

AXA IM - REPRESENTATIONS TO THE COL CONSULTATION ON THE PROPOSED SUBMISSION DRAFT CITY PLAN 2040 (REGULATION 19 PUBLICATION)

R0161

Eleanor Hulm [Redacted]

Mon 6/17/2024 10:58 PM

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

Cc: [Redacted]

📎 9 attachments (3 MB)

Representations to City Plan 2040 AXA 240617 FINAL .pdf; Appendix 2 Part A Model Representation Form for Local Plans.pdf; Appendix 2 Part B AT1 Model Representation Form for City Plan 2040 .pdf; Appendix 2 Part B AT3 Representation Form for City Plan 2040 .pdf; Appendix 2 Part B DE1 Model Representation Form for City Plan 2040 .pdf; Appendix 2 Part B OF1 Model Representation Form for City Plan 2040 .pdf; Appendix 2 Part B S12 Representation Form for City Plan 2040 .pdf; Appendix 2 Part B Spatial Strategy Representation Form for City Plan 2040 .pdf; Appendix 2 Part B Strategic Policy S21 Representation Form for City Plan 2040 .pdf;

THIS IS AN EXTERNAL EMAIL

Dear Planning Policy Team

Please find attached and link to our client, AXA IM, written representations on the draft City Plan.

[Reps Forms](#)


Best wishes
Eleanor
Eleanor Hulm
Planner

[Redacted signature block]

website: www.dp9.co.uk

This e-mail and any attachments hereto are strictly confidential and intended solely for the addressee. It may contain information which is privileged. If you are not the intended addressee, you must not disclose, forward, copy or take any action in relation to this e-mail or attachments. If you have received this e-mail in error, please delete it and notify postmaster@dp9.co.uk

Model Representation Form for Local Plans

 <p>CITY OF LONDON</p>	<p>Local Plan Publication Stage Representation Form</p>	<p>Ref: Reg 19</p> <p>(For official use only)</p>
--	--	---

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

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 \(cityoflondon.gov.uk\)](https://www.cityoflondon.gov.uk/environment-department-privacy-notice) and the City Corporation's privacy notice available at www.cityoflondon.gov.uk/privacy). Please also see our Statement of Representations Procedure available at: [City Plan 2040 - City of London](#).

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.

Part B – Please use a separate sheet for each representation

3. To which part of the Local Plan does this representation relate? Strategic Policy S21

Paragraph	Policy	X	Policies Map	X
4. Do you consider the Local Plan is:				
4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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.

Policy CS7 (Eastern Cluster) of the Adopted Local Plan indicatively identifies 63 St Mary Axe as being located within the Eastern Cluster Area, one of the Key City Places (see Figure G at p72). Whilst the Plan acknowledges that the Key City Places do not have defined boundaries, they face particular challenges, and the challenge facing the Eastern Cluster was to ‘provide a clear policy framework to guide business development, particularly tall buildings, whilst ensuring a safe and attractive environment’.

In the draft City Plan 2040, the Key City Places have become Key Areas of Change (‘KAOC’), and the Eastern Cluster has now become the City Cluster. There are two defined boundaries of relevance, the boundary of the KAOc itself (shown at Figure 27 of the Plan), and the boundary of a defined City Cluster Tall Buildings Area (see Figure 14 at p197 of the Plan). The City Cluster Tall Buildings Area does include 63 St Amry Axe, and we endorse and support this for the reasons described below in relation to Strategic Policy S12. However, the KAOc boundary for the City Cluster does not include 63 St Mary Axe, or indeed adjoining sites between Houndsditch and Bevis Marks, and it is this omission that we consider makes the KAOc policy unsound, but capable of being sound with a modification.

We consider that the City Cluster KAOc boundary should be extended to include 63 St Mary Axe for the following reasons:

- It is already included within the City Cluster Tall Buildings Area, and is therefore an appropriate location for a tall building which is a change of the nature that is integral to the KAOc policy area;

- As a tall building site, 63 St Mary Axe can deliver a significant uplift in office floorspace, contributing to the delivery of the City Plan’s forecasted demand for new office space, the vast majority of which is planned to be accommodated within the City Cluster KAOC; and
- The site is bounded by Bevis Marks and Camomile Street to the south and Houndsditch to the north. Bevis Marks/Camomile Street is identified as a Green Link on Figure 1 in the Spatial Strategy, and a Major Street to Enhance on Figure 28. Green Links are not defined in the Plan, however the redevelopment of 63 St Mary Axe is integral to delivering the environmental and public realm enhancements along this axis of a strategic scale as envisaged by the Spatial Strategy and Strategic Policy S21; and
- The redevelopment of 63 St Mary Axe can contribute to other aspects of Strategic Policy S21, including in relation to complementary uses such as culture and leisure, providing new open space, increased urban greening, improving connectivity (including in particular north-south connectivity) and improving walking and cycling infrastructure.

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.

The following modification is proposed to Figures 27 and 28:

Extend the City Cluster Key Area of Change boundary to the north, to run east to west along Houndsditch, rather than Bevis Marks.

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, 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:

We wish to represent our client in person so that their proposed modifications can be most effectively supported.

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.

Model Representation Form for Local Plans

 <p>CITY OF LONDON</p>	<p>Local Plan Publication Stage Representation Form</p>	<p>Ref: Reg 19</p> <p>(For official use only)</p>
--	--	---

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

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 \(cityoflondon.gov.uk\)](https://www.cityoflondon.gov.uk/environment-department-privacy-notice) and the City Corporation's privacy notice available at www.cityoflondon.gov.uk/privacy). Please also see our Statement of Representations Procedure available at: [City Plan 2040 - City of London](#).

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.

Part B – Please use a separate sheet for each representation

3. To which part of the Local Plan does this representation relate? Spatial Strategy (Figure 1)

Paragraph	Policy	X	Policies Map	X
4. Do you consider the Local Plan is:				
4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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.

The Spatial Strategy describes the key spatial aspects of the Plan. We do not propose any modifications to the strategy itself, but note (in relation to our proposed modifications to Strategic Policy S21 below) that part 2 of the strategy states that ‘Net additional office floorspace will primarily be delivered in the City Cluster KAOC, supplemented by floorspace in the Fleet Street and Ludgate KAOC and Liverpool Street KAOC’.

Our proposed modification to Strategic Policy S21 is to include the 63 St Mary Axe site (and adjoining sites) within the City Cluster Key Area of Chang (‘KAOC’), and that modification would require a consequential modification to Figure 1 located in the Spatial Strategy chapter.

Of relevance to that proposed modification is the identification of a Green Link on Figure 1, which runs east to west in an arc along Bevis Marks, immediately to the south of 63 St Mary Axe. Further reference to this aspect of the Spatial Strategy is provided below in relation to Strategic Policy S21.

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.

The following modification is proposed to Figure 1:

- Extend the City Cluster KAOC boundary to the north, to run east to west along Houndsditch, rather than Bevis Marks, to reflect the City Cluster Tall Buildings Area as proposed and denoted by the blue dashed line, owing to an area for tall buildings inherently being a key area of change.

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, 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:

We wish to represent our client in person so that their proposed modifications can be most effectively supported.

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.

Model Representation Form for Local Plans

 <p>CITY OF LONDON</p>	<p>Local Plan Publication Stage Representation Form</p>	<p>Ref: Reg 19</p> <p>(For official use only)</p>
--	--	---

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

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 \(cityoflondon.gov.uk\)](https://www.cityoflondon.gov.uk/environment-department-privacy-notice) and the City Corporation's privacy notice available at www.cityoflondon.gov.uk/privacy). Please also see our Statement of Representations Procedure available at: [City Plan 2040 - City of London](#).

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.

Part B – Please use a separate sheet for each representation

3. To which part of the Local Plan does this representation relate? Policy S12

Paragraph

Policy

Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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.

In the City's adopted Local Plan, 63 St Mary Axe is located within the Eastern Cluster, under policy CS14 (Tall buildings). The inclusion of the site within the City Cluster Tall Buildings Area in draft policy S12 (as shown in Figure 14) is consistent with this approach, and is fully supported. As described above, 63 St Mary Axe is a suitable site for a tall building and has the potential to deliver a significant uplift in floorspace in a highly accessible (and therefore sustainable) location.

As a site within the City Cluster Tall Buildings Area, the maximum height of a tall building permissible on the site is set by policy S12, which includes the tall building contour rings on Figure 15. Whilst we support the principle of the site's inclusion within this policy as stated above, we have some specific comments on the wording of the policy and the height of the contours which relate to the site, and consequently consider that it is not sound, but could be made sound with proposed modifications below.

Further commentary relating to this and a site specific response is set out in more detail in the accompanying written representations.

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.

Proposed modification S12(1)

The following modification is proposed to the Location and heights part of the policy (part 3):

*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. **In areas directly below a contour ring, tall buildings should not exceed the height of the relevant contour rings. In areas between the contour rings, tall buildings should be designed to successfully mediate between the relevant contour ring heights 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.*

The modification is designed to clarify the application of policy S12, and ensure that it is effective.

Proposed modification S12(2)

The following modification is proposed to the Design and public access part of the policy (part 10):

*h. incorporate publicly accessible open space within the building and its curtilage, including **where appropriate** free to enter, publicly accessible elevated spaces at upper levels, which may include culture, retail, leisure or education facilities, open spaces including roof gardens or public viewing galleries;*

This is considered necessary to ensure that the policy is justified.

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, 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:

We wish to represent our client in person so that their proposed modifications can be most effectively supported.

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.

Model Representation Form for Local Plans

 <p>CITY OF LONDON</p>	<p>Local Plan Publication Stage Representation Form</p>	<p>Ref: Reg 19</p> <p>(For official use only)</p>
--	--	---

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

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). Please also see our Statement of Representations Procedure available at: [City Plan 2040 - City of London](#).

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.

Part B – Please use a separate sheet for each representation

Name or Organisation: AXA IM

3. To which part of the Local Plan does this representation relate? Policy OF1

Paragraph

Policy X

Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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.

We wholeheartedly support the provision of new, best in class, flexible office space and other workspaces that will ensure the City's pre-eminence as a global financial centre. This includes floorspace to accommodate the full range of business types and sectors. However, we wish to ensure that terminology is used correctly and appropriately in response to evidence, and therefore seek to clarify the use of the term 'affordable' in relation to workspace.

The London Plan defines two main workspace requirements, with policy E2 requiring development proposals of more than 2,500sqm GEA to provide an element of flexible workspace for micro and SMEs, and policy E3 defining circumstances in which subsidised floorspace should be provided.

Draft policy OF1 appears to mix these two requirements in part f., and we would welcome clarification. The requirement under policy E2 does not require evidencing unless the City wish to set a lower threshold, however an affordable workspace policy in line with E3 does need to be evidenced. The evidence base for the Plan does not identify a need for affordable workspace in the City, and it has not been tested through the Local Plan Viability Assessment – other than as a crossover/component of the cultural contribution.

Consequently, we consider that part f of the policy should relate just to flexible floorspace, and references to affordable workspace should be removed to the cultural policies where they are the form of provision for arts, culture or leisure that proves to be appropriate for a particular development scheme, and where that provision forms part of any cultural contribution, and not a separate requirement in addition to it.

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.

Proposed modification (OF1)

The following modification is proposed to part f of the policy:

Where appropriate **on schemes proposing more than 2,500sqm GEA office floorspace**, provide a proportion of flexible ~~and affordable~~ workspace suitable for micro, SMEs.

Related modifications to the cultural policies are referenced below.

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, 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:

We wish to represent our client in person so that their proposed modifications can be most effectively supported.

***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.*

Model Representation Form for Local Plans

 <p>CITY OF LONDON</p>	<p>Local Plan Publication Stage Representation Form</p>	<p>Ref: Reg 19</p> <p>(For official use only)</p>
--	--	---

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

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). Please also see our Statement of Representations Procedure available at: [City Plan 2040 - City of London](#).

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.

Part B – Please use a separate sheet for each representation

3. To which part of the Local Plan does this representation relate? Policy DE1

Paragraph X

Policy X

Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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.

Policy DE1 (Sustainable Design) of the draft City Plan 2040 states that all developments should seek opportunities to contribute to the wider sustainability of the City.

Within Policy DE1, no embodied carbon intensity targets have been proposed – this is considered sensible, due to the fact that taller buildings often perform worse than other building types (i.e. low/mid-rise offices) due to stability and structural needs. Building examples which are provided in the SPD to demonstrate whole life carbon best practice (for example, Newgate, 7 Princess Street, 8-12 New Bridge Street) are not tall buildings. There is very little verified performance of tall buildings, which reiterates the importance of reporting with future transition towards targets once sufficient as-built data has been captured.

The policy refers to a greater emphasis on retrofit and retrofit first. Whilst AXA endorses the commitment towards the delivery of a net zero carbon City of London by 2040, taking a ‘retrofit first’ approach to development, this should be defined. There are scales of retrofit which will ultimately have implications on energy and carbon.

Further, overall Policy DE1 should make clear that the delivery of sustainable design will involve balancing the economic, social and environmental dimensions of development with regard to the Plan’s strategic objectives. This would ensure the policy is in general conformity with the London Plan’s ‘Good Growth’ objectives, as well as Policy D3 (optimising site capacity through the design-led approach) and Policy SD4 in respect of the Central Activities Zone.

The policy should be amended to embed this holistic approach, specifically where it seeks to ensure the ‘most sustainable and suitable approach’ for any given site and before introducing the need for development to ‘minimise whole life-cycle carbon emissions’.

As currently drafted, there is no acknowledgment of the need to optimise sites in the context of the wider economic and social dimensions of sustainable development. Without that balance, the Policy could be interpreted and applied as one which always favours the least carbon intensive development option in any given scenario. These comments should also be acknowledged in relation to Policy S8 (Design), given that the 'retrofit first' requirement is also noted at the forefront of this policy.

Policy DE1 states that a minimum target of BREEAM Excellent is now required, which is in-keeping with other Boroughs. However, we consider that the supporting text should recognise that non-office uses at lower levels, such as shell retail and leisure uses, are more challenging to deliver against Excellent.

The policy proposes that development should commit to achieving a minimum NABERS 5* rating. It should be clarified if this is a base build OR whole building rating requirement, as this potentially conflicts with the 'retrofit first' practice. Further clarification is also sought in relation to whether this rating requires verification in operation via Energy for Offices rating. It is unlikely a building will operate at NABERS DfP rating from day one, meanwhile, 'Be Seen' monitoring mechanism can be used to determine in-use energy consumption. This should be recognised.

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.

Proposed modification (DE1)

The following modification is proposed for part 2 of the policy:

All major development must undertake an assessment of the options for the site, in line with the City Corporation's Carbon Options Guidance Planning Advice Note, and should use this process to establish the most sustainable and suitable approach **in order to best meet the requirements** for the site **set out by the development plan**.

Proposed modification (DE1 supporting text)

The following modification is proposed to the supporting text, suggested as a new paragraph after 9.2.7:

It is recognised that tall buildings have additional requirements for carbon, including structure and infrastructure, which may prevent them from achieving the same carbon targets as lower rise alternatives. Where tall

buildings are recognised and required by the Plan as an appropriate form of development which optimises a site to accommodate growth, this will be reflected in the City's expectations for carbon performance.

The precise form of words is not as important here as the principle of acknowledging that tall buildings are inherently more carbon intensive, but that they are supported by the Plan for other reasons.

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, 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:

We wish to represent our client in person so that their proposed modifications can be most effectively supported.

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.

Model Representation Form for Local Plans

 <p>CITY OF LONDON</p>	<p>Local Plan Publication Stage Representation Form</p>	<p>Ref: Reg 19</p> <p>(For official use only)</p>
--	--	---

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

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). Please also see our Statement of Representations Procedure available at: [City Plan 2040 - City of London](#).

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.

Part B – Please use a separate sheet for each representation

3. To which part of the Local Plan does this representation relate? Policy AT3

Paragraph X

Policy X

Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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.

The draft policy reflects the standards set within the London Plan.

Data collected from AXA-IM's 22 Bishopsgate which was completed in 2020, has shown that at present only around 16% of the cycle spaces are occupied on a given day. Data collected from British Land and GIC's 100 Liverpool Street development, which was also completed in 2020 and which we understand to be fully occupied, has shown that at present, only around 20% of the cycle parking spaces are occupied on a given day. It should be noted that these two buildings were designed to the 2016 London Plan which had lower cycle parking standards for cycle space provision than the 2021 London Plan (1 space per 90 sq m GEA). Applying the 2021 London Plan standards to 22 Bishopsgate would result in only 10% of the cycle spaces being occupied by today's demand.

Encouraging cycling and other modes of active travel is supported, however the standards used to direct this present two key issues:

1. The use of GEA does not reflect how many employees are in a building given it includes back of house areas, basements, plant rooms, cores etc. Tall buildings and retrofit schemes have lower NIA:GEA ratios, which results in them providing significantly more cycle parking relative to their occupiable floor area compared to simpler, less constrained building typologies.
2. The London Plan standard assumes a density of 1 employee per 12sqm GEA, as set out in the London Plan evidence base. Each office building varies; however, this translates to approximately 1 employee per 8/9sqm NIA. The 2023 Building Council for Offices (BCO) guidance is that office buildings

should be designed for peak occupational density at 1 employee per 12.5sqm NIA. Employee densities have been reducing in the City of London as occupiers seek higher quality offices with additional spaces such as break out zones, meeting and conference rooms and areas for wellbeing, which do not translate to more desks and people. This means a typical day to day occupational density is often closer to 1 employee per 15sqm - 20sqm NIA, less than half of the assumed density in the London Plan cycle parking standards.

These two issues combined result in a significant overprovision of cycle parking spaces in most City office buildings. As the London Plan has significantly over-estimated employee density it is expected that cycle parking in buildings such as 22 Bishopsgate and 100 Liverpool Street will never be fully used, even if the London Plan cycle mode share target of 19% is reached in future. This overprovision has wider implications for new developments, with a lack of space for long-stay cycle parking at ground level and the need to deliver extensive multi-level basements, which significantly increases embodied carbon emissions.

Recent surveys of the cycle parking at 22 Bishopsgate show the cycle mode share for the building is typically 6%, considering a usual daily occupancy of 1 person per 21sqm NIA. Assuming a theoretical future maximum scenario where the London Plan mode share target of 19% is reached, and occupational density increases to 1 employee per 15sqm NIA, the office development would generate a demand for 1,570 cycle parking spaces. This is 970 spaces fewer than the London Plan currently dictates as a minimum day one provision, equivalent to 3600 cubic metres (based on London design standards) of unrequired carbon intensive basement space.

It should also be noted that applying the 19% mode share target directly as a cycle parking standard does not take into account innovations around Micro-Mobility as a Service (MaaS) modes such as cycle hire and e-scooters, which will continue to replace some of the privately owned bike trips within the City. Further work on commuting patterns and how this translates to cycle parking usage should be conducted to give a clearer picture as to what is required by new development and to minimise unnecessary basement excavation and embodied carbon. Whilst some surplus in cycle parking provision is supported to allow for future growth in cycling mode share, the gap between current usage and policy standards is considered excessive.

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.

Proposed modification (AT3)

1. Revise the methodology: To resolve current methodological issues we suggest updating the standard to use Net Internal Area (NIA) rather than Gross External Area (GEA), and update occupational density standards to reflect actual usage supported by BCO research and standards.
2. Adopt a phased approach: The current London Plan modal share target of 19% is likely to take many years to achieve in London. In the meantime, space is sitting empty that could be used for other purposes. Complimentary uses could include amenity and wellbeing space for employees such as fitness studios and gyms, which would contribute to healthy, active lifestyles. A monitoring regime secured through legal agreement would enable cycle parking usage to be regularly reviewed such that temporary or meanwhile uses could be removed and additional cycle parking provided in the future, if and when needed.

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, 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:

We wish to represent our client in person so that their proposed modifications can be most effectively supported.

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.

Model Representation Form for Local Plans

 <p>CITY OF LONDON</p>	<p>Local Plan Publication Stage Representation Form</p>	<p>Ref: Reg 19</p> <p>(For official use only)</p>
--	--	---

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

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 \(cityoflondon.gov.uk\)](#) and the City Corporation's privacy notice available at www.cityoflondon.gov.uk/privacy). Please also see our Statement of Representations Procedure available at: [City Plan 2040 - City of London](#).

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.

Part B – Please use a separate sheet for each representation

Name or Organisation: AXA IM

3. To which part of the Local Plan does this representation relate? Policy AT1

Paragraph

Policy X

Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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.

It is considered that the proposed transport policies are largely aligned and consistent with the City's Transport Strategy and the City's proposed revised Transport Strategy. The below therefore only considers some specific policy points.

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.

Policy AT1 (Pedestrian Movement, permeability and wayfinding) advises that developments should enhance permeability where possible for pedestrians and allow for the ground floors to be publicly accessible where possible. AXA-IM support these principles, with a key aim of their emerging scheme being to increase permeability and accessibility.

It is noted that part 11 of Policy AT1 states that major developments should model the pedestrian flows around their site. Whilst the aspirations of the policy are supported, more clarity is sought for the type of schemes that need to provide pedestrian modelling – i.e., perhaps not all major developments will need to provide this information. This should be on a case by case basis related to the potential impacts of the development.

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, 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:

We wish to represent our client in person so that their proposed modifications can be most effectively supported.

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.

Model Representation Form for Local Plans

 <p>CITY OF LONDON</p>	<p>Local Plan Publication Stage Representation Form</p>	<p>Ref: Reg 19</p> <p>(For official use only)</p>
--	--	---

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

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 \(cityoflondon.gov.uk\)](#) and the City Corporation's privacy notice available at www.cityoflondon.gov.uk/privacy). Please also see our Statement of Representations Procedure available at: [City Plan 2040 - City of London](#).

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.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**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	<input type="text"/>	Mr
First Name	<input type="text"/>	Jonathan
Last Name	<input type="text"/>	Smith
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	AXA IM	<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"/>

JS/EK/EH/DP6081

17 June 2024

**Development Plans Team
Environment Department
City of London Corporation
Guildhall
London
EC2P 2EJ**

DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ

Registered No. 05092507

0207 004 1700

www.dp9.co.uk

Sent via email to: planningpolicyconsultations@cityoflondon.gov.uk

Dear Sir/Madam,

REPRESENTATIONS TO THE CITY OF LONDON CORPORATION'S CONSULTATION ON THE PROPOSED SUBMISSION DRAFT CITY PLAN 2040 (REGULATION 19 PUBLICATION)

On behalf of our client, AXA Real Estate Investment Managers UK Limited (acting in its capacity as investment manager and advisor to its investors and clients) ('AXA IM'), please find enclosed representations to the Draft City Plan 2040 – Regulation 19 Public Consultation 2024. AXA IM welcomes the opportunity to engage in this consultation that will feed into the next stage of the Draft City Plan review.

AXA IM Alts is a global leader in alternative investments with €184 billion of assets under management comprising over €82 billion of primarily private real estate, c.€90 billion of private debt and alternative credit, as well as c.€12 billion in infrastructure equity and private equity. In the City of London, AXA IM developed 22 Bishopsgate in 2020, and is currently on site with 50 Fenchurch Street. Combined, these two schemes comprise 2 million sq ft net of Best in Class office accommodation. AXA IM is now at the early stage of discussions relating to the redevelopment of Camomile Court and 63 St Mary Axe ('63 St Mary Axe'), London, EC3A 8AA, to provide its next generation City building, and is working towards the submission of a planning application in 2024. The City's continued prosperity is of utmost importance, and all of AXA IM's representations should be read in this context.

As a member of the City Property Association ('CPA'), AXA IM also wholeheartedly endorse the separate representations made by the CPA, and these representations should be read as additional to those made by the CPA on behalf of their members.

The structure of these representations

These representations are structured as follows:

- Introduction and context;
- Detailed representations (including proposed modifications); and



- Conclusions and next steps

We are supportive of the Plan’s vision for the Square Mile and the strategic priorities it sets out, and we fully appreciate the considerable amount of work that has been put into the Plan to date. However, we do consider that the relevant draft policies are not sound i.e. not positively prepared; and/or not justified, effective or consistent with national policy, and so we propose that modifications are made in order to make the Plan sound. Our proposed modifications relate to the following policies:

- Spatial Strategy (Figure 1)
- Strategic Policy S4: Offices
- Policy OF1: Office Development
- Policy DE1: Sustainable Design
- Policy AT3: Cycle Parking
- Strategic Policy S12: Tall buildings
- Strategic Policy S21: City Cluster

Our detailed representations are set out below, including the elements of the Plan our client supports and suggested modifications to policies as required in order to ensure that the Plan is sound. For the proposed modifications, new text is in bold blue, deletions are struck through.

Introduction and context

63 St Mary Axe is located on the northern edge of the City Cluster, as shown on the Site Plan at Appendix 1. It is currently occupied by two outdated office buildings, and presents a significant opportunity to accommodate a substantial uplift in floorspace to create a best in class workspace building.

Located a short walk from Liverpool Street Station – now the UK’s busiest train station, and with a PTAL of 6B, the site is consequently one of the most accessible and sustainable locations in the country. Its immediate neighbours include existing tall buildings such as the Salesforce Tower and 100 Bishopsgate, which are amongst the tallest in the cluster. It is a site that national policy and the London Plan require to be optimised for development and given the Site’s location within the Eastern Cluster in the City’s adopted Local Plan, it presents a suitable location for a tall building.

AXA IM is engaged in pre-application discussions in relation to the redevelopment of the site, and the following representations are therefore being made with the benefit of a comprehensive understanding of the site, its requirements, and how 63 St Mary Axe can best contribute towards achieving the Strategic Priorities of the City Plan 2040.

Detailed representations

Spatial Strategy

Commentary



The Spatial Strategy describes the key spatial aspects of the Plan. We do not propose any modifications to the strategy itself, but note (in relation to our proposed modifications to Strategic Policy S21 below) that part 2 of the strategy states that ‘Net additional office floorspace will primarily be delivered in the City Cluster KAO, supplemented by floorspace in the Fleet Street and Ludgate KAO and Liverpool Street KAO’.

Our proposed modification to Strategic Policy S21 is to include the 63 St Mary Axe site (and adjoining sites) within the City Cluster Key Area of Change (‘KAO’), and that modification would require a consequential modification to Figure 1 located in the Spatial Strategy chapter.

Of relevance to that proposed modification is the identification of a Green Link on Figure 1, which runs east to west in an arc along Bevis Marks, immediately to the south of 63 St Mary Axe. Further reference to this aspect of the Spatial Strategy is provided below in relation to Strategic Policy S21.

Proposed modification (Figure 1)

The following modification is proposed to Figure 1:

- Extend the City Cluster KAO boundary to the north, to run east to west along Houndsditch, rather than Bevis Marks, to reflect the City Cluster Tall Buildings Area as proposed and denoted by the blue dashed line, owing to an area for tall buildings inherently being a key area of change.

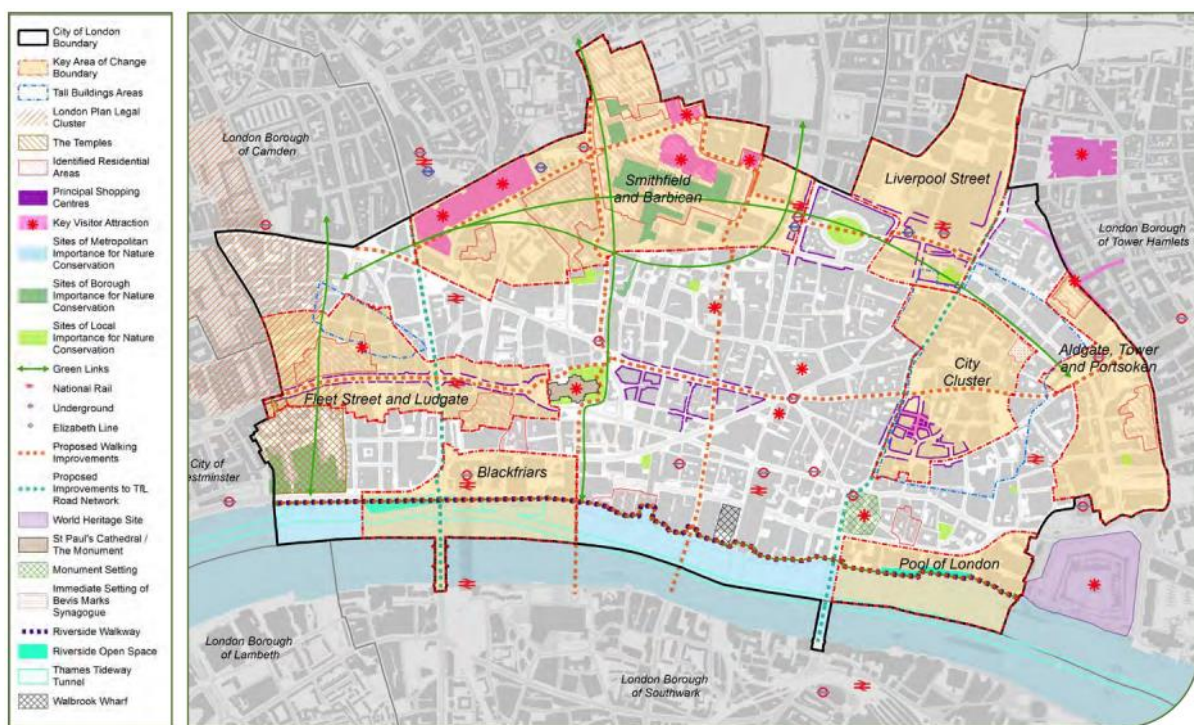


Figure 1: Key Diagram

Strategic Policy S4: Offices

Commentary



In accordance with the Draft City Plan, 'Strategic Policy S4: Offices' advises that the strategic growth target is 1,200,000 sqm over the plan period up to 2040. This results in a reduction from the previous 2,000,000 sqm growth target within the adopted City Plan. The supporting policy text advises that the overall office floorspace target of 1,200,000sqm is derived from the estimated growth in office employment between 2021 and 2040 and represents 13% increase in floorspace. The target delivery has been extended to reflect the evidence that growth is expected to be more even across the plan period rather than much of the 1.2m sqm delivered up front. There is also a greater emphasis on the provision of affordable workspace and flexible office space within Policy S4.

The evidence base for the reduction in the target has been taken from research by Arup on the future of office use. Arup have relied on data from a wide range of resources (post pandemic surveys) including the Hybrid Working Index (2022); Business Register and Employment Survey (BRES) (2023); City of London, Office Floorspace Net Gain data 2016-(2022). Ultimately, the report concludes that greater flexibility in ways of working has led to a lessened demand for new office floorspace.

The Offices Topic Paper states that *"current office occupancy and movement trends are showing a middle ground between the Hybrid Peak and Return of In-Person scenarios"*, which translates to an additional office floorspace requirement between 1.2 million sqm and 1.8 million sqm.

However, evidence is already confirming the need to plan fully for delivery of the higher floorspace target, and the "Return of In-Person" scenario. The City is performing differently to other London Boroughs and it is considered that the "Return of In-Person" is now prevailing, with a mid-week 'hybrid peak' that is less pronounced than that experienced in other markets. It is therefore considered that the office floorspace target in the draft City Plan should accommodate and support the higher floorspace target of 1.9 million sqm over the plan period.

Proposed modification (S4)

The following modification is proposed to part 1 of the policy:

Increasing the City's office floorspace stock by a minimum of ~~1,200,000~~ 1,900,000 m² net during the period 2021 to 2040, phased as follows:

There would be consequential changes to the phasing of floorspace, however we would propose for the City to identify this if it agrees to the modification.

Policy OF1: Office Development

Commentary

We wholeheartedly support the provision of new, best in class, flexible office space and other workspaces that will ensure the City's pre-eminence as a global financial centre. This includes floorspace to accommodate the full range of business types and sectors. However, we wish to ensure that terminology is used correctly and appropriately in response to evidence, and therefore seek to clarify the use of the term 'affordable' in relation to workspace.



The London Plan defines two main workspace requirements, with policy E2 requiring development proposals of more than 2,500sqm GEA to provide an element of flexible workspace for micro and SMEs, and policy E3 defining circumstances in which subsidised floorspace should be provided.

Draft policy OF1 appears to mix these two requirements in part f., and we would welcome clarification. The requirement under policy E2 does not require evidencing unless the City wish to set a lower threshold, however an affordable workspace policy in line with E3 does need to be evidenced. The evidence base for the Plan does not identify a need for affordable workspace in the City, and it has not been tested through the Local Plan Viability Assessment – other than as a crossover/component of the cultural contribution.

Consequently, we consider that part f of the policy should relate just to flexible floorspace, and references to affordable workspace should be removed to the cultural policies where they are the form of provision for arts, culture or leisure that proves to be appropriate for a particular development scheme, and where that provision forms part of any cultural contribution, and not a separate requirement in addition to it.

Proposed modification (OF1)

The following modification is proposed to part f of the policy:

Where appropriate **on schemes proposing more than 2,500sqm GEA office floorspace,** provide a proportion of flexible ~~and affordable~~ workspace suitable for micro, SMEs.

Related modifications to the cultural policies are referenced below.

Policy DE1: Sustainable Design

Commentary

Policy DE1 (Sustainable Design) of the draft City Plan 2040 states that all developments should seek opportunities to contribute to the wider sustainability of the City.

Within Policy DE1, no embodied carbon intensity targets have been proposed – this is considered sensible, due to the fact that taller buildings often perform worse than other building types (i.e. low/mid-rise offices) due to stability and structural needs. Building examples which are provided in the SPD to demonstrate whole life carbon best practice (for example, Newgate, 7 Princess Street, 8-12 New Bridge Street) are not tall buildings. There is very little verified performance of tall buildings, which reiterates the importance of reporting with future transition towards targets once sufficient as-built data has been captured.

The policy refers to a greater emphasis on retrofit and retrofit first. Whilst AXA IM endorses the commitment towards the delivery of a net zero carbon City of London by 2040, taking a ‘retrofit first’ approach to development, this should be defined. There are scales of retrofit which will ultimately have implications on energy and carbon.

Further, overall Policy DE1 should make clear that the delivery of sustainable design will involve balancing the economic, social and environmental dimensions of development with regard to the



Plan's strategic objectives. This would ensure the policy is in general conformity with the London Plan's 'Good Growth' objectives, as well as Policy D3 (optimising site capacity through the design-led approach) and Policy SD4 in respect of the Central Activities Zone.

The policy should be amended to embed this holistic approach, specifically where it seeks to ensure the 'most sustainable and suitable approach' for any given site and before introducing the need for development to 'minimise whole life-cycle carbon emissions'.

As currently drafted, there is no acknowledgment of the need to optimise sites in the context of the wider economic and social dimensions of sustainable development. Without that balance, the Policy could be interpreted and applied as one which always favours the least carbon intensive development option in any given scenario. These comments should also be acknowledged in relation to Policy S8 (Design), given that the 'retrofit first' requirement is also noted at the forefront of this policy.

Policy DE1 states that a minimum target of BREEAM Excellent is now required, which is in-keeping with other Boroughs. However, we consider that the supporting text should recognise that non-office uses at lower levels, such as shell retail and leisure uses, are more challenging to deliver against Excellent.

The policy proposes that development should commit to achieving a minimum NABERS 5* rating. It should be clarified if this is a base build OR whole building rating requirement, as this potentially conflicts with the 'retrofit first' practice. Further clarification is also sought in relation to whether this rating requires verification in operation via Energy for Offices rating. It is unlikely a building will operate at NABERS DfP rating from day one, meanwhile, 'Be Seen' monitoring mechanism can be used to determine in-use energy consumption. This should be recognised.

Proposed modification (DE1)

The following modification is proposed for part 2 of the policy:

All major development must undertake an assessment of the options for the site, in line with the City Corporation's Carbon Options Guidance Planning Advice Note, and should use this process to establish the most sustainable and suitable approach **in order to best meet the requirements** for the site **set out by the development plan**.

Proposed modification (DE1 supporting text)

The following modification is proposed to the supporting text, suggested as a new paragraph after 9.2.7:

It is recognised that tall buildings have additional requirements for carbon, including structure and infrastructure, which may prevent them from achieving the same carbon targets as lower rise alternatives. Where tall buildings are recognised and required by the Plan as an appropriate form of development which optimises a site to accommodate growth, this will be reflected in the City's expectations for carbon performance.

The precise form of words is not as important here as the principle of acknowledging that tall buildings are inherently more carbon intensive, but that they are supported by the Plan for other reasons.



Policy AT1 – Pedestrian Movement, Permeability and Wayfinding

Commentary

It is considered that the proposed transport policies are largely aligned and consistent with the City's Transport Strategy and the City's proposed revised Transport Strategy. The below therefore only considers some specific policy points.

Policy AT1 (Pedestrian Movement, permeability and wayfinding) advises that developments should enhance permeability where possible for pedestrians and allow for the ground floors to be publicly accessible where possible. AXA IM support these principles, with a key aim of their emerging scheme being to increase permeability and accessibility.

It is noted that part 11 of Policy AT1 states that major developments should model the pedestrian flows around their site. Whilst the aspirations of the policy are supported, more clarity is sought for the type of schemes that need to provide pedestrian modelling – i.e., perhaps not all major developments will need to provide this information. This should be on a case by case basis related to the potential impacts of the development.

Policy AT3 – Cycle Parking

Commentary

The draft policy reflects the standards set within the London Plan.

Data collected from AXA IM's 22 Bishopsgate which was completed in 2020, has shown that at present only around 16% of the cycle spaces are occupied on a given day. Data collected from British Land and GIC's 100 Liverpool Street development, which was also completed in 2020 and which we understand to be fully occupied, has shown that at present, only around 20% of the cycle parking spaces are occupied on a given day. It should be noted that these two buildings were designed to the 2016 London Plan which had lower cycle parking standards for cycle space provision than the 2021 London Plan (1 space per 90 sq m GEA). Applying the 2021 London Plan standards to 22 Bishopsgate would result in only 10% of the cycle spaces being occupied by today's demand.

Encouraging cycling and other modes of active travel is supported, however the standards used to direct this present two key issues:

1. The use of GEA does not reflect how many employees are in a building given it includes back of house areas, basements, plant rooms, cores etc. Tall buildings and retrofit schemes have lower NIA:GEA ratios, which results in them providing significantly more cycle parking relative to their occupiable floor area compared to simpler, less constrained building typologies.
2. The London Plan standard assumes a density of 1 employee per 12sqm GEA, as set out in the London Plan evidence base. Each office building varies; however, this translates to approximately 1 employee per 8/9sqm NIA. The 2023 Building Council for Offices (BCO) guidance is that office buildings should be designed for peak occupational density at 1



employee per 12.5sqm NIA. Employee densities have been reducing in the City of London as occupiers seek higher quality offices with additional spaces such as break out zones, meeting and conference rooms and areas for wellbeing, which do not translate to more desks and people. This means a typical day to day occupational density is often closer to 1 employee per 15sqm - 20sqm NIA, less than half of the assumed density in the London Plan cycle parking standards.

These two issues combined result in a significant overprovision of cycle parking spaces in most City office buildings. As the London Plan has significantly over-estimated employee density it is expected that cycle parking in buildings such as 22 Bishopsgate and 100 Liverpool Street will never be fully used, even if the London Plan cycle mode share target of 19% is reached in future. This overprovision has wider implications for new developments, with a lack of space for long-stay cycle parking at ground level and the need to deliver extensive multi-level basements, which significantly increases embodied carbon emissions.

Recent surveys of the cycle parking at 22 Bishopsgate show the cycle mode share for the building is typically 6%, considering a usual daily occupancy of 1 person per 21sqm NIA. Assuming a theoretical future maximum scenario where the London Plan mode share target of 19% is reached, and occupational density increases to 1 employee per 15sqm NIA, the office development would generate a demand for 1,570 cycle parking spaces. This is 970 spaces fewer than the London Plan currently dictates as a minimum day one provision, equivalent to 3600 cubic metres (based on London design standards) of unrequired carbon intensive basement space.

It should also be noted that applying the 19% mode share target directly as a cycle parking standard does not take into account innovations around Micro-Mobility as a Service (MaaS) modes such as cycle hire and e-scooters, which will continue to replace some of the privately owned bike trips within the City. Further work on commuting patterns and how this translates to cycle parking usage should be conducted to give a clearer picture as to what is required by new development and to minimise unnecessary basement excavation and embodied carbon. Whilst some surplus in cycle parking provision is supported to allow for future growth in cycling mode share, the gap between current usage and policy standards is considered excessive.

Proposed modification (AT3)

1. Revise the methodology: To resolve current methodological issues we suggest updating the standard to use Net Internal Area (NIA) rather than Gross External Area (GEA), and update occupational density standards to reflect actual usage supported by BCO research and standards.
2. Adopt a phased approach: The current London Plan modal share target of 19% is likely to take many years to achieve in London. In the meantime, space is sitting empty that could be used for other purposes. Complimentary uses could include amenity and wellbeing space for employees such as fitness studios and gyms, which would contribute to healthy, active lifestyles. A monitoring regime secured through legal agreement would enable cycle parking usage to be regularly reviewed such that temporary or meanwhile uses could be removed and additional cycle parking provided in the future, if and when needed.

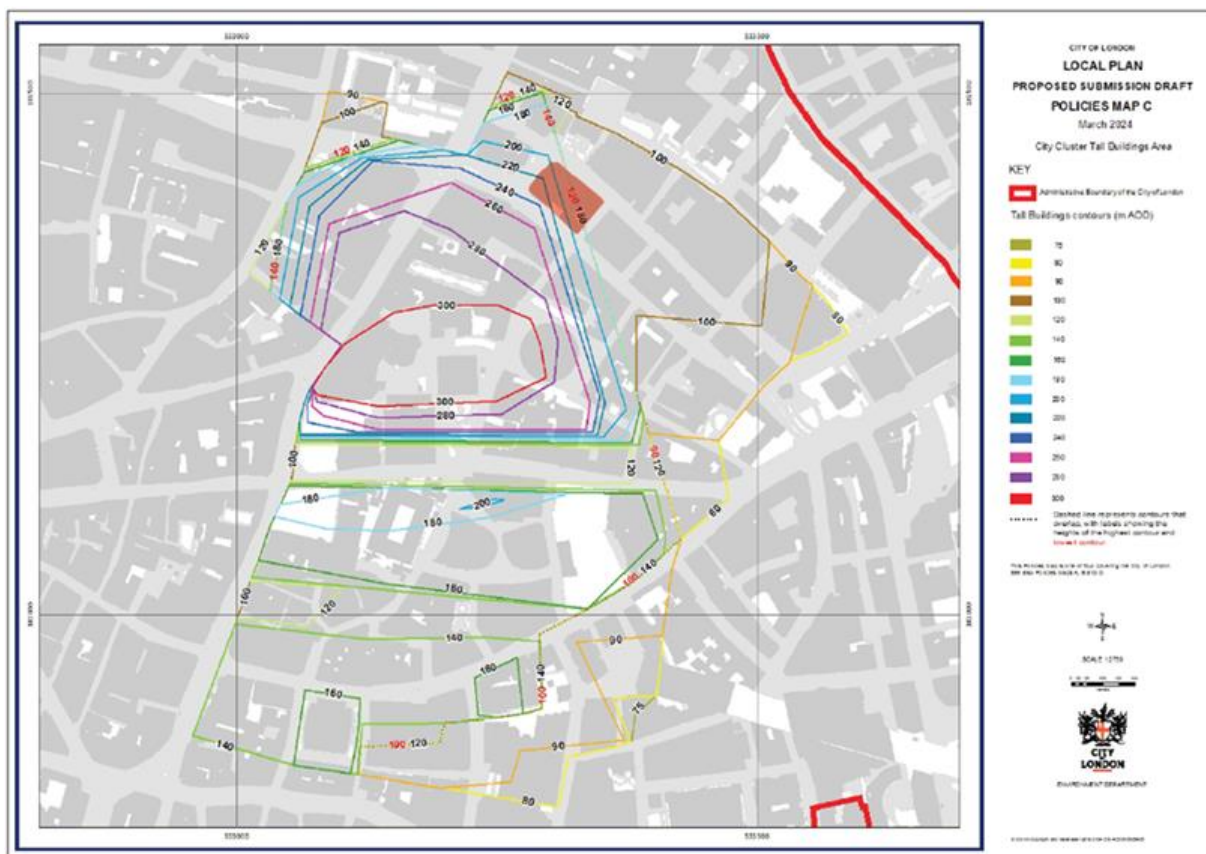


Commentary

In the City's adopted Local Plan, 63 St Mary Axe is located within the Eastern Cluster, under policy CS14 (Tall buildings). The inclusion of the site within the City Cluster Tall Buildings Area in draft policy S12 (as shown in Figure 14) is consistent with this approach, and is fully supported. As described above, 63 St Mary Axe is a suitable site for a tall building and has the potential to deliver a significant uplift in floorspace in a highly accessible (and therefore sustainable) location.

As a site within the City Cluster Tall Buildings Area, the maximum height of a tall building permissible on the site is set by policy S12, which includes the tall building contour rings on Figure 15. Whilst we support the principle of the site's inclusion within this policy as stated above, we have some specific comments on the wording of the policy and the height of the contours which relate to the site, and consequently consider that it is not sound, but could be made sound with proposed modifications described below.

The maximum permissible tall building heights for sites in the City Cluster Tall Buildings Area are depicted as contour rings on Policies Maps C and D and Figure 15. The site of 63 St Mary Axe has been identified on Policies Map C below in red for ease of reference:



The site is located between the contour rings for 100m AOD (to the east) and 240m AOD (to the west), with the contour rings at 120, 140, 160 and 180m AOD rings stacked vertically on the same alignment, with further contour rings at 200 and 220m AOD also located above the site. As such, it has a particularly complex interaction with Figure 15 and policy S12, and it is our main aim with these representations to ensure that clarity is provided in relation to the application of the draft policy to the site.



Evidence base

A Strategic Visual Impact Assessment (SVIA) was undertaken as part of the evidence base to inform draft strategic policy S12. This assessed an indicative massing for the City Cluster in the form of a three-dimensional ‘jelly mould’.

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 the City of London; 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.

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.

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.

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.

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.

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 the City, combining the hard and qualitative constraints. The influence of the qualitative constraints on the cluster’s massing has been at the subjective discretion of the City, and the draft City Plan does not offer a clear description of how these have influenced the 2D contours included in Policies Map C and Figure 15.

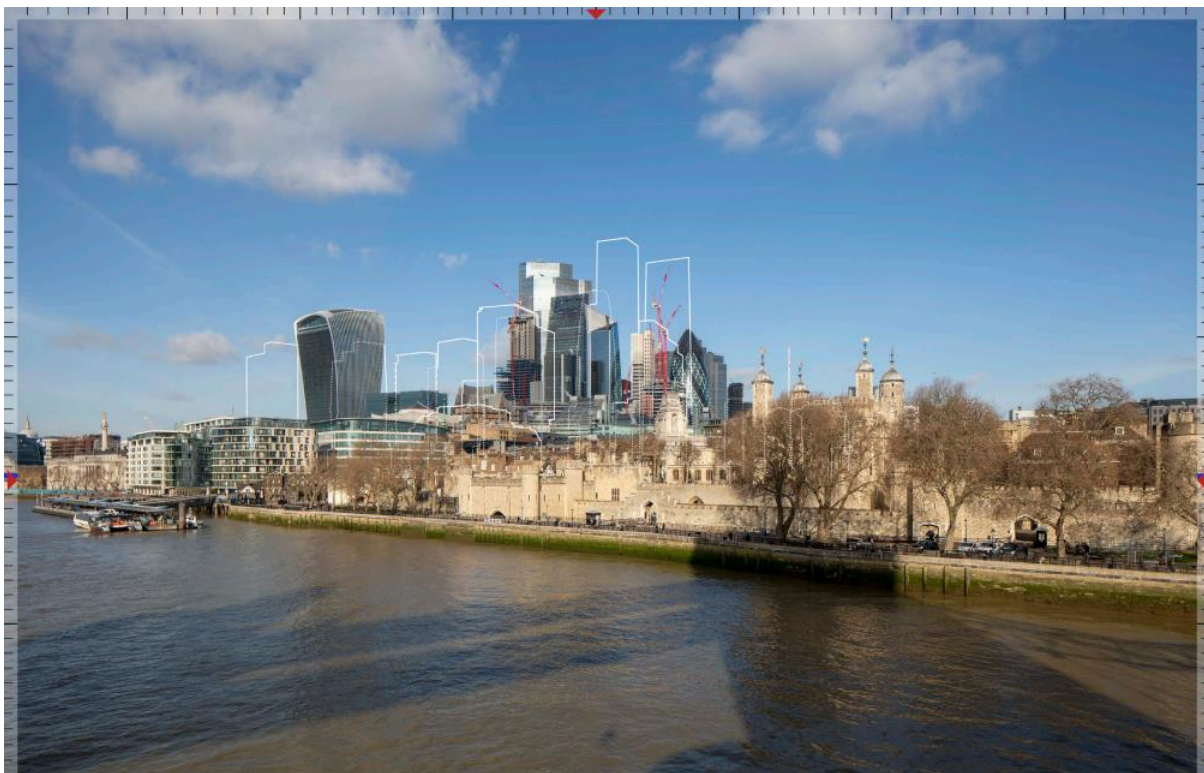
Draft Policy S12 identifies that the contour rings represent the “maximum permissible” tall building heights that the City considers to be appropriate, as evidenced by the Strategic Visual Impact Assessment (SVIA) which forms part of the evidence base to the emerging Local Plan. The Strategic Visual Impact Assessment (SVIA, April 2024) illustrates that the proposed contours are more conservative than the 3-dimensional jelly mould, and there are instances where some existing and



consented schemes protrude beyond the proposed contours making them hard to interpret. 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. Contours should allow for the heights of the existing and consented schemes to be fully integrated, as in the jelly mould presented in the evidence base, and for proposed new tall buildings to be accommodated within this broader envelope.

Site specific response

The Volumetric Testing that has informed the contour rings identifies that the contour heights which cross the site are principally generated in response to LVMF View 10A.1, or view c1 (Tower Bridge: upstream – the north bastion) in document ED-HTB3 Tall Buildings Policy Volumetric Testing 1-2. Below is the Future Baseline version of this view:



63 St Mary Axe is located at the vertical edge at the right hand side of the envelope in this view. There are three existing buildings visible in this view which need to be understood in order to understand the justification for our proposed modification, which are:

- The Tower of London's White Tower, which is a World Heritage Site and Grade I listed building, and is the main strategic landmark identified within the LVMF from this viewing position;
- The Pan Pacific Hotel, which is an existing tall building of 150m AOD which in this view appears immediately to the west (left) of the White Tower, appearing black/dark brown, with visual attachment to the White Tower through its lower shoulder. Its upper portion steps away, resulting in a sky gap with the White Tower; and
- The Salesforce Tower, located to the west (left) of the Pan Pacific Hotel, rising in steps to a height of 218m AOD.



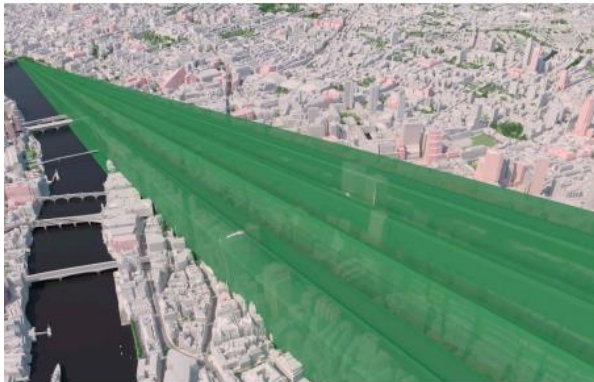
The evidence base, in document ED-HTB2 Tall Buildings Policy Volumetric Testing 1-1, identifies that a projection of the Future Baseline onto LVMF View 10A.1 results in the green envelope below. This notably includes a profile that relates directly to the silhouette of the Pan Pacific Hotel.



Projection of Future Baseline viewed from North Bastion of Tower Bridge (LVMF 10A.1)



Intersection of Future Baseline projections from key viewing locations



Projection of Future Baseline viewed from centre of Waterloo Bridge (LVMF 15B.2)

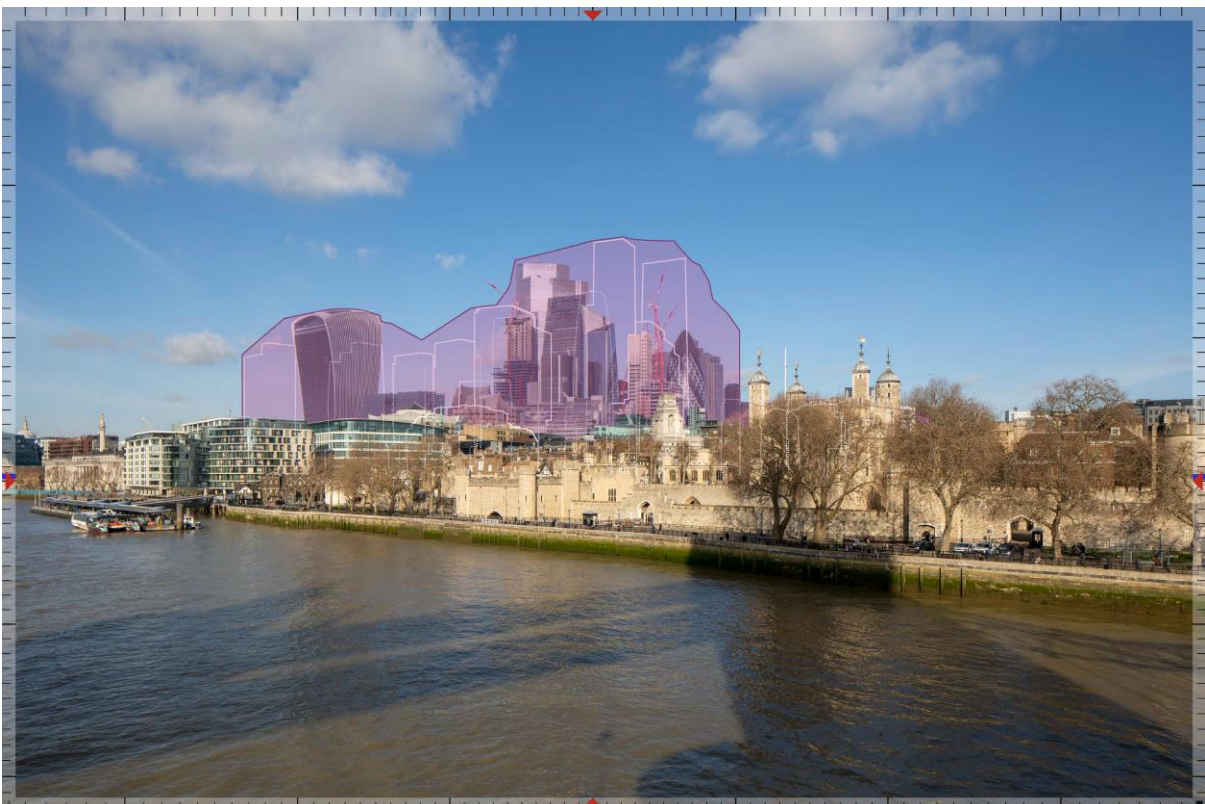


Intersection of Future Baseline projections viewed from Tower Bridge (LVMF 10A.1)

Document ED-HTB3 Tall Buildings Policy Volumetric Testing 1-2 then illustrates the appearance of Option B: Stepped envelope including defined contours in view c1 below. This also illustrates an envelope which follows the eastern edge of the upper portion of the Pan Pacific Hotel (i.e. its existing silhouette), in order to maintain the sky gap with the White Tower. The envelope then continues vertically in the same plane, stepping back in at 180m AOD.

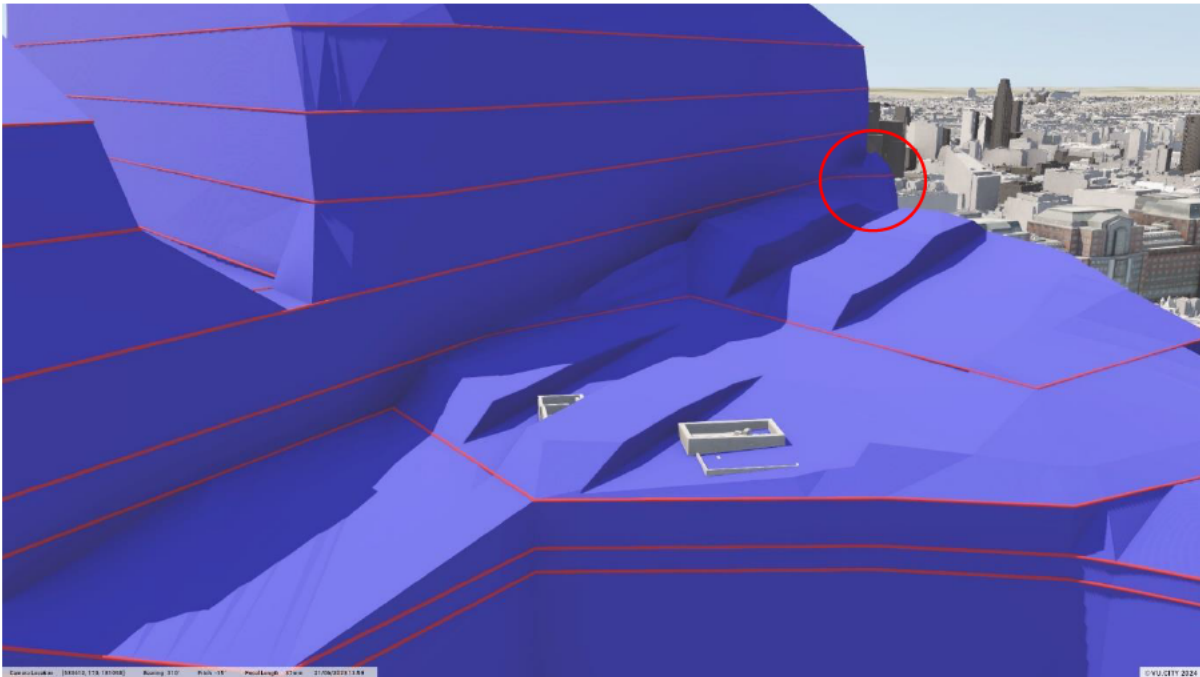


Document ED-HTB3 Tall Buildings Policy Volumetric Testing 1-2 then illustrates a ‘smoothed envelope’ of Option B, indicating the potential outcome from detailed assessment of specific sites. This illustrates an envelope which follows the eastern edge and the shoulder height of the Pan Pacific Hotel (i.e. its existing silhouette), in order to maintain the sky gap with the White Tower. The envelope then continues vertically in the same plane, stepping back in at 180m AOD.





A better understanding of the form of the envelope in relation to the Pan Pacific Hotel is provided by the three-dimensional model provided by CoL as part of their evidence base. The image below shows this model as imported into VuCity. The red lines represent the contour lines, and the purple is the jelly mould as produced by CoL.



The specific feature of the envelope to note is the extension of the 120m AOD contour ring to include just the shoulder of the Pan Pacific Hotel – highlighted with a red circle. The effect of this ‘step out’ is to include all of the existing silhouette of the Pan Pacific Hotel from view position LVMF 10A.1. This contour also runs across the site. The projection from the viewing position of LVMF 10A.1 is not explicitly marked to account for development in the foreground of the Pan Pacific and causes confusion. However, the three-dimensional modelling by CoL, seen in the purple form in the image above shows how the mediation between the 120m and 100m contour line could be interpreted, which would include allowing for development in the foreground of the Pan Pacific shoulder in LVMF 10A.1.

In relation to the policy itself and the interpretation of the contour rings, we think the draft wording would benefit from some clarifications in order to ensure that its intent is clearly understood and can be applied to individual sites with complex contour ring relationships such as 63 St Mary Axe. Extracts of Draft policy S12 are provided below, with specific text highlighted where we consider that further clarity is required. Part 3 of the policy states that:

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 not exceed the height of the relevant contour rings. In areas between the contour rings, tall buildings should be designed to successfully mediate between the contour ring heights 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.



Para 11.5.11 of the Plan provides the following guidance as to how the draft policy works:

*London Plan policy D9 B requires appropriate locations and appropriate tall building heights to be identified on maps in Development Plans. Figure 14 and Policies Maps C and D identify the areas where tall buildings may be appropriate in the Square Mile. Within these 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.** These maximum heights are those that the City Corporation considers to be the appropriate tall building heights based on an assessment of the potential impacts on strategic views and the following heritage assets: St Paul's Cathedral, The Monument and the Tower of London World Heritage Site. **In areas between the contour rings, tall building heights should be designed to successfully mediate between them. Where two contour rings overlap, Policies Map C identifies two heights. The lower height should be applied to the development that sits outside the contour ring; the higher height should be applied to the development that sits inside the contour ring.** In addition, part 8 of the policy requires the height and form of tall buildings to take into account strategic and local views; protected views are also addressed in Strategic Policy S13.*

This is a complicated approach to defining maximum heights, which requires the following steps to be taken in order to ascertain the maximum heights applicable to a specific site:

1. check that the site is within a location identified on Figure 14;
2. identify the 'relevant' contour rings for the site in question, being those that the site is located 'inside' of, 'outside' of, and any that run directly through the site;
3. where a site has a contour ring running through it, the maximum height for development is that contour ring at that specific point;
4. where a site is between contour rings, the maximum height for development comprises an upper limit defined by the next highest contour ring, and a lower limit defined by the next lowest contour ring;
5. where contour rings overlap, the maximum height for development comprises an upper limit defined by the highest contour ring and a lower limit defined by the lowest contour ring; and
6. all development is then subject to the qualitative design criteria and a subjective assessment of 'mediation'.

We recognise the challenges inherent in applying the rather blunt requirements of London Plan policy D9 to a place as complicated as the City of London, however we would urge a simpler approach which allows for greater flexibility and for more nuanced consideration of tall building designs through the planning application process. We wonder whether the Characterisation and Growth LPG (London Plan Guidance) provides helpful guidance as to how the policy could be simplified. It states at para 4.4.12 that '*heights can also be stated as a range instead of a single maximum height*', and we wonder whether this could provide for a simpler application of the contour rings, so that rather than contour height rings, maximum heights are expressed as height ranges between the contour rings. This could allow the six step process described above to be replaced with a simpler three step process:

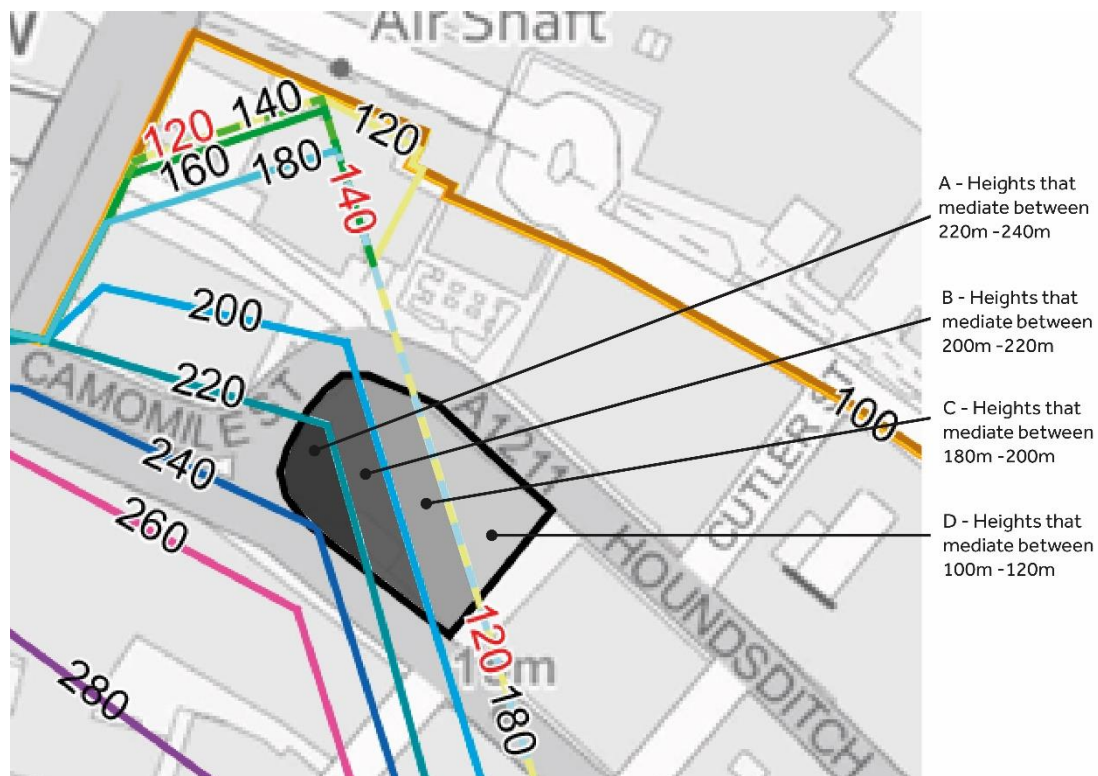
1. check that the site is within a location identified on Figure 14;



2. identify the maximum height range applicable to development on a site (noting that a site may be subject to more than one range);
3. apply the qualitative design criteria.

Specifically in relation to 63 St Mary Axe and the difference between the Future Baseline projection and the Stepped envelope with defined contours identified in the evidence base, policy S12 as drafted states that because there are overlapping contour rings at 120 to 180m AOD, development that sits outside the contour ring is subject to the lower height of 120m AOD. The policy then states that tall building heights should be designed to successfully 'mediate' between 120m and 100m AOD.

Our interpretation is that the site lies across areas identified to mediate between 100m and 240m as further labelled in the diagram below. Maximum heights for the site in line with the London Plan policy D9 are interpreted as: area A would have a maximum height of 240m; area B a maximum height of 220m; area C a maximum height of 200m; and area D would have a maximum height of 120m. Other elements of the policy then ensure heights are not maximised throughout the site but take into account further qualitative considerations.



We wish to support this aspect of the contour rings, as shown on Figure 15, as specifically permitting tall building development to occur on the 63 St Mary Axe site, within the silhouette of the Pan Pacific Hotel, and above its taller portion stepping up in height to the Salesforce Tower, and that the evidence base identifies that this specific form of 'mediation' is development that is envisaged by the draft policy.

We still request that the City considers whether a range of heights may be a simpler way to apply the evidence base to the policy, but if the existing approach is preferred, then we consider there to be



some modifications to the wording that would help to clarify how the contour rings should be applied to individual sites. These are provided as a proposed modification below.

In addition to the principle relating to the replacement of existing tall buildings outside identified tall building areas, we consider that the policy is overly prescriptive on the provision of public access. London Plan Policy D9 Part D states that *'Free to enter publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London'* (emphasis added).

Policy S12 requires all tall buildings to provide publicly accessible elevated spaces at upper levels, which we do not consider to have been substantiated, especially in light of the number of existing planning permissions that have already been granted with public viewing galleries, and the additional carbon cost of providing the additional lifting and other infrastructure to support a public use at the upper levels of a tall building. We consequently propose modifications to better align this policy with the London Plan.

Proposed modification S12(1)

The following modification is proposed to the Location and heights part of the policy (part 3):

*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. **In areas directly below a contour ring,** tall buildings should not exceed the height of the relevant contour rings. In areas between the contour rings, tall buildings should be designed to successfully mediate between the **relevant** contour ring heights ~~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.*

The modification is designed to clarify the application of policy S12, and ensure that it is effective.

Proposed modification S12(2)

The following modification is proposed to the Design and public access part of the policy (part 10):

*h. incorporate publicly accessible open space within the building and its curtilage, including **where appropriate** free to enter, publicly accessible elevated spaces at upper levels, which may include culture, retail, leisure or education facilities, open spaces including roof gardens or public viewing galleries;*

This is considered necessary to ensure that the policy is justified.



Strategic Policy S21: City Cluster

Commentary

Policy CS7 (Eastern Cluster) of the Adopted Local Plan indicatively identifies 63 St Mary Axe as being located within the Eastern Cluster Area, one of the Key City Places (see Figure G at p72). Whilst the Plan acknowledges that the Key City Places do not have defined boundaries, they face particular challenges, and the challenge facing the Eastern Cluster was to ‘provide a clear policy framework to guide business development, particularly tall buildings, whilst ensuring a safe and attractive environment’.

In the draft City Plan 2040, the Key City Places have become Key Areas of Change (‘KAOC’), and the Eastern Cluster has now become the City Cluster. There are two defined boundaries of relevance, the boundary of the KAOC itself (shown at Figure 27 of the Plan), and the boundary of a defined City Cluster Tall Buildings Area (see Figure 14 at p197 of the Plan). The City Cluster Tall Buildings Area does include 63 St Amry Axe, and we endorse and support this for the reasons described below in relation to Strategic Policy S12. However, the KAOC boundary for the City Cluster does not include 63 St Mary Axe, or indeed adjoining sites between Houndsditch and Bevis Marks, and it is this omission that we consider makes the KAOC policy unsound, but capable of being sound with a modification.

We consider that the City Cluster KAOC boundary should be extended to include 63 St Mary Axe for the following reasons:

- It is already included within the City Cluster Tall Buildings Area, and is therefore an appropriate location for a tall building which is a change of the nature that is integral to the KAOC policy area;
- As a tall building site, 63 St Mary Axe can deliver a significant uplift in office floorspace, contributing to the delivery of the City Plan’s forecasted demand for new office space, the vast majority of which is planned to be accommodated within the City Cluster KAOC; and
- The site is bounded by Bevis Marks and Camomile Street to the south and Houndsditch to the north. Bevis Marks/Camomile Street is identified as a Green Link on Figure 1 in the Spatial Strategy, and a Major Street to Enhance on Figure 28. Green Links are not defined in the Plan, however the redevelopment of 63 St Mary Axe is integral to delivering the environmental and public realm enhancements along this axis of a strategic scale as envisaged by the Spatial Strategy and Strategic Policy S21; and
- The redevelopment of 63 St Mary Axe can contribute to other aspects of Strategic Policy S21, including in relation to complementary uses such as culture and leisure, providing new open space, increased urban greening, improving connectivity (including in particular north-south connectivity) and improving walking and cycling infrastructure.

Proposed modification (S21)

The following modification is proposed to Figures 27 and 28:



- Extend the City Cluster Key Area of Change boundary to the north, to run east to west along Houndsditch, rather than Bevis Marks.

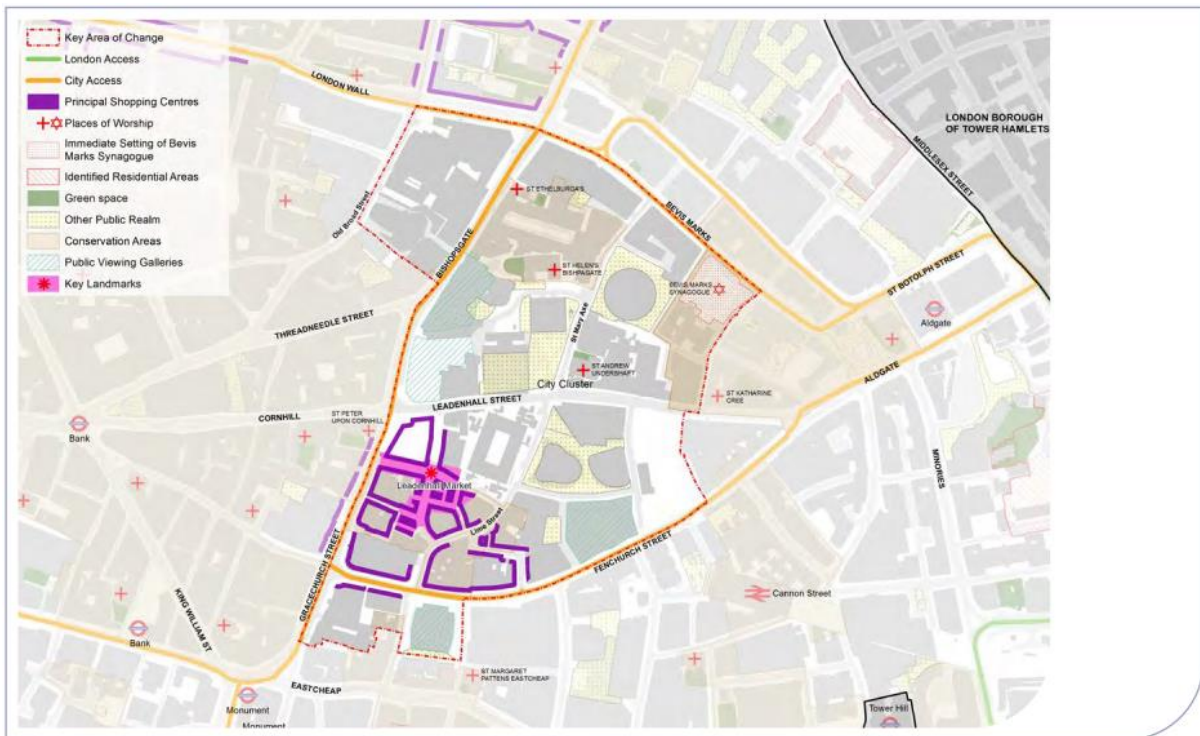


Figure 27: City Cluster existing conditions

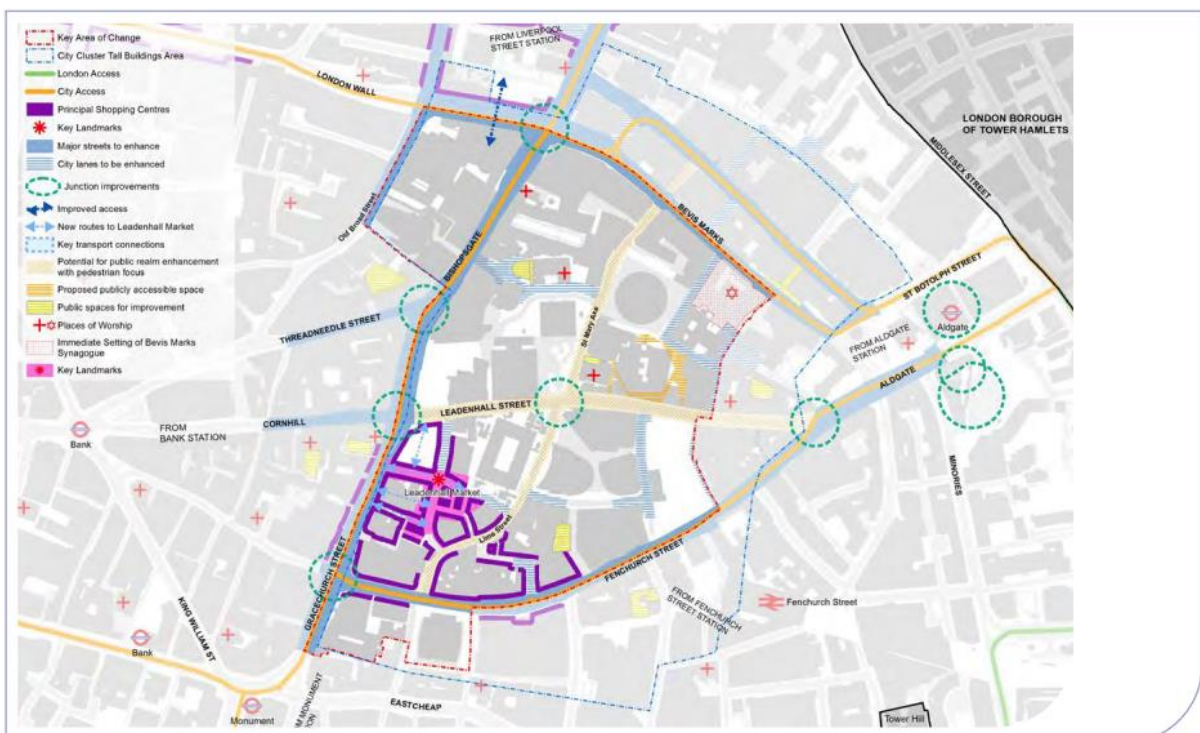


Figure 28: City Cluster Spatial Priorities



Conclusion

AXA IM welcomes the opportunity to comment on the Draft City Plan and we would welcome the opportunity to further engage with Officers to discuss any specific elements within these representations.

We trust the points raised in this representation will be taken into account and will be used to inform the final version of the City Plan. Should you have any queries or require any further information in respect of the above, please contact Jonathan Smith or Eleanor Hulm of this office.

Yours faithfully

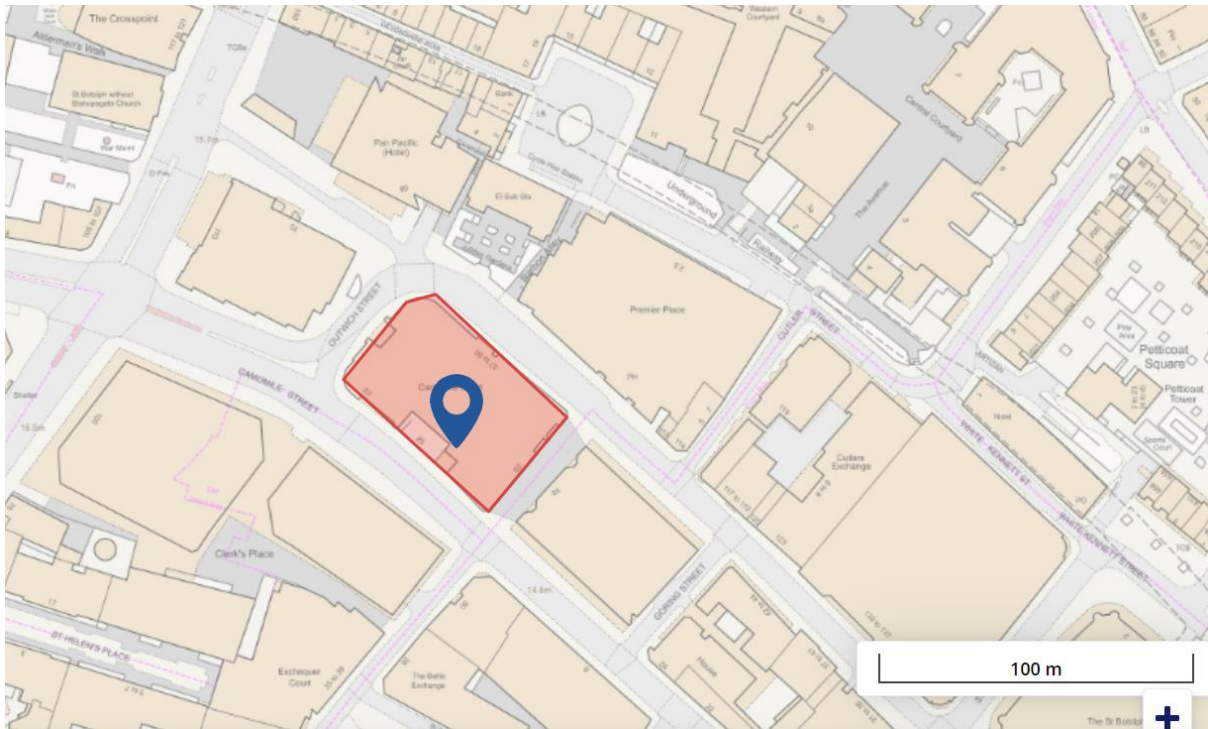
DP9 Ltd.

DP9 Ltd

Encs



APPENDIX 1: SITE LOCATION PLAN





APPENDIX 2: COMPLETED RESPONSE FORM