirement should apply only where appropriate and financially viable**. Whilst the aspiration to improve public access and maximise wider public benefit is supported in principle, an overall requirement risks creating unintended viability and deliverability and operational challenges. In addition, in certain circumstances allowing the public into a building may have an adverse effect on its ability to be let as many tenants e.g. banks have security requirements which would preclude this and therefore create potential letting challenges. As we have previously set out, tall buildings vary significantly in their design, function, ownership structure and management arrangements. In some cases, the provision of free to enter space may not be feasible or could compromise building security, operational effectiveness or long-term maintenance. Introducing the additional wording "where appropriate and financially viable" would ensure the policy remains proportionate and responsive to sites specific circumstances, whilst still encouraging meaningful public benefit.

6. Chapter 10 Transport - MM38 & MM39

We welcome the inclusion of amendments to Policy AT3(2) whereby that contributions towards improvements to cycle infrastructure in the City may be acceptable in 'exceptional circumstances' in MM38 and MM39. The acknowledgement in MM39 to individual site constraints and in particular the construction of a larger basement space where this would result in significant embodied carbon impacts is particularly welcomed. This represents positive direction towards a more proportionate approach to cycle parking provision and optimisation of sites.

However, given the compelling evidence submitted to the Inspectors during the examination this does not go far enough and **we maintain our position that changes should be made to Policy AT3 and the policy supporting text to reflect the unique circumstances of the City and to ensure that development provides sufficient cycle parking whilst ensuring the sustainable use of and optimisation of land.**

It is acknowledged by all parties that the London Plan standards do not reflect the City's specific commuting patterns, occupational densities or evidenced cycle demand and evidence has been provided on this in the CPA's [Cycling and the City](#) report (December 2024). Unlike the London Plan standards, which have been established from a 2017 TfL study which considered demand on a London-wide basis (albeit making a distinction for some boroughs), the report provides a detailed analysis of commuting patterns in the City to help inform future cycle parking requirements. The report (and further evidence gathering through 2025) provides clear evidence that an alternative approach to cycle parking standards as set out within the London Plan (2021) is needed for the City of London and justifies the case for changes to be made to Policy AT3(1).

BNPP, a CPA Board Member, has continued to undertake research (to that submitted and presented throughout the preparation of the draft City Plan) on cycle storage in tall buildings within the City, which continues to evidence and further supports a reduced cycle parking requirement is acceptable. This includes:

1. Towers are less efficient than low rise buildings, meaning they have more Gross External Area (GEA) for every sqm of Net Internal Area (NIA) than low rise buildings with the same number of occupants.
2. Current policy derives cycle parking requirements from GEA, meaning towers are required to provide more cycle parking spaces for the same NIA and number of occupants as an equivalent

low-rise building. This means cycle spaces are provided for unoccupied areas of buildings, such as plant rooms, corridors, toilets and even façade zones.

3. This difference in efficiency between towers and low-rise buildings means a typical tower required to have c.11% more cycle spaces than a low rise building with the same occupancy.

Further to this and in conjunction with the previous evidence submitted by the CPA, BNPP have further reviewed office utilisation and occupancy in detail:

1. In July 2025 the British Council for Offices (BCO) published new research revealing a fundamental shift in how UK offices are used, with major implications for developers, investors and occupiers.
2. The report shows that the long-standing benchmark of 80% office utilisation has fundamentally shifted. Post-pandemic data suggests a more realistic, but nevertheless conservative figure of 66%, equating to an Effective Occupancy of 15 sqm per person is appropriate for office buildings.
3. It should be noted that we published surveys of over six million sq ft of offices since 2023 which shows an average Effective Occupancy of 21 sqm per person, demonstrating that the BCO's 15 sqm per person is conservative.
4. These surveyed occupancy levels prove a maturing, flexible working model that empowers organisations to right-size their office space, reduce waste and enhance employee experience.

As set out within the CPA representations, the Further Matters Statement on Main Matter 16 (Active Travel and Healthy Streets) and continued research undertaken by BNPP, we suggest the following amendments be made to Policy AT3 and the supporting text:

“Policy AT3: Cycle Parking

1. Developments must provide on-site cycle parking for occupiers and visitors, complying with London Plan standards, aside from long stay cycle parking for office developments which should provide 1 cycle parking space per 136 sqm NIA. Developments, and will be encouraged to provide facilities for public cycle parking.
2. All long stay on site cycle parking must be secure, undercover and preferably enclosed, in accordance with the London Cycle Design Standards.
3. Developments that include ground floor retail and take-away food outlets should provide appropriate off-street storage for cargo bikes and hand carts.
4. Cycling facilities should be well designed for end users, conveniently located, easily accessible, safe and secure. Consideration should be given to a range of cycle parking type provision.
5. Opportunities to provide space for dockless parking should be explored where development would create or have an impact on existing public realm.
6. The use of Cycle Promotion Plans will be encouraged and the use of unutilised space for appropriate meanwhile uses will be acceptable in principle where cycle parking demand is demonstrated to not meet cycle parking standard requirements.”

The CPA recommends that the above is applied on a proportionate basis having regard to the key viability considerations of development as set out in the evidence provided to the City Corporation. We would suggest the following amendments to the Policy supporting text:

“10.10.4 The Mayor’s Transport Strategy seeks to ensure that on-street cycle facilities cater for the wide range of cycles used by disabled people. All cycling facilities should be well-designed for end users, giving careful consideration to the appropriate size and functional operation of spaces. Consideration should be given to a range of cycle parking provision.

10.10.5 This policy applies to the cycle parking provided within new developments. The City Corporation’s Transport Strategy addresses public cycle parking. Developers are encouraged to provide additional public cycle parking facilities within the curtilage of their developments. The Transport Strategy aims to ensure that operators of dockless cycle and scooter hire schemes require users to leave cycles and scooters in designated parking locations.

10.10.6 Where appropriate, Cycle Promotion Plans will be secured via section 106 legal agreement which should enable cycle parking usage within buildings to be monitored and reviewed annually. Where there is evidenced under-utilised space appropriate meanwhile uses will be acceptable, subject to the consideration of other relevant planning policies. Where cycle parking requirements do increase (to a maximum of the number required by policy), developments will be obliged to provide the required cycle parking space and associated facilities.”

It is considered that such changes would make Policy AT3 more aligned with the London Plan strategic policies by ensuring the best use of land, ensuring that developments do still provide cycle parking facilities in response to demand, ensuring that the over-provision of cycle parking does not lead to unnecessarily high levels of embodied carbon in new buildings and ensuring that London’s global economic competitiveness is conserved and enhanced by providing facilities which are utilised and more beneficial for economic success.

7. Chapter 13 Climate Resilience - MM61

We do not consider the revised wording in MM61 meets the NPPF soundness tests, as it introduces broad and unclear requirements that are not supported by sufficient guidance. The expectations around adapting to future climate scenarios and weather projections are not defined which makes the policy difficult to apply consistently. Further clarification and proportionality are needed to ensure the policy is effective, deliverable, and aligned with national policy.