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Sent: 05 February 2026 13:56
To: Environment - Local Plan
Cc: Tim Holtham
Subject: British Land Representations - City Plan 2040 Main Modifications Consultation
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Good afternoon,

On behalf of our client, British Land, please find attached representations relating to City Plan 2040 main modifications for your consideration.

We look forward to receiving your acknowledgement of these representations.

Kind regards,

Zoe Smythe
Associate

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City of London Local Plan Team
City of London Corporation
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Dear Sir/Madam,

CITY PLAN 2040 – MAIN MODIFICATIONS CONSULTATION

We are pleased to provide the following comments in response to the City of London Corporation’s consultation on the Main Modifications to the City Plan 2040 published in December 2025.

As set out in our previous representations on the draft City Plan 2040, British Land supports the overall vision for the City Corporation and the strategic policies set out within the Plan and the following comments are made within this context.

MM2 – Chapter 2 Spatial Strategy – Broadgate Tall Building Site

We welcome the inclusion of the Broadgate Tall Building Site within the overarching spatial strategy for the City Plan 2040. This represents a key development opportunity within the Broadgate Campus and will assist with the City’s target to deliver a minimum of 1.6 million sqm (GIA) of office floorspace over the new Plan period.

MM21 – Chapter 7 Culture & Visitors – New Paragraph 7.3.4

“Part two of the policy requires on site provision for developments of 10,000sqm gross or more, regardless of the uplift in floorspace, but does not dictate the scale of the provision. The capacity of developments to incorporate a cultural use will be determined on a site by site basis and will be commensurate with the scale of the development.”

	<u>On Site</u>	<u>Off Site</u>
>10,000sqm gross floorspace	<u>Yes. Provision will be commensurate with the scale of development</u>	<u>Not acceptable.</u>
<10,000sqm gross floorspace	<u>Preferred. Provision will be commensurate with the scale of development</u>	<u>Yes if a specific project has been identified. Provision can be through a direct intervention to support the project or through a financial contribution. As per</u>



		<u>paragraph 7.3.5, financial contributions can be pooled.</u>
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The City’s aspiration to increase the provision of high quality cultural spaces and offerings is supported in principle. In terms of the requirement for major developments to provide for arts, culture and leisure facilities, it is considered rational to assess each site on a site-by-site basis as to what is appropriate and achievable on site, off site or via a financial contribution. As drafted, the on-site provision is triggered at 10,000sqm of gross floorspace, we suggest this should be based on uplift which would align with other planning obligation requirements (for example – affordable housing and local employment contributions are calculated based on uplift). This is likely to be challenging, particularly for major refurb and extension schemes, where the overall uplift may be small in comparison to the gross floorspace.

As set out in our representations on the Call for Evidence SPDs, there is an opportunity for the cultural provision to more closely align with the Destination City objectives. The potential pooling of developer contributions from schemes to support identified projects or initiatives would likely better support the wider Destination City initiatives compared to a blanket requirement across all new developments. We also suggest the City could explore using other levers and funding streams to support its Destination City objectives, such as CIL investment, outdoor seating licenses and temporary road closures etc.

We welcome the suggested provisions to accept financial contributions on smaller scale developments which could be pooled to support identified projects or initiatives. We consider this would better support the ambitions and objectives of Destination City.

MM35 – Chapter 9 Design – Public Access

“3. Requiring all tall buildings ~~or major developments~~ to provide free to enter....”

Whilst the omission of major developments is welcomed, the provision of publicly accessibly elevated space in tall buildings should be considered in relation to a site’s context and opportunities. Given the extensive pipeline of existing and planned publicly elevated spaces, it considered that the scope of provision and the potential benefit of publicly accessible spaces in the City could be widened so that the requirement is not only for elevated public spaces, but for a range of spaces, which maximise choice, diversity and social impact.

MM39 – Chapter 10 Transport - Cycle Parking

“AT3 (2) In exceptional circumstances, if London Plan minimum long stay standards cannot be fully met for office developments, a contribution towards improvements to cycle infrastructure in the City will be secured through s106 planning obligations. All long stay cycle parking must be secure, undercover and preferably enclosed, in accordance with the London Cycle Design Standards.”

As set out in previous representations to both the draft City Plan (2040) and the recent Call for Evidence SPD consultation, British Land suggests any potential cycle parking shortfall contribution should be omitted on the basis the cycle parking requirements for developments are significantly under-utilised. This is further supported by the wider review being undertaken by Transport for London examining the cycle parking occupancy levels; and the recent Draft London Plan Guidance



(supporting the emergency housing measures) to revise the approach to residential cycle parking standards, which is expected to extend to commercial development, thereby removing the need for a payment in lieu.

We look forward to receiving acknowledgement of these representations and request that we be notified of further opportunities to comment on the draft SPDs accordingly. If you require any further information or clarification on these representations, please contact Tim Holtham or Zoe Smyther of this office.

Yours faithfully,

DP9 Ltd.

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