

Morgan, Jackson

From: Nigel Hawkey [REDACTED]
Sent: 31 May 2024 09:18
To: Planning Policy Consultations
Cc: Justin Black; Ryan Hodson; John Adams
Subject: City Plan 2040 - Representations on behalf of C C Land UK
Attachments: 1. C C Land CoL representation on City Plan 2040 Policy S6.pdf; 2. C C Land CoL representation on City Plan 2040 Policy S8.pdf; 3. C C Land CoL representation on City Plan 2040 Policy DE2.pdf; 4. C C Land CoL representation on City Plan 2040 Policy DE3.pdf; 5. C C Land CoL representation on City Plan 2040 Policy DE4.pdf; 6. C C Land CoL representation on City Plan 2040 Policy S12.pdf; 7. C C Land CoL representation on City Plan 2040 Policy OS1.pdf; 8. C C Land CoL representation on City Plan 2040 Policy S21.pdf

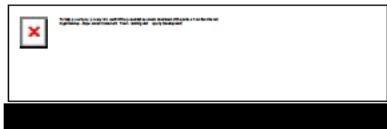
Categories: CONFIRMED

THIS IS AN EXTERNAL EMAIL

Dear Sir / Madam,
On behalf of C C Land UK and JDA Planning Consultancy (C C Land's planning agent) please see the attached representations on the City Plan 2040.
Can you please acknowledge their safe receipt in line with today's deadline.
Kind regards,

Nigel Hawkey MRICS MRTPI

[REDACTED]



Model Representation Form for Local Plans

	Local Plan Publication Stage Representation Form	Ref: Reg 19 (For official use only)
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Name of the Local Plan to which this representation relates:

City Plan 2040

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emailing to: planningpolicyconsultations@cityoflondon.gov.uk

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Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

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First Name

Last Name

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E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

Part B – Please use a separate sheet for each representation

Name or Organisation: C C Land UK

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
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5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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C C Land UK is the owner of the Leadenhall Building which is accommodates c.6,000 City workers.

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The key points in our representations are summarised below:

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We have therefore commented on the following Policies :

- S6: Culture and Visitors;
- S8: Design;
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Policy S6 should be modified by inserting the words underlined below:

5. Placing heritage at the heart of cultural placemaking, seeking opportunities to embed heritage in the cultural offer and creating spaces and experiences, particularly those at street level, that celebrate the City's rich history, culture and community

10. Maintaining and enhancing the City's open spaces and public realm, particularly those at street level, to accommodate cultural events and activities that are inclusive and accessible to all City communities, and which promote and celebrate the City's rich heritage and culture; and

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 <p>CITY OF LONDON</p>	<h3>Local Plan</h3> <p>Publication Stage Representation Form</p>	<p>Ref: Reg 19</p> <p>(For official use only)</p>
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Part B – Please use a separate sheet for each representation

Name or Organisation: C C Land UK

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text" value="X"/>
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C C Land UK's representations on the City Plan 2040 are focussed on the policies which protect existing public spaces and seek new public realm, particularly at street level.

The key points in our representations are summarised below:

1. We support the increased emphasis on protecting and improving existing street level public open space. The public realm is critical to the continued attractiveness of the City to employers, skilled workers, residents and visitors.
2. We support the recognition of the shortage of public open space in the City, in particular in the Eastern Cluster, and the need to provide new public space, particularly at street level.
3. We are concerned that the policies supporting tall buildings and the Eastern Cluster are not consistent with the policies for open space. There is a need for consistency and clarity to ensure that tall buildings do not result in the loss of public space, such as St Helen's Square, and do not impact on their amenity and attractiveness.
4. We propose amendments to the policies relating to tall buildings to strengthen the presumption against the loss of street level public open space and to ensure that public terraces and elevated public spaces within tall buildings cannot take the place of street level open space. They should always be provided in addition to existing public spaces.
5. We support the policies for open spaces and propose some amendments to ensure all the policies are equally clear and consistent about the need to resist the loss of open space, enhance the existing spaces as the first priority, and secure new open space, particularly at street level.

6. There should be a consistent theme running through the plan which gives priority to the protection and enhancement of street level public open space. This is essential to avoid situations arising where major developments result in the loss of, and harm to, public spaces and seek to mitigate the harm through the provision of terraces and elevated public spaces. A hierarchy therefore needs to be defined, prioritising street level public space, which is integral to the historic street scene and social fabric of the City, over terraces and elevated public spaces in tall buildings.

We have therefore commented on the following Policies :

- S6: Culture and Visitors;
- S8: Design;
- DE2: Design Quality;
- DE3: Public Realm;
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- S12: Tall Buildings;
- OS1: Protection and provision of open spaces;
- S21: City Cluster.

If they are not modified they would, in our view, be contrary to the National Design Guide and relevant national and local policy, and therefore neither legally compliant nor sound.

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6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We support the commitment to exemplar design and that development should “enhance the townscape and public realm”.

However, there should be a consistent theme running through the plan which gives priority to the protection and enhancement of street level public open space. This is essential to avoid situations arising where major developments result in the loss of, and harm to, public spaces and seek to mitigate the harm through the provision of terraces and elevated public spaces. A hierarchy therefore needs to be defined, prioritising street level public space, which is integral to the historic street scene and social fabric of the City, over terraces and elevated public spaces in tall buildings.

Strategic Policy S8: Design should therefore be modified by inserting the words underlined below:

9. Optimises pedestrian movement by maximising permeability at street level, providing external and where feasible internal pedestrian routes which are inclusive, welcoming, convenient, comfortable and attractive, enhancing the City’s characteristic network of accessible buildings, streets, squares, courts and alleys;

14. Delivers street level building frontages which are active at street level, public-facing, usable, permeable, interesting, well-detailed and appropriately lit, delivering suitable levels of passive surveillance;

15. Optimises the amount and connectivity of green infrastructure and, biodiversity and street level public amenity space and urban greening, and provides these in ways that are integral to the architecture and site design;

20. Delivers high quality design, which is visually interesting, well-proportioned and well-detailed and conserves and enhances the townscape character and appearance of the City, its street level public realm and historic environment, and takes into account cross boundary impacts of the neighbouring boroughs.

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Part B – Please use a separate sheet for each representation

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Policy DE2: Design Quality should be amended by inserting the words underlined below:

1. Development should be of an exemplar standard of design, aesthetics and architectural detail and should enhance the townscape and public realm. Development that would adversely affect the character, appearance or amenities of the buildings or area, including the street level public realm, will be resisted.
2. The design of new development must ensure that:

- a. The layout, form, scale, massing and appearance of schemes are appropriate in relation to their surroundings and have due regard to the scale, height, building lines, character, public realm, historic interest and significance, urban grain and materials of the locality and relate well to the character of the area;
- b. -----
- c. -----
- d. -----
- e. -----
- f. The development incorporates high quality landscape design and maximises opportunities for greening, biodiversity and street level public realm improvements;

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We have therefore commented on the following Policies :

- S6: Culture and Visitors;
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Policy DE3 should be modified by inserting the words underlined and removing those ~~omitted~~ below:

The City Corporation will work in partnership with developers, Transport for London and Business Improvement Districts (BIDs), and other key stakeholders to design and implement schemes for the protection and enhancement of streets and spaces and the creation of new street level spaces including public squares, parks, open spaces, ~~viewing galleries, rooftops~~, forecourts, streets, courts, alleyways, routes and spaces between buildings. In addition, new terraces and elevated public spaces within buildings will be encouraged where they meet the requirements of Policy DE4.

Street Level Public Realm Design

Street level public realm schemes must have regard to:

1. -----
2. -----
3. -----
4. -----
5. -----

- 6. -----
- 7. -----
- 8. -----
- 9. -----
- 10.-----
- 11.-----
- 12.-----

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Part B – Please use a separate sheet for each representation

Name or Organisation: C C Land UK

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Paragraph Policy Policies Map

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4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text" value="X"/>
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Our proposed amendments to Policies DE3 and DE4 introduce the hierarchy of open spaces, putting street level space first, and only permitting terraces and elevated public spaces if the street level public realm environment is protected and enhanced.

The requirement for all tall buildings to provide publicly accessible elevated spaces will have an impact on the design and land take of tall buildings because of the structural, vertical circulation and safety requirements of providing public access. There is a real danger of increasing the size of the floorplate of tall buildings to accommodate this requirement. This will lead to the loss of street level public space and impacts on the street level environment from projecting floorplates.

It is essential that this is guarded against by inserting the words underlined below into Policy DE4:

4. Terraces and elevated public spaces within buildings will only be permitted where they do not compromise the protection and enhancement of existing streets and spaces and the creation of new street level spaces, as required by Policy DE3.

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Part B – Please use a separate sheet for each representation

Name or Organisation: C C Land UK

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Paragraph Policy Policies Map

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Strategic Policy S12 should therefore be modified by inserting the words underlined below:

8.

d. the environmental impact on the surrounding buildings and the quality and character of existing street level public realm, including daylight and sunlight, solar glare, solar convergence, overshadowing and wind shear, and the capacity of the City's streets and spaces to accommodate the development.

10.

g. enhance permeability by providing the maximum feasible amount of publicly accessible open space at street level, and which should not compromise the character of or result in the loss of existing street level public realm ;

h. subject to the requirements of Policy DE4, incorporate publicly accessible open space within the building and its curtilage, including free to enter, publicly accessible elevated spaces at upper levels, which may include culture, retail, leisure or education facilities, open spaces including roof gardens or public viewing galleries;

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Name or Organisation: CC Land UK

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Policy OS1 is not consistent with the recognised deficiency in open space in the Eastern Cluster, as evidenced in the Open Space SPD 2015. The policy and supporting text needs amending to specifically recognise the acute shortage of open space in the Eastern Cluster.

Policy OS1 should be modified by inserting the words underlined below:

1. Existing open space will be protected and enhanced. Any loss of existing open space, including street level public realm, should be wholly exceptional and it must be replaced on redevelopment by open space of equal or improved quantity and quality at street level on or near the site. The loss of historic open spaces and public realm will be resisted.
2. Subject to Policies DE3 and DE4 (which require new developments to protect and enhance street level open space) additional publicly accessible open space and pedestrian routes will be sought in major developments, particularly in and near to areas of open space deficiency, in areas such as the riverside and the Eastern Cluster, where it is a key component of placemaking, and where pedestrian modelling shows significant pressure on City Streets.

Amendments to supporting text:

In addition, reference should also be made in the supporting text, at paras 12.2.0 and 12.2.1, to the evidence provided by the City of London Open Space Strategy, January 2015 which clearly demonstrates that the whole of the City can be described as deficient in open space and that there is a particular need for public open space in the Eastern Cluster.

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Model Representation Form for Local Plans

	Local Plan Publication Stage Representation Form	Ref: Reg 19 (For official use only)
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Name of the Local Plan to which this representation relates:

City Plan 2040

Please return to City of London Corporation BY 11:00PM 31 May 2024

emailing to: planningpolicyconsultations@cityoflondon.gov.uk

Please note that all representations will be made public on our website in line with the Town and Country Planning (Local Planning)(England) Regulations 2012. This will include the name of the person and, where relevant, the organisation making the representation. All other personal information will remain confidential and managed in line with the City Corporation's privacy notice.

For more information on how we collect and process personal information, and your rights in relation to that information, please refer to the Environment Department's privacy notice available at [Environment Department Privacy Notice \(cityoflondon.gov.uk\)](http://cityoflondon.gov.uk) and the City Corporation's privacy notice available at www.cityoflondon.gov.uk/privacy). Please also see our Statement of Representations Procedure available at: City Plan 2040 - City of London.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title

First Name

Last Name

Job Title
(where relevant)

2. Agent's Details (if applicable)

Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

Part B – Please use a separate sheet for each representation

Name or Organisation: C C Land UK

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

C C Land UK is the owner of the Leadenhall Building which accommodates c.6,000 City workers.

C C Land UK shares the City Corporation's aspirations for the future of the Square Mile and the City Cluster in particular. It supports the growth and improvement of the City, and:

- sits on the Board of the City Property Association (CPA).
- is one of the founding Members of the Eastern Cluster Bid.
- sponsors the Sculpture in the City Programme; and
- supports the One City digital platform promoting the Square Mile.

The Leadenhall Building looks onto St Helens Square, the largest public open space in the Eastern Cluster. The Square has an outstanding aspect, with the sky being framed by the late Medieval St Andrews Church (Grade I), the Gherkin, the Lloyd's Building (Grade I) as well as the Leadenhall Building.

St Helen's Square connects seamlessly to the Leadenhall building public open space. It is one of the most popular places for recreation in the City – whether it is sitting, having a coffee or lunch, a meeting place. The Square also has the potential to host outstanding events for public enjoyment.

C C Land UK's representations on the City Plan 2040 are focussed on the policies which protect existing public spaces and seek new public realm, particularly at street level. The key points in our representations are summarised below:

1. We support the increased emphasis on protecting and improving existing street level public open space. The public realm is critical to the continued attractiveness of the City to employers, skilled workers, residents and visitors.
2. We support the recognition of the shortage of public open space in the City, in particular in the Eastern Cluster, and the need to provide new public space, particularly at street level.
3. We are concerned that the policies supporting tall buildings and the Eastern Cluster are not consistent with the policies for open space. There is a need for consistency and clarity to ensure that tall buildings do not result in the loss of public space, such as St Helen's Square, and do not impact on their amenity and attractiveness.
4. We propose amendments to the policies relating to tall buildings to strengthen the presumption against the loss of street level public open space and to ensure that public terraces and elevated public spaces within tall buildings cannot take the place of street level open space. They should always be provided in addition to existing public spaces.
5. We support the policies for open spaces and propose some amendments to ensure all the policies are equally clear and consistent about the need to resist the loss of open space, enhance the existing spaces as the first priority, and secure new open space, particularly at street level.
6. There should be a consistent theme running through the plan which gives priority to the protection and enhancement of street level public open space. This is essential to avoid situations arising where major developments result in the loss of, and harm to, public spaces and seek to mitigate the harm through the provision of terraces

and elevated public spaces. A hierarchy therefore needs to be defined, prioritising street level public space, which is integral to the historic street scene and social fabric of the City, over terraces and elevated public spaces in tall buildings.

We have therefore commented on the following Policies :

- S6: Culture and Visitors;
- S8: Design;
- DE2: Design Quality;
- DE3: Public Realm;
- DE4: Terraces and Elevated Public Spaces;
- S8: Tall Buildings;
- OS1: Protection and provision of open spaces;
- S21: City Cluster.

If they are not modified they would, in our view, be contrary to the National Design Guide and relevant national and local policy, and therefore neither legally compliant nor sound.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

As currently drafted, Policy S21 does not refer to one of the clear conclusions of the City of London Open Space Strategy, January 2015 that the Eastern Cluster is highly deficient in open space, due to the high concentration of office workers in the tall buildings in a small geographic area. The relevant conclusions of the Open Space Strategy are reproduced below. They remain as valid today and should be incorporated into the supporting text to Policy S21 and Policy OS1:

The Executive Summary of the Strategy has the following key conclusions [**emphasis added**]:

1. *"The existing level of public open space is low in both absolute and relative terms;*
2. *The quality of public open space is generally high, but there are a number of challenges to maintaining these high standards;*
3. *The whole of the City can be described as **deficient in open space and there is the need for all types of open space throughout the City;***
4. *There is a **particular need for public open space in the Eastern Cluster and Aldgate Key City Places.***

In the context of a growing week-day population it is considered that the most appropriate local standard is the maintenance of the existing City-wide ratio of 0.06 hectares public open space per 1,000 weekday day-time population."

Table 2 of the Strategy shows how deficient the Eastern Cluster was in open space in 2015, before the planned growth in working population:

Area	Percentage of Open Space	Total Size (Hectares)	Publicly Accessible (Hectares)
North of the City	51	16.53	12.02
Cheapside and St. Paul's	9	2.84	2.73
Eastern Cluster	4	1.18	1.06
Aldgate	4	1.33	1.09
Thames and the Riverside	19	6.17	5.32
Rest of the City	13	4.04	3.44
Total	100	32.09	25.66

Paragraph 3.3.8 of the Open Space Strategy states [**emphasis added**]:

*"The ratio of existing publicly accessible open space to 1,000 people varies considerably across the City. **Figure 4 demonstrates that the Eastern Cluster is most deficient in open space, due to the high concentration of office workers in the tall buildings in a small geographic area.** In contrast Figure 5 illustrates that the Aldgate Key City Place is most deficient in open space in terms of the City's residential population."*

Figure 4: Open Space Provision – Office Workers demonstrates that the Eastern Cluster will be under more pressure for open space provision, as much of the increased employment will be in the Eastern Cluster:

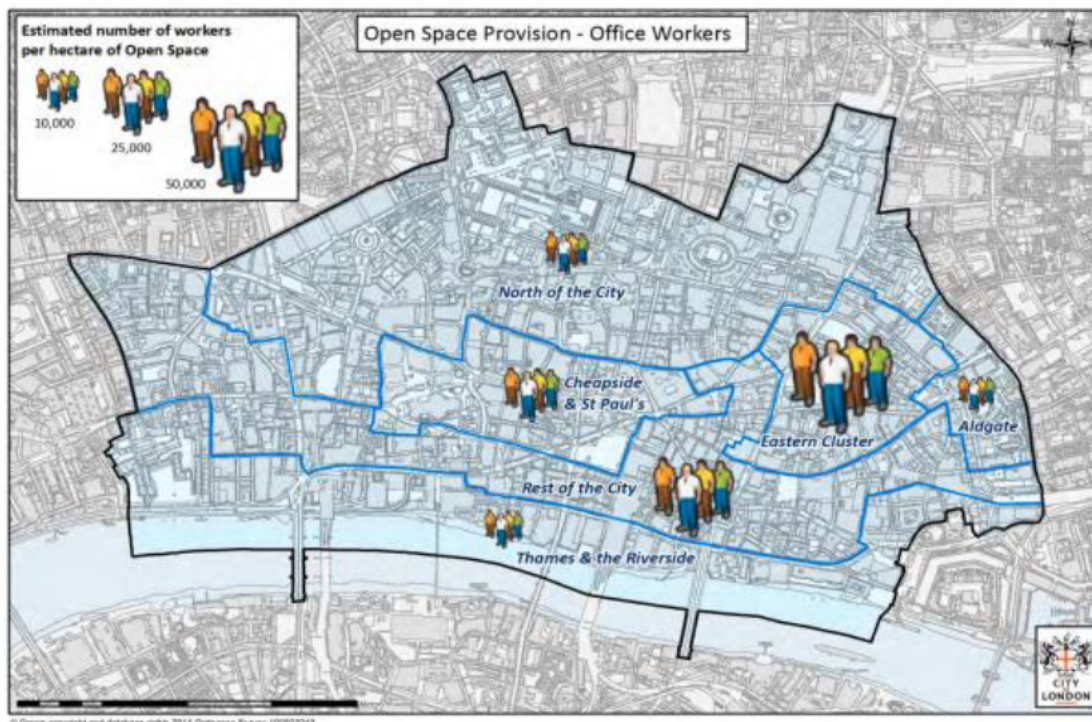


Figure 4: Open Space Provision - Office Workers

Summary

The City's Open Space Strategy has the following strategic objectives:

"1. *Maintain and increase public access to existing open spaces and enhance the quality of these spaces, in terms of both design and management.*

4.2.2 *The first priority is to maintain and make the most of existing open space in the City, which is such a scarce and valuable resource."*

The second objective of the Open Space Strategy is to increase the amount of high quality public open space, particularly in the Eastern Cluster.

The strategy (which should flow through to adopted policy) is clear – public open space should be protected, improved, and expanded at street level, in addition to the provision of roof terraces and gardens.

Policy S21 itself should therefore be modified by inserting the words underlined below:

4.Protecting existing open space by resisting the loss of space and harm to its amenity and function. Requiring the provision of new and improved open spaces at ground level, in addition to existing open space and elevated terraces and public space, and subject to the requirements of Policy DE4 ...

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To expand upon the points made in these representations.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.