

30 May 2025
By email only
E: bankssolutionsuk@gmail.com

Examination Office
C/O Banks Solutions
80 Lavinia Way
East Preston
West Sussex
BN16 1DD

Dear Ms Glancy,

City of London City Plan 2040 Examination – Further Matters Statement – Main Matter 7 (Heritage and Tall Buildings)

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](#).

The CPA has been involved in the preparation of the City of London's emerging City Plan 2040 including submitting representations to the Regulation 19 consultation in June 2024.

We enclose a Further Matter Statement in respect of Main Matter 7 at Appendix 1, which solely addresses the further addendums prepared by the City of London Corporation to the Strategic Visual Impact Assessment, the St Paul's Cathedral and Monument Heritage Impact Assessments and the Tall Building Topic Paper, published on 9 May 2025.

We look forward to participating in the examination process at the hearing sessions. Should you wish to discuss the content of this letter and the appendices, please do not hesitate to contact me.

Yours sincerely,



Charles Begley
Chief Executive
City Property Association

Appendix 1 – Further Matter Statement – Main Matter 7 (Heritage and Tall Buildings (Policies S11 to S13 and HE1 to HE3)) – Comments on Additional Addendum

The CPA wishes to comment on the further addendums prepared by the City of London Corporation to the Strategic Visual Impact Assessment, the St Paul's Cathedral and Monument Heritage Impact Assessments and the Tall Building Topic Paper (the 'Addendums'), published on 9 May 2025.

The CPA supports the work of City Corporation officers to prepare the Addendums and identify additional sites within the Square Mile which could accommodate massing and provide additional office accommodation.

As set out within our representations, the CPA considers that the City Plan should be planning for the evidenced need of a minimum of 1.9 million sqm net additional office floorspace over the Plan period, rather than 1.2 million sqm, albeit it is acknowledged that the 1.2 million sqm is a minimum. The Addendums seek to expand the ability of the City of London to deliver additional office floorspace.

Both the London Plan and the NPPF require local plans to meet objectively assessed need and to provide a planning framework which helps build and grow the economy. Given the strategic importance of the Square Mile to London's and the national economy, it is crucial that the City Plan provide an effective framework to enable continued economic growth. The City Cluster is an important area of the Square Mile and one which will accommodate much of the potential growth. Opportunities to make the best use of land within the Cluster should be maximised. We consider that these additional sites as assessed within the Addendums take this opportunity without detriment.

The City Plan should not include policies which restrain or limit growth, unless this is justified. In the Addendums, the City of London Corporation has considered the potential impacts from the additional tall building areas and concluded that the amendments would be acceptable. The CPA has reviewed the Addendums and consider the additional massing entirely appropriate within the context of London Plan Policy D9.

For the avoidance of doubt, the CPA's Regulation 19 representations in respect of heritage and tall buildings matters still stand.