

Stennett, Jasmine

From: HNL Sustainable Places [REDACTED] >
Sent: 05 February 2026 15:15
To: Planning Policy Consultations
Subject: City of London, City Plan 2040 - Main Modifications - EA Representation
Attachments: EA Response to City Plan 2040 Main Modifications .pdf

Follow Up Flag: Follow up
Flag Status: Completed

CAUTION: This email is from outside the Corporation. Do not open attachments, click on links or scan QR codes in this email unless you recognise the sender's e-mail address and know the content is safe.

Dear City of London Planning Policy team,

Please find attached our response to the City Plan Main Mods. We do have some further suggestions which you have not updated since our previous response to the Regulation 19/20 responses, which we believe would improve the plan further, however I note that we are overall happy with the modifications.

I am happy to discuss further if helpful.

Best,

Kind regards,

Harry

Harry Scott
Planning Specialist (Hertfordshire), Hertfordshire and North London Sustainable Places
Environment Agency | | Alchemy, Bessemer Road, Welwyn Garden City, AL7 1HE

[REDACTED]

Working days: Monday to Friday



This message has been sent using TLS 1.2 Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else. We have checked this email and its attachments for viruses. But you should still check any attachment before opening it. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.

Policy Team
Corporation Of London
Development Plan
PO Box 270
London
EC2P 2EJ

Date: 5 February 2026

Dear Policy Team,

City of London Draft City Plan 2040 Main Modifications Consultation

Thank you for consulting us on the main modifications for the draft City Plan 2040. As part of our response to this consultation, we have reviewed the main modifications in consideration of environmental constraints within our statutory remit.

We strongly encourage engagement throughout the City Plan preparation process and are happy to provide additional evidence and advice and/or meet to discuss any of the comments and recommendations provided in this representation.

Environment Agency Response

We have divided our response into chapters, and where commenting on an amendment specifically, we have indicated the 'AM' reference. If anything is unclear, please contact us upon receipt of the representation.

Chapter 3: Health, Inclusion & Safety

We have no major comments on the main modifications to Chapter 3, however, we maintain our recommendation that Policy H4 updates the wording to reflect groundwater quantity as well as quality. "Development should have no adverse impact on **groundwater quantity** as well as groundwater quality."

Chapter 9: Design

We have no comments on the main modifications to this chapter. In our previous response we pushed for more stringent targets on water, however, we are satisfied with the policy as it is currently worded.

Chapter 12: Open Space and Green Infrastructure

Policy OS3: Biodiversity

We have no issues with the main modifications relating to Chapter 12, however, as part of our previous response we suggested a further paragraph was added in support of Policy OS3: Biodiversity, we maintain that this would improve and strengthen the City Plan.

"Where development is required to improve, replace or raise tidal flood defences in line with the TE2100 Plan or other reasons, applicants should explore the creation of

Cont/d..

intertidal terracing in line with examples set out in Home – Estuary Edges guidance (www.estuaryedges.co.uk). Applicants should also refer to the [Riverside Strategy](#), with particular reference to Biodiversity SP10.”

Chapter 13: Climate Resilience

AM81

We are pleased that this amendment has been made based upon our advice.

AM82

While we are slightly disappointed that the main modifications do not refer to 16m setback, we are pleased that AM82 includes the recommended updated wording we suggested in our previous response.

AM83

We are supportive of the amendment to include TE2100 requirements as part of this main modification, however, we do recommend that the wording we proposed is kept as suggested:

*“A strategic approach to flood defence raising will enable riparian developers to design buildings and the riverside environment to accommodate higher flood walls. Riparian owners are responsible for maintenance, **raising of defences in line with TE2100 requirements** and enhancement of flood defences.”*

Other Chapter 13 suggestions

We maintain our suggestion that the supporting text to the flood risk policy adds a paragraph to state that applicants should also assess the condition of defences to ensure they are suitable and sufficient for the lifetime of the development.

Further Considerations

Water Framework Directive (WFD)

We are disappointed to see that the main modifications do not add any reference to WFD or the Thames River Basin Management Plan (TRBMP) within the City Plan. The City of London must have regard to the TRBMP, and we recommend that reference to these are inserted within the supporting text of Policy’s HL4 (Contaminated land and water quality), OS3 (Biodiversity) and CR3 (Sustainable Drainage Systems). This will ensure that no development in the City of London will deteriorate the below water body or its associated elements.

Water body name	Water body ID	Water body type	Overall ecological status
Thames Middle	GB530603911402	Transitional	Moderate

Evidence Base

Strategic Flood Risk Assessment (SFRA) Level 2

In our previous response, we recommended that the SFRA L2 is updated to reflect this, we cannot tell that there has been an update to the SFRA L2, and therefore, we maintain this advice.

We stated: “Please note that since the SFRA L2 was published (April 2023) that the

[planning practice guidance](#) has been updated". The SFRA L2 should be updated to reflect any policy changes an

Final Comments

Thank you again for seeking our representation on the Draft City Plan Main Modifications. We trust that the comments presented in this letter are clear and informative, however, should you have any queries regarding this response or require additional information or guidance on any of the points raised, please do not hesitate to contact me.

Yours sincerely,

Harry Scott
Planning Specialist

E-mail: [REDACTED]
[REDACTED]