

City Plan 2040 - Regulation 19 Consultation

Scanlon, Dan [REDACTED]

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To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>

Cc: [REDACTED]

📎 1 attachments (3 MB)

240605 30Fen City Plan 2040 Repls.pdf;

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

Please find attached our consultation feedback on the draft City Plan 2040, particularly in relation to the property at 30 Fenchurch Street, EC3M 3BD.

Grateful if you can confirm receipt by return.

Regards
Dan

Daniel Scanlon

President | UK

[REDACTED]
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Brookfield
Properties

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Regulation 19 Publication City Plan 2040 Representations relating to 30 Fenchurch Street, London, EC3M 3BD

5th June 2024

- 1.1 These representations have been prepared by The Townscape Consultancy Ltd for 30 Fenchurch Trustee 1 Limited and 30 Fenchurch Trustee 2 Limited (as Trustees of the 30 Fenchurch Street Unit Trust) (the 'Client'), the freehold owner of the building at 30 Fenchurch Street, London, EC3M 3BD (the 'Site'). The representations have been made in response to the Regulation 19 consultation on the Draft City Plan 2040 to demonstrate how the proposed contours referred to in Strategic Policy S12 can be modified to better respond to the development potential of the Site.
- 1.2 Please refer to the cover letter prepared by DP9 Limited ('DP9') to the City of London Corporation (the 'CoL') on behalf of the Client in respect of the Site.

Evidence base

- 1.3 A Strategic Visual Impact Assessment (SVIA) was undertaken as part of the evidence base to inform the draft Strategic Policy S12 on Tall Buildings. This assessed an indicative massing for the City Cluster in the form of a three-dimensional 'jelly mould'.
- 1.4 The shaping of the indicative Proposed Cluster's form, as assessed in the evidence base, was informed by a 'Select Criteria' of hard constraints identified by CoL; these are established, adopted macro-level strategic views and heritage constraints in relation to three Strategically Important Landmarks: The Tower of London World Heritage Site, St Paul's Cathedral, and The Monument to the Great Fire.
- 1.5 The Select Criteria considered includes:
 - The Tower of London World Heritage Site (WHS), and associated policy and guidance;
 - St Paul's Cathedral, and associated policy and guidance;
 - The London View Management Framework (LVMF), and associated policy and guidance;
 - City Landmarks and Skyline Features, and associated policy and guidance and;
 - The Monument to the Great Fire, and associated policy and guidance.

- 1.6 The hard constraints, i.e. protected vistas, silhouettes, and St Paul's Heights, were combined and modelled as maximum parameters for the indicative massing of the City Cluster.
- 1.7 In addition to the hard constraints, which are based on objective three-dimensional data, qualitative constraints, based on more subjective interpretations of what the shape of the cluster should be, further shaped the indicative massing. These included more qualitative elements of the LVMF visual management guidance, which seek to allow for the potential of new development to be visible in a Designated View. This is, noting that any new development should be of appropriate height and incorporate excellent architectural design quality, while safeguarding the setting of strategic landmarks.
- 1.8 The qualitative criteria include:
- Potential impacts on the setting of local (non-strategically important) heritage assets;
 - Potential impacts on the character of the local townscape; and
 - The future baseline including consented schemes.
- 1.9 The indicative massing presented in the 'jelly mould' was achieved through a series of model-testing studies from a large set of viewpoints undertaken by CoLC, combining the hard and qualitative constraints. The influence of the qualitative constraints on the cluster's massing has been at the subjective discretion of CoL, and the draft City Plan does not offer a clear description of how these influenced the 2D contour map included in draft Strategic Policy S12 on Tall Buildings.

Using a 2D contours map

- 1.10 Draft Strategic Policy S12 relates to tall buildings. The draft policy defines tall buildings as anything over 75m AOD and identifies appropriate locations for tall buildings within the City Cluster and Fleet Valley Tall Building Areas. As with the existing and adopted Local Plan, the drawn boundary of the City Cluster includes the Site. It follows, therefore, that the Site may in principle be suitable for a tall building, provided that the proposals satisfy the requirements of Policy S12 and other policies contained within the London Plan and emerging City Plan.
- 1.11 Within the identified tall building areas, Figure 15 and Policies Maps C and D identify contour rings. These contour rings set out the maximum tall building heights at specific points within the area. The supporting text to draft policy S12 is covered in paragraphs 11.5.0 to 11.5.16 of the Draft Local Plan 2040. Paragraph 11.5.11 deals with the interpretation and application of the contour heights within the draft policy. It sets out that the contour rings represent the maximum tall building heights that the CoL considers to be appropriate, based on an assessment of the potential impacts on strategic views and the setting of St Paul's Cathedral, The Monument, and the Tower of London World Heritage Site.

- 1.12 The Client recognises and welcomes in principle the approach the CoL has undertaken in identifying appropriate locations for tall buildings using three-dimensional computer models to inform and depict suitable building heights identified in the form of contour rings within ‘Policies Map C’ (referred to as ‘Figure 15: tall building contours’) within the Draft City Plan 2040.
- 1.13 Draft Policy S12 sets out at part 3 that the contour rings represent the “*maximum permissible*” tall building heights that the CoL considers to be appropriate, as evidenced by the Strategic Visual Impact Assessment (SVIA) which forms part of the evidence base to the emerging Local Plan. The Strategic Visual Impact Assessment (SVIA, April 2024) illustrates that the proposed contours are more conservative than the three-dimensional ‘jelly mould’ used in the evidence base, and there are instances where some existing and consented schemes protrude beyond the proposed contours. For example, the existing building at 20 Fenchurch Street rises up to c. 177m AOD, c. 17m over the contour ring of 160m AOD indicated on its site. While it is understood that the policy is that shown in the contours, and the ‘jelly mould’ used in the evidence base is illustrative, the fact that the evidence used to prepare the contours allows for a greater volume than when using the contours alone, creates confusion and infers an overly conservative approach which could be avoided. As a solution, we would suggest that the contours map be revised, increasing its heights where necessary, to allow for the heights of the existing and consented schemes to be fully integrated, as in the evidence base.
- 1.14 Given the inconsistency between the proposed contours and the ‘jelly mould’ used in the evidence base, we recommend the wording of draft Policy S12 is amended as follows:

The ~~maximum permissible~~ tall building heights within the identified tall building areas are depicted as contour rings on Policies Maps C and D and Figure 15. Tall buildings should normally not exceed the height of the relevant contour rings applicable to a development site. Where multiple contour rings cross over a development site, ~~in areas between the contour rings~~, tall buildings should be designed to successfully mediate between the contour ring heights. Equally, where the next taller contour ring is beyond the site boundary, tall buildings may be designed to successfully mediate towards the next height ~~and should not exceed the next higher contour~~. Tall buildings should not necessarily be designed to maximise height; instead, they should be thoughtfully designed to create built form that contributes positively to the skyline and townscape character, creating a coherent cluster form and a varied and animated skyline, and should have architectural integrity.

Site-specific Evidence Response

- 1.15 As published, the contours map indicates that the Site is in principle suitable for a tall building of up to 140m AOD to the north of the Site, and 90m AOD to the south-east of the Site, with an intermediate, partial section of it at 120m AOD.
- 1.16 Given its location in the cluster relative to the three Strategically Important Landmarks, of most relevance to any development on the Site is its relationship with the setting of the Tower of London World Heritage Site. Having carried out a high-level analysis of the potential effects of extra height on the Site on the setting of St Paul's Cathedral and the Monument to the Great Fire, our conclusions are that there would be no detrimental effects on these landmarks. This includes consideration of views along the processional route of St Paul's from Fleet Street and Ludgate Hill, where an indicative scheme of up to 180m AOD would not be visible in conjunction with the Cathedral.
- 1.17 In relation to effects on the setting of the Tower of London, the most relevant townscape views are those from the Tower of London Inner Ward, LVMF view 10.A.1 from Tower Bridge, LVMF view 25A.3 from the Queen's Walk, and LVMF view 15B.1 from Waterloo Bridge. **Figure 1.1** shows a map with the viewpoints considered for this exercise in relation to the Site, and the relevant views are presented in Appendix 1, with illustrative massing and views prepared by Make Architects. For the purposes of these representations, the relevant views are presented as Vu.City model shots, showing an indicative massing model rising up to a height of 180m AOD to the west of the Site, and 160m AOD to the east of the Site. With this approach, though taller, the direction of stepping in height from east to west, away from the Tower of London, would be preserved as in the draft Local Plan.



Figure 1.1 Map of viewpoints considered (Inset of ToL and Waterloo Bridge number included for reference).

Tower of London Inner Ward

- 1.18 The SVIA assesses a number of views from the Tower of London Inner Ward looking towards the proposed City Cluster (views 31-36 of the SVIA). In these views, a scheme on the Site stepping from 160m AOD to the east up to 180m AOD to the west would be visible in the context of other consented tall buildings within the proposed City Cluster. A new scheme on the Site would therefore be appreciated as part of the consolidation of the cluster, and clearly separate from the foreground buildings, including the Grade I listed Chapel Royal of St Peter ad Vincula. Even SVIA View 31, which is closest to St Peter ad Vincula, and from where the least amount of consented schemes are visible (save for the top of the consented 1 Undershaft being visible over the chapel's nave), would be largely preserved, with massing visible only by the western end of the chapel. The element visible would only be a corner of the scheme rising to 180m AOD, but the element of 160m AOD would not be visible.

LVMF Views

- 1.19 LVMF views 10A.1 and 25A.3 (SVIA views 1 and 11 respectively) from Tower Bridge to the south-east of the Site and the Queen's Walk demonstrate that any development on the Site would sit alongside the existing building at 20 Fenchurch Street and the consented scheme at 50 Fenchurch Street, which adds to the emerging context. The scheme would be located on the southern side of the proposed City Cluster and would not dominate the White Tower, owing to its distance from it. As the SVIA states, *'To the west, the Proposed Cluster form would be tightly wrapped around the silhouette of 55 Gracechurch Street, leaving a considerable sky gap between the Cluster, the Monument and St Paul's Cathedral'*, which the increased heights would maintain (SVIA, pg. 22).
- 1.20 LVMF view 15B.1 from Waterloo Bridge to the south-west of the Site demonstrates that a building rising to an indicative height 180m and 160m AOD on the Site at 30 Fenchurch Street will be mostly occluded by the existing building at 20 Fenchurch Street and would further consolidate the City Cluster.

Enhancing the southern edge of the City Cluster

- 1.21 The contour heights over the Site, as drafted, would create a 'valley' between the existing building at 20 Fenchurch Street and the emerging building at 50 Fenchurch Street. Considering the width of the site on a west-east axis, along Fenchurch Street, the Site offers the opportunity for more than one tall building, or one large building that is broken down into more than one part. Equally, the generous dimensions of the Site on a north-south axis would offer the opportunity to create an arrangement whereby the massing steps gradually up the building(s), from south to north, responding to the immediate townscape context and clearly 'softening' the southern edge of the City Cluster. With this, the Site has the potential to help consolidate the southern edge of the cluster, while maintaining the 'jelly mould's' intention of stepping up gradually from the south-east to the north-west, as part of the

emerging cluster's foothills. The result would be a more dynamic and better-balanced skyline of the foreground elements of the City Cluster, as seen from the south (e.g. from across the Thames), where the Site is properly integrated with its immediate neighbours to the west and east.

- 1.22 Apart from its potential contribution to the emerging skyline, the Site also has the potential to offer a much-improved street-level experience, with enhanced public realm and the potential addition of a north-south route through it, connecting Lime Street and Cullum Street from the north, to Plantation Lane to the south, which in turn has the potential to become an important west-east route through the area.
- 1.23 We therefore believe that the Site can accommodate more than the 90m to 140m AOD denoted by the current contour map and ask that the contour map be amended accordingly to heights rising to 160m and 180m AOD over the Site, to optimise the potential of the Site. An amended contours map reflecting this is included in **Appendix 1** by Make Architects.

Summary

- 1.24 In summary, our Client supports in principle the approach taken to identifying permissible heights within the City Cluster through the use of a contours map. However, we would argue that the contours map as drafted is overall too conservative and leads to confusion, when considering it in the context of the evidence base provided with the draft Local Plan. We would argue that a modified map, which increases height in certain areas to allow for the full integration of existing and consented schemes, would better reflect the real capacity of height and development potential within the City Cluster and remove confusion in its interpretation.
- 1.25 Regarding the text accompanying the policy, we have recommended amendments that we consider would make it easier to understand and interpret, reducing room for confusion and ensuring the optimisation of the volume of the City Cluster.
- 1.26 In relation to the Site at 30 Fenchurch Street, we have tested the relevant views in regards to the three strategic landmarks and, as a result, we would argue that the Site can allow for more height, without causing any significant detrimental effects to the setting of the landmarks. In turn, this change would unlock the potential for the Site to enhance the southern edge of the cluster, better-balancing the form of the dynamic skyline, while maintaining the intention of stepping up gradually in height from the south-east to the north-east. As a result, we would argue that the heights presented across the Site within the contours map are insufficient and should be raised to up to 180m-160m AOD across the Site from west to east.

City of London 'City Tall Buildings Area'

Reps material

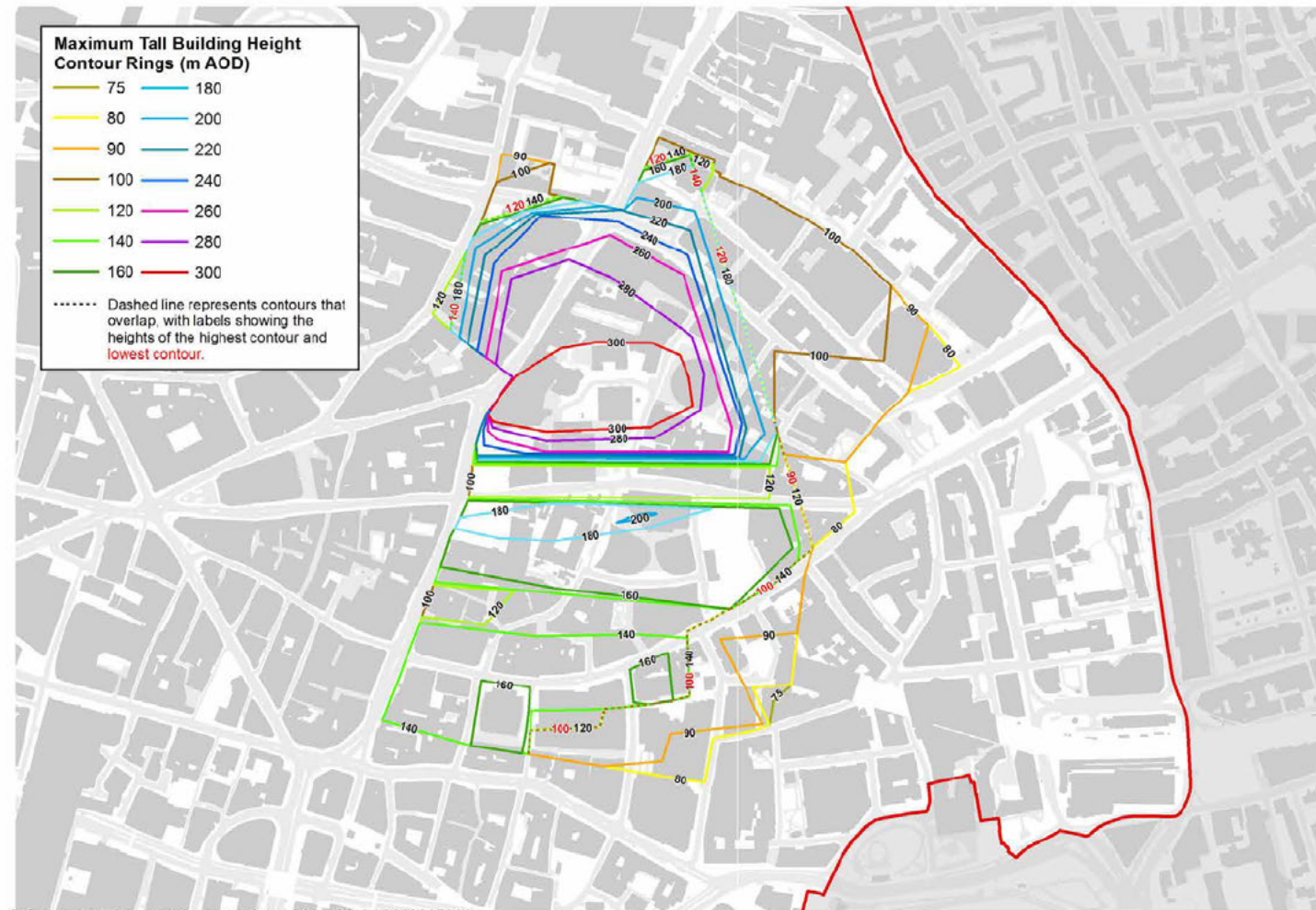
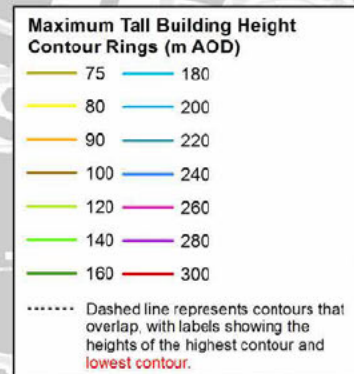
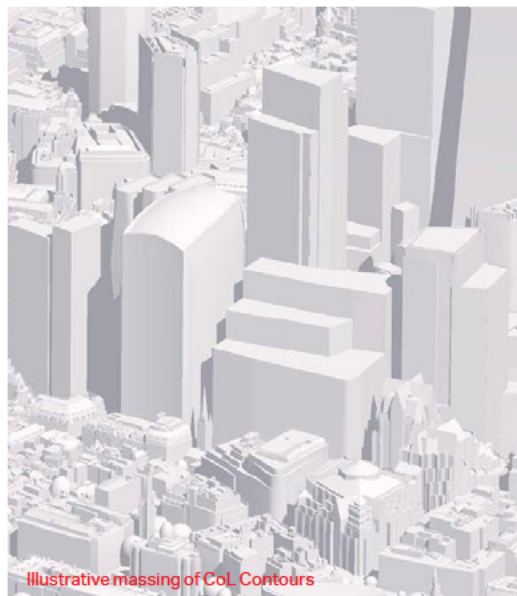
On behalf of 30 Fenchurch Trustee 1
Limited and 30 Fenchurch Trustee 2
Limited
(as Trustees of the 30 Fenchurch
Street Unit Trust)

make

Rev 02
June 2024

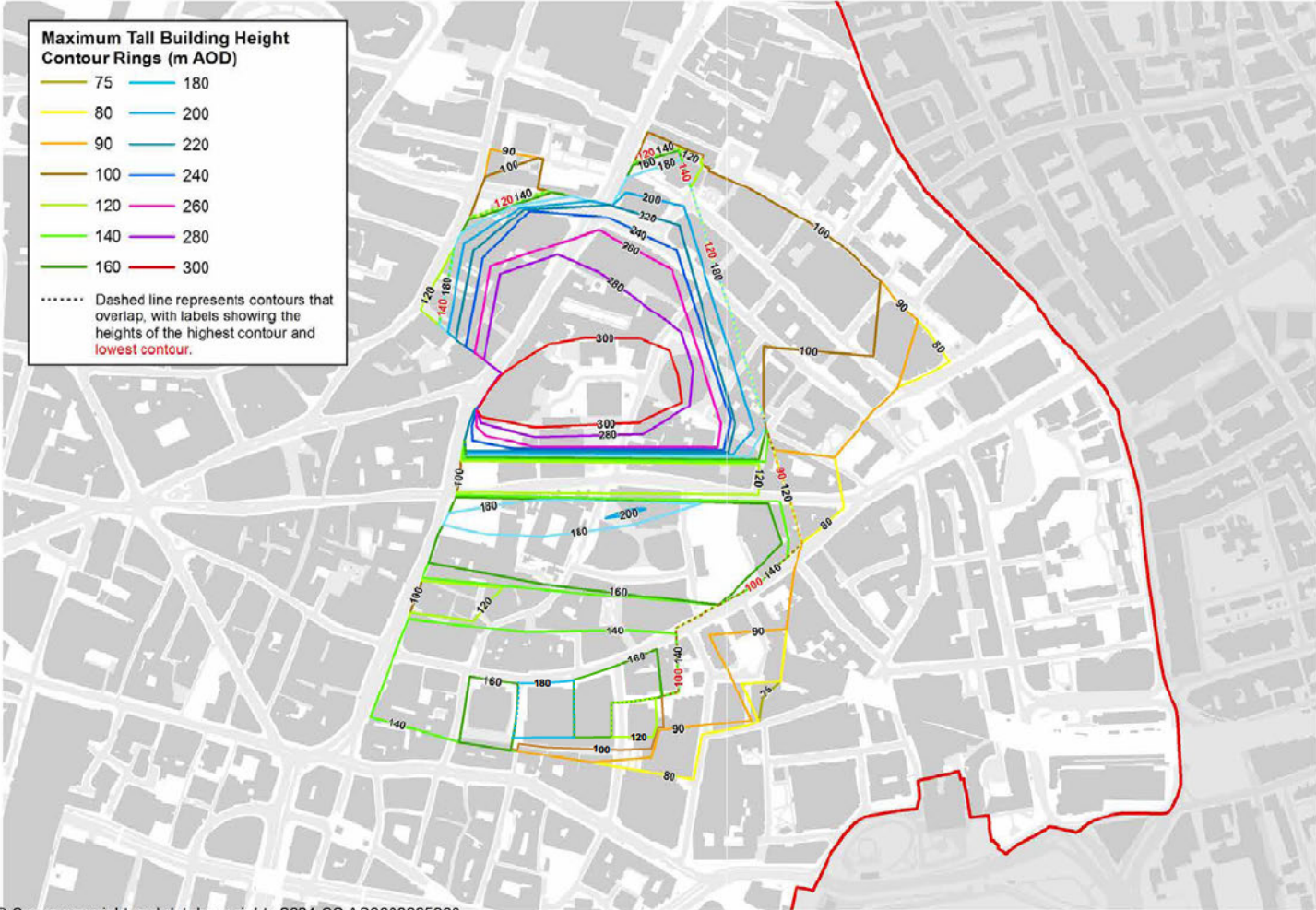
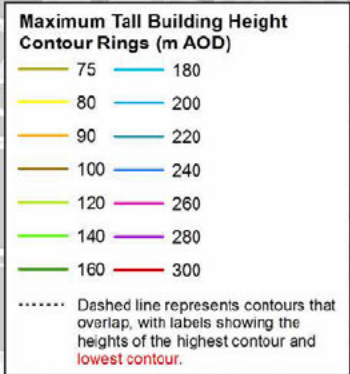


CoL Contours Current



CoL Contours

Proposed contour map



Illustrative massing on the site

180m AOD/160mAOD



Aerial view of illustrative massing within future baseline

Key views

View 1 (SVIA View 31)

Inner Ward



Future Baseline



Illustrative massing within future baseline

Key views
View 2 (SVIA View 32)
Inner Ward

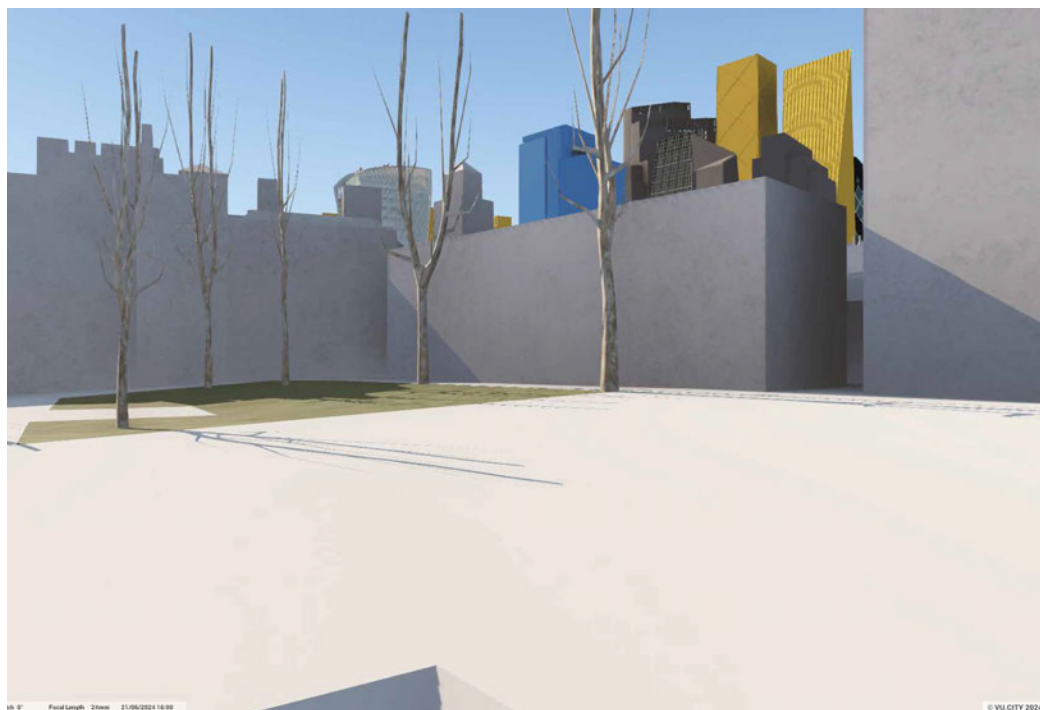


Future Baseline

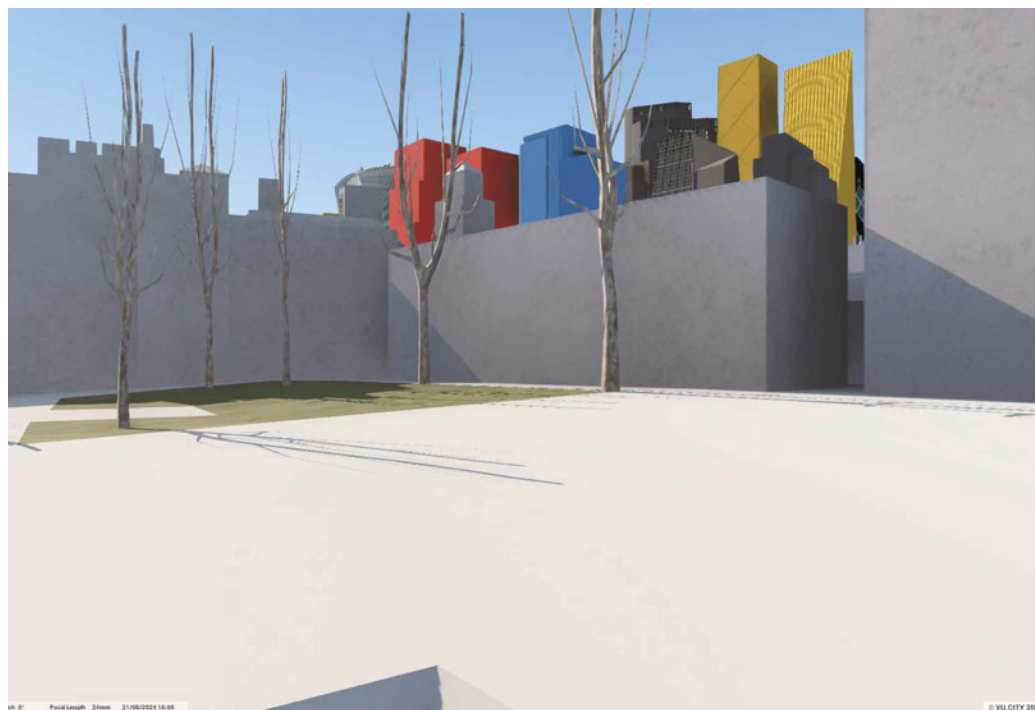


Illustrative massing within future baseline

Key views
View 3 (SVIA View 33)
Inner Ward



Future Baseline



Illustrative massing within future baseline

Key views
View 4 (SVIA View 34)
Inner Ward



Future Baseline



Illustrative massing within future baseline

Key views
View 5 (SVIA View 35)
Inner Ward



Future Baseline



Illustrative massing within future baseline

Key views
View 6 (SVIA View 36)
Inner Ward



Future Baseline




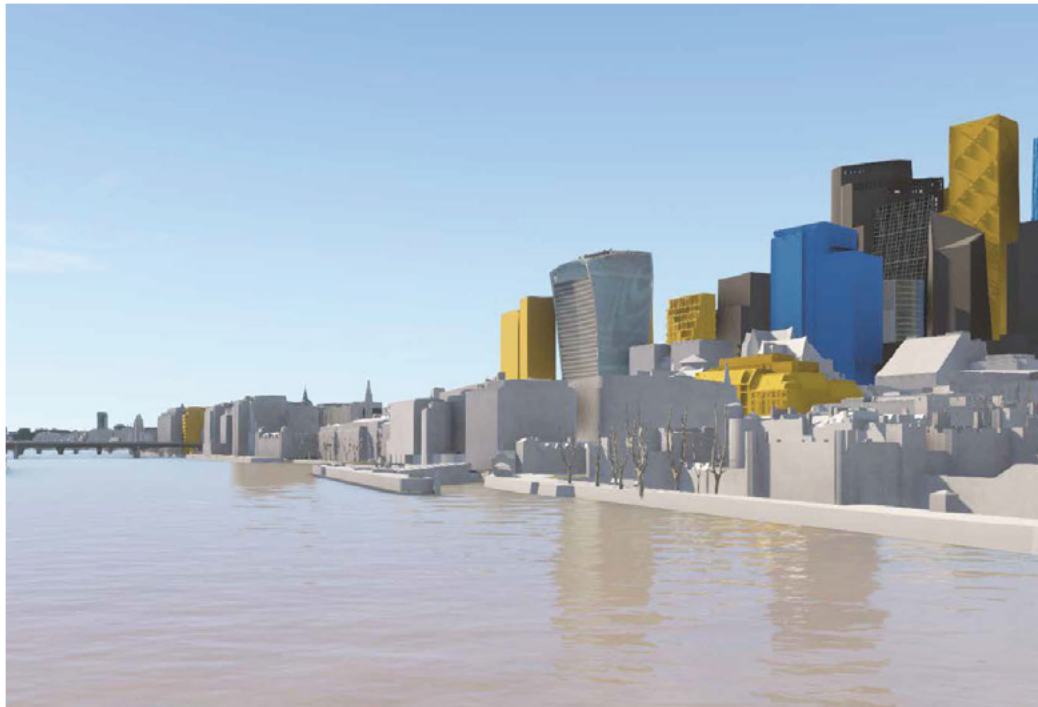
Illustrative massing within future baseline

Key views

View 7 (LVMF View 10A.1/SVIA View 1) Tower Bridge



View zone 



Future Baseline

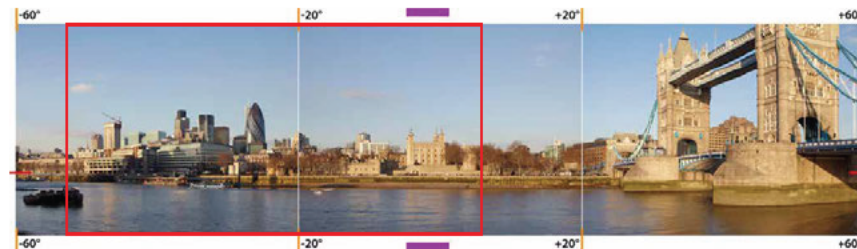



Illustrative massing within future baseline

Key views

View 8 (LVMF View 25A.3/SVIA View 11)

City Hall



View zone 



Future Baseline




Illustrative massing within future baseline

Key views

View 9 (LVMF View 15B.1/SVIA View 6)

Waterloo Bridge



View zone 



Future Baseline



Illustrative massing within future baseline