

**From:** Jake Tubb [REDACTED]  
**Sent:** 17 June 2024 23:57  
**To:** Planning Policy Consultations  
**Subject:** Proposed Submission Draft City Plan 2040 - Whitbread PLC  
**Attachments:** DP9 - City Plan Representations - Whitbread PLC (final).pdf  
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THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam

On behalf of Whitbread PLC, please see attached representations to the Draft City Plan 2040.

I would appreciate confirmation of receipt of this submission.

Kind Regards  
Jake

Jake Tubb

[REDACTED]

[REDACTED]

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DM/JT/DP6749  
17 June 2024

**Development Plans Team,  
Environment Department,  
City of London Corporation,  
Guildhall,  
London,  
E2P 2EJ.**

**By Email.**

Dear Sir/Madam,

**DRAFT CITY PLAN 2040 (REGULATION 19 CONSULTATION)  
REPRESENTATIONS ON BEHALF OF WHITBREAD PLC**

**Introduction**

- 1.1 These representations are submitted by DP9 Limited ('DP9') to the City of London Corporation ('the CoL') on behalf of Whitbread PLC (the 'Client') in respect of Regulation 19 Draft City Plan 2040 Consultation.
- 1.2 For context, we are acting as planning advisors and agents to the Client as part of the proposed comprehensive retrofit of the existing building at the above address (the 'Site') comprising the retention and extension of the existing tower structure with associated new façade; and the extension and remodelling of the existing podium with associated new façade (the 'Proposals').
- 1.3 The Proposals are subject to ongoing discussions with CoL Planning and Design Officers, with an application for full planning permission due to be submitted in the coming months. We welcome the opportunity to make representations on the Draft City Plan 2040 under the Regulation 19 consultation.

**Background**

- 1.4 Whitbread PLC is the UK's largest hospitality businesses. It owns the Premier Inn brand and operates more than 850 Premier Inn and hub by Premier Inn hotels across the UK and Ireland, offering its customers a choice of more than 85,000 bedrooms. The average room rate for Premier Inn hotels was £79.84 (excluding VAT) for Whitbread's FY24 financial year and its customers break down 50:50 between leisure and business travellers nationally.



- 1.5 London is a strategically important market for Whitbread and Premier Inn. In the CoL specifically, Whitbread operates six Premier Inn and hub by Premier Inn hotels contributing more than 1,240 affordable hotel bedrooms to the City's bedroom stock. A further two hub by Premier Inn hotels are also currently under construction at Snow Hill, Farringdon and Moorgate (+382 rooms).
- 1.6 In 2023, Whitbread commissioned Turley Economics and Ipsos to quantify the economic impact of its hotels. Based on a sample of 27,000 respondents, which included customers staying in Premier Inn hotels in the City and across Central London, the average external expenditure per bedroom per night was £143.22. In Central London locations this increases to £153.21 of external expenditure per bedroom per night of which £114.90 is spent within two miles of where the respondents were staying (the definition of 'local' in the report).
- 1.7 It is within the above context that we make the following representations to the Draft Local Plan.

### **Representations**

#### Strategic Policy S12

- 1.8 In support of our consideration in respect of Strategic Policy S12, please find Representations prepared by The Townscape Consultancy enclosed at **Appendix A**.
- 1.9 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, as identified at Appendix A, it is argued that the contours map as drafted is too conservative and leads to confusion when considering it in the context of the evidence base provided with the Draft City Plan. It is therefore considered 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 development potential within the City Cluster and remove confusion in its interpretation.
- 1.10 In respect of the Site specifically, the Representations at Appendix A include testing the relevant views and demonstrate that the Site is capable of including a building exceeding the draft contour map heights without causing any detrimental effects to the setting of the three Strategically Important Landmarks, or compromising any of the hard constraints that are shaping the City Cluster.
- 1.11 Based on the analysis within the Representations at Appendix A, it is considered that the Site can accommodate more than the 75m to 90m AOD (on a minimal corner) as denoted by the contour map, while conforming with the overall intentions of the City Cluster's south-eastern edge, in particular with regards to its relationship to the Tower of London World Heritage Site.



- 1.12 Accordingly, it is respectfully requested that the contour map is amended to include the site in an area allocated for between 75m AOD and 90m AOD (as suggested at Figure 1.1 within the Representations at Appendix A) to cover the extent of the existing building and to optimise the potential of the Site.
- 1.13 It is recommended that the requested amendment to the contours of this specific part of the Eastern Cluster is considered as a 'modification' to the Regulation 19 draft City Plan 2040, prior to its submission to the Secretary of State.
- 1.14 This modification is considered to be wholly appropriate as it would meet the objectives of Draft Policy S12, and align with London Plan Policy D9 whilst, importantly, optimising this Site in a highly sustainable location.

#### Policy CV4: Hotels

##### *Consideration*

- 1.15 Draft Policy CV4 relates to hotels and identifies the circumstances in which hotels and other visitor accommodation will be permitted which includes where they comply with the requirements of Policy OF2. The supporting paragraphs of Draft Policy CV4 reflect the Visitor Accommodation Needs Assessment (VANA) which forms part of the Evidence Base and acknowledges that the City has seen strong demand for hotel accommodation in the last ten years.
- 1.16 The VANA identifies that there is a projected need for a total of 4,012 hotel bedrooms by the year 2037. This figure includes the expected growth in the number of hotel rooms up to 2030, as well as an estimated additional demand of approximately 350 rooms per year beyond that time, clearly highlighting the need for further hotel accommodation within the CoL, which the Proposals at the site are well positioned to help address.
- 1.17 It is notable that our Client's own data identifies that, within the CoL, only 24% of the hotel supply is branded budget (including existing Premier Inn locations) versus 37% for Inner London and 40% for Outer London. The VANA identifies that four and five-star hotels make up over three quarter of the CoL bedroom supply.
- 1.18 The VANA also identifies that, compared to other central London Boroughs, the quantum of future supply in the CoL is relatively low.
- 1.19 This evidence demonstrates a clear need for additional branded budget hotel rooms to rebalance the supply within the CoL and in particular, encourage more families and those on lower incomes to visit and stay in the CoL. The Premier Inn brand with its family rooms would assist in re-balancing the supply and encouraging affordable leisure stays within the CoL.
- 1.20 The identified need sits in the context of the City's flagship Destination City strategy which seeks to ensure that the City is a global destination for workers, visitors and residents. It seeks



to enhance the Square Mile's leisure and cultural offer by creating a sustainable, innovative and inclusive ecosystem of culture that celebrates its rich history and heritage and makes it more appealing to visitors as well as the City's working and resident communities.

#### *Representations*

- 1.21 It is our consideration that hotels play an essential role in supporting the role of the CoL as a global centre in terms of office-based business, financial and legal services; along with a critical role in facilitating the delivery of the CoL's Destination City strategy.
- 1.22 In this context and with regard to the Draft City Plan evidence base, we consider that Draft Policy CV4 should proactively plan for hotel growth with a target number of rooms to be provided each year to support office growth, the Destination City strategy and meet the London Plan requirements.
- 1.23 It is our consideration that the target number of rooms should reflect the VANA evidence base which identifies a projected need for 4,012 hotel bedrooms by the year 2037; and 350 rooms per year beyond that time.

#### Policy OF2: Protecting Existing Office Floorspace

##### *Consideration*

- 1.24 Draft Policy OF2 relates to protecting existing office floorspace and is split into two parts. The first part sets out the conditions which an applicant would need to meet to demonstrate the loss of office. The second part of the policy sets out four routes to support the total loss of the office or change of use.
- 1.25 In this regard, Part 1 of Policy OF2 identifies that the loss of existing office floorspace will be resisted unless it can be demonstrated that:
- a. The proposed development would not lead to the loss of office floorspace that is, or sites that are, of a strategically important scale, type and/or location for the City;
  - b. The proposed development would not compromise the potential for office development on sites within the vicinity; and
  - c. There is no demand in the office market, supported by marketing evidence covering a period of no less than 12 months.
- 1.26 Part 2 of the Draft Policy identifies that where the criteria in part 1 of this policy have been met, proposals that would lead to the loss of existing office floorspace may follow one a number of routes. Of particular relevance are routes a. and b. which identify:
- a. Viability tested route: Proposed development will be required to demonstrate that the retention, refurbishment or reprovision of the office floorspace would not be viable in the longer term, demonstrated by a viability assessment;



b. Retrofit fast track: Proposed development will be required to retain the substantial majority of the superstructure of the existing building, lead to an improvement in the environmental performance of the building, and result in change of use to (one or a mix of) hotel use, cultural uses, and/or educational use. Partial retention of office floorspace will be encouraged;

- 1.27 It is noted that, when compared to the adopted Local Plan Policy DM 1.1, Draft Policy OF2 adds an additional requirement (Part 1, strand c.) to demonstrate that there is no demand in the office market, supported by marketing evidence covering a period of no less than 12 months.
- 1.28 Notwithstanding this inclusion, the Office Topic Paper, which forms part of the evidence base, notes that there is no concern about the loss of office stock to hotel uses and states: *“While there is strong current demand for hotel use in particular, the total demand for new hotels is 4,012 bedrooms by 2037, this would be a small proportion of the total office stock in the City”*.

#### *Representations*

- 1.29 Our representations in respect of Draft Policy OF2 follow on from the consideration in respect of Draft Policy CV4 above. In this regard, given the dominance of office uses within the CoL, the potential to accommodate alternative uses and particularly hotel uses is led principally by Draft Policy OF2. Draft Policy CV4 therefore becomes secondary to the tests applied within Draft Policy OF2.
- 1.30 As set out in supporting Paragraph 6.3.4 of the Draft City Plan: *“there are instances where conversion of office buildings to other uses may assist in making the retention of existing buildings a more attractive investment opportunity, contributing to the ‘retrofit first’ approach promoted in this Plan. This approach could also assist in delivering a greater range of facilities and uses in the City, complementing the primary function of the Square Mile while helping to deliver more vibrancy and a focus on increasing visitors”*.
- 1.31 It is important that the Draft City Plan ensures there is flexibility for future uses that complement the primary function of the Square Mile; and that this flexibility is secured within policy to enable alternative uses to come forward.
- 1.32 Our Client supports the introduction of the routes within Part 2 of Draft Policy OF2 but considers that, as drafted, the policy is overly restrictive and has the potential to restrict appropriate development and changes of use even where they are justified and would support the primary function of the Square Mile.
- 1.33 Specifically, the requirement for a minimum of 12 months of marketing would restrict the strategic aims of the Draft City Plan which seeks to foster economic growth. It is acknowledged that marketing evidence represents one route to demonstrating a lack of demand for existing office buildings, but it is ineffective on its own and risks building being left vacant and for at



least 12 months. There are other much more effective methods of capturing data on the office market, specifically, through a viability assessment which considers the long-term viable need.

1.34 We consider the approach to Draft Policy OF2 should broadly follow the approach taken in respect of visitor, arts and cultural facilities under Draft Policy CV1 which states: *“the City Corporation will resist the loss of existing visitor, arts, and cultural facilities, unless... it has been demonstrated that there is no realistic prospect of the premises being used for a similar purpose in the foreseeable future.”*

1.35 We therefore request that Part 1 of Draft Policy OF2 is amended to read:

*“The loss of existing office floorspace will be resisted unless it can be demonstrated that there is no demand in the office market, supported by marketing evidence covering a period of no less than 12 months; or there is no long term viable need, supported by a viability testing.”*

1.36 An associated amendment should also be made to Part 2 of the policy. In this respect, the requirement for viability testing as part of strand A should be deleted on the basis it would form a primary criterion within Part 1 of the Policy, as considered above.

#### Policy DE4: Terraces and Elevated Public Spaces

1.37 In respect of Draft Policy DE4, we query the requirement for *“all tall buildings or major developments to provide free-to-enter, publicly accessible elevated spaces, which may include roof gardens, terraces, public viewing galleries, or other retail or leisure facilities to create attractive destinations for people to enjoy the City’s spectacular skyline and views”*.

1.38 It is acknowledged that there are benefits to roof terraces and that they can, in certain circumstances, present an opportunity for amenity space and viewing. However, there should not be a requirement for all major developments to provide them and there is a risk that an absolute policy requirement would result in an oversaturation of provision across the CoL. Additionally, the Policy as worded does not acknowledge that there may be viability or operator specific challenges associated with introducing publicly accessible elevated space; or acknowledge that it may not be feasible in a retrofit schemes whereby existing retained lift cores are unable to provide dedicated public access.

#### Policy S6 (Culture and Visitors); and CV5 (Evening and Night-Time Economy)

1.39 Whitbread acknowledges the ambitions to encourage diversification of uses and attracting culture and visitors (Strategic Policy S6 and Policy CV5 in particular) but would note that the proposed enhancement of the CoL’s cultural, leisure and recreation offer and visitor experiences needs to be appropriately supported by the delivery of visitor accommodation.

### **Summary**

1.40 We submit these representations on behalf of Whitbread PLC, who are developing Proposals for the Site, with a planning application due to be submitted in the coming months.



1.41 On behalf of our Whitbread PLC, we welcome the opportunity to make these representations to the Regulation 19 of the Draft City Plan 2040. We trust you will take our comments into account and if you require clarification on any matters, please do not hesitate to contact Jake Tubb or David Morris of this office.

Yours faithfully

DP9 Ltd.

**DP9 Ltd.**





**APPENDIX A: REPRESENTATIONS PREPARED BY THE TOWNSCAPE  
CONSULTANCY ON BEHALF OF WHITBREAD PLC**

**Regulation 19 Publication City Plan 2040**  
**Representations on behalf of Whitbread PLC**  
**New London House, 6 New London Street, London, EC3R 7LP**

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17<sup>th</sup> June 2024

- 1.1 These representations have been made by The Townscape Consultancy Ltd on behalf of Whitbread PLC, the freehold owner of New London House, at 6 London Street, London, EC3R 7LP (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 by DP9 Limited ('DP9') to the City of London Corporation (the 'CoL') on behalf of 'Whitbread PLC' (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 CoL, 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 the 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 City 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 City 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 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**

1.15 As published, the contours map indicates that the Site is in principle suitable for a tall building of up to 80m AOD to the northern edge and south-western corner of the Site, and 75m AOD to roughly half of it, from the north-eastern corner to the southern edge. A minimal portion of a contour at 90m AOD also covers the south-western corner. With this, the boundary of the City Cluster Tall Buildings Area cuts across the middle of the existing building on the Site.

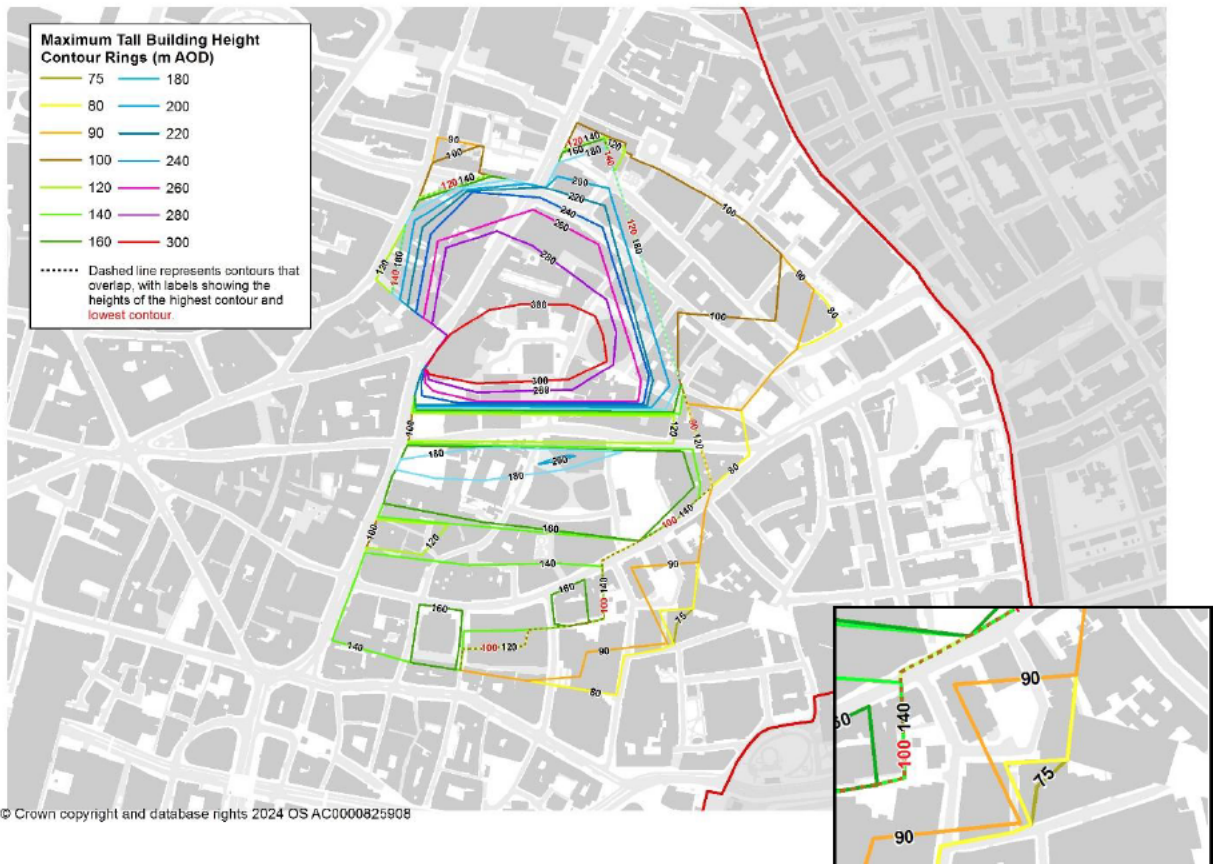


Figure 1.1: Published contours map (Figure 15 in the draft City Plan). Inset of the Site included for reference.

1.16 To allow for a meaningful redevelopment of the Site, fulfilling the aim of optimising the use of the City Cluster’s land, it is suggested that the contour area should be extended to cover the existing building footprint, more accurately reflecting the Site’s boundary. As a result of adjusting the contours horizontally on the map, the height of 90m AOD would cover the extent of the existing tower on the Site, while the 80m AOD contour would cover the existing podium, with the contour at 75m AOD creating a subtle step from the south. These changes would still accomplish the clear intention of the form of the cluster in this location: to step down towards the Tower of London World Heritage Site.

1.17 A revised version of the contour map, as suggested, is included at Figure 1.2 below.

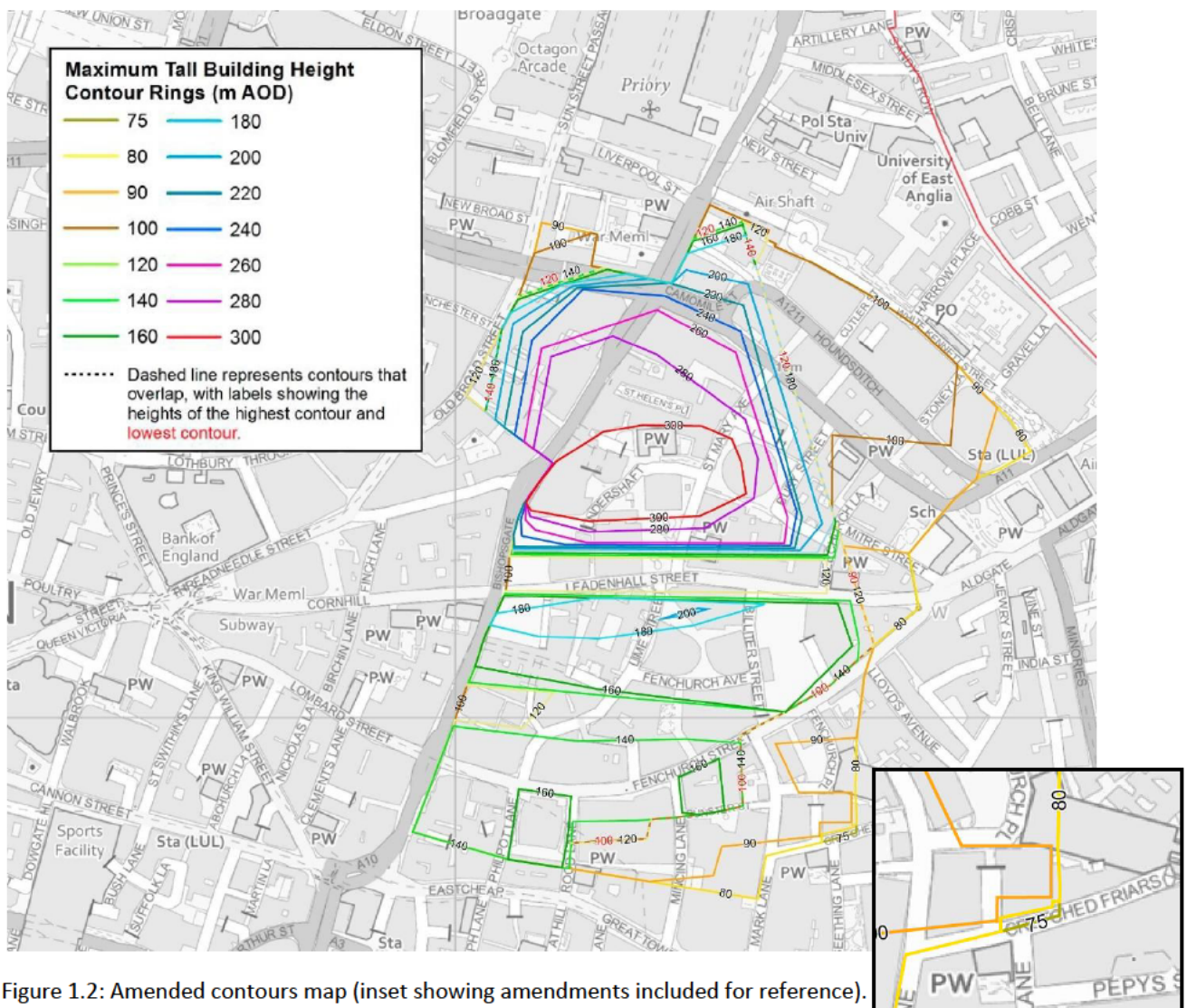


Figure 1.2: Amended contours map (inset showing amendments included for reference).

- 1.18 The analysis below demonstrates that any development on the Site would need to respond to sensitive views from St Paul’s Cathedral, the Monument, and the Tower of London. These highly graded heritage assets are identified as three Strategically Important Landmarks which, alongside hard constraints including viewing corridors, have informed the indicative shape of the ‘jelly mould’, as presented in the SVIA.
- 1.19 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.
- 1.20 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.2 from the Queen’s Walk, and LVMF view 11B.2 from London Bridge. Figure 1.3 shows a map with the viewpoints considered for this exercise in relation to the Site, and the relevant views are presented in **Appendix 1**. For the purposes of these representations the relevant views are presented as Vu.City model shots, showing a simple extrusion of the existing building on Site, upwards to a height of 90m AOD (with the podium rising to 40m AOD). With this approach, though taller, the direction of stepping in height within the City Cluster from east to west, away from the Tower of London, would be preserved as in the draft Local Plan.

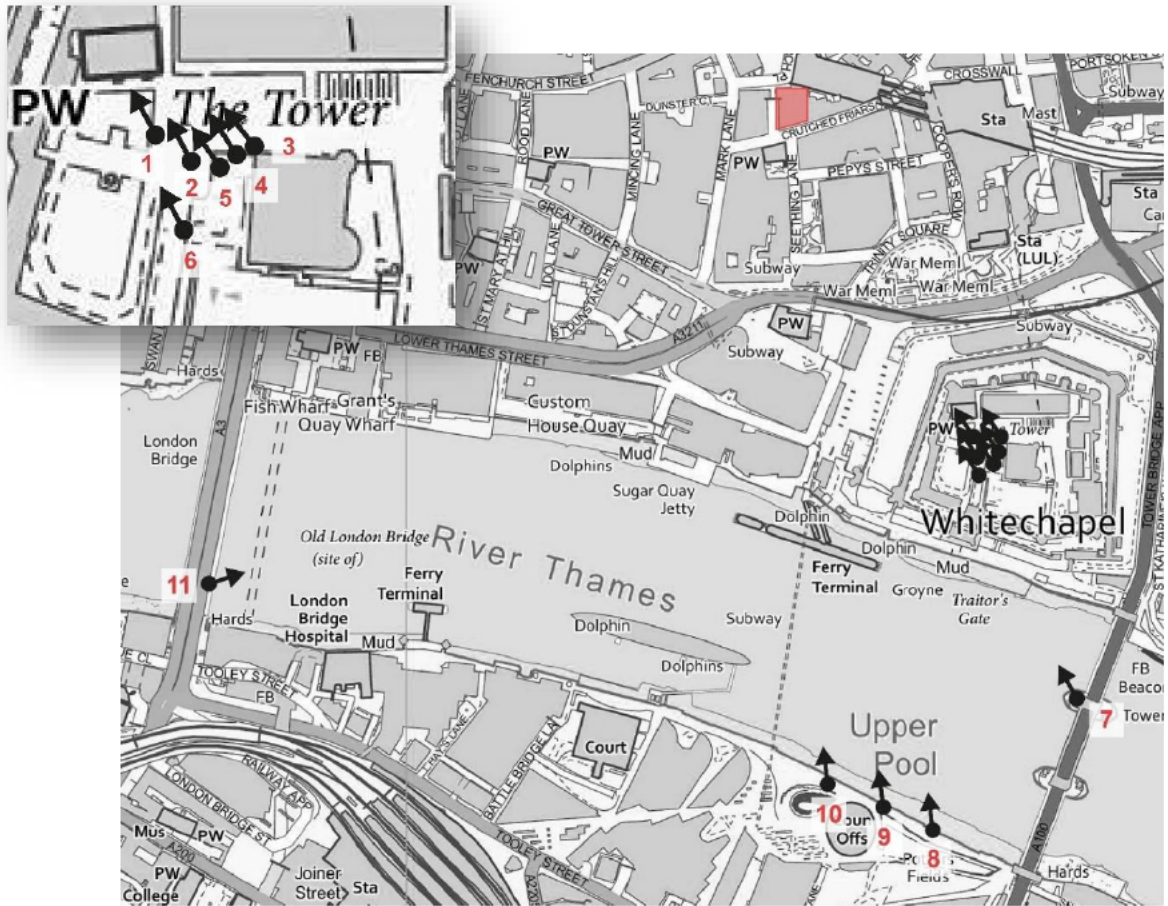


Figure 1.3: Viewpoints tested (inset showing views within Tower of London Inner Ward). The approximate location of the Site is highlighted in red.



#### Views from the Tower of London Inner Ward

- 1.21 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), demonstrating that there is not one established view from this part of the WHS looking towards the City Cluster. View 35 represents the only view in which an indicative scheme on the Site stepping from 75m AOD to the south-east up to 90m AOD to the north-west would be visible the context of other consented tall buildings within the proposed City Cluster. A new scheme on the Site would therefore be appreciated from this location as part of the consolidation of the City Cluster, and clearly separate from the foreground buildings, including the Grade I listed Chapel Royal of St Peter ad Vincula. The scheme would not be visible within SVIA View 31, which is closest to St Peter ad Vincula and is best preserved.

#### LVMF Views

- 1.22 LVMF view 10A.1 from Tower Bridge (SVIA view 1) demonstrates that the Site falls within the lower foothills of the proposed City Cluster. As the SVIA states, the form of the City Cluster descends towards the south and south-east *“in order to mediate successfully between it, the river and the WHS.”* (SVIA, p. 21). View 7 at Appendix 1 demonstrates that a building rising to an indicative height of 90m AOD on the Site would form part of the middle ground of the view and would step down from the taller buildings which further west and north in the City Cluster. The scheme would add to the existing backdrop of the City Cluster, sitting comfortably within its profile.
- 1.23 LVMF view 25A.2 (SVIA view 12) from the Queen’s Walk shows the maximum extent of visibility of the indicative massing on the Site, beyond the existing profile of the City Cluster. View 10 at Appendix 1 demonstrates that a scheme of up to 90m AOD on the Site would further consolidate the eastern edge of the City Cluster *“with the form stepping up to the taller elements of the Cluster”* (SVIA, pg. 67). The scheme would sit within the profile of the ‘jelly mould’ as shown within the SVIA, and the visual separation between the Cluster and the Tower of London would be maintained.
- 1.24 LVMF view 11B.2 from London Bridge (SVIA View 2b) to the south-west of the Site demonstrates that a building rising to an indicative height of up to 90m AOD on the Site would be largely occluded by the existing building at Minster Court and would sit within the silhouette of the existing City Cluster.

## Summary

- 1.25 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 City 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 development potential within the City Cluster and remove confusion in its interpretation.
- 1.26 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 cluster's volume.
- 1.27 In relation to the Site at 6 New London Street, having tested the relevant views, we argue the is capable of including a building exceeding the draft contour map heights without causing any detrimental effects to the setting of the three Strategically Important Landmarks, or compromising any of the hard constraints that are shaping the City Cluster. Based on our analysis, we suggest that the Site can accommodate more than the 75m to 90m AOD (on a minimal corner) as denoted by the contour map, while conforming with the overall intentions of the City Cluster's south-eastern edge, in particular with regards to its relationship to the Tower of London World Heritage Site. Accordingly, we respectfully ask that the contour map be amended to include the Site in an area allocated for between 75m AOD and 90m AOD (as suggested at Figure 1.2) to cover the extent of the existing building and to optimise the potential of the Site.

## Appendix 1: Vu.City Model Shots

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A1.1 The views presented on the following pages are shown on the map at Figure 1.3 above. The views show a simple extrusion of the existing building on Site (in purple), in the context of the future baseline. The indicative massing on the Site is highlighted in red in instances where it is occluded by foreground buildings.

A1.2 Cumulative schemes in Vu.City are depicted by three colours, as denoted in the key below:




	Consented
	Under construction
	Completed



Figure A1.1: View 1- Representative Viewpoint Tower Green, Inner Ward (SVIA View 31). The red highlighting shows that the indicative massing on the Site would be occluded.



Figure A1.2: View 2- Representative Viewpoint Tower Green, Inner Ward (SVIA View 32). The red highlighting shows that the indicative massing on the Site would be occluded.



Figure A1.3: View 3- Representative Viewpoint Tower Green, Inner Ward (SVIA View 33). The red highlighting shows that the indicative massing on the Site would be occluded.



Figure A1.4: View 4- Representative Viewpoint Tower Green, Inner Ward (SVIA View 34). The red highlighting shows that the indicative massing on the Site would be occluded.



Figure A1.5: View 5- Representative Viewpoint Tower Green, Inner Ward (SVIA View 35).



Figure A1.6: View 6- Representative Viewpoint Tower Green, Inner Ward (SVIA View 36). The red highlighting shows that the indicative massing on the Site would be occluded.



Figure A1.7: View 7- LVMF 10A.1 Tower Bridge- Upstream- The North Bastion (SVIA view 1).



Figure A1.8: View 8- LVMF 11B.2 London Bridge- The Downstream Pavement (SVIA view 2b).



Figure A1.9: View 9- LVMF 25A.1 City Hall- The Public Terraces (SVIA view 13).



Figure A1.10: View 10- LVMF 25A.2 City Hall- The Public Terraces (SVIA view 12).



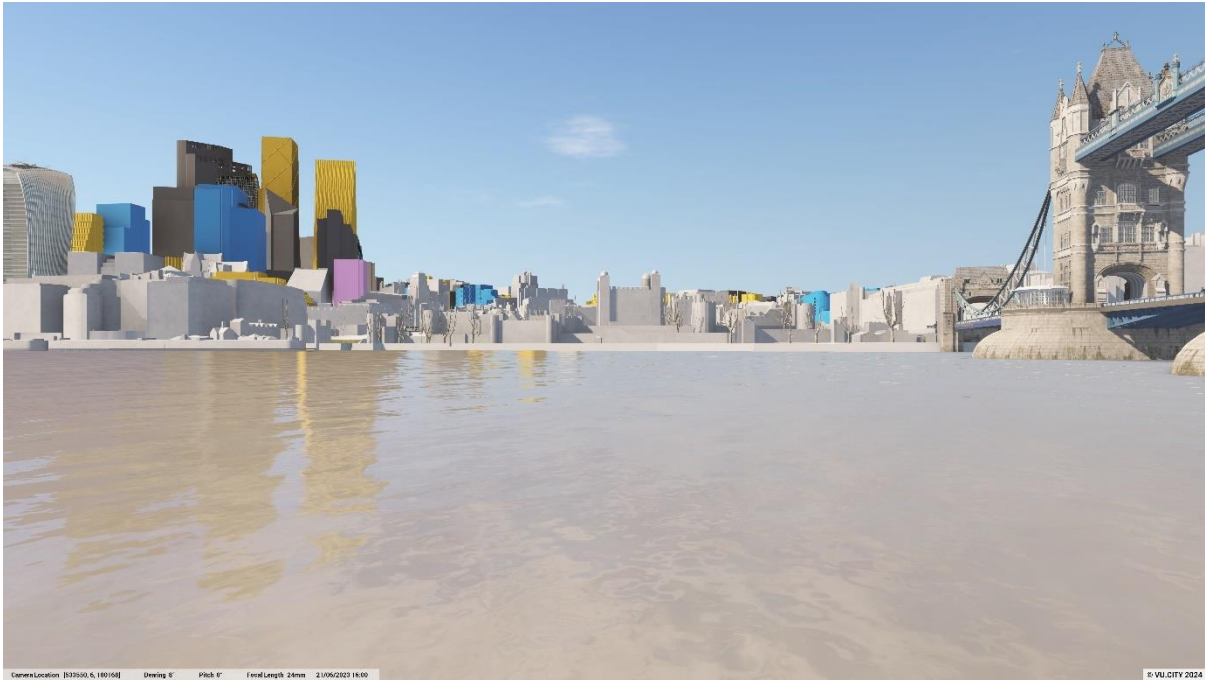


Figure A1.11: View 11- LVMF 25A.3 City Hall- The Public Terraces (SVIA view 11).