

SPD Early Engagement: What We Heard

*Collated findings from a programme of stakeholder
engagement sessions*



Introduction

Pre Engagement Approach

The City of London Local Development Scheme set out a programme for the development of a series of new SPDs: Planning Obligations, Offices, Culture, Inclusive City and Celebrating Heritage. These five SPDs are considered as a ‘suite’ of complementary SPDs being developed on broadly similar timescales. Following new Government guidance issued in November 2025, the LDS is in the process of being updated, with an update to be taken to Planning and Transportation Committee in March 2026.

The Town and Country Planning (Local Planning) Regulations 2012 set out clear expectations for Supplementary Planning Document (SPD) preparation involving consultation on a draft SPD before final adoption process. However, this can mean that interested parties can only input once key decisions have been made. Therefore, to get early stakeholder input and to gather all available evidence and insight an earlier ‘pre-engagement’ stage took place in November 2025. This engagement primarily focussed on the Offices, Culture and Planning Obligations SPD, with some focus on Air Quality and Inclusive City matters at a residents’ focussed session.

This document sets out the methods used to capture key insight and summarises the outcomes of these methods.

Methods and Outcomes

To capture information at an early stage in plan-making more informal methods were used, rather than formal consultation responses. Different methods were adopted with the aim of reaching as wide an audience as possible and gathering insight from those who would not normally be aware of or engage with the detail of a planning guidance document.

Over the course of Autumn 2025 the following events took place:

- Three roundtables or workshops for three different stakeholder groups (the development industry, cultural partners, and places of worship). *See pages 5-8*
- An event tailored to City of London Residents. *See pages 9 - 14*
- Twelve interviews with workers in the City. *See page 15*
- Additional targeted meetings with key stakeholders in the heritage sector. *See page 8*
- A call for evidence. *See page 3*

Call for evidence

As part of the pre-engagement exercises all those registered on the consultation database were also informed that the team would like to receive any additional evidence, case studies or information in relation to all the new SPDs to be produced, known as a 'Call for Evidence'. This was open between 3 November and 10 December 2026. It was publicised at the consultation events in November and details were available on the City Corporation's SPD webpage: [Planning guidance - City of London](#). The next two pages summarise all documents received.

Document Name	Organisation	Summary
Space for Change: Office space dynamics in central London 2024	City Property Association	This paper outlines the current trends of the office market in London's Central Activities zone with a focus on the City of London and Westminster. The paper suggests planning reforms at the national and local levels to ensure a high quality of office space is being delivered in the right locations.
City deep dive - Space for Change: Office space dynamics in central London (draft for release January 2026)	City Property Association	This paper analyses the secondary office stock in the City and its current and potential value. The paper suggests that office refurbishments are best delivered on specific transport hubs.
Supporting the City's economic growth and development pipeline 2024	City Property Association	The paper outlines four areas for improvement for development viability in the City of London covering flexibility on four areas: CIL, cycle parking, cultural spaces and circular economy within construction.
Cycling & the City 2024	City Property Association	This report analysed current and future cycle parking usage in office buildings in the City and its implications on carbon and viability.
Delivering Destination City 2025	City Property Association	Centred on engagement with City workers, this report presented recommendations on how to improve the offering and amenities for businesses and workers.
Visualising Destination City 2023	City Property Association	This paper recommends public realm enhancements and suggests funding routes to deliver on the Destination City vision.
Plan for Growth 2024	City Property Association	This paper focuses on increasing economic growth across all of London to support the transition to net zero, incentivise long-term investment and support London's global status.
Good Growth in Central London 2024	City Property Association	This paper outlines potential growth scenarios for the CAZ+ highlighting sectoral growth and the increases to the UK economy with the delivery of new office floorspace by 2045.
Retrofit First Not Retrofit Only: Future-proofing national policy to support sustainable development 2024	City Property Association	In focusing on a retrofit approach, this paper supports the protection of historic buildings through appropriate sustainable refurbishment.
Retrofit First, Not Retrofit Only: A focus on the retrofit and redevelopment of 20th century buildings 2024	City Property Association	This paper outlines the importance of flexibility in the retrofit first not retrofit only approach to support clarity in the planning process using real world examples.

Call for Evidence Continued

The Royal National Institute for Blind People

The Royal National Institute for Blind People submitted two documents as part of the Call for Evidence:

- In My Way – navigating pedestrian journeys with sight loss
- Key Principles of Inclusive Street Design

Both documents provide relevant background information and guidance on creating public spaces which are accessible to people with visual impairments and will be useful in the production of the Inclusive City Planning Advice Note.

Spanish and Portuguese Sephardi Community

The Spanish and Portuguese Sephardi Community's response underlines the importance of Bevis Marks Synagogue, not only as a historic building but as a living place of worship with strong religious, spiritual, cultural, and community value. It explains that the Synagogue is the oldest purpose-built Synagogue in the UK and holds a unique place within the Jewish faith. The response highlights how the building's design, particularly its use of natural light and open views of the sky, plays an essential role in Jewish religious practice which should be protected to preserve its spiritual meaning. Bevis Marks Synagogue remains at the heart of an active and committed community and has been in continuous use since it was built, adding to its cultural significance. The response calls for careful consideration of the potential impact of nearby tall buildings in the City Cluster and stresses the need for sensitive management to avoid harm to the Synagogue's intangible heritage.

Transport for London

For the Planning Obligations SPD, Transport for London (TfL), in its role as a transport operator and highway authority, supported pooling Section 106 contributions to fund strategic and area-wide transport improvements, such as Healthy Streets schemes along corridors like the A10, and emphasised the need for a consistent approach to transport contributions and standard Section 106 drafting. TfL suggested it should be a signatory to Section 106 agreements for major applications affecting strategic TfL infrastructure and its legal costs recovered, and proposed mechanisms for smaller contributions that avoid delays, such as initial payments to the City with automatic transfer clauses to TfL. The response also advocated flexibility in how Section 278 highway works are delivered and called for clearer SPD guidance on site-specific transport obligations.

British Land

British Land's response to the Planning Obligations SPD highlights that rising costs from S106, CIL, building levies, construction inflation, and regulatory changes risk development viability. They state that S106 rates should remain proportionate and not increase simply over time and suggest guidance on phasing CIL and S106 payments to ease cashflow pressures. The response calls for greater transparency on how contributions, particularly carbon offsets, are spent, and proposes in-kind offsets or clearer reporting. It also seeks clarity on CIL allocation, including potential reinvestment in public realm improvements around Liverpool Street, and recommends omitting cycle parking shortfall

St Paul's Cathedral

The Setting of St Paul's Cathedral study was submitted by St Paul's Cathedral. This examines the role of the Cathedral's setting in contributing to its overall heritage significance. The document is set out in four sections: a technical summary, evidence base, case studies, and supporting appendices. The report recognises the exceptional architectural and historic importance of St Paul's Cathedral and highlights the value of both its immediate surroundings and its wider setting. The study highlights the particular importance on maintaining the Cathedral's clear silhouette and protecting surrounding sky space as key to preserving its visual prominence and landmark status. The study considers the effects of modern development on the Cathedral's setting, including the impact of the City Cluster, and reflects on how these changes have influenced views of the Cathedral over time. The intention is that the study should be used to manage development in a way that protects the Cathedral's heritage significance while acknowledging ongoing change. The case studies illustrate how the setting study can be applied when assessing proposed developments during the planning process and from a range of viewpoints, covering both the immediate and wider setting. The approach is informed by Historic England's guidance on the setting of heritage assets and has been developed through consultation with key stakeholders. The report concludes that the setting of St Paul's Cathedral is central to its heritage significance and that development affecting this setting should be carefully and sensitively managed.

Development Industry Roundtable

Offices

1. There was general consensus that the City is attractive for investing in offices because of its location and the planning process. The City is a global financial centre that has attraction to a high quality of talent. The City is extremely well connected to key destinations. Developers noted that certainty and clarity can be found in the City's planning process.
2. Developers noted that they generally plan new office space speculatively to be suitable for a range of users. Developers stated a risk that if they design an office product too bespoke and an occupier leaves, then the office becomes less valuable.
3. Considerations for a change of use are policy, individual investors, building specific factors and its location.
4. Sustainability and viability are hand in hand for developers in the City. Developers will attempt to get the best sustainability credentials for their site. This can help them to attract occupiers, but there can be a gap in how the occupier uses the building and a sustainable building.

Culture

1. There needs to be clarity on what the City Corporation means by 'culture'. Culture is amorphous and cannot be fully defined but the industry was clear that some guidance, even if broad and general, would be welcomed. In fact, broad and general, was highlighted as the most appropriate as it would allow for the industry to respond flexibly on a site by site basis, while also being true to the variety of what 'culture' can be.
2. It is crucial that cultural offers are allowed to be self-sustaining. This means having some element of ticketed entry, closure for private events or revenue raising capability. The industry noted that many cultural partners are unwilling to take on the management of a space if they cannot make some revenue from it.
3. There was wide support for a payments in lieu model that would funnel funds towards cultural institutions across the City.
4. It was debated how this payments in lieu model should work. The industry tended to consolidate around a position that any formula for calculating contributions should be flexible to account for the real world impact, rather than a crude measure of monetary value. The payments should not be marketed as 'offset payments', rather they have the potential to support and empower cultural organisations across the City; in many cases the most useful thing for a cultural organisation is money.
5. The impact of business rates was raised. This makes it very hard to do meanwhile or cultural production uses where the business rates bill would land with an artist.

Planning Obligations

1. There was a general consensus that planning obligations can place significant pressure on scheme viability, particularly within an already constrained City market. The cumulative impact of multiple obligations was noted to make schemes increasingly difficult to deliver, influencing decisions on design, scale, and timing, and in some cases delaying or preventing development altogether.
2. The need for greater clarity regarding the City Corporation's priorities for planning obligations was emphasised. It was considered that contributions should be more targeted and responsive to the specific needs of different areas, rather than applied uniformly across all sites.
3. Concerns were raised regarding the phasing of CIL payments, with front-loaded contributions adversely affecting development viability. It was noted that some schemes have been delayed, scaled back, or restructured to manage financial risk. It was suggested that the City Corporation adopt a more flexible approach to phasing, drawing on examples from other boroughs where phasing arrangements support cash flow. It was also proposed that payments be linked to development progress to better align obligations with scheme delivery.
4. The introduction of cultural contributions was seen by many developers as adding pressure to the overall obligations package. There was opposition to the proposed threshold (included within the emerging City Plan 2040), with stakeholders favouring a more flexible, case-by-case approach. It was also suggested that cultural contributions be calculated based on net internal area, ensuring that charges and reflect only usable space. Industry feedback further highlighted that cultural provision be focused on locations where it would be most effective, noting that such amenities do not always add value to developments, as occupier engagement can be limited, and securing cultural tenants early in a lengthy build-out period can be challenging.
5. Greater transparency was requested regarding how planning obligation contributions are allocated and spent, particularly in relation to carbon offsetting. There was a clear expectation that the City should publish clearer, more accessible information explaining how these funds are spent and how they support sustainability and carbon-reduction initiatives across the Square Mile.

Culture Industry Workshop

1. Creative organisations do not work like a profit seeking enterprises, they are purpose driven. This means that there needs to be an act of translation when a property developer partners with a creative organisation. Nonetheless, not being profit seeking does not mean that these organisations can do everything for free, part of the translation exercise is the recognition that charities and cultural organisations are professionals that also need to be paid.
2. There is a balance between flexibility and specificity. Both creative organisations and property developers want the flexibility to create an offer that works for the specifics of the site. However, those in this workshop also made the point that the more guidance and information that is provided the better. Although the City Corporation should be wary of being too prescriptive given that culture is dynamic.
3. The workshop supported a payments in lieu system, based on the assumption that not every new building would be appropriate for new physical spaces. The way any monies would be allocated is crucial. If there are very strict requirements and complicated governance arrangements for accessing the funds, then it is hard for cultural organisations to benefit. The way an organisation spends the money should not be policed: money to cover capital costs for upgrading spaces is just as valuable as funds for new programming.
4. There were questions about the role of the City Corporation and whether it has the in-house skills to review cultural plans. There was an open ended question about the role the Corporation could play in matchmaking, using its power to convene disparate organisations.
5. Office architects often do not specialise in creating cultural/creative spaces, in some circumstances it may be useful to require the design of the cultural space to be subcontracted to another, more specialised architect. Equally, co-design is another useful tool for improving the design, especially where an end user has been identified. The GLA Designing Space for Culture Guidance is a good baseline, however, it tailored to a residential mixed use setting. There is scope to be more ambitious in the City.

Places of Worship Workshop

1. Churches already have lots of space so money for programming is more important. Equally, money to upgrade existing spaces is valuable even if it does not directly contribute to new programming.
2. Cultural spaces have mental health and wellbeing value. They can be spaces of calm that do not ask anything of people. The Barbican foyer was given as an example of a free to access and warm space that anyone can use without a specific purpose.
3. Many workers come into the churches during the day for a moment of tranquillity and the importance of this should not be overlooked.
4. There is a need to put 'culture' where residents live. Wayfinding could also be improved to make it clearer how any things there are in the City.
5. Too much of a focus on office workers hides the other people who use and create the City. Places of worship often cater to these people (night workers, the homeless, builders)
6. In terms of engagement, the harder to reach groups will not come to the Guildhall, the City must go to them. Additionally, it must be a long term programme of engagement that shows people that they are being heard.

Additional engagement for the Celebrating Heritage SPD

In autumn 2025, engagement commenced on the Celebrating Heritage SPD, and several meetings have been held so far, including with Historic England, the Mayor of London, the City Property Association and others. These meetings included presentations and an initial exchange of views on the proposed approach. Meetings with other key stakeholders will continue to be held in advance of the publication of a first full draft for public consultation in March-April 2026.

Residents' Event

A consultation event was held for residents on the 26th of November to gather their views on a range of policy areas which will be developed to support the implementation of the City Plan 2040. A range of residents, residents' associations and volunteer groups were invited, with a 22 people attending the event. Consultation methods to inform people of the event included emailing residents, City Ward members, libraries and voluntary groups and tapping into contacts through the City Churches and engagement specialists at the Corporation. The event was promoted on the City's Facebook page and included in the City resident's newsletter which has a wide readership. The attendees were almost exclusively from the Barbican and Golden Lane Estates.

The format of the event included an introductory slide presentation which highlighted developments in the City which have positively complied with City Plan policy, including air quality improvements, new public realm, and routes as well as new cultural spaces that have been secured through planning obligation funding.



Attendees at this session highlighted two key matters which were of great importance to them.

1. Hire bikes and scooters:

The negative impacts of commercial hire bikes on pedestrian movement through dockless parking taking up space, being visually unattractive and often ridden erratically. It was also suggested that cyclists, electric vehicles and food delivery bikes often ride through pedestrianised areas.

2. Resident's SPD:

Attendees questioned why there was no SPD proposed to deal primarily with resident's concerns. It was agreed that as SPDs are based on land-use issues, a resident's SPD would need to focus on new housing development, and as there is little new housing growth in the City, this is not currently required. It was also explained that the Inclusive City SPD was intended to address many of the residents' experiences of living and moving through the City.

Participatory Mapping

Attendees were then asked to participate in a mapping exercise to draw on maps of the City where they lived, which routes they used frequently to travel to facilities and locations in the City for various purposes and to indicate whether there were areas of the City they avoided, for any reason.

The results of this mapping exercise are shown in Figure 1. This shows that almost all attendees lived on the Barbican Estate, while a few live on the Golden Lane Estate.

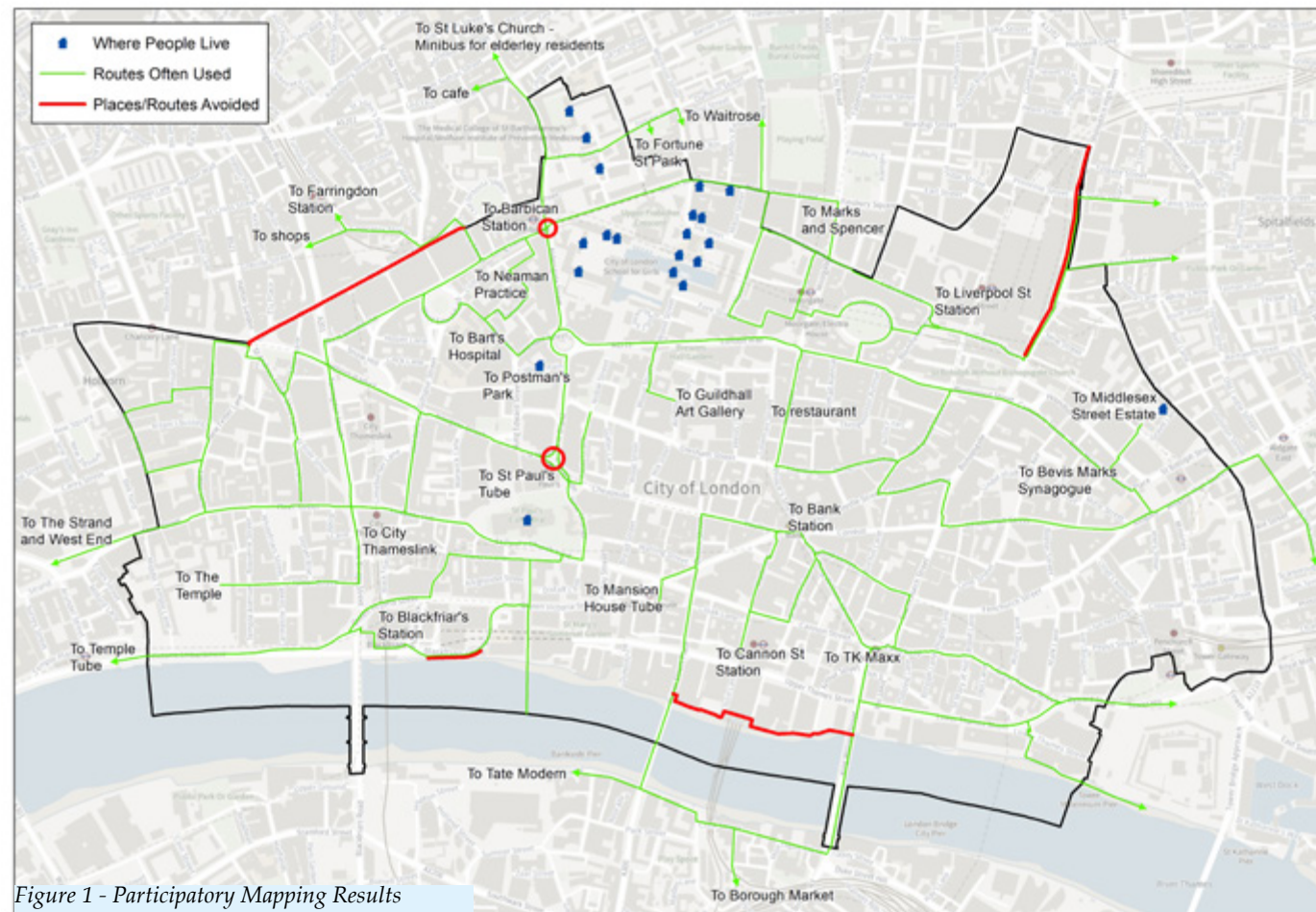
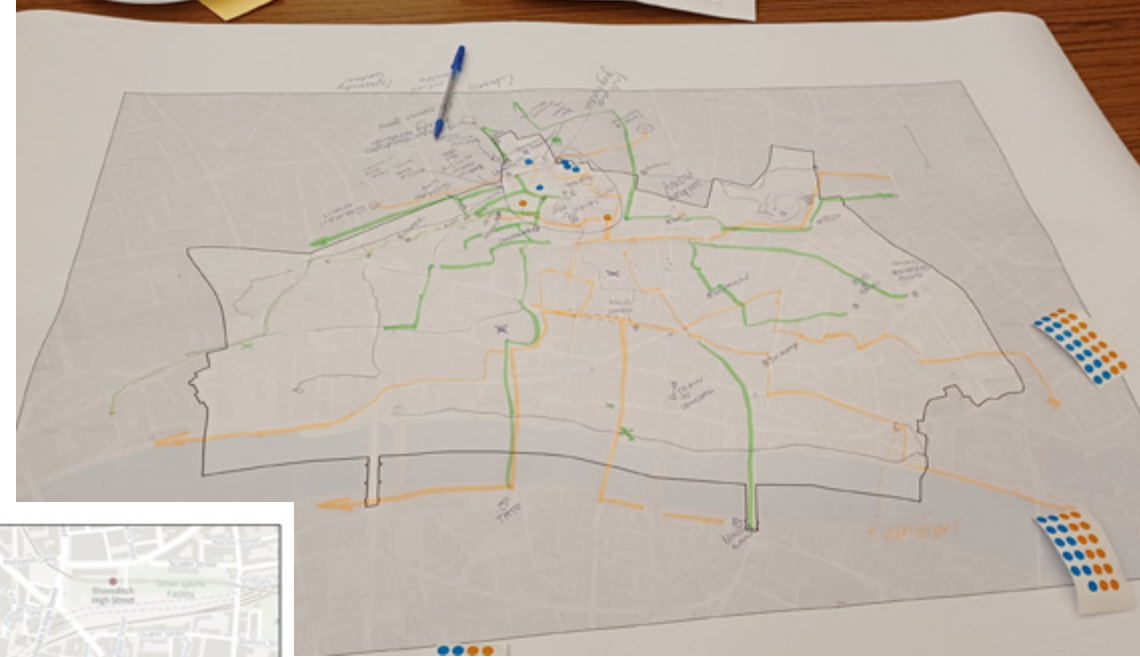


Figure 1 - Participatory Mapping Results

Residents showed that they travelled in and through the City to visit:

- Shopping areas, markets.
- Transport hubs.
- Medical facilities.
- Leisure: walking/running along Riverside Walk, pubs, restaurants, theatres, Barbican facilities, galleries.
- Places of worship.
- Walking to work.
- Visiting friends.



The areas of the City that residents said they avoided included:

- Beech Street - unpleasant and phone snatching.
- Junction of Beech Street and Long Lane - is not considered as safe.
- Aldersgate/Carthusian Street/Fann Street -large number of accidents and near misses with cars, scooters and bikes.
- Bishopsgate - late on Thursday evenings due to anti-social behaviour caused by drinking and unpleasant pollution from traffic.
- Streets with pubs - which allow people to drink on the pavement as people spill outside the designated areas for customers, particularly on Thursday evenings.
- Upper Thames Street - poor provision for pedestrians and vehicle dominated environment.
- Gresham Street - doesn't feel safe as faceless office buildings dominate the streetscape. Suggested a need for property guardians in vacant buildings. Need active uses on ground floor and better lighting and CCTV. Also dangerous to cross.
- The Riverside Walk - between Southwark Bridge and London Bridge as dangerous at nighttime.
- Lower Thames Street – noisy and polluted.
- Blackfriars Underpass/Upper Thames Street/White Lion Hill - difficult to navigate.
- West Smithfield – unpleasant smell of meat.
- Main reason for avoiding certain routes was poor lighting.

The discussion at the tables was then guided towards attendee's views on resident's experiences of living in the City, barriers to participating in aspects of City life, what they would like to experience as a result of cultural developments and Destination City initiatives. The discussion that occurred across the three tables on various topics is outlined below:

Offices

- All office lobbies should have free public toilet provision during office hours.
- When ground floor coffee shops are developed in office lobbies there should be clear signage that the public are welcome and that there are public toilets available.
- When we ask a developer to ensure a café is put into a lobby, it should be an independent café. Developers should subsidise creative arts cafes.
- Other countries have a wider range of uses in lobbies. Need to be more creative in our thinking. Warm/cool spaces for the public.
- Lobbies should be used for public art. Lend out City Corporation works from art gallery.
- Islington has a policy of requiring small workshop spaces in large buildings. Could have a small space in each lobby.
- Could terraces and gyms within offices be open to the public on weekends?

Matters relating to Inclusivity

- Need more accessible toilet provision throughout City, particularly in the public realm.
- Pavements blocked by bikes, scooters and advertising boards make it difficult for people with disabilities to move around.
- To create an inclusive City, resident's needs should be given equal importance with worker's needs.

Community Uses

- Although there are various community spaces provided by developers through planning obligations, it is difficult for residents to book the spaces because available slots are limited, and residents do not get first choice.
- Tenter House near the Barbican Estate provided community space specifically for Barbican residents but the booking system is inadequate.
- Need spaces for children's parties, rehearsal space for musicians and music lessons and community group music events.
- Community spaces are often poorly defined.

Culture

- Existing cultural facilities should be more accessible and have longer opening hours e.g Roman Baths, Monument.
- Need a programme of events to engage children and residents in the creative industries and tap existing resources such as Guildhall School of Music and Drama. Involve businesses and schools.
- Cultural programming is just as important as delivering new spaces.
- Cultural mapping is important to join cultural spaces as well as accessible roof terraces to allow for easy navigation.
- Should ensure a pool of money is managed to use for projects not necessarily on the development site e.g improving the vacant Barbican Exhibition Halls for cultural uses.
- Funding should be available for temporary/learning activities in the public realm and open spaces as well as permanent space in buildings.
- Questioning why the Smithfield SPD not being expanded to cover a wider area and comprehensively covering the Barbican e,g vacant Exhibition Halls.
- Markets should be encouraged similar to Whitecross Street market.
- Churches and churchyards as cultural elements should be encouraged.
- St. Paul's Churchyard should be pedestrianised, and a cultural/market space developed to capitalise on the high footfall.
- Wood Street Police Station development should include community uses.
- Need more art fresco uses.
- Need more cultural input along Riverside Walk to enhance vibrancy.
- Developers say they need guidance as to what to use the required space in their buildings for.

Mixed Uses

- City should encourage mixed use development to include housing units within office developments and to also be developed in buildings no longer appropriate for commercial uses.
- Empty office buildings waiting for leases to finish or for site amalgamation should allow temporary student or other accommodation in the building.

Facilities and Services

- Need more public (accessible) toilets with generous opening hours and better promotion of the Community Toilet Scheme.
- Need more seating.
- Facilities and services are needed for the City's ageing population and young families. Housing and services for older people is needed so residents can remain in the City.

Physical Barriers

- Constant construction work creates a barrier to movement through streets being blocked off for construction vehicles, excess dust and noise. Streets are blocked off for long periods of time unnecessarily.
- Some stations still do not have step free access.

Safety

- The City is a very safe place in terms of crime.
- The volume and behaviour of cars and bikes are a threat to safety.
- Cyclists jumping red lights are dangerous.
- Delivery bikes riding erratically in pedestrian areas dangerous.
- Commercial hire bikes being driven erratically and left on pavements is dangerous.
- Pavements should be designed to deter unsuitable bike/scooter use.

Infrastructure

- There needs to be more transparency of how CIL/S106 funding is allocated.
- Residents should have been consulted on the Infrastructure Funding Strategy.
- Officers need to be more aggressive with developers to ensure planning obligations money is spent locally to development.
- Should promote Citigen more effectively.
- Pocket parks need improving.
- Need locked bikes sheds to prevent theft.
- Need better coordination of roadworks to minimise disruption.
- Not enough resources focussed on big ticket infrastructure e.g cabling tunnels under streets and Citigen.



Interviews

Interviews were conducted with 12 City workers across 8 sectors to gather insights into their experiences working in City offices. Personas were developed of City workers that represented the demographic populations. Workers were found and contacted through the City Belonging Projects which has thousands of people in its membership. Much of the published research on offices focused on what insurance and legal occupiers are looking for, so these interviews were planned to gather input from the main office based sectors in the City: technology, insurance, legal, financial services, media/communications, real estate, architecture/engineering and public administration.

City workers

For the City workers, collaboration was the number one reason for them to be at the office. Second was socialising and third was they typically had limited space at home. The Media interviewee remarked, “It’s nice to be in a room with someone, to be able to bounce ideas back and forth, which you can’t do online. When you’re talking on WhatsApp, the threshold for what is worth mentioning is much higher”.

Three insurance interviews noted the importance of offsite space for team building and confidential meeting requirements.

All City workers mentioned the importance of a variety of lunch options being available to them. One of the workers who was physically disabled mentioned that they miss out on some retail options due to the lack of step free access.

For all City workers, they enjoyed working in the City due to the ease of access to other locations, the friends they had nearby and the options for convenience retail.

While some City workers noted the busyness of the City, they liked it because it was organised busyness. The busy pedestrian streets was mainly workers, not as touristy as the West End, therefore, everyone knew where to go.

Marketing Agents

Four marketing agents were interviewed in individual interviews to provide clarity on their processes and to compare against different agencies. While one of the marketing agents stated that all of the City is good for offices, another marketing agent honed in on the Core as being paramount for protecting offices.

Two marketing agents concurred that smaller occupiers would rather take space such as managed or flex space in a larger building rather than a small building.

One of the marketing agents commented that if a landlord breaks a lease to make a building unviable then that should be taken into account in the planning process.

One of the marketing agents commented that well located sites should be protected as offices in the long term to support amalgamation to become large floorplate offices.

One of the marketing agents stated that when they are doing Third Party Review of marketing evidence, they do not consider marketing to be serious if it hasn’t been marketed on Agent’s Society.