

From: D Rose [REDACTED]
Sent: 16 June 2024 12:37
To: Planning Policy Consultations; Environment - Local Plan
Subject: Response to City Plan 2040
Categories: CONFIRMED

Some people who received this message don't often get email from [REDACTED] [Learn why this is important](#)

THIS IS AN EXTERNAL EMAIL

To: Planning Policy Team Environment Department

City of London Corporation

The Guildhall London EC2V 7HH

By email: planningpolicyconsultations@cityoflondon.gov.uk

16 June 2024

Dear Planning Policy Team

Re: City of London – Local Plan Regulation 19 Consultation

I would like to make the following submission in response to your consultation.

I am writing as a resident of the City in the ward of Portsoken, as a member of the Middlesex Street Residents Association and the Petticoat Square Leaseholders Association; and also as a member of the City Parent Carer Forum, a group for families with children with additional needs or disabilities.

Summary:

- I believe the City Plan 2040 is unacceptable as a Local Plan in its present form and requires substantial changes or conditions in order to protect and promote the City as a thriving, diverse, place with a mix of different kinds of development.
- Specifically, the Plan requires greater detail and safeguards to promote and protect residents and residential growth, which for a period of more than 40 years has been shunned in favour of other forms of development, even in the designated “residential wards” of the City.
- The City has a unique role and identity within London and the UK as a whole but the Corporation is pursuing a blinkered approach to promote commercial interests and transient worker, student and visitor populations almost exclusively over residential growth. This Plan does nothing to change that course, although doing so would bring substantial benefits to the built environment, community wellbeing and enhance the City's appeal as a place to live or spend time in.

Background:

The City Plan 2040 talks about encouraging and enabling a future "mix" of residential, commercial and hospitality development, in my ward and others.

But the Housing Topic Paper in the annex (<https://www.cityoflondon.gov.uk/assets/Services-Environment/Housing-Topic-Paper-City-Plan-2040.pdf>) directly contradicts this.

It outlines the current stock of housing in the City, and explains that new development will only be on "windfall" sites. e.g. previously-developed sites that have unexpectedly become available.

It also states that there has been no availability of new build residential units in the City from December 2021 onwards(!) and this shows no sign of changing, as the identified sites for possible residential development are very few, suggesting this is not being seriously considered as a priority.

Instead, office and other development is preferred, or student accommodation is being considered as the main type of "residential" supply. Meanwhile, all housing projects being developed by the Corporation are outside the Square Mile, in other boroughs.

I do not expect the City to shift its main focus from business towards residents numbering at least 8,600 individuals.

Yet, the housing paper acknowledges that the resident population of the Square Mile itself is set to grow, even at current baseline projections, and yet there is no medium or long-term planning of housing to accommodate them within the City. I do not believe this is compatible with sustainable development.

Please contrast this with the spirit of the 1960s when the Corporation was prepared to invest in and build housing estates, including some which are now much admired as valuable contributions to the City's architecture and character.

It is disappointing that no significant investment in similar housing schemes has been pursued for at least the last 40 years since, to my knowledge.

Despite any lip service to residents in the draft City Plan, the Corporation's political leader Chris Hayward, the chair of policy and resources committee, has stated in a recent interview with the New York Times (November 2023) that:

"We've never considered ourselves as a residential city... Pepper-potting residential development around the City actually constrains that business growth, that commercial growth, that we want."
(<https://www.nytimes.com/2023/12/13/business/central-london-office-space.html>)

Mr Hayward and his colleagues in the Corporation's leadership are clearly gambling on "a return to the office" even though flexible working patterns and downsized offices are becoming the norm.

The City Plan's approach to promote office-based, large corporate working patterns at the expense of other forms of work is against all the evidence, trends and predictions that point to different working patterns, smaller office floor space and reduced headcounts, especially with the advent and development of AI and new technologies.

Constraining the supply of housing within the Square is very blinkered and will only boost inequalities, making it increasingly expensive and narrowing the demographic of those who do live here. What housing is planned is likely to take the form of small luxury flats rather than affordable or

family homes. This is in effect discriminatory and also contradicts efforts to make the City a more “diverse” and “inclusive” place to live or work.

Based on experience of living in the City for at least 15 years, and the background history of development in my ward and others, I am dismayed by the Plan’s targets for office floorspace growth and new tall buildings in the form and locations identified.

I am not convinced they will provide substantial value to existing and future communities living and working here.

The Plan needs to specify and promote more residential development, perhaps focussing on the existing and legally-defined residential wards of Portsoken, Queenhithe, Aldersgate and Cripplegate. Here residents are disproportionately suffer from the encroach of tall buildings or proliferation of offices, hotels and student accommodation at the expense of everything else.

We recognise of course that commercial development should be a major part in driving the economy of the City and the UK as a whole. However it should also bring with it some added social or community value, and the City Plan does not specify where real and valuable community enhancements (i.e. schools, children’s centres, leisure centres, playgrounds, health and social services) could or would be provided.

Granted, the City is the UK’s leading business district and plays a special role in the economy, but it also needs diversity and a long-term vision for a mixed community - or else it will become even more of a corporate ghetto, potentially of half-empty office blocks that are entirely dependent on the vagaries of political and economic cycles, and “boom and bust”.

We instead should recognise and make a virtue of the City's unique demographics, institutions and resources and promote a true “mix” in the Plan. Provide services within the Square Mile to draw people in from neighbouring boroughs rather than pushing residents out or building schools and estates elsewhere.

Providing such a mix is not incompatible with the broader economic objectives but will actually enhance and make economic growth successful. Providing a greater mix of housing, services and amenities, would arguably reduce commuting, encourage workers back to the office blocks being envisaged, as well as promote and active and attractive lifestyle for the "Destination City".

However instead under the plan residents and their interests continue to be under-valued, neglected and overlooked.

We are pushed out of the City to access many public services or schools, and I do not see this changing under the terms of the draft plan, which would see the Square Mile becoming even more of a “corporate ghetto” than it already is.

I hope you will forward these comments to the Planning Inspector and if possible contact me about future opportunities to continue the conversation. I would be pleased to be contacted or provide more information if required.

Yours Faithfully,

David Rose

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]