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To: Planning Policy Consultations
Subject: Southwark Council - Response to City Plan 2040 - Main Modifications Consultation
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Dear Planning Policy team,

Please find attached Southwark Council's response to your Main Modifications Consultation.

Should you have any questions or require further information, please do not hesitate to contact us.

Many thanks,

Planning Policy and Monitoring Innovation

Planning and Growth | Resources

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Charlotte Brooks-Lawrie
Head of Planning Policy and Monitoring
Innovation

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Date: 29 January 2026

**Ref: Response to City Plan 2040 - Main
Modifications Consultation**

By Email

To whom it may concern,

Thank you for the opportunity to comment on the Proposed Main Modifications (MMs) to the City of London City Plan 2040. As a neighbouring authority, Southwark Council welcomes continued constructive engagement with the City of London Corporation to ensure that growth within the Square Mile is planned in a way that is effective, coordinated, and mindful of cross-boundary impacts.

Our comments focus only on those Main Modifications (MMs) where changes may have relevance for Southwark.

1. Housing Delivery and Affordable Housing

Comments relate to MM8, MM9, and MM10–MM14

Southwark Council notes that the MMs update supporting text on windfall delivery, affordable housing expectations and the housing trajectory. As the Sustainability Appraisal (SA) Addendum confirms, these updates do not change the overall quantum of housing anticipated in the Plan.

While the additional clarity is welcomed, Southwark Council would still find it helpful to continue discussions on how reliance on windfall sites and changes to affordable housing delivery might affect social infrastructure demands outside the City boundary, for example on City of London Corporation-owned housing estates within Southwark.

We appreciate that the technical assessments do not indicate significant new environmental impacts, but some cross-borough implications may still warrant ongoing cooperation.

2. Tall Buildings and the City Skyline

Comments relate to MM2 and MM3, MM48 and MM49, and MM52 and MM56. In addition, they relate to heritage-focused Main Modifications including MM43, MM46 and MM47.

We note the introduction of the new Broadgate tall building site and the associated contour updates. The SA Addendum acknowledges that these modifications may have some additional effects on townscape and heritage objectives, although these are not considered to alter the overall assessment of the policy.

Given the importance of views across the Thames and from key Southwark locations such as Bankside and London Bridge, it would be helpful for the City to share any updated visual, microclimate or heritage impact analysis that informed the modifications. This would assist us in understanding any implications for the wider skyline and the heritage assets affected including those of the highest significance like the Tower of London World Heritage Site and Tower Bridge.

In addition, Southwark Council would welcome further information to support a fuller understanding of the potential effects of the revised contour approach within the Central Cluster. A brief explanation of how the setting of Southwark's Conservation Areas has been taken into account in shaping the revised contours would also be appreciated.

3. Office Growth and Transport Implications

Comments relate to MM17, MM18 and MM37.

The MMs provide reinforced clarity about the City's minimum office floorspace expectations. The HRA Review identifies no change to likely environmental effects from these modifications.

As noted previously, Southwark Council would welcome continued dialogue about transport impacts associated with long-term office growth, particularly as many workers access the City via stations and movement corridors within Southwark.

4. Utilities and Infrastructure Capacity

Comments relate to MM23.

The updated wording in MM23 is helpful in strengthening expectations for early engagement with utilities providers. The HRA Review confirms that these changes do not materially alter water or wastewater impacts assessed in 2024.

Given the shared nature of many networks across local authority borders, it may be beneficial for future evidence or guidance to consider cross-boundary capacity where relevant. We would be happy to discuss this further through ongoing cooperation channels.

5. Night-Time Economy and Visitor Movement

Comments relate to MM22.

MM22 strengthens the focus on managing amenity impacts from cultural and visitor uses. Southwark Council welcomes this and notes that movement patterns from the City often extend south across the river. We would welcome continued collaboration on any future work relating to dispersal routes, evening-time activity or management of visitor flows, particularly around Blackfriars and London Bridge.

6. Thames Corridor and Climate Resilience

Comments relate to MM59 – MM62.

The additional clarity on climate adaptation and resilience measures is welcome. Both the SA Addendum and HRA Review indicate that these modifications do not materially change anticipated effects.

Given our shared frontage along the Thames, Southwark Council would appreciate continued joint working on flood risk, resilience and riverside management as evidence is updated over time.

Southwark Council supports the broad direction of the Main Modifications and notes that the City's technical assessments conclude that they do not change the overall environmental effects of the Plan. We would, however, welcome continued collaborative engagement on areas where cross-boundary implications may arise, particularly in relation to tall buildings, transport, housing-related infrastructure, and the Thames corridor.

We appreciate your consideration of these comments and look forward to ongoing constructive cooperation.

Yours faithfully,

Charlotte Brooks-Lawrie

Head of Planning Policy and Monitoring Innovation
Southwark Council