

Draft City Plan - Representations OBO Merchant Land - 33 Creechurch Lane

Beth Hawkins [Redacted]

Mon 6/10/2024 10:34 AM

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

Cc: Jeremy Randall [Redacted]

1 attachments (212 KB)

240610 33 Creechurch Lane Reps to City Plan.pdf;

THIS IS AN EXTERNAL EMAIL

Dear Planning Policy,

Please find attached representations to the Draft City Plan on behalf of Merchant Land regarding 33 Creechurch Lane. Please can you confirm receipt of the representations?

Many thanks

Beth Hawkins

Associate



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Development Plans Team
Environment Department
City of London Corporation
Guildhall
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Via email: planningpolicyconsultations@cityoflondon.gov.uk

10 June 2024

Our ref: JRA/BHA

Dear Sir

**Regulation 19 Publication City Plan 2040
Representations on behalf of Merchant Land**

We write to submit representations on the draft City Plan on behalf of Merchant Land, the freehold owner of land at 33 Creechurch Lane.

The existing site comprises a 5-storey office building and occupies the entirety of the site. It is underutilised and the building has undergone piecemeal upgrades to prolong its short-term life. There is limited occupation of the floorspace, despite it being marketed. Planning permission was sought for the demolition of the existing building and redevelopment of the site to provide an office building and a retail unit comprising basement, ground floor, mezzanine and 19 upper floors, together with cycle parking and associated works in January 2019. The planning application was withdrawn in June 2022. The freeholder is currently considering options for the site to ensure it does not become a stranded asset.

Merchant Land broadly support and endorse City Corporation's positive vision for the Square Mile and the draft Plan's position to optimise sites within the City Cluster. For the City to maintain its status as a world-leading centre for financial and professional services, it is vital to ensure that sufficient office floorspace is available to meet projected economic and employment growth over the Plan period. In addition, it is essential that supporting and complimentary land uses are delivered alongside office floorspace over the Plan period to support the City's growth.

On the specific policies of the draft Plan, we make the following observations.

Offices

Merchant Land support the use of the term 'minimum' for the net additional office requirement as included within the Strategic Offices Policy (Draft Policy S4 Offices) and endorse the City Property Association's ('CPA') position that the draft Local Plan should be consistent with the realisation of the higher requirement of 1.9 million sq. m net additional office floorspace over the Plan period. It is essential that the City can accommodate the additional growth to ensure it can continue to maintain its position as a word-leading international financial and professional service

centre. Merchant Land believe the appropriate office floorspace target will require greater flexibility in the City Cluster Tall Buildings Area to ensure that all potential sites are fully optimised.

It is acknowledged that Draft Policy OF2 'Protection of Existing Office Floorspace' now includes a 'retrofit fast track' route. Merchant Land support the inclusion of the new route within the second part of the draft policy, which enables applicants whose assets are no longer suitable or viable to contribute to the strategic office function to be utilised for other uses. Merchant Land have an overall concern that certain constrained sites in the City could become stranded assets if there is not flexibility to enable the change of use to other complimentary uses. Merchant Land welcomes the new route (part B – retrofit fast track route) as this enables existing buildings to be used for alternative uses, such as hotel use, cultural use, or educational use and removes the requirement for viability justification. Merchant Land would question why residential is not included within this route, as there are opportunities within the City for the change of use of existing buildings, through this retrofit route to residential. This is particularly important given the housing targets set by the GLA (with no such targets for other alternative uses). It is acknowledged that the same caveat around location of proposed residential is likely to be applicable to this part of the policy.

Merchant Land acknowledge part C of the policy which is the 'residential areas route' and enables the loss of office floorspace on a site within or immediately adjacent to identified residential areas to provide additional housing. This is supported and it is considered that this is an important provision, as it enables the provision of accommodation for City workers.

Overall, Merchant Land endorse the inclusion of this new route, question whether residential could be included under part B and consider that this would support the overall function of the City to provide accommodation for workers in the City.

Retrofit First Approach

Merchant Land support the inclusion of a 'retrofit first' approach included in Draft Policy DE1 'Sustainable Design' and endorse the overall ambition to promote sustainable design. The draft policy is clear that this is not a retrofit only approach, which aligns with the CPA's Retrofit First, Not Retrofit Only research paper (Merchant Land endorse this research paper). Merchant Land acknowledge the aspiration to deliver exemplary designed developments and to respond to the City's unique heritage assets. In addition, Merchant Land endorse the delivery against sustainability initiatives, urban greening and greater biodiversity across the City, however, flexibility needs to be applied by decision makers to constrained sites where there are competing priorities to deliver against. This needs to be acknowledged in draft Policy DE1 'Sustainable Design'.

Housing

As set out above, Merchant Land acknowledge that the provision of additional housing supports the City, by providing accommodation for its workers at an early stage of their careers. Merchant Land support the City's policy approach to the delivery of different types of housing (co-living, short term residential letting, purpose-built student accommodation), to ensure that it meets its need and provides accommodation for the City's workers.

Strategic Policy S3: Housing under part B states that '*residential development with the potential for 10 or more units to provide a minimum of 35% affordable housing on site. It further states that exceptionally, new affordable housing may be provided off-site or through an equivalent cash in lieu payment, if evidence is provided to the City Corporation's satisfaction that on-site provision cannot be satisfactorily delivered and is not viable*'. Whilst the provision of affordable housing is a clear requirement, Merchant Land consider the policy is applied flexibly to ensure that constrained sites are not warranted unviable as a result of either the delivery of affordable housing on site or

financially through a cash in lieu payment. It is acknowledged that this position is viability tested alongside other required financial obligations and contributions, to ensure a development is viable and deliverable.

Culture and Visitor Facilities

Merchant Land acknowledge the Destination City Initiative and the policy requirement for major developments to deliver cultural and visitor attractions, as set out in draft ‘Policy CV3: Provision of Visitor Facilities’. However, it is unreasonable to require these from certain types of developments including change of use, retrofit and refurbishment, and refurbishment and extension. These sites are likely to be constrained and the delivery of an onsite facility could be compromised in terms of location and size. Therefore, any requirement to provide a cultural and visitor offer needs to be considered on site specific considerations and be proportional to the proposal. Officers need to take a flexible approach to this requirement and this needs to be finely balanced with other Section 106 obligations and contributions, to ensure that development schemes remain deliverable and viable.

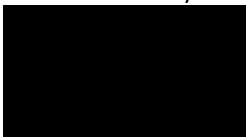
Merchant Land therefore endorse the CPA’s representations on the Culture and Visitors Policy.

Summary

In summary, Merchant Land have a long-term interest in the site and want to ensure that it does not become a stranded asset. Merchant Land endorse the points above and as detailed in the CPA representation and support the adoption of an ambitious Plan.

We believe key sites within the City Cluster, such as 33 Creechurch Lane, will play a vital role in realising the strategic objectives of the Plan. The Plan’s policies on sustainable design and tall buildings must provide clear support for the optimisation of such sites to ensure the City’s full potential for positive and transformative change is realised.

Yours faithfully



Jeremy Randall
Partner

