

City of London Corporation: City Plan 2040

Main Modifications Consultation Report

February 2026

The Consultation

- 1.1. Following the conclusion of the City Plan Examination hearings in June 2025 the Planning Inspectors J Bridgwater PGDipTP MRTPI and A Phillips BA(Hons), DipTP, MTP, MRTPI proposed a list of Main Modifications to the City Plan. The Main Modifications are those which the Inspectors consider are required to make the plan sound or legally compliant. The Main Modifications were consulted upon between 15 December 2025 and 6 February 2026.
- 1.2. Addendums to the Sustainability Appraisal <https://www.cityoflondon.gov.uk/assets/Services-Environment/Sustainability-Review-of-the-Main-Modifications.pdf> and the Habitats Regulation Assessment were also produced to reflect the modifications: <https://www.cityoflondon.gov.uk/assets/Services-Environment/Habitats-Regulations-Assessment-Review-Matrix.pdf>.
- 1.3. The proposed Main Modifications, the Sustainability Appraisal and the Habitats Regulation Assessment Matrix were consulted upon as a part of the examination process. For completeness the Atlas of Change and Additional Modifications are being consulted on but they do not fall within the scope of the examination process. The Atlas of Change provides an illustrative tool to set out where changes in the policies maps have occurred during the Examination in Public process. All documents were made available in accordance with the Regulations at the City Corporation's examination website: [City Plan 2040 Modifications - City of London](#)
- 1.4. The consultation was publicised by direct notification of all individuals and organisations registered on the City Corporation's local plan consultation database and all those who have submitted representations to previous consultations on the City Plan and/or taken part in the examination.
- 1.5. This consultation summary builds on the Regulation 22 Consultation Statement (including appendices) available at this link: [City Plan 2040: submission plan documents - City of London](#). In combination these documents should be considered the full consultation report.

2. Summary of representations

- 2.1. In total representations were received from 114 individuals and organisations, totally 332 comments against the modifications. This summary is primarily focussed on the Main Modification comments but as above, for completeness a summary of the Additional Modifications is also provided.
- 2.2. The full and complete text of the consultation responses are included within a Schedule at Appendix 1, which includes a City Corporation response to the matters raised. These are sorted by policy number order of the Plan.
- 2.3. The full and redacted consultation responses are also available on the Corporation's examination website at this address: [City Plan 2040 Modifications - City of London](#)

3. Comments received

- 3.1. The comments have been grouped by policy area as below.

Consultation themes

- 3.2. A majority of the comments related to the Main Modifications to Chapter 11 Heritage and Tall Buildings (MM41 to MM57). Key heritage sector stakeholders (St Paul's Cathedral, Historic England, Historic Royal Palaces) reiterated some of their previous concerns in relation to the impacts on key assets, such as St Paul's and the Tower of London World Heritage Site, while also welcoming some of the other modifications agreed through Statements of Common Ground at the examination hearings. The S&P Sephardi Community suggested further modification relating to sky space at Bevis Marks synagogue. Other comments from residents' groups, local residents and other interested parties expressed concerns around the approach to existing tall buildings outside a cluster within MM55.
- 3.3. Respondents commenting on the office floorspace requirements maintained their previous position that the requirements should be set at a higher or lower level.
- 3.4. The modifications relating to cycle parking were welcomed by Transport for London and developers, including the City Property Association, who also consider that they don't go far enough to avoid over provision and high embodied carbon.
- 3.5. The City Property Association, the Barbican Association and the Barbican and Golden Lane Neighbourhood Forum consider that the plan should allow potential pooling of culture contributions. Barbican Association and the Barbican and Golden Lane Neighbourhood Forum and other residents' groups

welcomed many of the modifications but still consider that the City Plan should go further in relation to its approach to residential amenity, air quality and urban heat island effect.

Vision and Strategic Priorities and Spatial Strategy

- 3.6. The Barbican Association (R_25_043) and the Barbican and Golden Lane Neighbourhood Forum (R_25_063) both note amendments under **MM1**. The City Property Association (CPA) (R_25_070) welcomes clarification on the GIA/NIA within **MM1** but considers that the requirements should be higher.
- 3.7. Comments from St Paul's (Caroe Architecture on behalf of the Surveyor to the Fabric) (R_25_076) welcome the inclusion of the vision with **MM1** including references to worship but disagrees that modern and historic development are 'blended seamlessly'.
- 3.8. For **MM2**, DP9 on behalf of British Land (R_25_034) welcomes the inclusion of the Broadgate Tall Building site. St Paul's Cathedral (Caroe Architecture on behalf of the Surveyor to the Fabric) (R_25_076) refer to comments made at previous stages and the examination hearings for MM2 and reiterate concern over the additional tall building site at **MM3**, while welcoming the inclusion of the diagram at **AM3**.
- 3.9. The Barbican Association (R_25_043) draws attention to the clarifications on GIA/NIA requirements for office space highlighting that that consultation was based upon the lower NIA figure (**AM4**).

Health, Inclusion & Safety

- 3.10. The Barbican Association (R_25_043) does not consider that the amendments at **MM4** constitute a change to the approach to air quality.
- 3.11. The City Property Association (CPA) (R_25_070) seeks further clarity than has been provided in **MM4** in relation to whether the requirements of a Rapid HIA relate to uplift in floorspace only, and this should ensure the requirements are proportional to the scale and form of the development (**MM7**). It also supports amendment in **MM6**.
- 3.12. Sport England (R_25_030) welcome the removal of 'public' under **MM5** and **MM6** but do not think that HL7 is consistent with the NPPF in relation to the assessment of need for facilities (**MM6**). Robert Harris (R_25_105) also objects to the potential loss of privately owned sport facilities under **MM6**.
- 3.13. Comments from Barbican and Golden Lane Neighbourhood Forum (R_25_063) state that the policies on toilet provision remain inadequate (**AM16**), that further emphasis on housing should be given as a 'sensitive use' (**AM17**).

- 3.14. Other comments by St Paul’s Cathedral (Caroe Architecture on behalf of the Surveyor to the Fabric) (R_25_076) relating to **AM12, 13, 14, 16** and **17**) make reference to their comments at **AM10**.

Housing

- 3.15. Under **MM8**, Fred Rogers (R_25_002) raised concerns about the ONS resident population figures and the relationship with housing requirements. While others (Dimitri Varsamis, R_25_004; Peter and Susan Cox, R_25_032; Barbican and Golden Lane Neighbourhood Forum, R_25_063, Shelagh Wright, R_25_113) expressed a need to set out specific and separate older persons housing requirements within S3. The City Property Association (CPA) (R_25_070) made comments under **MM8** seeking references to the government’s ‘emergency package’ of measures.
- 3.16. London Borough of Southwark (R_25_014) requested further collaboration on housing delivery implications for social infrastructure (**MM8, MM9, MM10–MM14**).
- 3.17. The Barbican Association (R_25_043) and Barbican and Golden Lane Neighbourhood Forum (R_25_063) support amendments under **AM23** and **AM24**, and the Neighbourhood Forum supports amendment at **AM22**.

3.18. Offices

- 3.19. St Paul’s (Caroe Architecture on behalf of the Surveyor to the Fabric) (R_25_076) finds the additional clarification of NIA and GIA in strategic policy S4 helpful, but consider that the office floorspace requirement should be a maximum instead of a minimum (**MM17, MM18**).
- 3.20. LB Southwark (R_25_014) finds that the MMs have provided clarity on the City’s office floorspace requirement, requesting continued dialogue about the transport impacts associated with long-term office growth because workers may access the Square Mile from transport located within Southwark (**MM17, MM18, MM37**).
- 3.21. Fred Rodgers (R_25_002) expressed concerns that the ratio of NIA to GIA proposed in **MM17** for office floorspace is not correctly calculated and will result in increasing embodied carbon emissions, as well as querying the 1.2 million sqm requirement and how many workers are expected by 2040 (**MM18**).

Retail

- 3.22. No comments were received in regard to Chapter 6 on Retail Policy RE2(3) (**AM29**).

Culture and Visitors

- 3.23. The City Property Association (R_25_070) suggested that the Cultural Planning Framework should not be referred to in the policy text as the weight a decision maker should give to it would be unclear (**MM20**)
- 3.24. The Barbican Association (R_25_043), the Barbican and Golden Lane Neighbourhood Forum (R_25_63) and the City Property Association (R_20_070) suggested that there should be some option for larger developments to deliver cultural contributions either offsite or financially, and that financial contributions should also be able to be pooled (**MM21**).
- 3.25. The Barbican Association (R_25_043), and the Barbican and Golden Lane Neighbourhood Forum (R_25_63) consider that the introduction of 'unacceptable' into CV4 weakens the policy and makes it less clear (**MM22**).
- 3.26. The Barbican Association (R_25_043) and the Barbican and Golden Lane Neighbourhood Forum (R_25_63) see **AM30-AM41** as materially consequential. They view them as widening the scope of the Culture and Visitors chapter to include recreation, leisure and visitor facilities, hence diluting a focus on 'Culture'

Infrastructure

- 3.27. LB Southwark (R_25_014) notes that **MM23** is helpful in strengthening expectations and would like to discuss developing evidence or guidance to consider cross-boundary capacity when relevant.
- 3.28. Fisher German LPP on behalf of National Grid Electricity Transmission (R_25_016) wishes to be consulted separately to National Grid Electricity Distribution. They did not have a comment on the proposed **MM23**.
- 3.29. The Barbican and Golden Lane Neighbourhood Forum (R_25_063) consider that Infrastructure Delivery Plan should more closely reflect, the Local Area Energy Plan which has been not used and was not consulted on or debated at committee (**MM23**).

Design

- 3.30. Fred Rodgers (R_25_002) made comments about terminology in **MM24**. Barbican and Golden Lane Neighbourhood Forum (R_25_063) consider that a more ambitious approach is required than as set out in **MM24** to **MM33**. St Paul's Cathedral (Caroe Architecture on behalf of the Surveyor to the Fabric) (R_25_076) made suggestions for additional amendments to **MM24** to reflect environmental sustainability measures in the historic context.

- 3.31. Dominus (R_25_015) suggested that it was unclear what specific minor developments the sustainability information requirements would apply to and should also reflect updates to the City's Carbon Options Guidance (**MM34**).
- 3.32. The Barbican and Golden Lane Neighbourhood Forum (R_25_063), Shelagh Wright (R_25_113), Robert Harris (R_25_105) and Dimitri Varsamis (R_25_004) made comments under **MM35** that other building typologies including 'groundscrapers' should also be subject to the requirements of DE4 (publicly accessible elevated space). DP9 on behalf of British Land (R_25_034) suggested that the scope of provision and the potential benefit of publicly accessible spaces in the City could be widened to cover a range of different spaces (**MM35**).
- 3.33. The City Property Association (CPA) (R_25_070) states that clarification should be provided on the meaning of 'substantial embodied carbon impact' (**MM27**) and for **MM35** the requirement for publicly elevated space in DE4 should only be where appropriate and financially viable.
- 3.34. Against the additional modifications St Paul's Cathedral (Caroe Architecture on behalf of the Surveyor to the Fabric) (R_25_076) referred to other comments made. Barbican and Golden Lane Neighbourhood Forum (R_25_063) Barbican Association (R_25_043) both seek strengthening of policy DE7 under **AM57**.

Transport

- 3.35. Transport for London (TfL) (R_25_080) welcomes that most of their comments were taken on board. Although TfL did not state the Modification numbers it is assumed that they refer to the modification numbers as set out against the comments below:
- Electric vehicle charging clarity in Policy VT3 (**MM36**)
 - Improved expectations around cycling infrastructure, including long-stay standards and s106 alternatives (**MM38, MM39**)
 - Enhancements to walking permeability and railway connections within AT1 (**MM37**)
 - Explicit recognition of TfL Cycleways and the cycle hire scheme (**AM67**)
 - Updated references to work with TfL on accessibility at stations (**AM61**)
 - Clarification of London Access Street hierarchy and TLRN responsibility (in table 2 resolved prior to examination)
- 3.36. LB Southwark (R_25_014) would like to have continued dialogue about the transport impacts associated with long-term office growth because workers may access the Square Mile from transport located within Southwark (**MM17, MM18, MM37**).

- 3.37. The City Property Association (R_25_070) welcomes the amendments to AT3(2) in relation to cycle parking in **MM38** and **MM39** but they do not consider that **MM39** goes far enough in reflecting the unique transport characteristics of the City. The CPA would like AT3 to be more aligned with London Plan strategic policies on ensuring the best use of land to avoid over provision of cycle parking leading to high level of embodied carbon in new buildings.
- 3.38. DP9 on behalf of BNP Paribas (R_25_049) consider that in the change proposed by **MM39** 'exceptional circumstances' should apply to most, if not all, major City developments and the wording should be amended to remove 'exceptional'.
- 3.39. DP9 on behalf of British Land (R_25_034) suggest that any potential cycle parking shortfall contribution should be omitted because the cycle parking is underutilised (**MM39**).
- 3.40. The Barbican and Golden Lane Neighbourhood Forum (R_25_063) consider that the flexibility provided to cycle parking could be applied to cultural provision (**MM38, MM39, MM40**).
- 3.41. St Paul's Cathedral (Caroe Architecture on behalf of the Surveyor to the Fabric) (R_25_076) queried why St Paul's Churchyard was not down-graded to local access only on Figure 7 but did not query the change proposed by **AM60**.
- 3.42. The Barbican Association (R_25_043) and Barbican and Golden Lane Neighbourhood Forum (R_25_063) both commented on **AM63** suggesting that the text was not changed to reflect their representations at examination about the impact of servicing on residents.
- 3.43. St Paul's Cathedral (Caroe Architecture on behalf of the Surveyor to the Fabric) (R_25_076) suggested an additional change to **AM64** to include a Healthy Streets Plan about St Paul's Churchyard in order to provide a world square by the cathedral, and also questioned how policies in the Plan will achieve the aim of the proposed walking improvements in Figure 10.

Heritage and Tall Buildings

- 3.44. Over 50% of the representations received were on **MM55** and many also refer to a live planning application at 1 Silk Street. The representations claim that **MM55** undermines the plan led approach to tall buildings by permitting tall buildings outside of the identified zones and would lead to height creep as tall buildings are redeveloped with even taller ones. There is also a suggestion it is contrary to the London Plan policy D9.
- 3.45. St Pauls' (Caroe Architecture on behalf of the Surveyor to the Fabric) (R_25_076), the S&P Sephardi Community (R_25_048), Historic England (R_25_054), and the Historic Royal Palaces (R_62_062) all welcomed modifications that were

discussed and agreed at the Examination. They also confirmed their previous submissions still stand, specifically around the tall building areas and contour lines (**MM49, MM53, MM56**)

3.46. The exact modifications each stakeholder supported are listed below:

St Paul’s Cathedral	MM42, MM44, AM7, AM76
S&P Sephardi Community	MM41, MM42, MM49, MM50, MM57
Historic Royal Palaces	MM41, MM42, MM44, MM54, MM50, MM60, MM57
Historic England	MM41, MM49, MM50, MM54, MM57, MM63, AM71, AM74, AM75, AM76

3.47. The S&P Sephardi Community (R_25_048) suggested a further modification at paragraph 11.2.1a to specifically highlight the sky space as part of the setting of Bevis Marks synagogue. They also raised concerns around **MM51** and **AM73** as they see these modifications as potentially encouraging the development of tall buildings outside of the clusters, where it is highly likely to cause unacceptable heritage harm.

3.48. Historic England (R_25_054) noted that they do not support **MM47** as they believe that the City Corporation’s interpretation of the Tower of London Outstanding Universal Value (OUV) is not consistent with UNESCO’s methodology. HE considers that the City’s interpretation of the OUVs, as expressed in the contour lines, would cause harm to the Tower of London.

3.49. St Pauls’ (Caroe Architecture on behalf of the Surveyor to the Fabric) (R_25_076) suggested some minor amendments to the modifications to further enshrine in policy the need to preserve and enhance heritage significance (**MM41**), and to better distinguish between the methodologies for townscape impact assessments and heritage impact assessments (**MM43, MM50, MM54**). St Paul’s Cathedral welcomed the inclusion of the setting study in the supporting text (**MM44**) but suggested some a minor rewording to better reflect recent discussions.

3.50. St Paul’s Cathedral, the City Deanery and the Historic Royal Palaces all commented that **MM49** should use the phrase ‘preserves and enhances’ rather than just ‘respects’ heritage significance

3.51. At **MM51** St Paul’s Cathedral suggested some additional text to more easily more easily acknowledge that some existing tall buildings are in locations of heritage sensitivity, and are actively detracting elements that caused a degree of ‘harm’ upon their construction.

- 3.52. St Paul’s Cathedral welcomes **MM57** but questions whether other key views (Cannon Street, and views from the north and south) are sufficiently identified to capture the entirety of the viewing experience of the cathedral
- 3.53. Historic Royal Palaces (R_62_062) raises the same point on **MM46** and **MM47** as Historic England regarding the use of the word ‘interpreted’ and does not support the amendments to the south-eastern edge of the tall building cluster (**MM56**).
- 3.54. St Paul’s Cathedral (Caroe Architecture on behalf of the Surveyor to the Fabric) (R_25_076) suggested an addition to **AM73** to add further reference to the need to preserve and enhance the significance of heritage assets. It also wanted to delete reference to juxtaposition in **AM74** as it thinks that it gives the misleading impression that all juxtaposition is beneficial.
- 3.55. Historic Royal Palaces (R_62_062) and Historic England (R_25_054) also noted that as part of **AM75** reference to the 2016 WHS Management Plan should be deleted from paragraphs 11.4.3 and 11.6.6.
- 3.56. The Barbican and Golden Lane Neighbourhood Forum made a general comment on **MM41-MM50** that too much weight is given to office growth and this is contrary to national policy that protects heritage significance.

Open Spaces and Green Infrastructure

- 3.57. The Woodland Trust (R_25_003) and Barbican and Golden Lane Neighbourhood Forum (R_25_063) support the changes set out in Chapter 12 (Open Spaces and Green Infrastructure) paragraph 12.3.4 (**MM58**). Caroe Architecture on behalf of the Surveyor to the Fabric of St Paul’s Cathedral (R_25_076) requested additional wording to Policy OS2 paragraph 12.3.4 (**MM58**) on regular maintenance and management of green infrastructure.
- 3.58. No comments were received in regard to Chapter 12 (Open Spaces and Green Infrastructure) on Policy OS3 (Biodiversity) paragraphs 12.4.2 and 12.4.5 (**AM77 and AM78**). However, the Environment Agency (R_25_035) had a general comment on Policy OS3 not related to the MMs or AMs on introducing wording regarding ‘intertidal terracing’ along the River Thames.

Climate Resilience

- 3.59. LB Southwark (R_25_014) would appreciate continued joint working on flood risk, resilience and riverside management as evidence (**MM59-62**). The Barbican and Golden Lane Neighbourhood Forum (R_25_063) and Peter and Susan Cox (R_25_032) suggest a further strengthening of S15 in relation to the heat island effect (**MM59-62**).

- 3.60. The Environment Agency support **AM81** and aspects of **AM82** but raise some disappointment in relation to the lack of setback reference, and a need for further amendment under **AM83** to raising of defences.

The Temple, the Thames Policy Area & the Key Areas of Change

- 3.61. The Barbican Association (R_25_043) supports the changes in **MM64** and **MM65**.
- 3.62. The Barbican and Golden Lane Neighbourhood Forum (R_25_063) would like for the policy about freight and amenity to apply to the Barbican area in addition to being applied to the Smithfield area (**MM64, MM65**).
- 3.63. The Barbican and Golden Lane Neighbourhood Forum (R_25_063) are pleased that the representations that they made alongside the Barbican Association (R_25_043) were reflected in **AM 95-98**. Fred Rodgers (R_25_002) noted an inconsistency in the City Plan in reference to 'citigen' in **AM96**.

Implementation, appendices and glossary

- 3.64. There was one comment on **AM106** from the Barbican and Golden Neighbourhood Forum (R_25_063) thanking the Corporation for adding the definition of neighbourhood forum.

Other comments

- 3.65. The Environment Agency (R_25_035) expressed disappointment that the MMs do not refer to the WFD or the Thames River Basin Management Plan (TRBMP), recommending that reference to these are inserted within the supporting text of HL4 (Contaminated land and water quality), OS3 (Biodiversity) and CR3 (Sustainable Drainage Systems). It also recommends an update to the strategic flood risk assessment Level 2. It expressed satisfaction in relation to the wording on targets for water but raised that their previous response to improve and strengthen policy OS3 Biodiversity was not included.
- 3.66. The S&P Sephardi Community (R_25_048) believes that the City Plan still fails to present a positive strategy with regard to heritage and tall buildings, suggesting a modification to change the wording related to immediate setting. The Marine Management Organisation (R_25_077) welcomes references to their guidance.
- 3.67. Michael Swash (R_25_045) made comments on a live planning application. Fred Rodgers (R_25_002) made comment relating to a live planning application at Swan Lane Pier, comment on paragraph 14.8.0 as well as querying the approach to hotels in light of Destination City objectives. Bernard Hughes (R_25_112) raised concerns that the London skyline will lose its global attraction due to tall buildings. Angelina De Parma (R_25_108) made a general comment on tall

buildings without specifying a particular modification. The comment seems to relate to a live planning application at 1 Silk Street.

4. Other consultation documents

- 4.1. No comments were received to the Sustainability Appraisal and Habitats Regulations Assessment addendums or the Atlas of Change.

5. Next Steps

- 5.1. The Main Modifications have been proposed by the Inspectors on a 'without prejudice' basis. The Inspectors will review and take into account all the comments received during the consultation in consideration within their report. If the Inspectors find the City Plan 2040 sound, the City Corporation will proceed to adopt the City Plan in Summer 2026.