

**Morgan, Jackson**

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**From:** Craig Slack [REDACTED]  
**Sent:** 31 May 2024 11:58  
**To:** Planning Policy Consultations  
**Cc:** Ian Fergusson  
**Subject:** Draft Local Plan - Dominus representations  
**Attachments:** Dominus -Representation-Form-for-City-Plan-2040.pdf  
  
**Categories:** CONFIRMED


THIS IS AN EXTERNAL EMAIL

Dear Sir or Madam,

Please find attached our representation to the City's draft new Local Plan, which is out for consultation till 17 June. Overall, we find it to be sound.

I would appreciate if you could confirm receipt of this email by way of a response.

Kind regards

 **Craig Slack** | Planning Associate  
[REDACTED]  
[REDACTED]

## Model Representation Form for Local Plans

 <p><b>CITY OF LONDON</b></p>	<h3>Local Plan</h3> <p>Publication Stage Representation Form</p>	<p><b>Ref: Reg 19</b></p> <p><b>(For official use only)</b></p>
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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](mailto: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](http://www.cityoflondon.gov.uk/privacy)). Please also see our Statement of Representations Procedure available at: [City Plan 2040 - City of London](http://City Plan 2040 - City of London).

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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.

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### Part A

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#### 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)

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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:

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

Overall, we find the draft Local Plan to be sound. Its policies will allow the City of London to maintain and enhance its position as a global economic powerhouse, while being flexible to allow for the City to deliver its flagship corporate strategy, 'Destination City', which aims to enhance its leisure, culture and visitor offer.

Our commentary in support of Policies OF2 (offices), S6 and CV4 (hotels), HS6 (student accommodation), and S22 (Fleet Street and Ludgate Key Area of Change) is as follows.

### **Offices**

Policy OF2 is sufficiently flexible in that it protects office floorspace (particularly strategically important floorspace) but allows for the loss of office floorspace in buildings where it is no longer viable for the that use in the longer term. In such instances, Policy OF2 supports a change from office, particularly to hotel and cultural uses. We support this.

### **Hotels**

The draft Local Plan notes that its evidence based predicts a need for visitor accommodation and hotels, which includes 350 rooms per year to be delivered after 2030. To assist meeting this need, Policies S6 and CV4 both generally aim to enhance culture and visitor accommodation and support the development of hotels. We agree with the approach that hotels and visitor accommodation should be welcomed in the City, particularly to ensure the 'Destination City' aspiration is realised. We would also add that the wording of Policy CV4 allows the characteristics of the site to be taken account of in terms of how the building is to be serviced. We support the flexibility that this allows.

### **Student accommodation**

Policy HS6 of the draft Local Plan supports student accommodation generally, and subject to various requirements being met. The requirements all align with other development management policies, and the London Plan, and we therefore consider the policy to be sound.

### **Fleet Street and Ludgate Key Area of Change**

Dominus is the owner of 65 Fleet Street (which includes the Tipperary pub) and is in the process of submitting an application for its redevelopment for an expanded and improved Tipperary pub, a new cultural visitor and education centre, retail uses, and student accommodation. Thus we have a particular interest in the success of the Fleet Street and Ludgate Key Area of Change.

Draft Local Plan Policy S22 seeks, as its overarching thrust, for the character and function of the Fleet Street and Ludgate Key Area of Change as a centre for judicial and related business, a royal and state processional route and a Principal Shopping Centre to be promoted. The policy also says student accommodation will be supported on appropriate sites. The supporting text goes on to say that there may be some potential for a more flexible use of some buildings, whilst retaining a predominance of commercial uses; and that the work of the Fleet Street Quarter BID will be supported (which is for Fleet Street to be a vibrant spine of the area).

We support Policy S22 and agree with the supporting text that the policy must be interpreted flexibly. No site or building is the same and some flexibility must be built into the policies in order to deliver the best outcome for Fleet Street and Ludgate, for that site or building.

(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.

n/a

(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  
participation

**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:

n/a

**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.