

Appendix 2 – Further Matter Statement – Main Matter 2 (Spatial Strategy)

The CPA sets out below a response to a question set out in the Inspector’s Issues and Questions in respect of Main Matter 2 (Spatial Strategy).

Inspector’s Issue/Question: Is the Spatial Strategy for the City of London justified by appropriate available evidence, having regard to national guidance and local context, including the London Plan?

CPA Response:

Part (2) of the Spatial Strategy states that office growth will be encouraged in all parts of the Square Mile. This is welcomed.

No specific reference is made within the Spatial Strategy to office-based targets however the Strategic Priorities (1.2) do refer to “Delivering sustainable economic growth, including a minimum of 1.2 million sqm net additional office floorspace by 2040”.

It is assumed that the Strategic Priorities would be read alongside and inform the application of the Spatial Strategy. The CPA strongly considers that the Local Plan should target a minimum of 1.9 million sqm net additional office floorspace for the reasons set out within the CPA’s representations to the Regulation 19 consultation (July 2024) and the Further Matter Statement for Main Matter 4 (Offices) as contained in Appendix 3 of this submission. Appropriate available evidence points towards 1.9 million sqm being a more appropriate target than 1.2 million sqm.

As it relates to the Spatial Strategy, a higher growth scenario must be able to be accounted for within the development management policies in the plan that relate to design and heritage, so that there is sufficient flexibility in terms of physical capacity to meet demand. The appropriate office floorspace target requires more flexibility in the drafting of draft Policy S12 generally and particularly in relation to the City Cluster Tall Buildings Area to ensure that all potential sites are fully optimised.

Inspector’s Issue/Question: Is the plan period sufficiently defined i.e. clearly written and unambiguous?

CPA Response: No additional comments.

Inspector’s Issue/Question: Is the Spatial Strategy for the City of London effective and will it ensure the delivery of the identified economic, social, and environmental objectives within the Plan period?

CPA Response:

Should the Spatial Strategy be read alongside the Strategic Priorities, then Strategic Priority 1.2 should be amended to refer to 1.9 million sqm net additional office floorspace to ensure that the Plan will deliver identified economic objectives.