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Sent: 03 February 2026 17:51
To: McNicol, Rob [REDACTED]; Andrews, Gudrun [REDACTED]
Subject: City Plan 2040

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Hi Rob, Gudrun,

I hope you're both well.

Although I have made comments on the Major Modifications, I have some further points on the Plan. The tracked versions are very helpful but the more I read the more errors relating, in particular, to tense I find.

There are other parts of the Plan which have been either made redundant or require refocussing as a result of the passage of time. The proposal relating to the Thames Tideway Tunnel project is obviously redundant but hasn't been deleted, although I have mentioned this before.

The various references to the future of Smithfield Market - "expected" (14.8.0), "if existing uses are relocated" (S23.3) being two. Why hotels should only be permitted if "complimentary to the City's business not only ignores "Destination City". Smithfield, without the Market, though, will hardly be contributing to the City's business which seemingly requires more and more tall buildings.

14.8.6 refers to "Citigen". Albeit being within LBI, its proximity to Smithfield suggests it will be the source of heat for new developments there but reference to "Citigen" has been deleted in the rest of the Plan

AM41 adds "and will work closely with the Culture Mile Bid to deliver public realm and cultural activation". As mentioned previously, the BID has a limited life and "local community" would not only include the BID but also those affected by the proposed delivery.

MM66 (S25.12) refers specifically to the South Shoreditch CA in LBH and the Grade II* listed Webb Terrace. However, there's no specific reference to other adjoining CAs in, for instance, the Smithfield and Barbican KAOC. Charterhouse Square, Hat and Feathers, Chiswell Street and St Lukes CAs in LBI aren't mentioned. Why is this?

MM67 is interesting but why is it limited to the Liverpool Street KAOC?

Re S17.3.4, the potential reuse of Swan Lane Pier for river transport is threatened by the outstanding planning application 25/01113/FULMAJ. Given the amount of support from Livery Companies, the fate of S17.3.4 is likely to have been adversely determined prior to adoption.

MM55 has been addressed elsewhere. However, it could exclude the residential areas referred to in the Plan or permit a replacement tall buildings there no taller than the existing tall buildings.

Finally, Housing. HS5 re short term residential letting is, quite frankly, bizarre if not perverse. City Corporation prohibits sub-letting of flats in the Barbican Estate for 90 days or under. Policy HS5.1 states that such lettings for over 90 days “will not normally be permitted”.

The reasons given for the policy - reducing the amount of permanent housing stock in the City and the adverse effect on the amenity of existing residents - simply make no sense. The purpose, rather than length, of letting seems more relevant than the reasons offered.

The policy throws up another anomaly. City Corporation is treating the effect of someone living temporarily in a home to have more relevance to residential amenity than constantly permitting tall buildings has permanently on residential amenity.

This is a link to Bernstein Levitts’ Melfield Gardens in Lewisham -




As you can see, this is a residential development for both elderly residents and students with students enjoying affordable accommodation in return for providing a few hours each month of support and time with their other residents. With the proliferation of student accommodation in the City, providing mixed residences like Melfield Gardens could easily become City Corporation policy.

Two of the obstacles to housing provision in the City - cost of land and restrictions on conversions of existing offices should be addressed. The abolition of the CAZ would not only benefit London generally but also free up sites in the City for housing provision. Also the removal of the Article 4 restriction on conversion of offices into residences. That most of the freehold of the City is held by City Corporation means that alterations by leaseholders would enable it to have control of the process.

Best regards,

Fred

Fred Rodgers



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