



City of London Corporation
City Plan 2040 — Examination in Public
Matters Statement

Main Matter 4: Offices

Do the strategy and policies relating to the provision of offices make adequate provision to meet the City’s needs for the whole plan period (15 years)?

Yes, the office floorspace requirement is set out in Strategic Policy S4 (1) and the strategy and policies relating to the provision of offices make adequate provision to meet these needs for the whole plan period (15 years). This approach has been informed by national policy, the London Plan and comprehensive evidence, and complements the City’s Corporate Plan.

Paragraph 8 (a) of the NPPF¹ 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 provision of infrastructure”*. Paragraph 2.5.1 of the LP demonstrates the overarching economic strategy for the CAZ, stating it is an internationally and nationally significant office location and paragraph 2.5.5 states Development Plans will play a key role in setting out detailed office policies for the CAZ.

In accordance with paragraph 86 (A) of the NPPF, CP Policy S4 sets out a *‘clear economic vision and strategy’*, by setting out total office floorspace minimum requirements (part 1 of policy S4), ensuring flexibility of provision to meet sector needs (parts 2 and 4), promoting the retrofit of offices (part 3) and protecting existing stock (part 5). Further detail is set out below.

To conserve and enhance London’s global economic competitiveness, LP Good Growth Objective part C and G encourages sufficient employment space to be planned in the right locations to support economic development and regeneration and make the fullest use of London’s existing and future public transport network.

The City of London Corporate Plan 2024-2029 (ED-COL1) states: *“The City of London is the engine in the country’s economy. Driving dynamic economic growth in financial and professional services at local, national, and international levels will create jobs, attract investment, and support businesses across communities and the country”*. This is reflected in paragraph 5.1.0 of the CP which states that the City of London is a world leading international financial and professional services centre and has a nationally important role in the economy. As identified in paragraph 5.1.0 of the CP, the intense concentration of business occupiers in a small area is a key part of the attraction for companies looking to move into the City, therefore sufficient office floorspace must be planned for over the plan period.

The office floorspace requirement will meet the needs of different occupiers across the City. The needs of the office floorspace are driven by the current and incoming office based sectors in the City. The Future of Office Use (ED-OFF1) evidence base states on page five that traditional office based jobs are the dominant sector in the Square Mile, representing 59% of all jobs in 2021. As set out in Table 5 of the study, traditional office based jobs include financial and insurance activities, real estate activities, professional activities, legal and accounting activities, activities of head offices and management consultancy activities. Page five of the study states that emerging office based firms are faster growing, with 41,600 new jobs between 2015 and 2021, an 80% increase as compared to a 25% increase over the same period for traditional office based jobs. Page five of the

¹ National Planning Policy Framework, 2023 as was the policy when the City Plan was submitted to the Secretary of State on 29 August 2024

study states that emerging office based firms (information and communication and professional, scientific and technical activities) tend to value different typologies of office space including more agile working environments with lower workplace densities and higher amenity offices, implying a shift in the market in terms of demand for best-in-class office space. This confirms that the need in the City is not just for more office floorspace, but for floorspace which meets the needs of both the more traditional financial sectors in the City but also the emerging office based firms.

Part 2.2 of the Spatial Strategy of the CP supports the clear strategies outlined in the NPPF and Corporate Plan, identifying that net additional floorspace will be primarily delivered in the City Cluster KAOC, supplemented by floorspace in the Fleet Street and Ludgate KAOC and Liverpool Street KAOC. Part 2.2 of the Spatial Strategy states that office growth will be encouraged in all parts of the Square Mile. The City Cluster is one of only two areas that is only 'sensitive' as compared to 'very sensitive' to tall building development as stated in paragraph 25.6 of the Tall Building Topic Paper (ED-HTB1). It is the primary area in the City that can accommodate a significant uplift in office floorspace. The capacity of the City Cluster is required to deliver the identified office need in the way that best protects and enhances the historic environment. Page 14 of the Office Topic Paper (ED-OFF2) states that the capacity in the clusters is required in order to meet the demand projections. Delivering the majority of the office floorspace in the clusters forms part of a positive strategy for the conservation and enhancement of the historic environment.

The office floorspace requirement is identified in Strategic Policy S4 (1) for at least an additional 1.2 million sqm (NIA) of office floorspace over the period from 2021/22 to 2039/40. The evidence for the floorspace requirement is found in the Future of Office Use report by ARUP and Knight Frank (ED-OFF1) on page 42. The Future of Office Use report (ED-OFF1) states that an additional 13 million sq ft NIA is required in the Hybrid Peak scenario. When converting sq ft to sqm the Hybrid Peak scenario gives a requirement for 1.2 million sqm NIA.

Policy S4 (4) sets out a clear strategic policy for office provision. This states that the City Corporation will facilitate significant growth in office development of the highest quality to meet projected economic and employment growth by ensuring new floorspace is designed to be flexible to allow for 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 SMEs, start-ups, creative industries and those requiring move on accommodation. Page 16 of the Future of Office Use study (ED-OFF1) states that occupiers require flexible floorplates that can accommodate the changing nature of employee working patterns, with a focus on social and collaboration spaces.

In supporting the strategy for economic growth for the City, CP Policy OF2 protects existing office floorspace, setting a criteria-based approach to any changes of use. This protects strategically important offices and development sites and requires marketing evidence where a loss is proposed. It sets out four routes through which loss of office may be justified, dependent on the relevant circumstances (discussed further below). As set out in paragraph 5.3.0 of the CP, 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.

The Key Areas of Change will also contribute to the economic growth strategy of the City through regeneration and providing a mix of uses including and complementary to the offices function of the City. Along the riverside, CP policies S17 (1)(e), S18 (3) and S19 (3) all promote office-led commercial development or refurbishment, while providing retail, culture and leisure uses and safeguarding heritage assets and biodiversity value. In the Moorgate-Liverpool Street area, CP policy S25 (4) ensures that the area takes advantage of the opportunities of the Elizabeth line by encouraging the development of flexible office space to meet the needs of future offices occupiers and potential start-ups, allowing for business growth in a variety of sectors.

The City is one of the most accessible locations by public transport in the UK and London, explored further in Matter Statements 2 and 7.

Are the policies relating to offices justified by appropriate available evidence, having regard to national guidance and local context; and are they in ‘general conformity’ with the LP?

Yes, the policies are justified by appropriate evidence, having regard to national guidance and local context and they are in general conformity with the London Plan.

Paragraph 86 of the NPPF states that planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. Paragraph 20 of the NPPF requires strategic policies to set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for employment and other commercial development (among other uses). The CP responds to this in paragraph 1.2 (Economic Objective), which outlines a clear vision for increasing new and refurbished space in the City and increasing the business city supporting uses. CP policy S4 (1) follows this direction by facilitating *“significant growth in office development of the highest quality to meet projected economic and employment growth by increasing the City’s office floorspace stock by a minimum of 1,200,000 m2 net during the period 2021 to 2040”*.

Paragraph 86 of the NPPF requires that planning policies should be flexible enough to accommodate needs not anticipated in the plan, to allow for new and flexible working practices, and to enable a rapid response to changes in economic circumstances. CP Policy S4 (2) 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 move-on accommodation”*.

Planning Practice Guidance (Paragraph: 027 Reference ID: 2a-027-20190220) sets out a need to prepare a robust evidence base to understand existing business needs, and sets out the types of evidence that can inform economic needs assessments, including sectoral and employment forecasts and projections. The policies of the CP are therefore supported by a robust and

appropriate evidence base from the Future of Office Use Study (ED-OFF1), City Plan 2040 Office Topic paper (ED-OFF2), and the Offices Explanatory Note (LD23). These documents have been informed by London-wide labour market projections and the spatial strategy in the London Plan (Chapter 2), as well as capturing local trends and evidence relating to the Square Mile.

The Future of Office Use Study (ED-OFF1) utilises the GLA job projections to determine future office floorspace requirements. The forecasts project an increase of 66,000 new jobs in the City of London from 2021-2040. As set out on page 38, the study utilises a demand-driven model, estimating the future implied demand for office space in the City of London. This evidence developed three scenarios for the future of office use in the City of London. As identified on pages 40 and 41 of the Study, the 'Return of In Person' and 'Hybrid Peak' scenarios use the Greater London Authority's long-term labour market projections, as well as more local trends such as the 'flight to quality' and shifting office density levels as inputs to the economic model to determine how much office floorspace is required. The 'New Diverse City' scenario utilised historic BRE employment figures. As outlined on page 38, the study also considered industry trends of the 'flight to quality', the development pipeline, and return to the office statistics such as TfL's tube tap ins.

The 'Hybrid Peak' scenario was selected as being closest to current office occupancy and movement trends, with a central pattern of in-person on Tuesday, Wednesday, Thursday. Page 37 of the study outlines that this scenario sets out a minimum requirement for 1.2 million sqm NIA which was based on workers attending the office at 65% of 2019 levels with the freedom to choose which days (approximately 2.5 days a week). The Offices Explanatory Note (LD23) on page 6 states that data from TfL has indicated that visits by train and tube remain below 2019 levels, but are generally between 70% to 80% of 2019 levels in 2024, which is broadly in line with the Hybrid Peak assumptions. This has been corroborated by a comprehensive global study from Centre for Cities (ED-OFF3), showing on page eight that the average full-time central London worker is spending 2.7 days in the office per week (as at June 2024).

As demonstrated in paragraph 15 of the Offices Explanatory note (LD23), the CP sets a minimum requirement for office floorspace based on the current hybrid working patterns. The minimum requirement was used instead of a target to ensure the CP can respond flexibly to respond to unanticipated needs (as per NPPF paragraph 86). This approach also recognises that it is more likely that office occupation patterns will be higher rather than lower than the 'Hybrid Peak' model has assumed; this is an issue that a number of respondents raised in Regulation 20 responses. While the requirement for 1.2 million sqm remains the most likely need over the longer term, setting this as a minimum provides flexibility in case more office floorspace is needed to respond to market changes.

The Future of Office Use (ED-OFF1) report shows floorspace requirements up to 2042. The floorspace figure of 1.2 million sqm in the City Plan covers the Plan period from 2021 to 2040. As identified in the Offices Topic Paper (ED-OFF2), the 2022 employment projections from the GLA suggest a steeper rise in City employment in the period up to 2031, when compared with the 2017-based projections, followed by a levelling off and then a slight fall after 2041. As the employment growth will be seen to be levelling off following 2031, it was felt to be appropriate that the office floorspace minimum requirement would be more beneficial to be provided by the end of the Plan period instead of 2042.

The Future of Office Use (ED-OFF1) report on page five states that a new standard of office space has emerged that exceeds the standards of those previously classified as Grade A, termed ‘best-in-class’. The best-in-class properties typically have a range of different ratings, with BREAAAM Outstanding, EPC A, Well Platinum, Cycling Score Platinum and NABER 5 stars+, reflecting high-quality and high-amenity buildings. These standards are reflected in other CP policies, such as DE1 (8) (a) and (b) (Sustainable Design) which require proposals for major development to achieve a minimum BREEAM rating of excellent and commit to achieving a minimum NABERS UK rating of 5 stars. The study states that the flight to quality will drive stronger demand for best-in-class space in the City of London. This in turn is also driving occupation at lower densities than previously seen, which in turn is a factor that has informed the calculation of office floorspace demand.

Page 4 of the study recognises that a proportion of the City’s existing office stock will require investment to meet energy regulation and market demands. The CP takes a balanced approach in response to this, putting in place policies that encourage the retrofit of office buildings (Policy S4 (3) and OF1 (1A) and protection of office floorspace (OF2), while providing an appropriate level of flexibility for office floorspace which does not meet occupiers’ requirements. The retrofit fast track approach in policy OF2 (2)(b) provides flexibility for office floorspace to change to other uses in certain circumstances. As identified in the Whole Plan Viability Assessment (EBA1) on page 4, the appraisals indicate that the viability of refurbishment will depend on the extent to which space can be reconfigured to meet contemporary requirements of occupiers. Another key factor is the extent to which existing buildings are capable of increases in height or volume as there is a positive correlation between uplift in floorspace and viability. The focus on new office floorspace and retrofit of existing offices ensures that high quality office floorspace in the City can support the needs of occupiers.

London Plan conformity and offices

The CP is in general conformity with the policies in the LP. In the Regulation 21 representation provided on behalf of the Mayor of London (R0292), the Mayor recognises the City’s status as a nationally important location for globally oriented financial business services. In the representation, the Mayor recognises the unique and important role of the City of London and its strategic contribution to the economy, culture and identify of the capital and supports its promotion and enhancement. LP Good Growth objective 5 – growing a good economy – seeks to conserve and enhance London’s global economic competitiveness by planning for sufficient employment space in the right locations. Paragraph 1.5.1 of the LP recognises that London is the engine of the UK economy and that London has specialist fields in finance, business services, technology and law, and that the Central Activities Zone (CAZ) will remain vital to London’s economic success (paragraph 1.5.2).

Paragraph 2.0.6 of the LP 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 of offices, enabled by the hyper-connectivity of its public transport infrastructure. Paragraph 2.4.7 of the London Plan recognises the City of London as a nationally important location for globally-oriented financial and business services. The LP requires the support and enhancement of the nationally and

internationally significant office functions of the CAZ, including the intensification and provision of sufficient space to meet demand (LP policy SD4 part B).

The CP responds to these overarching objectives and policies in the LP by planning positively to meet demand for office development, encouraging flexible floorspace, promoting retrofitting of offices, and protecting existing stock (Strategic Policy S4).

The CP makes provision for an appropriate proportion of the jobs growth identified within table 6.1 of the LP, which indicates that the CAZ and Northern Isle of Dogs are projected to accommodate more than 367,000 jobs and a net increase of 3.5 million sqm (GIA) of office floorspace from 2016-2041. By planning for 1.2 million sqm (NIA) (equivalent to 1.6 million sqm net gain GIA) of office floorspace between 2021 and 2040, the City of London plays a very significant role in provision of office floorspace in central London.

LP policy E1 (A) states: *“Improvements to the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development”*. The policies in the CP directly respond by supporting new office provision and refurbishment. CP policy S4 (1) states that: *“the City Corporation will facilitate significant growth in office development of the highest quality to meet projected economic and employment growth by increasing the City’s office floorspace stock by a minimum of 1,200,000 m2 net during the period 2021 to 2040”*.

LP policy E1 (B) states: *“Increases in the current stock of offices should be supported in the locations in Parts C and D below”*. LP policy part C states: *“The unique agglomerations and dynamic clusters of world city businesses and other specialist functions of the central London office market, including the CAZ, ...should be developed and promoted.”*. The CP policy S4 (1) directly supports this policy of the LP stating that: *“the City Corporation will facilitate significant growth in office development of the highest quality to meet projected economic and employment growth by increasing the City’s office floorspace stock by a minimum of 1,200,000 m2 net during the period 2021 to 2040”*. The significant amount of new office floorspace growth will be supported by the City’s excellent public transport connectivity. The vast majority of the Square Mile has a Public Transport Accessibility Level (PTAL) of 6b – the highest score – and as outlined in the Office Topic Paper (ED-OFF2) over 9,300,000 sqm (99.6%) of office floorspace in the City is within a 5 minute walk of a rail or tube station.

As identified on page eight of the Office Topic Paper (ED-OFF1) over 98% of City businesses are SMEs with fewer than 250 employees and 80% have fewer than 10 employees. To support the existing and future SMEs, office floorspace should be available in sizes and at rates suitable for growing businesses. LP policy E1 part H states: *“development proposals related to new or existing offices should take into account the need for a range of suitable workspace including lower cost and affordable workspace”*. CP policy S4 (4) directly responds, stating: *“where appropriate, encouraging the provision of affordable office workspace that allows small and growing businesses the opportunity to take up space within the City”*. Paragraph 5.1.8 of the CP states that as well as providing flexible space, it is important to ensure that there is floorspace that is affordable to start-up and growing businesses. Paragraph 5.1.8 of the CP states that developers and building owners are also encouraged to consider a range of leasing structures, including below market rents to ensure that a range of affordable workspaces are available to meet demand, in particular from new and emerging sectors of the economy and creative industries.

As demonstrated, policies on offices in the CP are justified by appropriate evidence, having regard to national guidance and local context and they are in general conformity with the London Plan.

Are the policies relating to offices positively prepared ‘in a way that is aspirational but deliverable’?

Yes, the policies in the CP relating to offices are positively prepared in a way that is aspirational but deliverable. A clear ‘golden thread’ runs from the Corporate Plan (ED-COL1) and through the plan from the Vision and Objectives to the Spatial Strategy, strategic and non-strategic policies through the Offices chapter.

The CP is aspirational, reflecting the status of the Square Mile as a primary business hub. In 1.2 Economic Objective of the CP, one of the objectives is for delivering sustainable economic growth, including a minimum of 1.2 million sqm net additional office floorspace by 2040. This reflects the Corporate Plan (ED-COL1), action 2 on page 42 which seeks to maintain London’s position as the leading global financial and professional services centre by retaining a world class business environment. This is reflected in the City Plan, which seeks significant growth in office development of the highest quality in Strategic Policy S4, an approach that underpins the City’s role as a world leading international financial and professional services centre with a nationally important role in the economy (CP paragraph 5.1.0).

As identified in the Offices Topic Paper (ED-OFF2), the 2022 employment projections from the GLA suggest a steeper rise in City employment in the period up to 2031, when compared with the 2017-based projections, followed by a levelling off and then a slight fall after 2041. As the CP is aspirational, the front loading of floorspace at the beginning of the plan period is reflective of the increased requirements from jobs growth.

The policies within the CP on increasing office floorspace are positively prepared. The locational strategy for office floorspace within the clusters ensures that the policies are able to meet the City’s objectively assessed needs. The floorspace requirements within Policy S4 (1) are deliverable as demonstrated in the office trajectory, which was introduced within the Office Explanatory Note (paragraph 22, LD23) showing that delivery is currently on track to meet the requirements in the first phases of the plan period. As set out in the Office Explanatory note (LD23) in paragraph 29, the capacity figures have identified that there is sufficient capacity to exceed the minimum requirement. Capacity modelling in the City Cluster and Fleet Valley tall buildings areas has found an overall capacity between 1,350,000 sqm and 1,428,000sqm NIA (1,690,000sqm and 1,795,000sqm GIA) in the City up to 2040.

The majority of office floorspace over the plan period will be delivered in the City Cluster. The City Cluster has the largest opportunity for an increase in office floorspace to support the strategy for economic growth. CP policy S21 (1) makes clear how the City Cluster Key Area of Change will increase the provision of attractive world class buildings that are sustainable and offer a range of office accommodation to cater for the needs of varied office occupiers.

The Fleet Valley tall buildings area has the capacity to provide for an uplift in office floorspace. The Fleet Valley cluster has a different characteristic than the City Cluster. The typology of the tall

buildings will respond to the context resulting in different types of floorplates and spaces that can complement the offering in the City Cluster. This is made clear in Policy S22 (3) which states that the Fleet Street and Ludgate area will be promoted by continuing to protect existing office use in the area, whilst encouraging office-led redevelopments including for creative, start-up and SME businesses, with a mix of complementary retail, leisure and cultural uses which enhance the area’s rich heritage and culture.

Table 1 below shows delivery against the phases as included in S4 (1). It demonstrates how the strategy and needs for net additional floorspace are deliverable in the City. It shows that since 2021/22, 99,397 sqm net gain of office floorspace has been completed with 1,190,349 sqm that could potentially be delivered by 2032 (including schemes Under Construction, Permitted Not Commenced and schemes with Resolution to Grant awaiting section 106).

Table 1: Status of office floorspace in the City

Status (from 2021/22)	GIA sqm	NIA sqm
Completed	99,397	74,547
Consent to build (permitted not commenced and resolution to grant pending s106)	604,914	453,685
Under construction	585,435	439,076

As identified in Matter Statement 19, the office trajectory will be closely monitored. This will keep a close eye on the amount and proportion of office floorspace being lost to other uses, such as hotels, as per OF2. Should delivery fall above or below these anticipated levels to a degree which affects the ability to meet the total office requirement over the plan period measures will be considered and reviewed. This may involve targeted policy amendments through review of the CP, changes or introduction of further SPD or guidance. This will also involve working closely across the organisation and consider what other measures the City Corporation has at its disposal to affect change.

As identified in the City Plan 2040 Viability Assessment (EBA1) on page five, the cumulative impact of the requirements of the City Plan does not render any schemes unviable against the sites’ benchmark land values. The Viability Assessment tested the impacts of the office retrofit policies set out in OF1 and DE1. As set out on page four, the appraisals indicate that the viability of refurbishment will depend on the extent to which space can be reconfigured to meet contemporary requirements of occupiers. Overall, having regard to the viability evidence the provisions of the office plan are deliverable over the plan period.

Are the policies clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?

The policies in the CP are clearly defined and unambiguous and it is evident how a decision maker should react to development proposals. The policies in the CP are aligned with the NPPF which requires plans to contain policies that are clearly written and unambiguous (paragraph 16). As well as the policies being clearly structured and worded, they have been drafted such that they are clearly linked with the relevant environmental, social and economic objectives of the CP.

Policies S4, OF1, OF2 and OF3 are positively worded. Each of the policies are split into the policy text, 'reason for the policy' and 'how the policy works'. These three distinct sections for each policy provide background and clarity to decision makers and stakeholders on how to interpret the policies.

For example, Policy S4 provides clear direction on how the City will facilitate significant growth in office development to meet the projected economic and employment growth. Part 1 of the policy identifies the net gain of floorspace required for each phase of the plan period between 2021 to 2040. Paragraph 5.1.0 of the 'Reason for the policy' then demonstrates why the policy has been developed as it is. It states that the City of London is a world leading international financial and professional services centre and has a nationally important role in the economy. The intense concentration of business occupiers in a small area is a key part of the attraction for companies looking to move into the City. Paragraph 5.1.10 of 'How the policy works', demonstrates how the amount of floorspace required to meet the forecast employment growth will be phased over the plan period.

Policy OF1 is clearly worded and linked to the strategy of the CP. OF1 (1) is aligned with DEI (1) which prioritises the retrofitting of existing buildings to minimise carbon emissions. OF1 (f) requests that, where appropriate, office development should provide a proportion of flexible and affordable workspace suitable for micro and SMEs. In paragraph 5.2.0 of 'Reason for the policy', it clearly states that flexible and affordable office floorspace is required that can be easily adapted to meet changing workplace and technology requirements and the needs of a variety of office occupiers. Paragraph 5.2.2 of 'How the policy works' provides further detail that conditions or legal obligations may be used to ensure the delivery of a range of affordable workspaces.

Policy OF2 provides clear thresholds for the protection of existing office floorspace. The policy is split into two main parts. OF2 (1) states that the loss of office floorspace will be resisted unless all three sub parts of section 1 are satisfied. Only once the three thresholds of section 1 are satisfied a proposal may follow one of the four routes for change of use: Viability tested route, Retrofit fast track, Residential Areas route or Ground floor uses. In paragraph 5.3.1 of the 'Reason for the Policy' section, it outlines how this policy responds to the flight to quality, providing options for office space to be an alternative use such as education, culture or hotel to create a more vibrant Square Mile. The 'How the policy works' section in paragraph 5.3.4 outlines what information marketing evidence and viability assessments need to contain.

Further clarity was provided for the OF2 Residential Areas route through PC 32 (see LD26). Further detail was added in the 'How the policy works section' stating, "Proposals involving a change of use to residential will be expected to provide viability assessments where not within or adjacent to the residential area...".

OF2 (1) (c) requires 12 months of marketing evidence to support an application for a change of use for an office building and paragraph. Paragraph 5.3.4 in 'Reason for the policy' states that the City of London Local Plan has for many years sought to protect suitably located and viable office floorspace, with marketing and viability evidence required to support proposals that result in a loss of office floorspace. Paragraph 5.3.7 of 'How the policy works' states that robust evidence of the marketing of the building or site for continued office use over a period of at least 12 months will need to be demonstrated to comply with part 1 of the policy. The City Corporation will need to be satisfied that the site/building has been offered at a realistic price commensurate with the value of the

site/building for office use and that active promotion has been undertaken by the agents marketing the site over the period. This is also in line with the approach of the London Plan (see paragraph 6.1.7).

OF3 is clearly worded. OF3 (1) includes a threshold where temporary permissions are granted, it will be for a period not exceeding 36 months and the site will revert to its prior lawful use after.

Paragraph 5.4.0 of 'Reason for the policy' explains that where buildings or sites in Class E commercial, business or service uses are vacant, and development is not expected in the short term, 'meanwhile' or temporary uses will be supported to ensure the vitality and vibrancy of the City. The threshold of a maximum of 36 months in paragraph 5.4.2 of 'How the policy works' provides clear guidance on the time expectation of a 'meanwhile' use.

Appendix 1: List of office pipeline schemes in the City of London

Reference	Site	Area	Status (Completed/PNC/ UC/s106)	Date of permission	GIA (Total)	GIA (Net Gain)
16/00776/FULMAJ	60 London Wall London EC2M 5TQ	Rest of City	Completed	27/04/2017	42,984	14,665
15/01312/FULMAJ	56-60 Moorgate, 62-64 Moorgate & 41-42 London Wall London EC2	Rest of City	Completed	14/02/2017	3,218	762
17/00230/FULL	1 Finsbury Avenue London EC2M 2PA	Rest of City	Completed	06/01/2017	27,368	-7,085
17/00447/FULEIA	6-8 Bishopsgate & 150 Leadenhall Street London EC3V 4QT	City Cluster	Completed	13/09/2018	51,084	19,275
17/01095/FULEIA	21 Moorfields London EC2Y 9AE	Rest of City	Completed	05/04/2018	61,937	61,937
18/00859/FULL	25 Cannon Street	Rest of City	Completed	15/11/2018	13,231	-1,989
18/01122/FULL	120 Cannon Street London EC4N 6AS	Rest of City	Completed	22/03/2019	1,250	-2,027
19/00058/FULMAJ	65 Fleet Street London EC4Y 1HT	Rest of City	Completed	04/08/2020	3,473	3,334
19/00440/FULL	16 Eastcheap London EC3M 1BD	Rest of City	Completed	27/08/2019	4,112	-153
20/00214/FULMAJ	Millennium Bridge House, 2 Lambeth Hill, London, EC4V 4AG	Rest of City	Completed	18/03/2021	27,725	1,781
20/00325/FULEIA	101 Moorgate London EC2M 6SL	Rest of City	Completed	28/07/2021	8,897	8,897
16/00406/FULMAJ	15 Minories, 57-60 & 62 Aldgate High Street	Rest of City	Permitted not commenced	20/12/2024	32,613	32,613
21/00885/FULMAJ	Thavies Inn House 3 - 4 Holborn Circus London EC1N 2HA	Rest of City	Permitted not commenced	02/12/2022	11,873	7,505
22/00298/FULL	23 - 26 Austin Friars, London, EC2N 2QP	Rest of City	Permitted not commenced	07/08/2024	8527	639
22/00622/FULMAJ	8 - 12 New Bridge Street London EC4V 6AL	Rest of City	Permitted not commenced	18/12/2023	7122	2190
22/00753/FULMAJ	6 Devonshire Square, London, EC2M 4YE	Rest of City	Permitted not commenced	17/07/2024	10502	2720
22/00848/FULMAJ	65 Gresham Street	Rest of City	Permitted not commenced	21/12/2023	13,145	13,145
22/01155/FULEIA	85 Gracechurch Street	City Cluster	Permitted not commenced	10/11/2023	35,137	35,137
22/01200/FULMAJ	1 Appold Street London EC2A 2UU	Rest of City	Permitted not commenced	07/10/2024	47,626	22,877

22/01245/FULMAJ	57-60 Mark Lane	Rest of City	Permitted not commenced	20/09/2023	25,007	12,666
23/00469/FULEIA	55 Old Broad Street	City Cluster	Permitted not commenced	19/12/2024	33,078	23,863
23/00867/FULMAJ	40 Holborn Viaduct London EC1N 2PB	Rest of City	Permitted not commenced	27/09/2024	25,346	3,259
23/00926/FULMAJ	The Broadgate Tower 20 Primrose Street London EC2A 2EW	Rest of City	Permitted not commenced	17/12/2024	0	1,782
23/01115/FULL	Alban Gate, 125 - 130 London Wall, London, EC2	Rest of City	Permitted not commenced	21/06/2024	734	254
23/01304/FULEIA	London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall) London EC2Y 5DN	Rest of City	Permitted not commenced	11/12/2024	56,211	39,324
23/01384/FULL	120 Old Broad Street London EC2N 1AR	Rest of City	Permitted not commenced	30/09/2024	6,408	216
24/00356/FULL	147 - 148 Leadenhall Street London EC3V 4QT	City Cluster	Permitted not commenced	01/07/2024	432	253.75
22/00981/FULEIA	55 Bishopsgate, London, EC2N 3AS	City Cluster	Permitted not commenced	06/07/2024	121946	94459
24/00126/FULMAJ	21 Lombard Street London EC3V 9AH	Rest of City	Permitted not commenced	02/09/2024	19,094	2762
23/00365/FULMAJ	30-33 Miniories and Writers House	Rest of City	Resolution to grant pending s106		25,937	13,375
23/01102/FULMAJ	Hill House 1 Little New Street EC4A 3JR	Fleet Valley	Resolution to grant pending s106		43,341	27,499
23/01423/FULEIA	1 Undershaft London EC3P 3DQ	City Cluster	Resolution to grant pending s106		153,602	104,519

24/00743/FULEIA	60 Gracechurch	City Cluster	Resolution to grant pending s106		52,129	38,995
24/00825/FULEIA	70 Gracechurch Street	City Cluster	Resolution to grant pending s106		52,012	38,878
24/00836/FULEIA	99 Bishopsgate	City Cluster	Resolution to grant pending s106		139,845	85,983
13/01004/FULEIA	Site Bounded By 19-21 & 22 Billiter Street,, 49 Leadenhall Street, 108 & 109-114 Fenchurch Street,, 6-8 & 9-13 Fenchurch Buildings, London, EC3	City Cluster	Under construction	29/05/2014	124,063	90,705
14/00178/FULEIA	Site Bounded By King William Street, Cannon Street, Abchurch Lane & Nicholas Lane Incorporating 10 King William Street, 12 Nicholas Lane, 14 Nicholas Lane, 135-141 Cannon Street, 143-149 Cannon Street & 20 Abchurch Lane, London, EC4.	Rest of City	Under construction	27/06/2014	16,159	2,145
17/00165/FULMAJ	Morley House, 26 - 30 Holborn Viaduct And City Temple 31 Holborn Viaduct, London, EC1A 2AT	Rest of City	Under construction	18/08/2020	1,646	-1,518
17/00330/FULMAJ	Bevis Marks House, 24 Bevis Marks, London, EC3A 7JB	City Cluster	Under construction	22/11/2018	35,658	24,339
17/01050/FULMAJ	Tenter House, 45 Moorfields, London, EC2Y 9AE	Rest of City	Under construction	29/09/2020	27,443	11,988
18/00152/FULEIA	100, 106 & 107 Leadenhall Street, London, EC3A 3BP	City Cluster	Under construction	27/03/2019	99,267	71,126
18/00740/FULEIA	Leadenhall Court, 1 Leadenhall Street, London, EC3V 1PP	City Cluster	Under construction	28/03/2019	50,368	35,820
18/00878/FULMAJ	Stonecutter Court , 1 Stonecutter Street, London, EC4A 4TR	Rest of City	Under construction	28/03/2019	32,236	13,342
18/01065/FULEIA	1-2 Broadgate, London, EC2M 2QS	Rest of City	Under construction	28/03/2019	44,889	4,405
18/01178/FULMAJ	Seal House, 1 Swan Lane, London, EC4R 3TN	Rest of City	Under construction	30/09/2021	32,168	15,154

19/01307/FULEIA	Site bounded by Fenchurch Street, Mark Lane, Dunster Court and Mincing Lane, London, EC3M 3JY	City Cluster	Under construction	23/09/2021	88,064	77,436
20/00179/FULL	10-15 Newgate Street, London, EC1A 7HD	Rest of City	Under construction	22/12/2020	37,477	-1,074
20/00371/FULMAJ	150 Aldersgate Street 3-4 Bartholomew Place London EC1A	Rest of City	Under construction	21/05/2021	17,133	6,147
20/00546/FULMAJ	5 Chancery Lane London WC2A 1LG	Rest of City	Under construction	16/09/2021	13,686	3,019
20/00581/FULMAJ	Northcliffe House 26-30 Tudor Street, 16-22 Bouverie Street London EC4Y 0AY	Rest of City	Under construction	08/04/2021	23,788	984
20/00759/FULMAJ	74 Moorgate London EC2M 6SE	Rest of City	Under construction	07/08/2021	3,056	3,056
20/00869/FULEIA	2-3 Finsbury Avenue London EC2M 2PF	Rest of City	Under construction	19/08/2021	77,146	77,146
20/00997/FULEIA	Land Bounded By Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars Street, London, EC4Y	Rest of City	Under construction	30/07/2021	13,490	13,490
21/00116/FULMAJ	City Tower And City Place House 40 - 55 Basinghall Street London EC2V	Rest of City	Under construction	29/09/2021	38,542	14,155
21/00279/FULMAJ	Site Bounded By King William Street, Cannon Street, Abchurch Lane & Nicholas Lane London EC4N 7TW	Rest of City	Under construction	30/06/2022	1,221	1,221
21/00282/FULMAJ	New Liverpool House 15 - 17 Eldon Street London EC2M 7LD	Rest of City	Under construction	14/02/2023	1,921	1,921
21/00454/FULMAJ	100 And 108 Fetter Lane London EC4A 1ES	Rest of City	Under construction	29/09/2021	7,282	7,282
21/00538/FULEIA	120 Fleet Street London EC4A 2BE	Fleet Valley	Under construction	20/05/2022	61,153	3,318
21/00622/FULEIA	115 -123 Houndsditch	City Cluster	Under construction	01/02/2022	56,533	44,778
21/00930/FULMAJ	1 Exchange Square London EC2A 2JN	City Cluster	Under construction	14/06/2023	9,738	9,738

22/00158/FULMAJ	Princes Court 7 Prince's Street London EC2R 8AQ	Rest of City	Under construction	18/01/2023	7,220	902
22/00202/FULMAJ	Cripplegate House 1 Golden Lane London EC1Y 0RR	Rest of City	Under construction	23/01/2023	2,516	2,516
22/00748/FULMAJ	100 New Bridge Street London EC4V 6JA	Rest of City	Under construction	29/06/2023	3,774	3,774
22/00867/FULMAJ	20 Giltspur Street London EC1A 9DD	Rest of City	Under construction	14/09/2023	2,449	2,449
23/00752/FULMAJ	81 Newgate Street, London, EC1A 7AJ	Rest of City	Under construction	23/09/2023	76,798	28,893
23/01270/FULMAJ	Winchester House, 75 London Wall, London, EC2M 5NG	Rest of City	Under construction	07/06/2024	61178	16778