

31 May 2024

Mr Shravan Joshi MBE  
Chairman  
Planning and Transportation Committee  
Corporation of the City of London  
Guildhall  
London, EC2P 2EJ

Dear Shravan,

## **CITY PLAN 2040 CONSULTATION**

On behalf of the City of London Chamber of Commerce, which is part of the London Chamber of Commerce and Industry, may I request your consideration of this submission.

The City of London Chamber is committed to understanding the key issues impacting businesses in the Square Mile and campaigning for action. The City of London Chamber champions all voices in the City and provides a forum for businesses to work towards a shared ambition to maintain the City's standing as the best place in the world in which to start and run a business.

In considering the draft City Plan 2040, the City of London Chamber of Commerce Committee decided that the following key objectives had to be met for this spatial strategy to help maintain and enhance the competitiveness of the Square Mile:

1. Office space for SMEs/incubation centres
2. Affordable housing provision should be included
3. Heritage of the City should be considered in all planning decisions
4. 5G infrastructure should be included in the City Plan
5. New builds should contribute to net zero targets such as the installation of solar panels
6. The need to green the City to mitigate against climate change patterns
7. Transport links from the south of the City of London, including around Cannon Street station, should be considered

Having reviewed the City Plan 2040, we warmly welcome the recommendations which address many of these issues.

For the City of London to become a Destination City, as is the ambition of the Corporation of the City of London, further affordable housing is required so that visitor economy workers can be within easy reach of their workplaces. The City Plan explores in detail how this affordable housing will be delivered within the restricted confines of the Square Mile.

We also support the detailed statements contained in the document to protect the heritage of the City. One of the reasons the Square Mile can become a Destination City is because of the rich mix between the contemporary landscape and the historic buildings. From its spires to its skyscrapers, the City has a diversity of architectural styles which ensures the City has one of the most outstanding skylines in the world.

The detailed plans for 5G and successive broadband connections to be embedded in the planning and infrastructure of the City is critical if London is to remain as the premier global business hub. The speed which is required for transactions and deals to be reached is vital as the City looks towards the 2030s.

One of the most impressive features of the City Plan is its commitment to net zero. The detailed plans for renewable energy generation to be integrated within the City and for various climate resilience measures to be implemented to address issues such as flooding and heatwaves is exactly what the City requires, especially when there are severe fluctuations in weather patterns.

Therefore, our primary recommendations for change relate to the offices policy and the transport policy.

There is very little reference in the City Plan to the need to ensure incubation space exists for SMEs. The majority of businesses in the City are SMEs and the Corporation has spoken of its determination to support these firms. This has led to a small business support centre being established near Guildhall. This centre provides a range of free business support services for the City's SMEs. At the same time, we are delighted that the Corporation has developed its own SME support strategy, which we look forward to help to implement.

However, despite the Corporation's good work in this area, it is not reflected in the City Plan. Business incubation centres have been shown to be critical for sustainable business growth and ensuring there is a healthy business environment with new entrants to the markets. **We recommend text is included in the City Plan to support the development of business incubation centres.** This would support the Corporation's commitment to support SMEs and help to ensure the City remains the global centre for innovative business growth.

We propose the text in the City Plan could read as follows:

*To enable the development of innovative businesses and new entrants to the markets, space needs to be provided to attain the development of business incubation centres which support SMEs. The Planning Authority would need to consider whether any new development can or should consider incubation space for small and medium sized enterprises before permission is granted.*

Another issue which we believe needs to be addressed in the City Plan concerns transport links towards south east London.

As stated earlier in this submission we support the ambition of the Corporation that the Square Mile becomes a 'Destination City', thereby bringing more tourists and leisure visitors to the area. For this to occur there is likely to be a need for a greater number of people to work in the night time economy in the City. Due to geographical proximity and the lack of affordable homes in the Square Mile, many of these workers may come from south east London.

However, transport links to south east London has been poor for decades with limited Underground services, persistent issues with the overground rail network and a reliance on bus services.

We therefore recommend the transport section of the City Plan refers to the City's economic reliance on south east London. To meet the objectives of the spatial strategy, **we propose that planning for bus and taxi lanes between the City and south east London is referred to in the document.** This will enable long term planning in partnership with Transport for London (TfL).

We are also aware of the work of Central London Forward and TfL to advocate for the Bakerloo Line to be extended to Hayes. While such a development would have a material impact in Westminster, there are likely to be knock-on considerations for transport infrastructure planning between Westminster and the City if this project proceeds.

We therefore recommend the following text could be included in the City Plan:

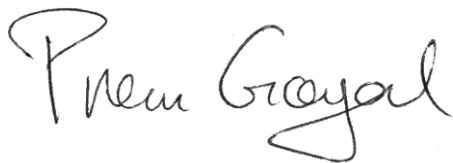
*Connections between south east London and the City is important to enable commuters and key workers to easily access the City of London. Consequently, any planning development considered by the Planning Authority has to take cognisance as to whether the bus lanes infrastructure is adequate for such traffic flow to continue with ease.*

***With potential plans for the Bakerloo Line extension to Hayes, the Planning Authority would be obliged to consider how road infrastructure between Westminster and the City of London can be future proofed if this project is developed further.***

In conclusion, the City of London Chamber of Commerce supports the City Plan. We believe that once the two outstanding issues we have identified are addressed – business incubation space for SMEs and transport infrastructure towards south east London – then the spatial strategy will help the City boost its competitiveness and remain as the global business centre.

Thank you for your consideration.

Yours sincerely,



Alderman Prem Goyal OBE  
Chair – City of London Chamber of Commerce