

City of London Corporation Offices SPD Consultation Statement

Introduction

This document, alongside the engagement summary included at Appendix 1, forms the 'Consultation Statement' under Section 12 (a) of the Town and Country Planning (Local Planning) Regulations, 2012. It sets out the dates and detail of the formal public consultation and informal engagement carried out with regard to the Offices SPD.

Appendix 1- 'What We Heard' document sets out the detail of the informal engagement which took place in Autumn 2025.

Scope of Regulation 12/13 consultation

The draft SPD and supporting material was 'made available' from 16 March to 15 April 2026. The documents were made available at the City Corporation's principal office, the libraries within the Square Mile and on the Corporation website: [Planning guidance - City of London](#). The website also contained links to the 'Konveio' consultation portal.

All persons registered on the Corporation's local plan database were informed of the consultation by email, including information on where to find the SPDs and supporting documents.

A series of consultation events also took place as per the below. These events were also promoted and publicised via social media, City Resident newsletters, posters and leaflets and via other networks.

- 24 March 9-10:30am [SPD information session\(external link\)](#) at Aldgate Centre EC3N 1AB
- 31 March 6:30-8pm [Residents session\(external link\)](#) at Artizan Street Library E1 7AF
- 8 April 9-10:30am [Heritage session\(external link\)](#) at St Ethelburga's Centre for Reconciliation and Peace Venue EC2N 4AG

Summary of main issues raised

A total of 15 representations and 121 comments were made in relation to the Offices SPD. These are all contained in the table at Appendix 1 as well as a City Corporation response.

Restrictiveness of Table 1

- Across respondents, most expressed their concerns about the restrictive definitions and thresholds for strategic offices in not permitting a change of use. Respondents had concerns that the table did not consider building condition or physical constraints which would make retention of office space unviable and which could be more suitable to alternative uses.
- Concerns were raised that decision makers will not be able to make judgements about what is strategic and will be required to conform to the table's specifications.
- Areas near key transport should be 500 metres instead of 5 minutes walk distance for clarity.
- Concerns about how to effectively demonstrate potential for future office development. There were concerns about this portion of Table 1 requiring additional requirements for a planning application for a feasibility study to demonstrate uplift of 2,500 sqm.

- Respondents were concerned that the City core was being considered as the same level of strategic quality as the City fringe.

Complementary uses to the business City

- Other policies in the London Plan and City Plan both recognise and celebrate visitors as important users in London.
- The SPD isn't clear about what alternative uses are complementary to the City's business function. Respondents felt the SPD didn't recognise how purpose built student accommodation and hotels can support and enhance the business City, including bringing footfall outside of core office hours.

Marketing evidence is restrictive

- 12 months of marketing evidence is unduly restrictive and could create stranded assets. Respondents were concerned that the 12 months requirement does not accord with the wider objectives of the City Plan and could delay projects. The marketing requirement should not set a fixed time period.
- Greater flexibility should be included in the marketing evidence to consider a broader range of scenarios of office building letting.

Signposting heritage

- Policy HE1: Managing Change to Historic Environment not included in policy context paragraph
- Adaptability of heritage buildings is not well highlighted
- The significance of the City's skyline is not addressed

Non compliance with the policy

- Respondents welcomed this section of the SPD but they queried whether this would trigger referral to the Mayor under the Mayor of London Order 2008. Respondents wished for more specific circumstances to be outlined in the SPD where this may be applied.

How those issues have been addressed in the SPD

The City Corporation has considered the representations made as at Appendix 1 and has made some changes to the final adoption version of the Offices SPD to cover the matters raised. These matters include:

Considerations of strategically important offices

- Diagram 1 sets out the circumstances where a site or existing office building may or may not be considered strategically important with reference to the scale, locations and types of

offices. Diagram 1 has been created to provide clarity on how decision-makers will consider strategically important offices. The five indicators combined provide an indication of the conclusions a decision-maker may draw when determining whether a site or building is considered strategically important in the context of Policy OF2. Additionally, where the assessment process may determine that a building or site falls on the lower end of the scale of strategic importance (as featured in the Figure) for one or more factors, an assessment against a higher end of the scale for another could still indicate that a building could be considered strategically important.

- The Tall Building Areas have been added as a locational indicator.
- Text has been added into Theme 3 to state that where it is not clear information submitted as part of a planning application that a site or building may have uplift, the Corporation may request additional information.
- Areas near key transport nodes has been reflected as metres instead of minutes.

Complementary uses to the business City

- Text has been added to the SPD to recognise how other uses contribute to the business City, including quoting additional City Plan policies HS6 student accommodation and CV4 hotels.

Historic environment

- Policy HE1: Making change to Historic Environment was included the policy context paragraph as well as wording that makes it clear all policies of the City Plan 2040 should be considered alongside the relevant policies listed in the paragraph.
- A new section on historic buildings, paragraphs 3.20 and 3.21 has been included to clarify the attractiveness of historic buildings for occupation from occupiers who place a premium on heritage, authenticity and distinctiveness. This section also explains the importance of seeking relevant advice from the City's design team when handling the sensitivities of historic buildings for continued use.

Appendix 1- Consultation Responses

SEQ no.	Rep number	Organisation	Comment	City Corporation response	SPD amendments?
1	R13_01_001	Port of London Authority	On the Offices SPD, support the reference in section 3.9 of the SPD (Blackfriars & Pool of London Key Areas of Change) to strategic policy S18 (1) which seeks to enhance the character and amenities of the Blackfriars Key Area of Change by making the area's buildings, streets and public spaces more inclusive, accessible, welcoming and vibrant, with a mix of uses that encourages more activity and greater enjoyment of the River Thames and the Riverside Walk for all. This is in line and supported by the PLA's Thame Vision 2050 plan with regard to increasing activity and use of the Thames and the Thames riverside.	We acknowledge the support.	No change
10	R13_04_001	None	(Para 1.1) As at 2026 there are currently over 9 million sqm GIA of office floorspace in the City of London with 1.6 million sqm GIA (1.2 million sqm NIA) of new office floorspace required between 2023 and 2040.1 City Plan 2040 aims to	The metric of GIA is how development monitoring information is captured, therefore is it used in planning policy.	No change

			facilitate significant economic and employment growth through policies for increasing the City's office stock. This is confusing. What is the current total NIA? As at 2026, what is the total amount of NIA in build, consented and under consideration? In any event, if the need is NIA, a specific amount of GIA is irrelevant except for attracting more embodied carbon.		
11	R13_04_002	None	(Para 1.2) The purpose of this SPD is to aid the interpretation and implementation of planning policies within the City Plan 2040. The main purposes of this SPD are the protection of strategically important office accommodation and maintenance of a sufficient supply of office floorspace suitable to meet the requirements of a variety of sectors and markets. Again, this is confusing – a single purpose and more than one main purpose.	We can revise the second sentence to be clear on the purpose. The aims of the SPD are to protect strategically important office accommodation and maintain a sufficient supply of office space suitable to meet the requirements of a variety of sectors and markets.	Minor wording amendment: The aims of the SPD are to protect strategically important office accommodation and maintain a sufficient supply of office space suitable to meet the requirements of a variety of sectors and markets.
12	R13_04_003	None	(Para 1.3) This SPD will primarily be used by those developing new and existing office floorspace or exploring the future of their office assets within the Square Mile and development management officers in	The provision and protection of office floorspace in the Square Mile supports economic growth.	No change

			assessing planning applications relating to office developments. On adoption, this SPD will be considered and referred to by decision-makers within the City Corporation. It is clear that the City Corporation's policy is less about providing office floorspace for jobs but using development to increase the asset value of the Square Mile, rather than economic growth.		
13	R13_04_004	None	(Para 1.4) This SPD provides additional guidance on the application of policies within the City Plan 2040 and is also aligned with the policy approaches of the NPPF, the London Plan 2021 and the growth aims of the Towards a New London Plan consultation document (2025). Paragraph 8 (a) of the NPPF2 sets out the overarching economic objective for achieving sustainable development: "to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the	We acknowledge the suggestions but don't feel it's necessary to write 2021 everytime.	No change

			provision of infrastructure". The London Plan 2021 reflects the importance of London as the engine of the UK economy and its unique strengths in specialist fields like finance, business services, technology, creative industries and law, all present in the Square Mile. The London Plan 2021 Good Growth Objective 5 (GG5 Growing a good economy) seeks to conserve and enhance London's global economic competitiveness by planning for sufficient employment space in the right locations. The London Plan 2021 seeks to support and enhance the nationally and internationally significant office functions of the Central Activities Zone (CAZ), including the intensification of existing and provision of sufficient space to meet demand (the London Plan 2021 Policy SD4(B)). Paragraph 2.0.6 of the London Plan 2021 recognises the CAZ as the primary location (alongside London's town centres) for commercial activity in the capital and paragraph 2.4.8 states that, as a whole, the CAZ supports a nationally and internationally significant scale and agglomeration		
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			of offices, enabled by the hyper-connectivity of its public transport infrastructure. Policy E1 part C of the London Plan 2021 states: “The unique agglomerations and dynamic clusters of world city businesses and other specialist functions of the central London office market, including the CAZ, NIOD (Northern Isle of Dogs) and other nationally significant office locations (such as Tech City and Kensington & Chelsea), should be developed and promoted. These should be supported by improvements to walking, cycling and public transport connectivity and capacity. Future potential reserve locations for CAZ-type office functions are identified at Stratford and Old Oak Common, capitalising on their current and potential public transport connectivity to central Paragraph 6.1.7 also sets out specific marketing requirements for surplus office space to ensure that it is marketed for at least 12 months, at market rates suitable for the type, use and size. The Towards a New London Plan consultation document (2025), states that planning has a role to play to support the development		
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			of London’s key growth sectors, including financial, professional and business services.³ The CAZ has served its purpose as increasing public transport and housing costs demand a move of business out of the centre towards the north, south, east and west.		
14	R13_04_005	None	(Para 1.9) One of the key pillars of the City of London’s Corporate Plan 2024-2029 is dynamic economic growth. The Corporate Plan aims to “drive dynamic economic growth in financial and professional services at local, national, and international levels and supports creating jobs, attracting investment, and supporting businesses across communities and the country”.⁴ The	SMEs, start-up companies, creative industries and those requiring move on accommodation are defined in the SME Strategy (2024).	No change

			City Plan 2040 is aligned with this aim, Strategic Policy S4 (3) states “the City Corporation will facilitate significant growth in office development of the highest quality to meet projected economic and employment growth by ensuring that new floorspace is designed to be flexible to allow the transformation and adaptation of space to support new uses, different layouts and configurations, different types and sizes of occupiers, and to meet the needs of Small and Medium Enterprises (SMEs), start-up companies, creative industries and those requiring moveon accommodation”. How is this defined?		
15	R13_04_006	None	(Para 1.10) City Plan 2040 Strategic Policy S4 (5) facilitates economic growth by “protecting existing office stock from being lost to other uses where there is an identified need or where the loss would cause harm to the primary business function of the City”. This SPD provides specific additional guidance on the application of Policy OF2; however, even if a planning application for a	The policies listed here are only for signposting. The SPD must be read in conjunction with the entirety of City Plan 2040.	No change

			proposed change of use were found to comply with both parts of this policy the proposal would also be required to be considered against the requirements of Policy S4 to ensure that the loss would not harm the primary business function of the City. This guidance in this SPD should also be considered alongside City Plan 2040 policies which set out other particular requirements to address local issues such as Policy HS1: Location of New Housing (2), Policy HS6: Student accommodation and hostels (1d) and Policy HL3: Noise (2). Hotels, education, health?		
16	R13_04_007	None	(Para 1.11) In supporting the strategy for economic growth for the City, City Plan 2040 Policy OF2 protects existing office floorspace, setting a criteria-based approach to any changes of use. Paragraph 6.1.7 also sets out specific marketing requirements for surplus office space to ensure that it is marketed for at least 12 months, at market rates suitable for the type, use and size. The Towards a New London Plan consultation document (2025), states that planning has a role to play to	The CAZ is designed and designated by the Greater London Authority.	No change

			support the development of London's key growth sectors, including financial, professional and business services. ³ The CAZ has served its purpose as increasing public transport and housing costs demand a move of business out of the centre towards the north, south, east and west.		
17	R13_04_008	None	(Para 1.12) Paragraph 5.3.0 of the City Plan 2040 also sets out that to maintain the position of the world's leading international financial and professional services centre and to accommodate the projected increase in employment and office floorspace, it is important to retain the substantial majority of existing office stock whilst accommodating future demand through the provision of flexible floorspace that is suitable for a range of occupiers and refurbished office space. This is an absolute	We believe that the Square Mile is the world's leading international financial and professional services centre.	No change
18	R13_04_009	None	(Para 1.13) The City Plan 2040 Policy S21(1), the City Cluster KAOC sets out how it will accommodate significant office growth by increasing the provision of attractive world class buildings that are sustainable and offer a range of office	This wording is from the draft City Plan 2040 strategic policy 21.	No change

			accommodation to cater for the needs of varied office occupiers. “Significant” requires definition. “Attractive” is objective. “World class buildings” is meaningless.		
19	R13_04_010	None	(Para 1.13) The City Plan 2040 Policy S22(5) highlights the character and function of the Fleet Street and Ludgate KAOC as a centre for judicial and related business, a royal and state processional route and a Principal Shopping Centre (PSC). It will be promoted by allowing tall building development on appropriate sites within the defined tall building area identified on the Policies Map.	We acknowledge the suggestion.	No change
20	R13_04_011	None	(Para 1.13) The City Plan 2040 Policies S17 (1)(e), S18 (3) and S19 (3) along the riverside all promote office-led commercial development or refurbishment, while providing retail, culture and leisure uses and safeguarding heritage assets and biodiversity value. The City Plan 2040 Policy S25 (4) ensures that the Moorgate-Liverpool Street area takes advantage of the opportunities of the Elizabeth line by encouraging the development of flexible office space	We acknowledge the suggestion.	No change

			to meet the needs of future offices occupiers and potential start-ups, allowing for business growth in a variety of sectors.		
21	R13_04_012	None	(Para 2.1) The City contains several major transport nodes, including Liverpool Street station (the country's busiest), 5 other mainline stations, 7 underground lines, 10 underground stations – including interchanges such as Bank station but only 5 have any step free access – Elizabeth line with one station and two entrances , Docklands Light Railway with two stations and 120 bus stops and numerous cycle routes.	The City of London will work with TfL to enhance step free access in the City.	No change
22	R13_04_013	None	(Para 2.4) While the largest number of jobs in the City is in traditional office based sectors (financial and insurance, real estate, legal, head offices), there is growth in the emerging office-based firms (research and development, information, communication and technologies, architectural and engineering, scientific research, advertising, other professional services) which tend to value	We acknowledge the suggestion.	No change

			different typologies of office floorspaces .		
23	R13_04_014	None	(Para 2.5) Recent trends for demand for office floorspace in the City of London has increasingly been for best in class office floorspace with Prime and Grade A space accounting for nearly 70% of lettings since 2020.¹⁴ Office buildings in the UK, and around the world, are typically divided into three different categories, which form a grading of quality. Most markets globally divide their office stock into Grade (Class) A, B, or C, but the definitions and approach vary from market to market with the British Council of Offices providing guidance in the UK.¹⁵ The concept of super prime office is gaining traction and is generally understood to exceed Grade A standards, associated with prime locations, superior amenities and cutting-edge sustainability features.¹⁶ Again confusing. “Prime” isn’t defined but is replaced with “super prime”, also undefined. The last phrase is of little help in being pure opinion.	The SPD uses terms as defined by the British Council of Offices, the resources of which are in the References list at the end of the SPD.	No change

24	R13_04_015	None	(Para 2.5) Office occupiers and investment funds increasingly prioritise the sustainability credentials of new office buildings as meeting their personal or corporate sustainability goals plays a role in their choice of office floorspace. However, occupiers will always make trade-offs, considering factors of location, price and quality to inform their choices and not all occupiers will demand the highest grade of offices, provided that other requirements are met. Demand for office floorspace in central London remains high¹⁷, and a large proportion of all grades of offices across the City remain occupied. Much of the City's secondary office stock has the potential to be upgraded as leases expire therefore the planning system should seek to facilitate the upgrading and renewal of existing office stock. Given the strong demand, the need for a variety of spaces, and the need to encourage renewal of stock, the City needs to retain the vast majority of office floorspace currently in the Square Mile. Sustainability credentials	There is an existing Sustainability SPD that will be read alongside the Offices SPD.	No change
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			should be a requirement and not a choice, whatever the condition of the building.		
25	R13_04_016	None	(Para 2.6) Large occupiers are a key feature of the City’s business ecosystem. The City of London is a premier global financial and professional services centre. Many companies have their global offices or European office in the City of London. For occupiers with many employees, it is often more efficient for them to be on fewer floors than more, thus their request can sometimes be for large floorplates. Therefore, the availability of large, flexible floorplates can be key to maintaining a good stock of office floorspace to meet demand. “Large” could perhaps be “Major”. “A premier” isn’t an absolute,	We acknowledge the suggestion.	No change

26	R13_04_017	None	(Para 2.7) A new London-wide trend has been emerging known as the 'hotelification' of offices. This means that occupiers and workers are increasingly expecting offices to be all encompassing with leisure amenities, fostering a sense of community and catering to both personal and professional needs, so potential occupiers tend to look for workspaces that prioritise wellbeing, productivity and comfort as a necessity This is policy reacting to WFH and requiring the type of environment workers should have enjoyed by right in any event. All of which is welcome where it isn't simply box ticking. However, this policy should not diminish the right of City residents to enjoy their own wellbeing and comfort	We do not anticipate this to negatively impact residents. Workers and residents both appreciate a diversity of comparison and convenience retail options.	No change
27	R13_04_018	None	(Para 2.8) For example, the Bank of England has been located within the City of London since 1694 and on Threadneedle Street since 1734 and the Middle Temple has been in its location along the Thames since the 1500s. The longstanding economic concentration of commerce in the	We will make the change to add 'Street'.	Minor amendment made as follows: "...and on Threadneedle Street since 1734 and..."

			Square Mile highlights the importance of protection and enhancement of existing offices. Not a very convincing argument for whatever it is that's being proposed.		
28	R13_04_019	None	(Para 2.9) Even with the degree of home working seen recently, physical presence in offices is still important. A study of employee perceptions within a bank in the City of London recently identified the ease of communication, team spirit, and pride in working in a leading international financial centre as factors behind employees' satisfaction with the return to the office.²² Collaboration and socialising were also identified as the main benefits of office attendance in interviews with City workers conducted to inform the scope of this SPD. And now one of several.	We acknowledge the suggestion.	No change
29	R13_04_020	None	(Para 3.1) Section 2 above highlights the importance of offices to the economic output of the City as well as key factors and trends which drive office occupation. This means that the substantial majority of offices in the City are likely to be considered 'strategically important' in the	We acknowledge the suggestion.	No change

			context of The City Plan 2040 Policy OF2, reflecting the critical role of the City in supporting and enhancing the nationally and internationally significant office functions of the CAZ , including the intensification and provision of sufficient space to meet demand, as identified in the London Plan 2021 .		
30	R13_04_021	None	(Para 3.2) Policies the City Plan 2040 recognise that it is vital to ensure that sufficient office floorspace is available to meet projected employment growth and occupier demand.	We acknowledge the suggestion.	No change
31	R13_04_022	None	Table 1 Modern office buildings (regardless of size, including those below 5,000sqm (GIA)) are likely to be strategic. In these areas, heritage assets (regardless of size, including those below 5,000sqm (GIA)) may be strategic. In these areas, other types of building (regardless of size, including those below 5,000sqm (GIA)) may be strategic. Is there a strategic hierarchy?	All types of office space could be considered to be strategically important.	No change
32	R13_04_023	None	(Para 3.4) All locations across the City are strategically important for offices, with the Spatial Strategy of the City Plan 2040 encouraging office growth	We acknowledge the suggestion.	No change

			in all parts of the Square Mile, and recognising that office floorspace need will be met through the delivery of new office space and refurbishment and retrofit of existing floorspace (see paragraph 5.1.4).		
33	R13_04_024	None	(Para 3.5) The London Plan 2021 also recognises the CAZ– which includes the entirety of the City – as being one of the world’s most attractive and competitive business locations. Paragraph 2.4.4 defines the strategic functions of the CAZ which includes: “agglomerations of nationally and internationally significant offices and company headquarters connected with finance, business, professional bodies, associations and institutions”. The London Plan 2021 recognises the City of London	We acknowledge the suggestion.	No change
34	R13_04_025	None	(Para 3.6) Given the role that the City as a whole plays in providing office floorspace and the potential for development, for the implementation of the City Plan 2040 Policy OF2 (1a),	We acknowledge the suggestion.	No change

35	R13_04_026	None	(Para 3.7) The City Cluster KAOC, the Liverpool Street KAOC, the Fleet Street and Ludgate KAOC 3.7. The Spatial Strategy of the City Plan 2040 states: “net additional office floorspace will primarily be delivered in the City Cluster KAOC, supplemented by the Fleet Street and Ludgate KAOC and the Liverpool Street KAOC”. The Liverpool Street KAOC and the City Cluster KAOC enjoy exceptional accessibility by public transport. The City Plan 2040 Policy S22, for the Fleet Street and Ludgate KAOC,	We acknowledge the suggestion.	No change
36	R13_04_027	None	(Para 3.8) Proximity to key transport nodes is a signifier of a strategic office location, such as within a 5 minute walk from a station entrance on the Elizabeth line, mainline rail or Bank underground and DLR .	We acknowledge the suggestion.	No change
37	R13_04_028	None	(Para 3.9) The Blackfriars KAOC, the Pool of London KAOC 3.9. Strategic policy S18 (1) of the City Plan 2040 seeks to enhance the character and amenities of the Blackfriars KAOC by making the area’s buildings, streets and public spaces more inclusive, accessible, welcoming and vibrant, with a mix of uses that encourages	We acknowledge the suggestion.	No change

			more activity and greater enjoyment of the River Thames and the Riverside Walk for all. It seeks to provide new high quality office and commercial accommodation in the area. A Supplementary Plan is being prepared to inform the future growth of the Puddle Dock area, which faces constraints in terms of site agglomeration, townscape, and infrastructure, while being a major opportunity for substantial enhancements to the character of the area, and which therefore warrants a holistic approach. Here it is important to avoid piecemeal change of use from office to other uses, which could lead to further limitations, preventing the area's potential transformation. All offices and sites in this area are therefore considered to be strategic when implementing the City Plan 2040 policy OF2. Development of Puddle Dock will require strict adherence to height limits along the river bank		
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38	R13_04_029	None	(Para 3.10) Strategic policy S19 (2) of the City Plan 2040 for the Pool of London KAOC seeks renewal of the area through the refurbishment and redevelopment of building stock and the delivery of significant public realm improvements and seeks to enable office-led mixed commercial use redevelopment or refurbishment. The office stock in this KAO is characterised by stand-alone office buildings that are all of a significant size and which play an important role in providing office floorspace in the City. All offices in this KAO23 are therefore considered to be strategic for the implementation of City Plan 2040 Policy OF2.	We acknowledge the suggestion.	No change
39	R13_04_030	None	(Para 3.11) The Aldgate, Tower and Portsoken KAO, the Smithfield and Barbican KAO 3.11. The City Plan 2040 Policy S20 (1) for the Aldgate, Tower and Portsoken KAO promotes this part of the City as a mixed-use area, which balances the requirements of workers, residents, students and visitors, by promoting a greater mix of development including commercial, residential, education and hotels supported by	We acknowledge the suggestion.	No change

			complementary cultural and community use development to assist in the further renewal of the area. In recent years, the area has seen several developments and proposed schemes that would result in the reduction of office floorspace in the area. It is important that office use continues to play a role in the mix of commercial (and other) uses here. Isn't it the case that several non-office schemes have been approved, so "would result" should be "have resulted".		
40	R13_04_031	None	(Para 3.12) Larger offices – those with over 5,000sqm (GIA) of floorspace – are considered strategic for the implementation of the City Plan 2040 Policy OF2.	We acknowledge the suggestion.	No change
41	R13_04_032	None	(Para 3.14) The Smithfield and Barbican KOAC covers a wide area with a broad mix of uses, including residential use at the Barbican Estate, Moor Lane, Golden Lane, Bridgewater Square, Fann Street, Golden Lane Estate, Aldersgate Street, Little Britain, Bartholomew Close and in Smithfield; office uses around Silk Street, Moorgate, London Wall, Aldersgate Street, Moorfields	We acknowledge the suggestion.	No change

			and elsewhere; the high-profile cultural institutions of the Barbican Centre and London Museum; St Bartholomew's Hospital; Smithfield Market; churches, education uses, open spaces and other functions. The KOAC is well served by the Elizabeth line, Underground and National Rail with stations at Moorgate and Barbican as well as the Smithfield Ticket Hall. While offices do not make up the largest proportion of land use in the area, these play an important role in the mix of uses in the area as well as making a significant contribution to the strategic office function of the City in a highly connected location. "Elsewhere" is vague and should be more specific.		
42	R13_04_033	None	(Para 3.15) Larger offices – those with over 5,000sqm (GIA) of floorspace – are considered strategic for the implementation of the City Plan 2040 Policy OF2. Smaller (less than 5,000sqm (GIA)) modern offices that have the potential to meet current demand are likely to be considered strategic. In these locations, other smaller offices may	We acknowledge the suggestion.	No change

			be strategic in these locations as part of the mixed use environment, and heritage assets regardless of size may be considered strategic for the purposes of the City Plan 2040 Policy OF2.		
43	R13_04_034	None	(Para 3.17) Modern offices – defined, for the purposes of City Plan 2040 Policy OF2 and this SPD, as those built since 2000 – are considered strategic in terms of their type, regardless of their scale and location.	We acknowledge the suggestion.	No change
44	R13_04_035	None	(Para 3.18) The City of London has over 600 listed buildings and many non-designated heritage assets. As the office environment and types of sectors evolve, the historic buildings of the City of London may be attractive to firms who place a premium on heritage, authenticity and distinctiveness. ²⁴ Offices that are designated or non-designated heritage assets may be considered to be strategic due to the authenticity that they can offer. Research finds that highly skilled workers in particular industries are drawn to places that have more historic landmarks and historic buildings as	We acknowledge the suggestion.	No change

			these places are perceived to be more attractive;25 in the City this includes historic buildings adapted to meet modern office needs. This can provide an image of reliability, lineage and stability which are attractive for certain businesses such as private finance and law. But historic buildings may be sensitive to structural or internal works required to enhance office floorspace posing a potential limitation. Even if the list isn't made public, "many" hardly gives an idea of the exact number. Please explain what the "potential limitation" may be.		
45	R13_04_036	None	(Para 3.19) Large occupiers are a critical feature of the City property market and it is therefore essential that the City's existing and future building stock can accommodate them, providing a reasonable choice for multiple occupiers. The City's smaller office stock can offers maller unit sizes and (in some instances) a lower specification of accommodation in a prestigious location. The City should maintain a variation in scales of office space available to provide grow on office	We acknowledge the suggestion.	No change

			accommodation for small businesses and start ups. “Major”.		
46	R13_04_037	None	(Para 3.21) An office of a smaller scale, under 5,000 sqm may still be considered strategic in scale in particular locations where the supply is made up of many smaller offices to ensure the right balance of a mix of uses. Isn't there some repetition of the description of strategic here and in previous parts of the Theme?	We added in explanations in section 3 to provide guidance on the how decision makers may consider an office to be strategically important.	No change
47	R13_04_038	None	(Para 3.22) The City Plan 2040 Policy OF2(1) states that the loss of offices will be resisted unless it can be demonstrated that parts A, B and C can be met. Part B states the proposed development would not compromise the potential for office development on sites within the vicinity. A loss of office floorspace could undermine its surroundings and impact on the required volume of office floorspace needed to deliver the effects of agglomeration. Conversion of office space to residential could impact neighbouring sites' abilities to	We acknowledge the suggestion.	No change

			develop due to the impact of a new development on residential use. Conversion of office space to residential could have negative impacts on the servicing required as commercial buildings typically service overnight . This is a generalisation and less likely with new office developments near residential areas where decisions are made by elected members rather than through delegation.		
48	R13_04_039	None	(Para 3.23) This typically can include buildings built between (roughly) 1960-1980 which were built with significant latent structural capacity.	We acknowledge the suggestion.	No change
49	R13_04_040	None	(Para 3.25) Any site with a development potential, aligned with the policies of the City Plan 2040, of an additional 2,500sqm is a strategic site.	We acknowledge the suggestion.	No change
50	R13_04_041	None	(Para 4.1) The City Plan 2040 Policy OF2(1C) requires applicants to demonstrate that there is no demand in the office market, supported by marketing evidence covering a period of no less than 12 months.	We acknowledge the suggestion.	No change
51	R13_04_042	None	(Para 4.3) To satisfy the requirements of the City Plan 2040 Policy OF2 (1), the following marketing evidence	We acknowledge the suggestion.	No change

			should be submitted with a planning application proposing change of use from office:		
52	R13_04_043	None	(Para 5.1) Once all the City Plan 2040 Policy OF2(1) has been satisfied, proposals may follow route 2(a) Viability tested route. In the City Plan 2040 Policy OF2 (2)(a) Viability tested route:	We acknowledge the suggestion.	No change
53	R13_04_044	None	(Para 5.2) Paragraph 6.1.7 of the London Plan 2021 states:	We acknowledge the suggestion.	No change
54	R13_04_045	None	(Para 5.3) The City Plan 2040 Policy OF2(2)(a) sets out that information in the viability assessment should demonstrate why continued office use is unviable:	We acknowledge the suggestion.	No change
55	R13_04_046	None	(Para 6.1) This SPD provides guidance on the application of the City Plan 2040 Policy OF2.. The City Corporation envisages that applicants will follow this guidance and put forward development proposals in line with the City Plan 2040 Policies S4 and OF2.	We acknowledge the suggestion.	No change
56	R13_04_047	None	(Para 6.2) In such cases, given the requirements of the City Plan 2040 (including Policy OF2), it is likely that a decision maker would require an application for such development to provide	We acknowledge the suggestion.	No change

57	R13_04_048	None	The City Corporation will report on the outcomes of the City Plan 2040 Policies S4 and OF2 and this SPD through the production of an annual position statement on office delivery. This will compare the identified deliverable supply of new office floorspace, changes of use away from office against the office floorspace requirement for the next five-year period. The City Corporation will keep under review the policies in the City Plan 2040 and this SPD and provide additional guidance if required.	We acknowledge the suggestion.	No change
58	R13_04_049	None	To support the implementation of the City Plan 2040 , this SPD is being developed to align with the policy approaches and will wholly replace the Office Use SPD 2015.	We acknowledge the suggestion.	No change
59	R13_04_050	None	At the outset of developing this SPD, a comprehensive literature review on a variety of topics was completed. The Bibliography in this SPD includes reports and papers written by the City Property Association, Centre for Cities, Greater London Authority, British Council for Offices, Historic England, CBRE, ARUP and the City	We acknowledge the suggestion.	No change

			Corporation's neighbouring boroughs.		
60	R13_04_051	None	A range of ages and genders of City workers across office based sectors has provided a cross section into the life of workers to inform this SPD. Residents?	We acknowledge the suggestion.	No change
61	R13_04_052	None	Engagement on this SPD, and other planning guidance undertaken in autumn 2025 can be read in the engagement summary "What We Heard" published February 2026.	We acknowledge the suggestion.	No change
62	R13_04_053	None	The City Plan 2040 Document setting out the statutory local plan, including the strategy, vision and policies and proposals for planning the City.	We acknowledge the suggestion.	No change

283	R13_09_001	Montagu Evans	We support the overall intent of the City's Draft Offices SPD (the SPD) to help deliver the City's strategic policies, safeguard important office accommodation, and maintain an adequate and diverse supply of office floorspace, consistent with the objectives of the City Plan 2040. We welcome the SPD's focus on facilitating high quality office growth, including flexible and adaptable space that responds to changing occupier requirements, supports SMEs and start-ups, and enables the upgrading and renewal of existing office stock. The City's competitiveness depends on delivering offices that remain lettable, investable, and fit for purpose over the long term, and we support an approach that enables this. That said, the SPD must operate as practical development guidance, not as a presumption that every site should remain in office use regardless of context. It should support a robust, evidence led and site specific assessment of the most appropriate and efficient use of individual sites – where constraints, deliverability, format limitations, or	The primary use and objective of the Square Mile is to deliver high quality office space. In the research for the SPD, it was clear that on an international and national scale, the economic growth of the City of London is important. It is on a more detailed scale where specific buildings or streets may lend themselves to alternative uses at this current time. The SPD goes with that same approach in looking at the majority of offices in the City as strategically important and then using building specific evidence to justify an application for change of use.	No change
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		market fit, mean that office retention or reprovision is not the best outcome, the SPD should allow a proportionate response that secures the greatest benefit and most efficient use of land. The SPD should be capable of being interpreted and applied alongside the City's Destination City objectives. This includes visitor accommodation, residential and other associated forms of accommodation in appropriate locations, and complementary uses that strengthen the City's vitality, support tourism and culture, diversify the economy, and deliver active, safe and attractive streets and public realm. These uses can sit alongside, and in the right circumstances reinforce, the City's office role by improving place quality and supporting activity beyond core office hours, without undermining the City's strategic office function. To achieve this in practice, the SPD should be drafted and applied with flexibility and scope for site specific judgement, so that development is directed to the most suitable and best connected locations, the strongest office		
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			outcomes are prioritised where they make most strategic sense, and constrained or less suitable sites can come forward with an optimal planning solution based on clear and proportional evidence and assessment.		
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284	R13_09_002	Montagu Evans	Our representations are made in this context, and are summarised below: 1. Application of Strategic Importance: Amend the SPD to confirm that the term 'strategic' is to be determined on a site-specific and evidence-led basis and not presumed by default. This will protect genuinely strategic offices while enabling efficient land use and repurposing of obsolete stock. 2. Use of 'Vicinity' & 'Compromise': When considering potential detrimental effects caused by development on office redevelopment potential, the SPD should ensure any assessments are based demonstrable material effects. The SPD could provide examples of mitigation (design, servicing, coordinated), to provide a clear way of determining if there is a material compromise. 3. Proportionate Marketing Evidence: Whilst 12 months marketing is the default requirement as per Draft Policy OF2(1C), the SPD should introduce acceptance of shorter but equally robust and independently verified equivalent evidence where buildings are	We have taken the approach that the majority of offices in the Square Mile are strategically important but site specific evidence can be used to propose a change of use away from office. The SPD provides an example in 4.1 related to overnight servicing to ensure that vicinity is based on material effects. The 12 month marketing requirement is set by the London Plan 2021 and was included in City Plan 2040.	No change
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			demonstrably obsolete, long-term vacant, unusual or heritage impacted in nature, or where further marketing is not meaningful (in such instances imposing a strict 12 month marketing period may consign the building to be stranded in the long term – as opposed to being repurposed in the short term – because the opportunity cost of satisfying the marketing requirement will mean investors / developers pass over such opportunities). 4. Viability / Delivery Evidence: The SPD should recognise viability is not solely about whether an option can be made to work, but whether it is realistically deliverable in an appropriate timeframe and risk profile, and whether it secures a product aligned with market expectations. We provide further comments in the following section, with the intention of ensuring that the SPD can be considered to be positively prepared, and provide an effective part of the Development Plan.		
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285	R13_09_003	Montagu Evans	1. Application of ‘Strategic’ Importance We request that the SPD is applied with clear flexibility and site-specific interpretation so that the most efficient use of land is achieved – this approach will encourage offices in the right locations, focus the most office intensive outcomes on the most suitable and best connected sites, and allow constrained or less suitable sites to be released for alternative uses to achieve a beneficial solution through evidence-led assessment. To do this effectively, the SPD should operate as practical guidance that supports decision-making, not as a presumption against change. Strategic status should be capable of being tested and, where appropriate, rebutted on a site-by-site basis through robust evidence and discussion with officers. The assessment should consider scale, type and location in the round, recognising that genuine constraints such as heritage sensitivity, servicing limitations, floor to floor heights and irregular plot conditions can materially affect deliverability, office	The SPD was written with flexibility and site-specific interpretation in mind. On an international and national scale, offices in the City of London are strategically important but micro-locations thrive in the City as well. Occupiers are looking for offices to be near key transport nodes, which is reflected in how we consider offices to be strategically important. The marketing and viability evidence can be used to understand site specific benefits or challenges. The SPD aims to take a long term view, so should changes in the viability of offices shift then we continue to have the overall view of the majority of offices are strategically important. The test of a strategic office is part of policy OF2 (1A). Considerations such as floor to floor ceiling heights and irregular plot conditions could be taken into account in OF2 (1C) in the marketing evidence.	No change
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		suitability and the ability to provide modern, competitive accommodation. Wording that implies most offices are automatically or likely to be strategically important risks creating an overly prescriptive starting point. This can reduce flexibility for constrained sites and deter investment in comprehensive solutions that could deliver higher quality alternative space, more adaptable formats, and in some cases net additional floorspace – a more flexible approach ensures proposals are judged on their planning outcomes and avoids retaining offices where it no longer represents the best or most deliverable use. The SPD should also recognise that while the City functions as a whole office market, micro-location is important within the Key Area of Change (KAOC) locations. Not every location is equally suited to every office typology, particularly very large floorplates and amenity-rich formats. The SPD should therefore positively support the most office-intensive outcomes in the best connected locations and key areas of		
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		change, subject to heritage and townscape considerations. Elsewhere, it should support office renewal where it meets demand, but allow appropriate flexibility where office-led delivery would be inefficient or undeliverable, provided the relevant policy tests are met through clear evidence. We therefore suggest that rather than blanket designations, that existing buildings within the KAOCs can be assessed with flexibility where there are special cases (such as listed buildings or long term vacant properties) or on the edges and borders of the KAOCs, if there are material considerations and wider planning / public benefits that can contribute to the City's objectives (this could include buildings located in KAOCs, but which are vacant, outward facing with façades and orientation that does not benefit the KAOC itself). The SPD should provide clear routes to renew secondary and older stock for alternative uses in the KAOCs, rather than locking in obsolete formats. This includes explicit support for deep retrofit and		
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			reconfiguration for alternative uses where these materially improve ESG performance, amenity and flexibility, and for comprehensive redevelopment where it delivers better quality and or net additional office supply.		
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286	R13_09_004	Montagu Evans	2. Use of 'Vicinity' & 'Compromise' We agree that the test relating to whether a proposal would compromise the potential for office development on nearby sites is an important safeguard, as per the wording of Draft Policy OF2(1) – however, unless Section 4 of the SPD defines compromise is to be applied, there is risk it is interpreted too widely and inconsistently. An overly expansive reading could unintentionally sterilise otherwise suitable sites, constrain comprehensive redevelopment, or undermine well-designed mixed use proposals that deliver better outcomes for the City – this is relevant where coordinated development is needed to unlock delivery, improve the quality of office development, introduce new and appropriate alternative uses, and secure wider place benefits. To ensure effectiveness the SPD could define 'vicinity' and 'compromise' in practical decision-ready terms: • 'Vicinity' should be scoped so Applicants and decision makers understand the relevant geographic and functional relationship to be	It would be difficult to identify specific mitigation pathways within the SPD as potential impacts will vary site by site. However, City Plan policies do address amenity such as overnight servicing. The SPD wants to ensure that the City can remain a vibrant place delivering the best overall planning and public benefit outcomes.	No change
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		assessed, rather than treating it as an open-ended zone of influence. • ‘Compromise’ should be confined to demonstrable, material impacts on deliverability, such as access and servicing limitations, plot assembly and phasing requirements, or physical and operational constraints that genuinely prevent an office-led scheme coming forward on an adjacent or related site. The SPD should also confirm that where perceived impacts are identified (for example in respect of proximity, 24 hour servicing, or privacy considerations), they can be addressed through appropriate mitigation methods. This may include design details, coordinated masterplanning and phasing, legal agreements and easements, servicing strategies, and other practical interventions that secure compatibility and maintain deliverability. Clear signposting of potentially acceptable mitigation measures within the SPD will have the beneficial effect of encouraging early coordination between the City, Applicants, and adjoining landowners and third parties, and with it reduce		
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			the risk that workable solutions are discounted too prematurely in the planning process. Providing these definitions / explanation, and setting out mitigation pathways will materially improve certainty and transparency for all – it will potentially reduce scope for dispute, avoid delay, and prevent unintended sterilisation of land, while still safeguarding the ability of genuinely suitable nearby sites to come forward for office development, or indeed alternative uses where there is a robustly justified case to do so. With this approach the SPD will support efficient land use and coherent, coordinated development that protects strategic office capacity while enabling other high quality schemes that respond to real site constraints and deliver the best overall planning and public benefit outcomes (which may include appropriate change of use, or the introduction of new land uses in strategic or KAOC areas) to be delivered.		
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287	R13_09_005	Montagu Evans	3. Proportionate Marketing Evidence Robust evidence on demand and marketing is an appropriate and important component of the Development Plan and policy framework for assessing proposals involving the loss or reconfiguration of office floorspace. However, the SPD should more clearly confirm a proportionate approach where a building is demonstrably obsolete in physical or functional terms, or where the marketing approach is misaligned with the building's characteristics and realistic market position. Without that clarity, a rigid or mechanistic application of marketing expectations risks prolonging vacancy, suppressing investment, and delaying the delivery of improved accommodation that better meets contemporary occupier requirements and the City's wider objectives. The SPD should therefore confirm that marketing for a minimum 12-month period is the default expectation (as per Draft Policy OF2(1C)), but that robust 'equivalent evidence' may be accepted where independently verified and demonstrated that	In the marketing evidence, The City Corporation has requested to understand how the property has become vacant. The marketing evidence should include any details on the conditions, quality, location and scale of the building that would make it difficult to be desirable for tenants.	No change
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		continued marketing would not be meaningful or would not alter conclusions. This could include circumstances where physical or functional obsolescence is evidenced (for example, servicing limitations, inefficient floorplates, poor floor-to-floor heights, inability to meet baseline ESG expectations, or other constraints that fundamentally limit lettability), or where a credible redevelopment or deep retrofit strategy would deliver a substantially better outcome with wider planning and public benefits.		
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288	R13_09_006	Montagu Evans	4. Viability & Deliverability Requirements Viability assessment is a legitimate part of the policy framework and can provide a structured basis for understanding whether retention, refurbishment, or reprovision of office floorspace is feasible in the long term. The SPD should ensure viability is applied in a way that supports deliverability and investment, rather than unintentionally trapping sites which could be suitable for alternative uses in inefficient / obsolete office formats. If viability is approached as a narrow or backward-looking 'retention test', it can discourage comprehensive solutions, delay renewal, and perpetuate stock that no longer meets occupier needs, and with it ultimately undermine the City's objective of maintaining a healthy and competitive internationally renowned office market. To provide clearer and more effective guidance, the SPD should confirm that viability evidence should assess comparative deliverability across realistic options, including retention, refurbishment /	London Plan 2021 paragraph 6.17 sets the requirement for 12 months of marketing evidence. The London Plan identifies surplus office space as sites and/or premises where there is no reasonable prospect of these being used for business purposes. Within OF2, viability only needs to be undertaken if the proposal is taking the viability tested route in part OF2 (2A). Viability does not need to be undertaken in the Retrofit, Residential Areas or Ground floor uses routes in OF2 (2 B, C, D). The information requested in viability assessments says that development appraisal scenarios should be undertaken. The viability test is to understand the viability of continued office use, not to understand whether a different use is more profitable.	No change
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		deep retrofit, reprovision, and redevelopment. This comparative assessment should explicitly consider timing, delivery risk, and practical feasibility, alongside the costs and implications of meeting relevant sustainability and design requirements. The SPD should also recognise that viability is not solely about whether an option can theoretically be made to work, but whether it is realistically deliverable within an appropriate timeframe and risk profile, and whether it would secure an enduring office product aligned with market expectations. This approach supports investment confidence, aligns delivery with occupier demand, and helps ensure sites capable of providing the best alternative accommodation options such as hotel or other land uses are enabled to do so, while continuing to protect genuinely strategic office capacity and the City's primary office function.		
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289	R13_09_007	Montagu Evans	Concluding Remarks & Next Steps Strategic importance of existing office buildings, locations, and the acceptability of new or alternative forms of development should be determined through evidence led, site specific assessment, rather than presumption. The SPD should provide routes to renew and upgrade secondary stock through retrofit or redevelopment for alternative uses, where defined terms / metrics are met, to secure the best outcomes for the City. We therefore recommend a short decision framework confirming that where a site does not meet the strategic tests on evidence, or where long term office retention is not viable or deliverable, and where nearby office potential is not compromised, the City will support the most efficient use of land in line with wider objectives. This would ensure the SPD presents outcomes focused approach that optimises site capacity and directs the most office intensive, high quality formats, to the most suitable and best connected locations. Closings	The SPD is intended to provide a framework for strategically important offices within the City but each application for change fo use will be considered on its merits. The SPD includes section 7 which includes consideration of non-compliance with policies S4 and OF2 of the City Plan.	No change
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		We would like to thank the City for the significant work undertaken in preparing the Offices SPD and for the opportunity to comment at this stage. We recognise the value of the SPD in providing clarity and supporting consistent decision-making, and we welcome ongoing engagement with the City as the document is finalised, coordinated with the wider policy framework, and applied in practice through the development management process. We would be pleased to meet or correspond further to discuss any of the points raised in these representations and to assist in ensuring the SPD is implemented in a way that delivers the best outcomes for the City. We would also be happy to respond to any further queries arising, should it be helpful, and please do reach out to [REDACTED] or [REDACTED] of this office, in the first instance.		
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290	R13_09_001	Iceni Projects on behalf of Kaz Hotels Monument Ltd	On behalf of our Client, KAZ Hotels Monument Ltd ('the Client'), Iceni Projects ('Iceni') hereby provide representations in response to City of London's Regulation 12 and 13 draft Offices SPD. The draft Offices SPD contains supporting guidance on the application of policies within the City Plan 2040, namely in relation to maintaining and supporting a sufficient supply of office space. The consultation seeks comments from the public and other stakeholders, which would help inform the drafting. Upon adoption the Offices SPD will replace the 2015 Office Use SPD in its entirety. At this stage, KAZ Hotels Monument Ltd raise concern in relation to the draft Offices SPD in order to align with the strategic objectives of the City. The Client seeks to engage further with Officers in order to recognise the requirement to deliver alternative uses within the City of London that would not compromise the agglomeration of offices within the City, in line with the London Plan and City Plan. These representations focus on the following topics:	The City is the world's leading international financial and professional services centre and is recognised as having a key role in the UK economy. City Plan policy OF2 supports the continued economic growth of the Square Mile. We recognise the importance of other uses that can support the business City. We will make a change to recognise the supporting role that alternative uses can play in the Square Mile. The details of the marketing requirements are not too dissimilar from the existing Office Use SPD (2015). The marketing requirements in this SPD include what is typically asked by Development Management officers in the application process.	Minor amendment made to paragraph 1.11 to read: "The primary business function of the City is supported by other uses, infrastructure and services, to ensure that it can function successfully on a day to day basis. This includes student accommodation and hotels. In accordance with City Plan Policy HS6, student accommodation will be permitted where (6) they would not prejudice the primary business function of the City, or result in the loss of suitably located and viable office floorspace, contrary to Policy OF2. City Plan Policy CV4 allows for the provision of hotels and other visitor accommodation where they (1) comply with the requirements of OF2. Hotel accommodation is important to cater for business visitors wishing to stay in the City, as well as leisure visitors."
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		• That the extent of “strategic” offices and office locations is excessive and misaligned with the objectives of Policy OF2, and which would preclude the delivery of the wider objectives of the City Plan • The guidance on marketing requirements that are set out in Theme 4 • Further clarification and guidance on the evidence and information that the City of London would require where there is perceived non-compliance with Policy OF2. The remainder of the letter provides background information on KAZ Hotels Monument Ltd, the planning policy context, as well as the formal response to the draft Offices SPD consultation. KAZ Hotels Monument Ltd is a subsidiary of KAZ Hotels Ltd. KAZ Hotels Ltd has an established heritage in the UK hotels sector, with a highly experienced team spanning across development, construction, finance and operations. Kaz Hotels Ltd have an extensive successful track record of developing high-quality hotel accommodation across London.		
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			Within the City of London, they have recently secured planning permission for a 66 room hotel, including an ancillary bar, co-working space and coffee shop at 25-26 Lime Street (ref. 25/00639/FULL). KAZ Hotels Ltd are structured to design and build with a focus on quality, longevity and sustainability to ensure all projects are successful well beyond completion.		
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291	R13_09_002	Iceni Projects on behalf of Kaz Hotels Monument Ltd	Planning Policy Context Adopted Local Development Plan This section identifies the principal planning policy considerations which are to be considered against the draft SPD, whereby the current development plan consists of: • The London Plan (2021) • City of London Local Plan (2015) Given the status of the draft City Plan 2040, and the objective of the Offices SPD to align with the emerging Plan, the focus of comments is directed accordingly. The London Plan The London Plan (2021) was adopted in March 2021 and sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. Policy GG2: Making the Best Use of Land – Part C, states that to create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development,	Policies from the London Plan focusing on the CAZ and its significant office functions are also cited in the Offices SPD.	No change
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		particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. The entirety of the City of London is located within the Central Activities Zone ('CAZ'). Policy SD4 requires the nationally and international significant office functions of the CAZ to be supported and enhanced, alongside enhancing the distinct environment and heritage. Part E requires the diversity of cultural, arts, entertainment, nighttime economy and tourism functions should be promoted and enhanced and Part H sets out that the attractiveness and inclusiveness of the CAZ to residents, visitors and businesses should be enhanced. In addition, Policy SD5 states that mixed-use development proposals should not lead to a net loss of office floorspace in any part of the CAZ unless there is no reasonable and demonstrable prospect of the Site being used for offices. To achieve this, alternative provision of equivalent or net additional office space can be made – this should be within the CAZ and near the		
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		development. Policy E1, Part C supports the development and promotion of the unique agglomerations and dynamic clusters of world city business and other specialist functions of the central London office market in the CAZ. Part I supports the redevelopment, intensification and change of use of surplus office space where proposals have explored the need and range of suitable workspace (including lower cost and affordable workspace), alongside the scope of re-use of otherwise surplus large office spaces for small office units. In consideration of hotels, Policy E10, Part A states that London's visitor economy and associated employment should be strengthened by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure. Within the CAZ, strategically-important serviced accommodation should be promoted in Opportunity Areas, with smaller-scale provision in other parts of the CAZ except wholly residential streets or predominantly residential		
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		neighbourhoods. Part C specifies that a sufficient supply and range of serviced accommodation should be maintained. Paragraph 6.10.1 outlines that the Mayor wants to spread economic regeneration benefits by working with London and partners to promote tourism across the whole city. It continues to state that the plan will support the enhancement and extension of London's attractions particularly to town centres by supporting infrastructure including visitor accommodation. Paragraph 6.10.2 continues in the same vein by confirming that "London needs to ensure that it is able to meet the accommodation demands of tourists who want to visit the capital". 3 Emerging City of London City Plan The City of London is currently in the process of adopting its next Local Plan, titled City Plan 2040. City Plan 2040 is a new plan which will set the City Corporation's priorities for development up to 2040, alongside policies that will guide future decisions on planning applications. Consultation on the Revised		
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		Proposed Submission draft City Plan 2040 took place during Spring / Summer 2024, with submission of the Draft Plan to the Secretary of State for examination in early Autumn 2024. The examination in public hearing sessions was completed in 2025 and, at present, City Plan 2040 is expected to be adopted by Summer 2026. In relation to offices, draft Policy S4 states that the policy will look to protect existing office stock from being lost to other uses where there is an identified need or where the loss would cause harm to the primary business function of the City. Draft Policy OF2 outlines the aim to protect existing office floorspace. The loss of existing office floorspace will be resisted unless it can be demonstrated that: a. The proposed development would not lead to the loss of office floorspace that is, or sites that are, of a strategically important scale, type and/or location for the City; b. The proposed development would not compromise the potential for office development on sites within the vicinity; and		
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			c. There is no demand in the office market, supported by marketing evidence covering a period of no less than 12 months. The draft Local Plan continues to acknowledge the role of hotels within the City, whereby draft Strategic Policy S6 identifies how to create culture and encourage visitors to the City Corporation. The policy outlines how the City of London's cultural, leisure and recreation offer, visitor experiences and infrastructure, and the City's evening and weekend economies will be enhanced to position the Square Mile as a key cultural and leisure destination. Draft Policy CV4 states how proposals for hotels and other visitor accommodation will be permitted and provides a range of requirements for proposals to comply with, including that they must comply with Policy OF2.		
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292	R13_09_003	Iceni Projects on behalf of Kaz Hotels Monument Ltd	Theme 1: Office Stock and Market Trends We welcome the continued identification of office and market trends within the CoL in order to recognise the importance of offices and the range and variety that are available to businesses. Paragraph 2.5 outlines that demand for office space in the City has increasingly been for best-in-class office space, whereby Prime and Grade A space accounting for nearly 70% of lettings since 2020. This highlights the importance of high quality and sustainable office space in order to deliver towards the continued success of offices in the CoL. This is acknowledged in the City of London: Planning Obligations Viability Assessment (March 2026) which sets out that changing working patterns have evolved, resulting in high demand for the best quality space, and falling demand for secondary space. As set out within the assessment, this has in turn increased the pressure for redevelopment and repurposing. The draft SPD sets out that much of the City's secondary office stock has	The approach in the Offices SPD is to protect strategically important offices. London Plan 2021 paragraph 6.17 sets the requirement for 12 months of marketing evidence. The London Plan identifies surplus office space as sites and/or premises where there is no reasonable prospect of these being used for business purposes. Any proposed change of use must follow through the policy tests in City Plan policy OF2.	No change
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		the potential to be upgraded and “given the strong demand, the need for a variety of spaces, and the need to encourage renewal of stock, the City needs to retain the vast majority of office spaces currently in the Square Mile.” Whilst we acknowledge that there is an increasing demand in office floorspace, as identified in draft Policy S4 of the emerging City Plan 2040, supporting evidence does not identify a clear demand for lower quality office stock. As highlighted within Paragraph 5.3.4 of the draft City Plan 2040 there are instances where conversion of office buildings to other uses may assist in making the retention of existing buildings a more attractive investment opportunity, prioritising the ‘retrofit first’ approach. The City of London: Office viability review (March 2026) sets out that there is a changing demand and flight to quality, and as such, Grade B stock is becoming increasingly difficult to let. As such, the review supports a Policy approach which places less emphasis on a variety of stock and more emphasis on ensuring sites are		
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			recycled to other uses which can contribute towards the strategic objective of promoting economic growth. As set out in Paragraph 2.6: “If planning policies prevent the release of unwanted Grade B stock for other uses and there is no prospect of these sites being redeveloped for office use, one of the consequence would be an increasing mismatch between supply of and demand for Grade A stock, which would exacerbate existing trends of and increasing gap between prime and secondary rents.” In consideration of the changing demand, and the high demand for quality office floorspace, we would welcome Theme 1 acknowledging the range in demand in the City. Overall, whilst there is a continued need for office stock that is best-in-class, the supporting evidence identifies that there is a lower demand for lower quality offices. Moreover, it is outlined there is a potential for policies to harm the function of the CoL, should unwanted stock not be released and redeveloped.		
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293	R13_09_004	Iceni Projects on behalf of Kaz Hotels Monument Ltd	Theme 2: Definitions of Strategically Important Location, Type and Scale We are concerned with the SPD's approach in order to define offices that may or may not be considered strategic, with reference to the scale, location and types of office. As noted in our comments above, whilst we support the retention of in demand office stock, we view there should be greater flexibility in the guidance on the application of the term strategic, specifically in relation to Table 1. Table 1 recognises the range of locations within the City and outlines guidance as to where and when an office may be considered strategic. It is important to note that the term 'strategic' directly references draft Policy OF2 Part 1(A), whereby the loss of existing office floorspace will be resisted if the proposed development would lead to the loss of office floorspace that is of a strategically important scale, type and/or location for the City. Based on scale, we acknowledge that all parts of the City that are either/ or existing offices larger than 5,000sqm, sites with potential to increase the office floorspace by	In order for the City to remain a preeminent location for economic growth in the UK, strategically important office space must be retained, and improved where necessary. We understand that some sites might be challenged in continued office use which is why in section 7 the section outlines instances of non-compliance with the policy. We have made a change to reflect that specifically in the City Cluster and Fleet Valley tall building areas is where all existing office are strategic and should be retained.	Amendments made to replace Table 1 as previous with Diagram 1. Various other textual changes made to clarify requirements in Section 3.
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		2,500sqm or more or sites where change of use away from office would prevent the ability of other sites to come forward as an office development, may be defined as strategic. The second row of Table 1 outlines that all existing offices (regardless of scale of type), within the Blackfriars KAO, City Cluster KAO, Fleet Street and Ludgate KAO, Liverpool Street KAO Pool of London KAO and areas near key transport nodes would be considered strategic. Whilst we agree that these clusters support office use, we consider this to be extremely restrictive and does not account for demand, trends, adopted policy or site-by-site considerations and constraints. In addition, and as noted within the draft SPD, over 99% of all office floorspace in the City is within a 5-minute walk from a rail or tube station. As such, this guidance has the consequential effect of capturing close to all of the City's existing offices, without consideration of site-specific requirements, wider need and factors such as condition and scale of office.		
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			The London Plan highlights the CAZ as a location for offices, however, also a zone that requires diversity of cultural, arts, entertainment, nighttime economy and tourism functions, which should be promoted and enhanced. Policy identifies that the attractiveness and inclusiveness of the CAZ to residents, visitors and businesses should be enhanced. Should all offices within these locations be considered strategic (regardless of scale and type), this does not account for the other strategic goals of the City and how uses of buildings can deliver towards the function of the area, as supported at regional and local level. The draft City Plan 2040 sets a number of strategic priorities, centred around economic, social and environmental objectives. These highlight the range of uses to delivered within the City in order to promote it's function. In relation to the delivery of uses and development, this includes: • Delivering a minimum of 1.2 million sqm net additional office floorspace; • Delivering the accommodation,		
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		facilities, attractions and infrastructure required for a leading destination; • Creating a more vibrant and diverse retail economy (Paragraph 6.12 identifies an approximate need of 192,200sqm additional retail floorspace up to 2040); • Enhancing the City's evening and weekend economies; • Creating new and enhanced culture, leisure and visitor attractions; • Helping to facilitate infrastructure requirements; • Delivering new, inclusive open spaces and enhancing the City's public realm for everyone alongside enhancing the City's riverside; • Delivering additional homes (Strategic Policy S3 sets out a need for a minimum of 1,706 net additional dwellings between 2025/26 and 2039/40); and • Enhancing the City's social infrastructure and creating new sports and recreation opportunities. These strategic objectives and priorities identify significant scope for development in order to help realise the CoL's vision within the		
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			City Plan. There is a large quantity of existing office floorspace distributed across the entirety of the City. Between 2023/2024 the City of London recorded 9.38million sqm of office floorspace within the City. Figure 4 of the draft City Plan 2024 highlights office distribution across the CoL which demonstrates that the CoL is heavily dominated by office floorspace, as shown below. This map identifies that a significant proportion of the City is made up of office floorspace.		
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294	R13_09_005	Iceni Projects on behalf of Kaz Hotels Monument Ltd	Office Distribution – Draft City Plan 2024 As such, the City of London comprises majority office use. As aforementioned, over 99% of all office floorspace in the City is within a 5-minute walk from a rail or tube station and therefore the draft guidance would define close to all of the City’s existing offices as strategic. Therefore, the draft Offices SPD would consequentially restrict the majority of brownfield land (which is existing office use) within the CoL from redevelopment. As identified, the CoL has a range of strategic priorities, including the delivery of housing, infrastructure and accommodation that supports the City as a destination, open space, retail and wider infrastructure. These are embedded within Strategic Policies S17 – S25, which identify the promotion of land uses other than offices, and ensures that, in line with the London Plan, a diversity of uses and functions are promoted and enhanced. Notwithstanding, through restricting the redevelopment of existing, unviable and unwanted office use for redevelopment, there is	The SPD acts as intended, to protect strategically important office floorspace in the City. The different parts of policy OF2 seek more evidence on viability matters. The SPD acknowledges that there may be certain circumstances where a proposal may be not in compliance with OF2 which is outlined in section 7 of the SPD. This portion of the SPD ensures that if a site is severely restricted or challenged then it will be considered on its own merits on how the scheme would outweigh the loss of strategically important office. It is considered that City Plan 2040 and this SPD will encourage development to make the best use of land, strengthening the City's distinct character within London. The City Cluster KAOC, Liverpool Street KAOC and Fleet Street and Ludgate KAOC all have proposed tall building areas within or overlapping. The tall building areas are required to deliver the uplift in office space required to support economic growth in the City of London. The SPD does not prohibit the objectives of Destination City. We will add text to the SPD to highlight the	Amendment made to paragraph 1.11 to read “The primary business function of the City is supported by other uses, infrastructure and services, to ensure that it can function successfully on a day to day basis. This includes student accommodation and hotels. In accordance with City Plan Policy HS6, student accommodation will be permitted where (6) they would not prejudice the primary business function of the City, or result in the loss of suitably located and viable office floorspace, contrary to Policy OF2. City Plan Policy CV4 allows for the provision of hotels and other visitor accommodation where they (1) comply with the requirements of OF2. Hotel accommodation is important to cater for business visitors wishing to stay in the City, as well as leisure visitors.”
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		limited scope to bring forward the other strategic objectives of the draft City Plan 2040. As such, the draft Offices SPD limits the abilities of the draft City Plan 2040 from delivering its strategic priorities. For instance, within the Spatial Strategy, Paragraph 4 of the draft City Plan sets out that demand for retail growth is likely to be focussed in the four principal shopping centres. Notwithstanding, the majority of these centres are located within Clusters. In a location that does not benefit from significant undeveloped sites, new development must look at the re-use and redevelopment of existing buildings that are no longer fit for purpose. Similarly, within the Spatial Strategy, Paragraph 6, new hotels are encouraged in suitable locations whereby draft Strategic Policy S6 supports hotel development where it supports the primary business or cultural role of the City. In support of this, draft Policy CV4 outlines hotels must be in suitable locations that have good access to attractions, workplaces and other destinations. Notwithstanding, this policy	importance of amenities in the City that complement its business function.	
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		requirement would have significant overlap with sites within Blackfriars KAO, City Cluster KAO, Fleet Street and Ludgate KAO, Liverpool Street KAO Pool of London KAO and areas near key transport nodes. London Plan Policy GG2 highlights the importance of making best use of land, including understanding what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character. As such, all options for using land more effectively must be explored as London's growth continues and demand shifts, where the reuse of existing, underutilised offices should be considered in order to meet all strategic objectives. As aforementioned, the supporting evidence highlights the requirements to release unwanted office stock in order to support the wider function of the CAZ and City of London. The redevelopment of surplus office stock is supported both in the London Plan, alongside draft Local Plan Policy OF2, in order to ensure development delivers the best use of land, alongside acknowledging a range of		
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		uses, including hotels, deliver towards the vitality and viability of the CAZ. It has been clearly identified that based on market trends and the Council's own evidence base not all offices are in demand, whereby the City of London: Planning Obligations Viability Assessment (March 2026) outlines that secondary offices suffer from high level of vacancy. Moreover, the City of London: Office viability review (March 2026), Paragraph 6.3 sets out that rents for Grade B offices are forecast to remain flat, resulting in real terms falls. In addition, this issue is likely to increase due to constantly improving energy efficiency requirements that may render buildings unlettable within less than four years without a major refurbishment to achieve an EPC rating of B or higher by 2030. As such, and in accordance with the test of soundness, there is no clear justification as to how office space that is not in demand, can be considered 'strategic' and delivering to the long term interest of the City. Paragraph 6.3 outlines that many Grade B buildings will be redeveloped as offices, "but there		
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		are others where this will not be a feasible option". As such, whilst there is a preference to refurbish and retrofit vacant offices, there are also a range of factors which impact the feasibility of this. For instance, Paragraph 3.7 of the draft SPD acknowledges that all three KAOCs present challenging and complex street patterns, views issues and constraints. There are a range of considerations that should be accounted for when assessing development, including technical, physical and economic constraints. Without considering the existing site's locational-specific features, policy requirements, physical constraints and heritage considerations, there is no clear justification to define these as being able to strategically deliver towards office use and/ or whether reprovision of office use on site is possible. Finally, Row 3 of Table 1 within the draft Offices SPD identifies all modern offices in Aldgate, Tower and Portsoken KAOC, Barbican and Smithfield KAOC and the rest of the City, are likely to be strategic		
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		whereby heritage assets in these areas and all other type of buildings may be strategic. This approach is entirely dependent on their characteristics and variable when assessing when assessing each individual application. Notwithstanding, as mentioned previously, physical constraints, including heritage considerations, should be acknowledged further in order to assess whether a heritage asset can be considered strategic. As set out in Paragraph 6.3 of the City of London: Office viability review (March 2026), redevelopment of offices is not always feasible, “most notably offices in heritage assets which cannot be demolished and cannot be reconfigured to meet contemporary occupier requirements”. As noted in our comments above, these site-specific features must be considered in order to assess whether an office does, and will in the future, strategically deliver towards office use within the City. Policy OF2(1) states that the loss of office will be resisted unless it can be demonstrated that parts A, B and C can be met. Part A outlines that		
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			proposals must not lead to the loss of office floorspace that is, or sites that are, of a strategically important scale, type and/or location for the City. Notwithstanding, the proposed definition of strategic offices is considered to be wholly restrictive in the context of Policy OF2(1) (A) and not in keeping with the evidence base, or wider policy goals. Lastly, the proposed approach appears to have no underpinning in evidence base and is reliant upon arbitrary measurements whereby it does not consider the commentary and themes identified in the City of London: Office viability review (March 2026) and City of London: Planning Obligations Viability Assessment (March 2026). We would welcome engaging further with CoL regarding the approach to the function of offices and whether they strategically deliver towards the City's objectives, to ensure future intentions of the City Plan can be realised.		
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295	R13_09_006	Iceni Projects on behalf of Kaz Hotels Monument Ltd	Theme 3: Potential for Office Development We are supportive of Theme 4 of the draft Offices SPD which provides details of necessary marketing evidence to be submitting in order to justify the lack of demand in the office market. We are pleased to see that the guidance outlines that 12 months of marketing is required, in order to clearly outline whether the continuation of office use is reasonable or feasible on site. We support that specific details must be provided, including condition, quality, location and scale of buildings in order to ensure the site specifics are accounted for and considered. Based on existing knowledge of buildings within the CoL, we would advise that it often difficult to provide the 12 months of marketing directly preceding the pre-application or submission of an application. In consideration of experience of the market within the City, there are often timescales that control the marketing period and account needs to be made on how this marketing strategy has considered potential	The approach in the Offices SPD is to protect strategically important offices. London Plan 2021 paragraph 6.17 sets the requirement for 12 months of marketing evidence. The marketing evidence states 12 months preceding pre-application or submissions as we want to ensure that the offices were marketed. We want to see how the offices were intended to be kept as offices. The marketing information is to understand occupier demand and interest. Each submission will be looked at on a case by case basis. The marketing information requested includes requesting information on business occupation across all floors. A change was made to clarify the 'entirety or parts of the building' becoming vacant or underutilised.	Amendment made at paragraph 5.3 to read "Information on current and most recent levels of business occupation across all floors, and the reasons for <u>the entirety or parts of</u> the building becoming vacant or underutilised"
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		occupiers and the marketing strategy. As such, whilst we acknowledge 12 months directly prior to submission would be a preferred approach, we would advise that there should be flexibility to the timelines of this, based on site-specific considerations. In addition, we support the requirement to provide information on current and most recent occupations and consideration of the local market. As acknowledged in the draft SPD, the City offers a range of office uses and there can be a number of occupiers within one building. In accordance with this, there can often be a range of marketing available for one building, dependent on when or where the building is vacant and/ or underutilised. As such, whilst we appreciate the preference would be to provide complete marketing of a building as a whole, in practice this can often be difficult in consideration of the range of use across all floors, particularly where buildings are multi-let. As such, we would suggest that the marketing acknowledges the range of marketing details that may be available across units, and that		
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		on-going advertising / marketing of individual offices. This enables for accurate information to be provided in consideration of the market demand at the time of the CoLs consideration of such marketing evidence. Moreover, office accommodation can operate across a range of occupational formats. The current drafting appears to focus on evidence derived primarily from traditional tenant occupation; however, this does not fully account for variations in demand arising from freehold, leasehold, serviced office, and partial letting scenarios. In particular, where a property is actively operating as a serviced office, its performance over a continuous 12-month period should reasonably be regarded as equivalent to marketing evidence. Sustained under-occupancy, such as average occupancy levels remaining significantly below capacity, and lettings at below market rates to encourage some occupancy, provides a clear and robust indication of limited market demand and therefore a lack of viability for		
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		continued office use. As such, we suggest that greater flexibility is incorporated into the approach to marketing evidence, allowing for a broader range of scenarios to be considered. This would ensure a more comprehensive understanding of demand for the space. Overall, we are supportive of the guidance; however, we request that further detail is provided to ensure sufficient flexibility in addressing site-specific circumstances, and that the evidence base fully reflects all relevant marketing scenarios and the potential of a site.		
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296	R13_09_007	Iceni Projects on behalf of Kaz Hotels Monument Ltd	Theme 5: Viability Theme 5 within the draft Offices SPD seeks to provide further guidance on the viability tested route in order to identify why the retention, refurbishment or reprovision of the office floorspace would not be viable in the longer term, demonstrated by a viability assessment. We are supportive of this in order to account for the viable options of a site.	Thank you for your comments. We note your support of the viability section.	No change
297	R13_09_008	Iceni Projects on behalf of Kaz Hotels Monument Ltd	Non compliance with the policy Section 7 of the draft Offices SPD recognises that proposals might be put forward that seek change of use of offices that are considered to be strategic and, in such cases, will be considered on their own merits, against the requirements of the development plan and any relevant material considerations. We are pleased to see within Section 7 that the CoL acknowledge the restrictive nature of 'strategic' offices under the proposed application and definitions, and proposes considering proposals on a site-by-site basis. Paragraph 7.2 outlines that in such cases, an application for such development should provide strong	We acknowledge your support of this section of the SPD. Section 7 alongside the other parts of the SPD strikes appropriate balance and flexibility. Each proposal will be addressed against the plan and SPD as a whole.	No change

		reasons and justification, including robust evidence for how the benefits of the scheme would clearly and demonstrably outweigh the loss of strategically important office floorspace. In consideration of this, we would support the City providing further clarification and guidance on these material considerations and the evidence, reasons or benefits that the CoL would assess proposals against. The explicit inclusion of this approach suggests that the CoL is aware of the preclusive nature of the definition of “strategic” and that it will be reliant upon case by case assessments. Without redefining the scope of “strategic” offices and locations, the CoL is at risk of adopting an SPD that provides no further clarity to landowners and developers as to the protection afforded offices that are plainly not strategic in isolation or agglomeration. Notwithstanding the above, we are broadly supportive of the CoL providing an assessment should proposals not comply with Policy OF2 but require the CoL to provide both a		
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			revised approach to defining a “strategic” office location and more detail on criteria that would sufficient allow the CoL to support a position of non compliance with Policy OF2.		
298	R13_09_009	Iceni Projects on behalf of Kaz Hotels Monument Ltd	Summary In this letter, Iceni Projects have provided representations on behalf of KAZ Hotels Monument Ltd with regards to City of London’s Regulation 12 and 13 draft Offices SPD. Having reviewed the draft Offices SPD, the Client is particularly concerned that the scope of the definition of “strategic” office would be unnecessarily and unreasonably restrictive and which would be misaligned with the objectives of Policy OF2 and the wider City Plan 2040. We would be keen to engage	Thank you for your comments.	No change

		with the Council in order to ensure that the guidance provides suitable consideration that is reflective of the current market, evidence base and policy direction. We would be grateful for any updates on the progression of the Offices SPD, and we are happy to meet with any policy officers to discuss any element of the draft SPD if required.		
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305	R13_12_001	Urbanest	Introduction Urbanest welcomes the opportunity to comment on the Draft Offices SPD and supports the City Corporation's overarching objective of safeguarding strategically important office floorspace within the Square Mile. Urbanest recognises the importance of retaining a substantial majority of office stock to ensure the continued success of the City as a globally competitive business centre. However, Urbanest considers that the Draft Offices SPD should more clearly recognise the long-term role of purpose-built student accommodation (PBSA) in supporting London's higher education sector, skills development and the future workforce that underpins the City's primary business function, as well as providing an important planning purpose by contributing to general housing need, in line with the London Plan and the Draft City Plan 2040. Founded in 2009, Urbanest is now London's leading specialist student accommodation provider. We are long-term providers and operators; we don't just build and sell buildings,	Students bring activity and vibrancy into the Square Mile. We have made a change to recognise how other uses can support the business City, contributing to economic growth and vibrancy. We are supportive of the incubator space provided in the Tower Bridge Urbanest scheme.	Amendment made to paragraph 1.11 to read: "The primary business function of the City is supported by other uses, infrastructure and services, to ensure that it can function successfully on a day to day basis. This includes student accommodation and hotels. In accordance with City Plan Policy HS6, student accommodation will be permitted where (6) they would not prejudice the primary business function of the City, or result in the loss of suitably located and viable office floorspace, contrary to Policy OF2. City Plan Policy CV4 allows for the provision of hotels and other visitor accommodation where they (1) comply with the requirements of OF2. Hotel accommodation is important to cater for business visitors wishing to stay in the City, as well as leisure visitors."
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		we manage each property ourselves, every day. We provide a range of accommodation types in all our buildings. We work closely with the capital's major universities to ensure we deliver what they, and their students, want and with almost 7,400 beds in operation, or under construction, we make a very important contribution to housing delivery in London (equivalent of almost 3,000 residential units) and are actively looking to grow our portfolio and deliver sites. We have an excellent relationship with the City Corporation having already delivered Urbanest Tower Bridge and more recently Urbanest City which opened in 2021 and provides 629 student bedrooms, incubator and flexible office space. The building also offers a café and public exhibition, which houses a preserved section of the original Roman London City Wall. It won 'City Building of the Year 2022' for its design and exceptional delivery. Urbanest City has been fully let since opening to King's College London, who let approximately 75% of the beds alongside David Game College		
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		who let the remainder. Urbanest City also includes 911 sqm of incubator space managed by Northeastern University London (NUL) known as the NUL start-up hub. Opened in February 2024, the hub already accommodates 25 businesses, all of which provide opportunities for students. The incubator currently supports 110 jobs and generates £16.8m in annual GVA. It enables businesses to establish in the CoL and then fledge to premises within CoL. It is clear that Urbanest City delivers significant benefits to the City of London supporting both its primary business function and the vibrancy of the Square Mile, in addition to supporting London's higher education sector and contributing towards general housing need.		
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306	R13_12_002	Urbanest	Theme 1: Office Stock and Market Trends Urbanest supports the analysis of office stock and market trends set out in the SPD, including recognition of: •Sustained demand for high-quality, Grade A office accommodation; •Record low availability of Grade A office floorspace; and •The significant proportion of existing office stock comprising older and secondary buildings with weaker environmental performance. Urbanest agrees that targeted measures to protect and upgrade office stock that is structurally sound, fit for purpose and commercially viable are essential to meeting future office demand. However, the SPD also highlights that the City contains a large volume of secondary office stock that may struggle to meet modern occupier expectations due to age, configuration, sustainability performance or heritage constraints. In such cases, continued office use may no longer represent the most viable or sustainable outcome. The Draft City Plan 2040 recognises	We have made a change to the SPD to acknowledge how other uses can support the business City, contributing the economic growth aims.	Amendment made to paragraph 1.11 to read: “The primary business function of the City is supported by other uses, infrastructure and services, to ensure that it can function successfully on a day to day basis. This includes student accommodation and hotels. In accordance with City Plan Policy HS6, student accommodation will be permitted where (6) they would not prejudice the primary business function of the City, or result in the loss of suitably located and viable office floorspace, contrary to Policy OF2. City Plan Policy CV4 allows for the provision of hotels and other visitor accommodation where they (1) comply with the requirements of OF2. Hotel accommodation is important to cater for business visitors wishing to stay in the City, as well as leisure visitors.”
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		that the City's long-term economic success also depends on education, skills growth and talent retention, alongside office development. Purpose-built student accommodation plays a key enabling role by: •Supporting universities and educational institutions within and adjacent to the Central Activities Zone; •Facilitating access to higher education and supporting innovation and research-led sectors; and •Contributing to footfall, vibrancy and activity beyond traditional office hours in line with the Destination City vision. Urbanest, therefore, considers that the SPD should explicitly recognise PBSA in its supporting role to the office economy, rather than viewing it as a competing use to office provision.		
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307	R13_12_003	Urbanest	Theme 2: Definitions of Strategically Important Location, Type and Scale Urbanest supports the principle of setting a high bar for the loss of strategically important office floorspace. However, the SPD must be applied with sufficient flexibility to recognise that not all sites or buildings are suitable for continued office use, even in highly accessible locations. There is a risk that overly broad definitions of “strategically important” offices could, in practice, designate almost all office buildings within the City as resistant to change of use. This could have unintended consequences, including: •The creation of stranded or under-utilised assets; •Reduced ability to adapt the City’s built environment to changing economic and social needs; and •Constraints on delivering alternative policy-supported uses where office use is no longer realistic. The London Plan 2021 notes that London’s higher education providers make a significant contribution to its economy and labour market. It is important that their attractiveness	The intention of the SPD is to protect strategically important office accommodation. Policy HS6 acknowledges that PBSA and hostels should support the City of London's primary business function. Wording will be added to the SPD to align with the City Plan on how alternative uses can support the business City.	Amendment made to paragraph 1.11 to read: “The primary business function of the City is supported by other uses, infrastructure and services, to ensure that it can function successfully on a day to day basis. This includes student accommodation and hotels. In accordance with City Plan Policy HS6, student accommodation will be permitted where (6) they would not prejudice the primary business function of the City, or result in the loss of suitably located and viable office floorspace, contrary to Policy OF2. City Plan Policy CV4 allows for the provision of hotels and other visitor accommodation where they (1) comply with the requirements of OF2. Hotel accommodation is important to cater for business visitors wishing to stay in the City, as well as leisure visitors.”
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		and potential growth are not compromised by inadequate provision for new student accommodation. It goes on to say that boroughs should seek to ensure that local and strategic need for PBSA is addressed subject to meeting various criteria. The Draft City Plan 2040 notes that the demand for student accommodation in London continues to grow and that higher education provision is a key part of London's attractiveness as a World City and supports the City of London's commercial role. Policy HS6 states that PBSA should support the City of London's primary business function and the vibrancy of the Square Mile. This acknowledges the role that PBSA plays in the vitality of the primary business function in CoL. Both the London Plan and the Draft City Plan confirm that PBSA should count towards meeting housing targets on the basis of a 2.5:1 ratio, with two and half bedrooms/units being counted as a single home. PBSA therefore has a significant role in contributing towards meeting housing needs.		
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			The SPD should therefore provide clearer guidance on how PBSA can be assessed positively within the policy framework, rather than being implicitly discouraged by rigid definitions. This is essential to ensuring that the City of London's primary business function and vibrancy is safeguarded as well as contributing towards housing need. This acknowledgement would align with, what will become, the statutory development plan and help to ensure that the SPD does not provide guidance that is contrary to the development plan. Urbanest considers that the SPD should clearly acknowledge that: •Some buildings, particularly those in secondary locations or with significant structural or heritage constraints, may no longer be capable of delivering modern office accommodation; •In such circumstances PBSA is often viable where office retention or reprovision is not, especially in buildings constrained by floor-to-ceiling heights; limited servicing or daylight; or heritage designations restricting adaptation;		
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			•PBSA can therefore provide a sustainable, long-term and actively managed alternative, supporting wider City Plan objectives. Based on the above, we have concerns about the practical application of Table 1 and consider it to be unworkable as currently drafted. It would seem to suggest that almost all buildings within the City would be identified as 'strategically important' and as such, any change of use would be resisted. This is likely to result in many stranded assets, even where it is clear they are no longer suitable for continued office use. Urbanest requests that Table 1 is substantially redrafted.		
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308	R13_12_004	Urbanest	Theme 3: Potential for Office Development Urbanest has concerns regarding the introduction of an arbitrary 2,500 sqm development potential threshold and also the need, in some cases, to demonstrate the potential for future office development amalgamation, which is likely to be outside an applicant's control. These requirements risk introducing disproportionate uncertainty, time and cost, particularly where office redevelopment is not a realistic prospect. Urbanest considers that the SPD should focus on realistic and deliverable office potential, rather than hypothetical future scenarios that may restrict appropriate regeneration.	To deliver significant office uplift in some areas, amalgamation of sites may be required. This portion of the guidance protects for future scenarios and supports the policies of City Plan 2040. The threshold in the SPD of 2500 sqm was determined based on sites where uplift of a similar amount was added onto existing offices. These offices were considered to be strategically important office accommodation.	No change
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309	R13_12_005	Urbanest	Theme 4: Office Demand Urbanest supports the principle that proposals involving the loss of office floorspace should be supported by evidence of a lack of market demand. However, the SPD should allow for a proportionate approach to this requirement. A rigid insistence on a fixed 12-month marketing period in all circumstances risks delaying or preventing appropriate redevelopment where: •The market position of a building is already clear; •Structural or functional constraints limit suitability for office use; or •Continued vacancy undermines economic and placemaking objectives. The SPD should allow decision-makers to consider the appropriateness of evidence of lack of demand on a case-by-case basis, particularly where alternative uses such as PBSA align with Draft City Plan priorities. This approach allows for decision to take place on a planning balance basis as opposed to a rigid criterion, which is not in the interest of good planning or	The 12 month marketing requirement is identified in the London Plan 2021 and City Plan 2040. In the typical processes when landlords are understanding the future of their buildings, we would typically expect that they would undergo a marketing exercise to attract new occupiers.	No change
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			supported by national planning policy.		
310	R13_12_006	Urbanest	Theme 5: Viability Urbanest welcomes the additional guidance on viability but supports an approach that recognises the need for case-specific assessment rather than prescriptive checklist that do not allow for decisions made on a case-by-case basis.	Each site will be looked at on a case by case basis using the SPD as guidance.	No change
311	R13_12_007	Urbanest	Non-Compliance with the Policy Urbanest welcomes the SPD's recognition that proposals should be assessed against the development plan as a whole, and that material considerations may justify the loss of 'strategic' offices. In applying this discretion, decision-makers should have regard to: • London Plan and Draft City Plan support for PBSA where this supports the City's primary business function;	We acknowledge the benefits that student accommodation can have to meeting the Destination City objectives. Development management officers would use discretion on referability to the GLA. Compliance with the development plan on a whole would be considered if an application was to apply section 7 of this SPD. An otherwise overwhelming balance toward	No change

		•The role of student accommodation in maintaining a pipeline of skilled future City workers; and •The contribution of student populations to vibrancy, diversity and Destination City objectives. Additional guidance within the SPD on how these wider benefits should be balanced against office protection would improve clarity and consistency. Notwithstanding the above, there are concerns around the implications of the Mayor of London Order 2008 and whether ‘non-compliant’ applications would then need to be referred to the Mayor as “development which does not accord with one or more provisions of the development plan” which we assume is not the intention. Urbanest would welcome the opportunity to discuss their comments with the City Corporation in advance of further drafting of the SPD and adoption.	compliance with the development plan would be desired.	
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318	R13_14_006	BGLNF	General comments 1.We don't consider that this SPD is needed – Both Policy S4 and OF2 make clear the primacy of office space within the City Plan 2040 and state that its loss will be resisted We would point out that: *During the Examination of the Plan the Planning inspectors have already increased the amount of office space needed in the Plan *The Examination showed that the existing policies are robust *Much time and effort has gone into producing the Plan, and this SPD reads less like an attempt to elaborate on the policies than an attempt to impose further restrictions by the back door. In a world where planning policy is permissive this policy is just too prescriptive.	The SPD has been written to secure the future of office space in the square mile by protecting strategically important office space. The SPD is needed to provide guidance on policy OF2 and to ensure consistent interpretation of the wording 'strategically important' for decision makers and applicants.	No change
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319	R13_14_007	BGLNF	2. Defining all office buildings built since the year 2000 (why that year?) and all office buildings over 5000sqm as “strategic” is unnecessarily restrictive and could lead to unintended consequences. For example, Smithfield and the Barbican Exhibition Halls have extensive offices within them: does that mean that when development proposals come forward they have to be considered as offices? That would completely undermine other parts of the plan.	The year 2000 has been used as the threshold because offices built/refurbished more recently are more likely to meet high/grade A office standards. Where development proposals are put forward for offices that are considered strategically important as defined in the SPD this will be considered on a case-by-case basis. In the case of the exhibition halls the wider uses would be taken into consideration by decision-makers.	No change
320	R13_14_008	BGLNF	3. Moreover, the SPD says little about improving the quality and sustainability of offices and focuses relentlessly on quantitative definitions of office space.	This SPD supports policy S4 which provides details of the quality of office space, there is an existing sustainability SPD which covers sustainability matters for offices and the city more widely	No change
321	R13_14_009	BGLNF	4. We didn’t find the table on p10 particularly clear. We didn’t understand the reference to heritage being significant. Is it saying that offices that are heritage assets are likely to be strategic, or that any heritage asset is likely to be strategic?	The table only relates to existing offices, whether that be in modern or historic buildings. The adaptability of heritage assets will be taken into consideration by decision makers.	No change

			The table – bottom row says - “In these areas, other types of building (regardless of size, including those below 5,000sqm (GIA)) may be strategic.” So does that mean non-office buildings? Strategic in the sense that they could become office buildings?		
322	R13_14_010	BGLNF	5.Theme 3 on the potential for office development seems to be saying in effect that every potential site is ripe for office development. But that runs counter to many policies within the Plan 2040 (eg on the protection of social infrastructure, such as health centres, leisure facilities, shops, on the protection of heritage assets). If that is what is meant that is radical undercutting of the main Plan and should not be slipped in via an SPD.	Theme 3 only relates to existing offices and their potential for uplift. Other policies of the City Plan 2040 will be taken into consideration when proposals for office development come forward. Theme 3 supports policy S4 which aims to protect existing office floorspace from being lost to other uses and the potential of smaller sites for redevelopment through land assembly.	No change
323	R13_14_011	BGLNF	6.In para 4.1 We query the text: “Conversion of office space to residential could impact neighbouring sites’ abilities to develop due to the impact of a new development on residential use. Conversion of office space to residential could have negative	This stems from City Plan policy OF2 which seeks to balance the uses and stakeholders of the city. The SPD hasn't tested every case but this is something that will be determined by decision-makers. This SPD should be read alongside the City Plan 2040	No change

			impacts on the servicing required as commercial buildings typically service overnight.” Certainly, we understand the Plan policy S3 1a, which resists residential development where it would prejudice the primary business function of the City. But this section in the SPD overstates the issue. We note that prominent office occupiers – such as Deutsche Bank, Schroders, the law firms in Aldersgate Street, have been content to site their new buildings next to the Barbican residential estate.	as a whole and the rest of the development plan documents.	
350	R13_17_002	Historic England	We note the focus of the SPD is to help in the interpretation and application of policies S4 and OF2 of the City Plan 2040 which has recently been through examination. Given the number of commercial buildings in the City that are historic, together with the implications for historic character and heritage significance of new office development, we have a limited number of comments. A number of factors combine in the City of London to mean that a substantial proportion of planning	We will make it clear that all policies of the City Plan should be considered as well as those mentioned in this paragraph and include signposting to policy HE1 to add to the list of relevant policies.	Amendment made to paragraph 1.8 to read: “Strategic Policy S4 (5) facilitates economic growth by <i>“protecting existing office stock from being lost to other uses where there is an identified need or where the loss would cause harm to the primary business function of the City”</i>. This SPD provides specific additional guidance on the application of Policy OF2; however, even if a planning application for a proposed change of use were found to comply with both parts of this policy the proposal would also be required to be considered against the

		applications have potential effects on the historic environment. The densely developed character of the City, the degree of development pressure prevalent (the proportion of which is office-based in nature is substantial) and the concentration of heritage designations, including conservation areas, mean that impacts on heritage from office development applications are highly common. As a result, we would suggest that the relevant policies in the emerging City Plan for managing such effects, notably HE1, should be included at paragraph 1.8 to complete the relevant policy context.		requirements of Policy S4 to ensure that the loss would not harm the primary business function of the City. This guidance in this SPD should also be considered alongside <u>all policies of the City Plan 2040, including those</u> which set out other particular requirements to address local issues such as Policy HS1: Location of New Housing (2), Policy HS6: Student accommodation and hostels (1d), Policy HL3: Noise (2) and <u>Policy HE1: Managing Change to Historic Environment.</u>"
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351	R13_17_003	Historic England	We note and welcome paragraph 3.18 regarding heritage assets and the signpost to recent research indicating particular demand for historic office buildings among highly skilled sectors. While we would obviously agree with the final sentence of this paragraph, we would suggest adding text to emphasise the adaptability of many historic buildings would be useful in encouraging their continued occupation and use. This could include making clear that appropriate advice should be sought at an early stage in relation to the sensitivities of the building in question. Such an addition would better reflect the objectives of City Plan 2040 policies S11 and HE1 – in particular S11 3b, which seeks ‘the beneficial, continued use of heritage assets through sensitive adaptation that is consistent with their conservation and enhancement. I trust these comments are helpful. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific	This paragraph was intended to highlight the attractiveness of historic buildings for occupation from occupiers who place a premium on heritage, authenticity and distinctiveness. We will include a section on historic buildings to clarify this and explain the importance of seeking relevant advice from the City's design team when handling the sensitivities of historic buildings for continued use.	Amendment made to 3.20 to read: “Research finds that highly skilled workers in particular industries are drawn to places that have more historic landmarks and historic buildings as these places are perceived to be more attractive;²⁶ in the City this includes historic buildings that meet modern office needs. The City of London has over 600 listed buildings and many non-designated heritage assets. The historic buildings of the City of London are often attractive for occupation by firms who place a premium on heritage, authenticity and distinctiveness.²⁷ Offices within historic buildings can attract occupiers who seek an image of reliability and stability, such as private finance and law. 3.21. In some cases, heritage assets may present particular challenges to the maintenance of the office use, where the significance of the heritage asset could be affected by alterations required to upgrade the building to modern standards. However, under other circumstances a change of use may also mean that the significance is more likely to be conserved. Advice should be sought at an early stage from the City of
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			development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.	London Corporation Planning (Design) team to handle the sensitives of historic buildings to facilitate their continued use. sensitives of historic buildings to facilitate their continued use."
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381	R13_24_001	Whitbread PLC	Representations on the Draft Offices Supplementary Planning Document (SPD) Summarising our concerns While we recognise the Corporation's objectives in bringing forward the Draft Offices Supplementary Planning Document (SPD), it is our view that, as currently drafted, the guidance may give rise to unintended consequences. There is a risk that the SPD introduces greater uncertainty, delay and risk for hotel investors, with early indications suggesting these effects are already being felt by the market. Rather than accelerating delivery or supporting economic growth, the guidance may inadvertently drive slow decision-making, deter investment and contribute to a growing number of stranded or under-utilised assets – including in circumstances where buildings are demonstrably unsuited to continued office use. We value our long-standing relationship with the Corporation	This SPD has been written to retain strategically important office floorspace and support City Plan 2040 policy OF2. Schemes that are considered unsuitable for continued office use must pass the tests laid out in policy OF2.	No change
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			and would welcome the opportunity to discuss the practical application of it in advance of the guidance coming into effect. As part of the conversation, we would be happy to share examples where the proposed policy is leading to greater uncertainty in a challenging development market.		
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382	R13_24_002	Whitbread PLC	Introducing Whitbread Whitbread is the UK's largest hospitality business operating more than 850 Premier Inn and hub by Premier Inn hotels and over 85,000 rooms across the UK and Ireland. This is equivalent to 12% of UK hotel room supply. Around 18% of our trading estate is located within the M25 (a little over 100 hotels) and the capital is where a significant proportion of the company's future expansion is focused. Currently, we offer our guests a choice of seven trading hotel locations within the City of London, providing 1,370 rooms, with two additional hotels in development or in the advanced stages of planning (+500 rooms). The company's long-standing and positive relationship with the City Corporation reflects its commitment to its 'Destination City' strategy and the shared vision of a successful 7-day/week destination for workers	Noted.	No change
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			and visitors to the Square Mile. Against a total hotel supply of 10,550 hotel bedrooms within the City of London – 20% of which are economy rooms (AMPM/STR data) – our budget brands help address an undersupply of affordable hotel options in the Square Mile and appeal primarily to a domestic traveller customer base, with most guests staying for less than two nights on average.		
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383	R13_24_003	Whitbread PLC	Theme 1: Office Stock and Market Trends We recognise the City Corporation's overarching ambition to protect and enhance office floorspace in the Square Mile, acknowledging the City's role as a nationally and internationally significant centre for business. There is clear demand and need for high quality Grade A floorspace and we acknowledge that where office buildings are structurally sound and commercially viable to retain, there will be opportunities to upgrade some of the existing secondary office stock. However, we consider that the SPD should more clearly and positively articulate the role of complementary uses, particularly hotels, in supporting the City's office economy and the objectives of both the London Plan 2021 and the Draft City Plan 2040 including the Spatial Strategy and Strategic Policy S6 which enshrines the Destination City vision. This is essential to ensure that the Office SPD is applied in a manner that both safeguards the City's primary	We acknowledge your suggestion, this SPD has been written to retain strategically important offices. We have made a change to recognise how other uses can support the business City.	Amendment made to paragraph 1.11 to read: "The primary business function of the City is supported by other uses, infrastructure and services, to ensure that it can function successfully on a day to day basis. This includes student accommodation and hotels. In accordance with City Plan Policy HS6, student accommodation will be permitted where (6) they would not prejudice the primary business function of the City, or result in the loss of suitably located and viable office floorspace, contrary to Policy OF2. City Plan Policy CV4 allows for the provision of hotels and other visitor accommodation where they (1) comply with the requirements of OF2. Hotel accommodation is important to cater for business visitors wishing to stay in the City, as well as leisure visitors."
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			business function and enables sustainable, inclusive and vibrant mixed-use growth – and the maintenance of the ecosystem of the City of London that underpins its success. The London Plan identifies tourism facilities, including hotels, as one of the strategic functions of the CAZ. Given the importance of tourism to London’s economy, the plan emphasises the importance of meeting the accommodation demands of both tourists and business visitors.		
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384	R13_24_004	Whitbread PLC	The Draft City Plan 2040 establishes a clear policy framework which recognises that the future success of the City's office economy depends on a balanced mix of uses: • Strategic Policy S4 (Offices) promotes a minimum 1.2 million sqm (NIA) of net additional office floorspace by 2040. • Strategic Policy S6 (Culture and Visitors) and Policy CV4 (Hotels) recognise that hotels are a critical component of the City's visitor and business infrastructure. • The Destination City vision seeks to transform the Square Mile into a 7-day-a-week destination, supported by hotels, leisure, culture and evening economy uses. Hotels are therefore not competing uses; they are explicitly acknowledged as supporting the City's primary office function, by: • Meeting the needs of business visitors linked directly to the City's expanding office base; • Supporting international	The City Plan and SPD strike the appropriate balance to provision of new office space alongside other requirements and the SPD has appropriate flexibility to ensure that new uses such as hotels can come forward. This SPD has been written to help meet the minimum requirement of 1.6 million sqm of net additional office space, where proposals for hotel development comes forward this will need to adhere to the policies of the City plan 2040.	No change
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			investment and occupier decision-making; • Enabling longer stays and increased footfall that underpin retail, culture and hospitality vibrancy; • Providing more than bedrooms through the provision of high-quality communal spaces that reflect the diversity of modern work The Office SPD should therefore align more closely with this plan-led recognition of hotels as both functionally strategic, and complementary uses, rather than treating them as exceptions to office protection.		
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385	R13_24_005	Whitbread PLC	Theme 2: Definitions of Strategically Important Location, Type and Scale We recognise the City of London Corporation's ambition to protect and strengthen the Square Mile's core office function, and we appreciate the City's global economic success is fundamentally underpinned by a diverse and competitive office market. However, we also consider that hotels and other complementary uses are essential to sustaining that success and should be fully recognised in supporting the delivery of Destination City and the City's retrofit first approach, specifically acknowledged by the proposed retrofit fast track policy. The Draft City Plan 2040 consistently identifies hotels as supporting uses within office-led locations, particularly: • Near key transport hubs; • Within areas of high office density; and • Where they enhance the City's role as a global hub for business visitors and investment. In this context, we	We have included text in the Plan about how other uses can support the business City, complementing the economic growth of the Square Mile. We have revised section 3 to provide guidance on how decision makers will come to conclusions on strategically important offices.	Amendment made to paragraph 1.11 to read "The primary business function of the City is supported by other uses, infrastructure and services, to ensure that it can function successfully on a day to day basis. This includes student accommodation and hotels. In accordance with City Plan Policy HS6, student accommodation will be permitted where (6) they would not prejudice the primary business function of the City, or result in the loss of suitably located and viable office floorspace, contrary to Policy OF2. City Plan Policy CV4 allows for the provision of hotels and other visitor accommodation where they (1) comply with the requirements of OF2. Hotel accommodation is important to cater for business visitors wishing to stay in the City, as well as leisure visitors."
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			consider that the SPD should make clear that a site's designation as strategically important for offices does not automatically preclude hotel use, where the physical limitations of a building are better served by another use that requires less intervention to make it viable. Greater guidance should be provided on how decision-makers should assess overall planning benefits, particularly where hotel uses enhance the Destination City vision as set out in draft Strategic Policy S6, without undermining office supply at a strategic level. We have concerns about the practical application of Table 1 when combined with broad definitions of "strategic" location. As drafted it appears to designate almost all buildings within the City of London as 'strategically important' and as such, resist their loss to alternative uses.		
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386	R13_24_006	Whitbread PLC	This is likely to have the unintended consequence of creating stranded office buildings as well as restricting the ability to deliver high-quality hotels in precisely those locations where business demand is strongest – such as near major stations and office clusters – undermining the Destination City strategy. Whitbread considers that Table 1 needs to be substantially redrafted. The example of Whitbread’s conversion of 9-11 Angel Court (Moorgate) into a 95-bedroom hub by Premier Inn hotel, clearly shows how a disused office building can be repurposed for another more viable use where the limitations of small floor plates, and physical site constraints restrict the delivery of new offices of any viable scale, or suitable for modern office needs. We consider it important that the SPD explicitly recognises that not all sites or buildings within the Square Mile are suitable for modern office use, even in highly	Demand for offices in the City remains high and will continue in the future. Where buildings do not meet the needs of occupiers and there are significant physical constraints, this can be taken into account by decision makers through the submission of marketing and viability information.	No change
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		accessible locations. Many potential hotel sites involve: • Buildings with narrow or inefficient floorplates • Deep-plan or structurally constrained assets • Older buildings that cannot viably deliver Grade A office accommodation • Locations where office redevelopment would be economically or practically unviable • Heritage assets which present challenges for conversion into modern offices In such cases, retaining office use may not represent the best or most sustainable outcome for the City. Hotels can provide a viable alternative use that delivers economic benefit, employment, sustainability benefits, publicly accessible ground floor uses, and public realm activation, while avoiding an asset becoming stranded which, we believe, should be recognised to a greater effect in the SPD, and which is dealt with under the current drafting		
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387	R13_24_007	Whitbread PLC	In addition, there are often significant challenges posed by designated and non-designated heritage assets, which are common within the Square Mile. Heritage constraints can significantly limit: • Floor-to-ceiling heights • Natural light and servicing • Adaptability and flexibility of floorplates • Ability to meet modern sustainability and office design standards In many cases, hotels are more compatible with the sensitive adaptation of heritage buildings than modern office uses. This is acknowledged through the retrofit-first approach embedded within the Draft City Plan 2040 and reflected in Policy OF2(2)(b) (the retrofit fast track). The Office SPD should therefore reinforce – rather than dilute – this policy intent by: • Clearly distinguishing between speculative loss of offices and planned, policy supported hotel conversions;	The SPD is guidance and aims to support policies in the City Plan 2040, both this SPD and the plan strikes the appropriate balance to provision of new office space. This SPD provides the appropriate flexibility to ensure that new uses such as hotels can come forward, proposals for hotel schemes must comply with policy OF2. Decision-makers will assess on a case-by-case basis to determine viability related to heritage .	No change
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			• Confirming that hotels brought forward via the retrofit fast track are a positive delivery mechanism, not an exceptional departure from office policy; • Encouraging early engagement on hotel-led retrofit schemes that demonstrably support office demand and Destination City objectives; • Provide greater flexibility within the SPD where heritage constraints demonstrably limit the viability of continued office use.		
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388	R13_24_008	Whitbread PLC	Theme 3: Potential for Office Development We consider that introducing a 2,500 sqm development potential threshold as well, will add significant uncertainty and risk to the process. A requirement for speculative assessment work at the feasibility stage will add time and cost, is overly onerous and, in many cases, outside of the applicant's control. Theme 4: Office Demand We consider that a strict requirement to provide 12 months marketing evidence before entering into pre-application discussions or submitting a planning application will again, add uncertainty and risk which will likely result in, at best, delay and at worst, stranded assets even where a site is clearly no longer suitable or viable for office use. Theme 5: Viability On viability, we consider that the additional guidance provided is helpful, but it should be made clear that it is 'guidance' and not a prescriptive list, acknowledging that each site is	Sites which are smaller than 1000sqm are less likely to be considered strategically important offices. The 12 months marketing evidence is a requirement of policy OF2. Viability testing is set out in policy OF2 of the City Plan. The threshold of 2500 sqm has been determined based on planning approvals of approximately 2500 sqm being added to strategically important offices.	No change
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			different and will need to be considered in the context of its own specific constraints.		
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389	R13_24_009	Whitbread PLC	Non-Compliance with the Policy Whitbread welcomes Section 7 of the SPD, which confirms that proposals will be assessed against the development plan as a whole and that material considerations can be weighed where strategic office loss is proposed. It is right that each proposal should be considered on its merits, particularly in the context of ever-changing markets and occupier needs. In applying this discretion, decision-makers should be guided by, amongst other factors: • The explicit support in the Draft City Plan 2040 for hotels as complementary uses where they support the City's cultural infrastructure or businesses; • The Destination City ambition to enhance vibrancy and visitor infrastructure; • The carbon, heritage and placemaking benefits often associated with hotel-led retrofit schemes. Providing additional guidance within the SPD on how these city-wide benefits are to be	Development management officers would use discretion on referability to the GLA. Compliance with the development plan on a whole would be considered if an application was to apply section 7 of this SPD. An otherwise overwhelming balance toward compliance with the development plan would be desired.	No change
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		balanced against office protection would greatly improve certainty and consistency in decision-making. Notwithstanding the above, there are concerns around how this would sit with the Mayor of London Order 2008 and whether all such applications would then need to be referred to the Mayor as “development which does not accord with one or more provisions of the development plan” which we assume is not the intended consequence.		
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390	R13_24_010	Whitbread PLC	Conclusions The City has built a strong reputation amongst the investor/developer community for its speed and transparency in planning, for which it should rightly be proud. We recognise the Corporation's objectives of the Draft Offices SPD but consider that, as currently drafted, the unintended consequences will be greater uncertainty, risk and delay for the investor / developer community, the signs of which are already being felt. It is our view that the impact of this guidance will be a surge in the volume of requests for early clarification on potential opportunities made of the City planners, tying up their resources and without the adequate framework against which to validate those queries. Rather than generating economic growth, we feel this SPD may be a detractor to investment in the City, slow down delivery, and lead to more stranded building assets, even in situations where the site is clearly no longer	Thank you for your comments. We will include text in the SPD about the positive benefits of alternative uses in supporting the business City.	Amendment made at 1.11 to read: "The primary business function of the City is supported by other uses, infrastructure and services, to ensure that it can function successfully on a day to day basis. This includes student accommodation and hotels. In accordance with City Plan Policy HS6, student accommodation will be permitted where (6) they would not prejudice the primary business function of the City, or result in the loss of suitably located and viable office floorspace, contrary to Policy OF2. City Plan Policy CV4 allows for the provision of hotels and other visitor accommodation where they (1) comply with the requirements of OF2. Hotel accommodation is important to cater for business visitors wishing to stay in the City, as well as leisure visitors."
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		suitable or viable for continued office use. We consider that its effectiveness will depend on: • A more explicit and confident articulation of the role of hotels as complementary, business-supporting uses; • Alignment with the Draft City Plan 2040's strategic objectives for offices, hotels and Destination City priorities; • Sufficient flexibility to enable appropriate hotel-led schemes – particularly retrofit proposals – where they demonstrably support the long-term success of the City's office economy. We would also recommend the Corporation commits to review the impact of the planning guidance following implementation. As a long-term stakeholder in the City of London, we would welcome further engagement with the Corporation on these points prior to the finalisation and implementation of the Offices SPD, should it be helpful.		
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396	R13_25_006	For and on behalf of Caroe Architecture Ltd	Comment: Offices SPD Much of this SPD lies outside of the scope of the Cathedral's comment. However, there are some areas of relevance to St Paul's. The SPD provides further information on those offices thought to be 'strategic', 'likely to be strategic', or that 'may be strategic'. It notes that all existing offices within the Key Areas of Change of most relevance to the Cathedral (Blackfriars, City Cluster, and Fleet Street and Ludgate) are strategic. We query what this means for development in such areas, given that developments in these areas may have greater potential to affect the setting of the Cathedral – indeed there have been consents granted that have caused harm. We feel it should be made clearer that strategic schemes (whether within key areas of change or not) still have to apply rigorous methods to avoid harm to heritage assets.	We acknowledge your suggestion, this is supplementary guidance and City Plan 2040 and planning applications will need to adhere policies in the plan.	No change
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397	R13_25_007	For and on behalf of Caroe Architecture Ltd	We welcome discussion of the forthcoming Puddle Dock Supplementary Plan related to the Blackfriars Key Area of Change and the holistic approach undertaken therein. We suggest that this section can and should better stress this opportunity to note the sensitivity of this site in relation to the setting of St Paul's. The SPD also describes the role that historic buildings play in drawing highly skilled workers to particular locations. The emphasis of this section (para 3.18) is on retrofit and heritage assets that are also offices. However, we suggest that the text could better clarify that the 'draw' and benefits of these heritage assets clearly also stems from the legibility and character of the City's historic skyline and landmarks, and the significance of its heritage assets (such as St Paul's). Noting this as a sensitivity, but also an asset, would be useful.	This section intends to specifically explain the pull that historic buildings have as a location for occupiers who place a premium on heritage rather than the role of the city's wider historic setting and context. We will provide a section on historic buildings to provide further clarification.	Amendments made at 3.20 and 3.21 as follows "Research finds that highly skilled workers in particular industries are drawn to places that have more historic landmarks and historic buildings as these places are perceived to be more attractive;²⁶ in the City this includes historic buildings that meet modern office needs. The City of London has over 600 listed buildings and many non-designated heritage assets. The historic buildings of the City of London are often attractive for occupation by firms who place a premium on heritage, authenticity and distinctiveness.²⁷ Offices within historic buildings can attract occupiers who seek an image of reliability and stability, such as private finance and law. 3.21. In some cases, heritage assets may present particular challenges to the maintenance of the office use, where the significance of the heritage asset could be affected by alterations required to upgrade the building to modern standards. However, under other circumstances a change of use may also mean that the significance is more likely to be conserved. Advice should be sought at an early stage from the City of
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					London Corporation Planning (Design) team to handle the sensitives of historic buildings to facilitate their continued use.”
412	R13_26_004	DP9 on behalf of BNP Paribas	Dear Sir / Madam, Representations on the Draft Offices SPD to support the implementation of the City Plan 2040 These representations are submitted to the City of London (CoL) on behalf of our client, BNP Paribas Asset Management ('BNPP AM') (formerly AXA Real Estate Investment Managers) (acting in its capacity as investment manager and advisor to its investors and clients) in respect of the consultation on the new and update SPD's. The SPDs are an update to the Planning Obligations SPD, and new SPDs covering Officers, Air Quality and Celebrating Heritage. These representations focus on the draft Offices SPD, and separate representations have been preped on the other SPD's listed above	Thank you for your comments.	No change

			where relevant. BNPP AM welcomes the opportunity to engage in this consultation that will feed into the City Plan 2040. Representations have been made previously on the City Plan 2040 Regulation 19 consultation (17 June 2024) and to the Tracked Changes' version of the City Plan 2040 Proposed Main and Additional Modifications to the Regulation 19 version (6 February 2026). BNPP AM understand the purpose of the draft Offices SPD to protect strategically important office floorspace and maintain a sufficient supply to meet the requirements of a variety of sectors and markets. We have provided the following representations on each of the themes within the draft SPD.		
413	R13_26_005	DP9 on behalf of BNP Paribas	Theme 1: Office Stock and Market Trends It is understood that this theme confirms continued demand for high-quality Grade A floorspace. This is strongly aligned with the City Property Associations (CPA's) evidence on the demand for Grade A floorspace, stating that occupiers are	We acknowledge your support.	No change

			increasingly prioritising sustainable, flexible, high specification offices. BNPP AM support this.		
414	R13_26_006	DP9 on behalf of BNP Paribas	Theme 2: Definitions of Strategically Important Location, Type and Scale BNPP AM strongly support the draft City Plan and draft Offices SPD's emphasis on the strategic importance of office floorspace in the Square Mile. However, BNPP AM believe that the City's economic success is dependent on numerous factors and does not solely relate to the concentration of significant office clusters. The economic success is also due to the other wider complimentary uses e.g. hotels, serviced apartments, cultural and higher education institutions and commercial uses which support the business function of the Square Mile. Therefore, the SPD needs to provide emphasis on the importance of ensuring that the Square Mile remains highly competitive in attracting investment through delivering and enabling appropriate opportunities for complementary uses. BNPP AM advise that the SPD	Policy OF2 of the City Plan identifies uses that could be suitable for an office change of use that are complementary to the business function. We will include text in the SPD about the positive benefits of alternative uses.	Amendments made at paragraph 1.11 as follows "The primary business function of the City is supported by other uses, infrastructure and services, to ensure that it can function successfully on a day to day basis. This includes student accommodation and hotels. In accordance with City Plan Policy HS6, student accommodation will be permitted where (6) they would not prejudice the primary business function of the City, or result in the loss of suitably located and viable office floorspace, contrary to Policy OF2. City Plan Policy CV4 allows for the provision of hotels and other visitor accommodation where they (1) comply with the requirements of OF2. Hotel accommodation is important to cater for business visitors wishing to stay in the City, as well as leisure visitors."

			should provide confirmation of the activities which the City of London define as complementary to the City's business function.		
415	R13_26_007	DP9 on behalf of BNP Paribas	Theme 3: Potential for office development BNPP AM question this theme's expectation that applications should be required to demonstrate the potential for future office development amalgamation. The introduction of this requirement risks creating additional workstreams for applications which could be considered disproportionate and which is beyond the control of the	We do not intend to place an additional obligation on applicants for this theme. This theme intends to protect sites, for examples sites in tall building areas that have suitable room for uplift. The threshold was based off of recent approvals which added approximately 2500 sqm on to strategically important offices.	No change

			applicant or developer. BNPP AM request further engagement with the City on whether they intend to place an obligation on applicants to undertake further assessments/speculative assessments to satisfy this additional guidance.		
416	R13_26_008	DP9 on behalf of BNP Paribas	Theme 4: Office demand BNPP AM have no commentary on this theme. Theme 5: Viability BNPP AM have no commentary on this theme.	Noted.	No change
417	R13_26_009	DP9 on behalf of BNP Paribas	Conclusion BNPP AM welcomes the opportunity to comment on draft Offices SPD to support the implementation of the City Plan 2040 and we would welcome the opportunity to further engage with Officers to discuss any specific elements within these representations. We trust the points raised in this representation will be taken into account and will be used to inform the final version of the Offices SPD. Should you have any queries or require any further information in respect of the above, please contact	Thank you for your comments.	No change

			██████████ or ██████████ of this office. Yours faithfully DP9 Ltd.		
434	R13_28_001	Avison Young on behalf of clients	Dear Sir/Madam, Representation to City of London “Offices SPD”, “Planning Obligations SPD” and “Celebrating Heritage SPD” dated March 2026 On behalf of clients, we write to provide our representations on the City of London’s Offices SPD, its Planning Obligations SPD and its Celebrating Heritage SPD, all dated March 2026. It should be noted that Avison Young represents a diverse range of clients operating in the City of London across range of sectors, such as office, leisure/ hotel and specialist residential, and includes developers, investors and other types of clients. In summary, whilst we are supportive of the aspirations of all documents, it is important that the objectives of the Offices SPD and Planning Obligations SPD in particular	Support noted.	No change

		are balanced against the current and well-documented viability challenges facing development projects, including significantly increased construction costs (particularly for higher-rise buildings), the continued high cost of finance, higher yields and associated development risk. In this context, ensuring sufficient flexibility in relation to office projects, leisure projects and changes of use projects to complementary uses (including the application of planning obligations) is critical. With regard to the Celebrating Heritage SPD, we have only very minor comments on one of the principles within the document; otherwise, we offer our support for the adoption of the SPD. With regard to the Draft Offices SPD, we are supportive of the aspiration to protect and enhance the office stock within the City of London to ensure the City of London remains a competitive and attractive location for business. In this context, we recognise the strategic importance of office uses to the City of London's economic function and global role.		
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436	R13_28_003	Avison Young on behalf of clients	Representations to Offices SPD Table 1 on Page 10 of the Draft Offices SPD (reproduced below) summarises when a loss of office space is considered “strategic”. Policy OF2 of the City Plan 2040 resists the loss of ‘strategic’ office floorspace. However, the SPD assumes that almost all office is strategic, which is not the case in our experience. Accordingly, we have included our comments on this Table 1 in red below, where we consider updates could be made. Table 1 (taken from the Draft Offices SPD) with AY comments SEE TABLE IN PDF REP Finally, we request the introduction of a six-month grace period before implementation from the date of adoption, to allow for schemes that are delayed to be determined (i.e. adopted by end June but implemented by December).	The City's office stock is spread across all parts of the Square Mile and it's the breadth, concentration and volume of offices that make the City such an important location for economic growth. We will be delaying the implementation date of the Offices SPD.	No change
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446	R13_29_002	Newmark on behalf of CPA	We also support the overall direction of the draft Offices SPD and its clear recognition of the strategic importance of office floorspace. However, it will be essential that the SPD is applied with appropriate flexibility. Overly rigid change-of-use policies risk preventing justified alternative uses in secondary locations, delaying development and creating stranded assets. A balanced approach is needed to maintain the City's mix of uses, including hotels and serviced accommodation, which play an important role in its wider ecosystem. Similarly, we welcome the progress made in the Celebrating Heritage SPD and its ambition to integrate the City's historic environment positively within new development, provided this is applied proportionately and with regard to viability. Taken together, the draft SPDs form an important framework for shaping future development across the Square Mile. We would welcome continued engagement with officers as these documents are refined and implemented.	Support noted.	No change
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447	R13_29_003	Newmark on behalf of CPA	APPENDIX – CPA DETAILED REPRESENTATIONS 1. Offices SPD (page 3) 2. Planning Obligations SPD (page 7) 3. Air Quality SPD (page 13) 4. Celebrating Heritage (page 14) CPA REPRESENTATIONS TO THE OFFICES SPD 1. Office stock and market trends The CPA welcomes the updated commentary on ‘Office Stock and Market Trends’ (Theme 1) within the draft Offices SPD and this underpins the strategic policy as set out within the Draft City Plan (Policy S4 Offices). The commentary confirms continued demand for high-quality Grade A floorspace and is consistent with CPA’s analysis in its Space for Change: City of London Deep Dive (January 2026) report by Knight Frank, which reveals prime and Grade A office space account for nearly 70% of lettings in the Square Mile. In both this analysis and London Property Alliance’s Space for Change: Office space dynamics in central London (December 2025), it is clear that occupiers across the Square Mile increasingly prioritise sustainable, flexible, high-specification offices to	Support noted.	No change
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			attract and retain talent. These reports also show that availability of floorspace, of all types, in the City of London is at record lows, although this is exacerbated amongst the very best space the Square Mile has to offer. For businesses looking to grow or locate their headquarters, the City of London has only two large floorplates currently available.		
448	R13_29_004	Newmark on behalf of CPA	Alongside this, London Property Alliance and CPA data reveal that the Square Mile has lost over 3 million sq ft of office floor space between 2018 and 2023, whilst the City of London is home to a large pool of secondary office stock: older, second-hand buildings typically with weaker energy performance, falling in EPC bands C– G. Over 54 million sq ft (56.8%) of City floorspace sits in this category, underpinning roughly £96.8 billion of capital value. Therefore, CPA strongly supports targeted measures to	Comments noted.	No change

			protect and upgrade office stock where it is structurally sound and commercially viable to retain. Intervening in these buildings is essential to meet the demand for high-quality, sustainable workspace and to ensure the Square Mile remains competitive for leading global businesses seeking to move, invest, and grow.		
449	R13_29_005	Newmark on behalf of CPA	2. Definitions of strategically important location, type and scale Policy OF2 ‘Protection of Existing Office Floorspace’ of the draft City Plan seeks to protect existing office floorspace and outlines circumstances in which offices may be considered for change of use. The subsequent part of the policy (1a) provides a criteria-based approach to the assessment of schemes involving loss of office floorspace. This sets out that a loss of floorspace or sites suitable for office development will be resisted unless it can be demonstrated that it is not of ‘strategic important scale, type and/or location for the City’. ‘Definitions of Strategically Important Location, Type and Scale’ (Theme 2)	Policy OF2 of the City Plan identifies uses that could be suitable for an office change of use that are complementary to the business function. Text has been added to the SPD to recognise how other uses can support the business City.	Amendments made as follows: 1.11 The primary business function of the City is supported by other uses, infrastructure and services, to ensure that it can function successfully on a day to day basis. This includes student accommodation and hotels. In accordance with City Plan Policy HS6, student accommodation will be permitted where (6) they would not prejudice the primary business function of the City, or result in the loss of suitably located and viable office floorspace, contrary to Policy OF2. City Plan Policy CV4 allows for the provision of hotels and other visitor accommodation where they (1) comply with the requirements of OF2. Hotel accommodation is important to cater for business visitors wishing to stay in the City, as well as leisure visitors.

			provides additional guidance on these terms and introduces Table 1. The CPA strongly supports the draft City Plan 2040 and draft Offices SPD's emphasis on the strategic importance of office floorspace for the Square Mile. Given the demand for office space and pace of its loss, CPA welcomes steps to address these imbalances. However, the City's economic success also depends on the vibrancy of its wider complementary uses such as hotels, serviced apartments, cultural and higher education institutions and accommodation which support the business function of the Square Mile. The CPA's Delivering Destination City: The Growth Strategy for the Square Mile (July 2025) highlights the importance of creating 'a magnetic destination for business, workers and visitors', reinforcing that these complementary uses are essential to sustaining office demand and drawing footfall. These complementary uses help to ensure the Square Mile remains highly competitive in attracting investment. Getting this balance right is essential.		
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450	R13_29_006	Newmark on behalf of CPA	Whilst CPA supports the principles of this approach and setting a high bar to mitigate office space loss, we would welcome the following: • The SPD to more clearly set out which activities are considered complementary to the City's business function, so those that may need to consider change of use are clear which are most appropriate and required to support the delivery of Destination City. • The SPD to include an acknowledgement within the policy that some sites within the Square Mile may no longer be suited to office use. Policy should recognise that not all buildings can or should be retained as offices. Some assets, particularly those in secondary locations or with significant structural constraints, will not be suitable for retention as an office. • The SPD to acknowledge the constraints presented by designated and non-designated heritage assets, particularly in terms of the constraints these buildings present. Heritage assets often limit the ability to meet requisite office standards through conversion and as a result	City Plan policy OF2 considers change of use to alternative uses such as culture, education and hotel. The viability assessment process can help to support an argument that a building may not be suitable for offices due to significant structural constraints. The Offices SPD should be read alongside the Celebrating Heritage SPD.	No change
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			impact on viability in the longer term. CPA would welcome some flexibility to be introduced for these buildings, which can be more constrained by heritage policies.		
451	R13_29_007	Newmark on behalf of CPA	The CPA welcomes a locational approach to the designation of 'strategic offices'. As our City of London Deep Dive analysis showed, demand for office space is highly concentrated in areas approximately 500m from a transport node, and particularly around the Elizabeth line. Indeed, Liverpool Street has become the eastern anchor of the Elizabeth line core, with the station and its surrounding streets forming one of the City's strongest concentrations of lettings, over 600 since 2020. Its combination of four London Underground lines, National Rail services and the Elizabeth line creates one of London's most connected interchanges, attracting both traditional financial and legal	It is anticipated that the age, condition and suitability of a site for continued office use would be highlighted in the marketing evidence. Section 3 provides a locational approach to strategically important offices which meets only one part of the three points on City Plan policy OF2.	No change

		firms, as well as growing tech and fintech occupiers. On this approach, CPA would welcome the following consideration: • The introduction of Table 1 'Guidance on consideration of strategic office by location' combined with the accompanying definitions of 'strategic' may not be sufficiently precise to inform applicants, developers, advisors and decision makers and greater clarity would be welcome. • Applying Table 1 in practice would mean that many sites regardless of their age, condition and suitability would be unable to progress through the policy pathway beyond OF2 (1a), even where there are specific site circumstances that would support an alternative and complimentary use. • Whilst CPA agrees with the approach, the application of Table 1 could limit the ability of owners and investors to acquire, reposition or repurpose buildings that are capable of meeting modern occupier expectations.		
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452	R13_29_008	Newmark on behalf of CPA	CPA proposes the following amendments to Table 1 to ensure it is effective in application by providing a clear hierarchy on location and size to supplement Draft City Plan Policy OF2 (1a): 1. Introduce grouping of locations and rank these by category and priority which reflects the relative strategic importance of different parts of the City. 2. The criteria column guides users in determining whether a site is considered strategically important based on its location and additional conditions in terms of distance (500m) from a station entrance on the Elizabeth line, mainline rail or Bank London Underground station. Or alternatively excludes designated residential areas. This ensures the table is location specific and adaptable to accommodate different spatial contexts. The CPA considers the use of a walking time (5 mins) to be subjective and difficult to measure. 3. The scale column identifies the minimum floorspace of a site to qualify as strategically important (>5,000 sqm GIA). This floorspace	We have made amendments and created diagram 1 which is a representation of the indicators of how strategically important offices will be considered.	Amendments made to replace Table 1 as previous with Diagram 1. Various other textual changes made to clarify requirements in Section 3.
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		then increases proportionately as the user moves through the location categories, recognising that large sites outside of higher priority areas can still play a strategic role. In addition, acknowledgement is also given to the redevelopment potential, noting that sites capable of intensification or renewal may be strategically important regardless of size. 4. The comments column provides contextual considerations that assist and guide the assessment of whether a site is considered strategic. It includes the age of the building which is relevant when considering the feasibility of refurbishment and retrofit. This column acts as a supporting layer of qualitative judgement to ensure that nuances that are not captured by fixed thresholds can be considered by a decision maker. SEE TABLE IN PDF REP		
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453	R13_29_009	Newmark on behalf of CPA	3. Potential for office development The CPA consider that amendments proposed to Table 1 allow the decision maker to take account of the potential for office development without introducing a fixed threshold of 2,500 sqm. The CPA has concerns regarding the expectation that applications should be required to demonstrate the potential for future office development amalgamation. Introducing this requirement risks creating an additional workstream for applicants which could be considered disproportionate and which is beyond the control of the applicant or developer. The CPA would welcome further engagement to seek clarification that the City Corporation does not intend to place an obligation on applicants to undertake further assessments/speculative assessments to satisfy this additional guidance. Overall, the CPA would recommend 'Potential for Office Development' (Theme 3) is removed as it is addressed within Table 1 and is a factor considered in viability assessments (Theme 5).	This section responds to OF2 part 1B. The SPD provides additional thinking behind the policy. The threshold was based off of recent approvals which added approximately 2500 sqm on to strategically important offices.	No change
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454	R13_29_010	Newmark on behalf of CPA	4. Office demand Policy OF2 (1c) requires applicants to demonstrate that there is no demand for the floorspace or site in the office market, supported by at least 12 months of marketing evidence (Theme 4). Whilst this requirement appears in the Draft City Plan's supporting text, in practice it can be arbitrary and may delay progress in cases where the position for a specific site is already clear. To better reflect the City's responsiveness to market conditions and its commitment to facilitating development, the SPD should instead refer to the need for appropriate evidence of lack of demand, rather than a fixed marketing period.	The 12 month marketing requirement is identified in the London Plan 2021 and City Plan 2040. In the typical processes when landlords are understanding the future of their buildings, we would typically expect that they would undergo a marketing exercise to attract new occupiers. The marketing evidence states 12 months preceding pre-application or submissions as we want to ensure that the offices were marketed. We want to see how the offices were intended to be kept as offices. The marketing information is to understand occupier demand and interest.	No change
455	R13_29_011	Newmark on behalf of CPA	Requiring applicants to wait 12 months before entering pre-application discussions or submitting an application could introduce uncertainty for investors, particularly where a site is no longer suitable or viable for office use. Decision-makers should also consider the reasonableness of the marketing approach, including pricing, the condition and location of the	Decision makers will consider the reasonableness of the marketing approach. The 12 month marketing requirement is included in City Plan 2040 and in the London Plan 2021.	No change

			building, the length of time the property has been on the market, and the level and nature of enquiries received, especially where these indicate limited suitability for continued office use. The CPA considers that the existing guidance on marketing is sufficiently clear and precise to allow these factors to be assessed without imposing a mandatory 12-month period prior to pre-application engagement or planning submission.		
456	R13_29_012	Newmark on behalf of CPA	Viability Policy OF2 (2a) outlines the viability tested route (Theme 5), which can be followed once part 1 of the policy has been satisfied. It requires applicants to demonstrate, through a viability assessment, that the retention, refurbishment or reprovision of office floorspace would not be viable in the longer term. The SPD usefully provides guidance on the information that should be included within the viability assessment which is welcomed by the CPA. However, the CPA considers that it should not become a prescriptive or tick-box exercise as each proposal will have its	Noted. The viability assessment can be useful evidence in understanding the future of continued office use on site.	No change

			own unique characteristics and constraints that need to be considered on a case-by-case basis.		
457	R13_29_013	Newmark on behalf of CPA	6. Non-compliance with the policy and application in practice Section 7 of the SPD acknowledges that some proposals will come forward that seek a change of use for offices that could be considered strategic. It sets out that such cases will be considered on their own merits, having regard to the development plan and other relevant material considerations. In these circumstances, it is likely that a decision maker would require an application for such development to provide strong reasons and convincing justification for allowing the change of use should, including robust evidence demonstrating that the benefits of the proposal would clearly and demonstrably outweigh the loss of strategically important office floorspace. The CPA welcomes this discretion to consider non-compliant proposals on their merits,	Development management officers would use discretion on referability to the GLA. Compliance with the development plan on a whole would be considered if an application was to apply section 7 of this SPD. An otherwise overwhelming balance toward compliance with the development plan would be desired.	No change

			which reflects the City's adaptability and commitment to respond to rapidly evolving market and occupier demands. However, there are concerns on how this non-compliance could likely trigger referral to the Mayor under the Mayor of London Order 2008 'development which does not accord with one or more provisions of the development plan'. In practice this creates uncertainty for applicants. The CPA considers that the SPD should provide clearer context and guidance on 'non-compliant proposals', to ensure decision-makers can properly assess change of use proposals in the round, having regard to the overall benefits of a scheme. Where marketing and financial viability evidence demonstrates that offices are not viable in the long term, such proposals should not be subject to referral to the Mayor's office. Once adopted, the CPA would welcome the introduction of a six-month grace period before implementation to allow for schemes that are delayed to be determined		
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			(i.e. adopted by end June but implemented by December).		
494	R13_30_010	DP9 on behalf of British Land	OFFICES SPD British Land strongly supports theme 1 which confirms the continued demand for high-quality Grade A floorspace. This is strongly aligned with the City Property Associations (CPA's) evidence on the demand for Grade A floorspace, stating that occupiers are increasingly prioritising well-located, high quality, sustainable and flexible offices. We look forward to receiving acknowledgement of these representations and request that we be notified of further opportunities	Support noted.	No change

			to comment on the draft SPDs accordingly. If you require any further information or clarification on these representations, please contact [REDACTED] or [REDACTED] of this office. Yours faithfully, DP9 Ltd		
497	R13_31_003	N/A	I'm neutral on the content of this SPD but it is clear and well set out and this glossary and following references are useful.	Noted.	No change

502	R13_32_004	Natural England	Dear Sir or Madam Offices Supplementary Planning Document for the City of London Thank you for your consultation request on the above dated and received by Natural England on 16th March 2026. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Our remit includes protected sites and landscapes, biodiversity, geo-diversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature. Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment. Should the plan be amended in a way which significantly affects its impact on the natural environment,	A Strategic Environmental Assessment screening was completed and consulted on with Natural England.	No change
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		then, please consult Natural England again. Strategic Environmental Assessment/Habitats Regulations Assessment A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance. Please send all planning consultations electronically to the consultation hub at [REDACTED] Yours faithfully Consultations Team, Natural England		
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Appendix 2- What We Heard document, Autumn 2025

<https://www.cityoflondon.gov.uk/assets/Services-Environment/SPD-Autumn-Engagement-What-We-Heard.pdf>