

# City Plan 2040 Regulation 19 Consultation - Representations by The Prudential Assurance Company Limited

Chris Beard [Redacted]

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Mon 6/17/2024 9:52 PM

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

Cc: Theo Barker [Redacted]

📎 2 attachments (3 MB)

L CoL 170624 Reg 19 reps.pdf; 120624 Project Domino CoL TTC final.pdf;

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Dear Sir

Please see enclosed representations submitted on behalf of our client, The Prudential Assurance Company Limited.

Please can you acknowledge receipt of this email and attachments.

Yours faithfully

Chris Beard

Board Director

[Redacted signature block]

website: [www.dp9.co.uk](http://www.dp9.co.uk)

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**Regulation 19 Publication City Plan 2040**  
**Representations on behalf of**  
**The Prudential Assurance Company Limited**  
**1-2 Minster Court, London, EC3R 7PD**

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12<sup>th</sup> June 2024

- 1.1 These representations have been prepared by The Townscape Consultancy Ltd for The Prudential Assurance Company Limited, who have a number of significant interests in the City of London and are the freehold owners 1-2 Minster Court, London, EC3R 7PD (the 'Site'). The representations have been made in response to the Regulation 19 consultation on the Draft City Plan 2040 to demonstrate how the proposed contours referred to in Strategic Policy S12 can be modified to better respond to the development potential of the Site.
- 1.2 Please refer to the cover letter from The Prudential Assurance Company Limited submitting representations to the City of London Corporation (the 'CoL').

**Evidence base**

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

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

#### **Using a 2D contours map**

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

views and the setting of St Paul's Cathedral, The Monument, and the Tower of London World Heritage Site.

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

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

**Site-specific evidence**

1.15 As published, the contours map indicates that the Site is in principle suitable for a tall building of up to 100m AOD to the northern edge and north-western corner of the Site, and up to 90m AOD to the south-eastern portion of the Site.

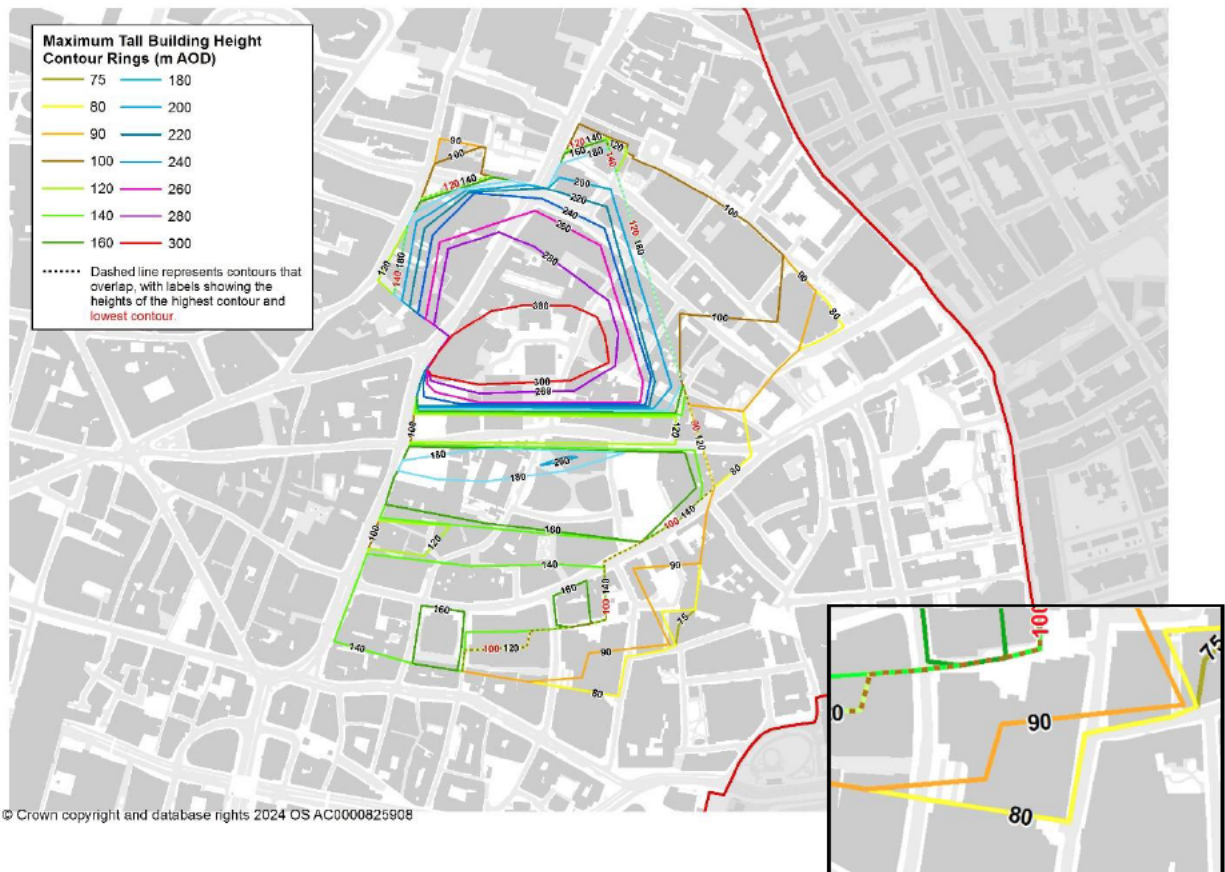


Figure 1.1: Published contours map (Figure 15 in the draft City Plan). Inset of the Site included for reference.

- 1.16 To allow for a meaningful redevelopment of the Site, fulfilling the aim of optimising the development potential of the City Cluster, it is suggested that the proposed contour heights over the Site should be adjusted horizontally on the map and increased upwards to a height of up to 120m AOD. Accordingly the 90m and 100m AOD contour lines would be shifted towards the southern and eastern boundaries of the Site, creating a gradual step up in height from the 80m AOD contour ring. The 120m AOD contour line would also be extended southwards and eastwards to cover the western-most portion of the Site. These changes would still accomplish the clear intention of the form of the cluster in this location: to step down towards the Tower of London World Heritage Site.
- 1.17 A revised version of the contour map, as suggested, is included at Figure 1.2 below.

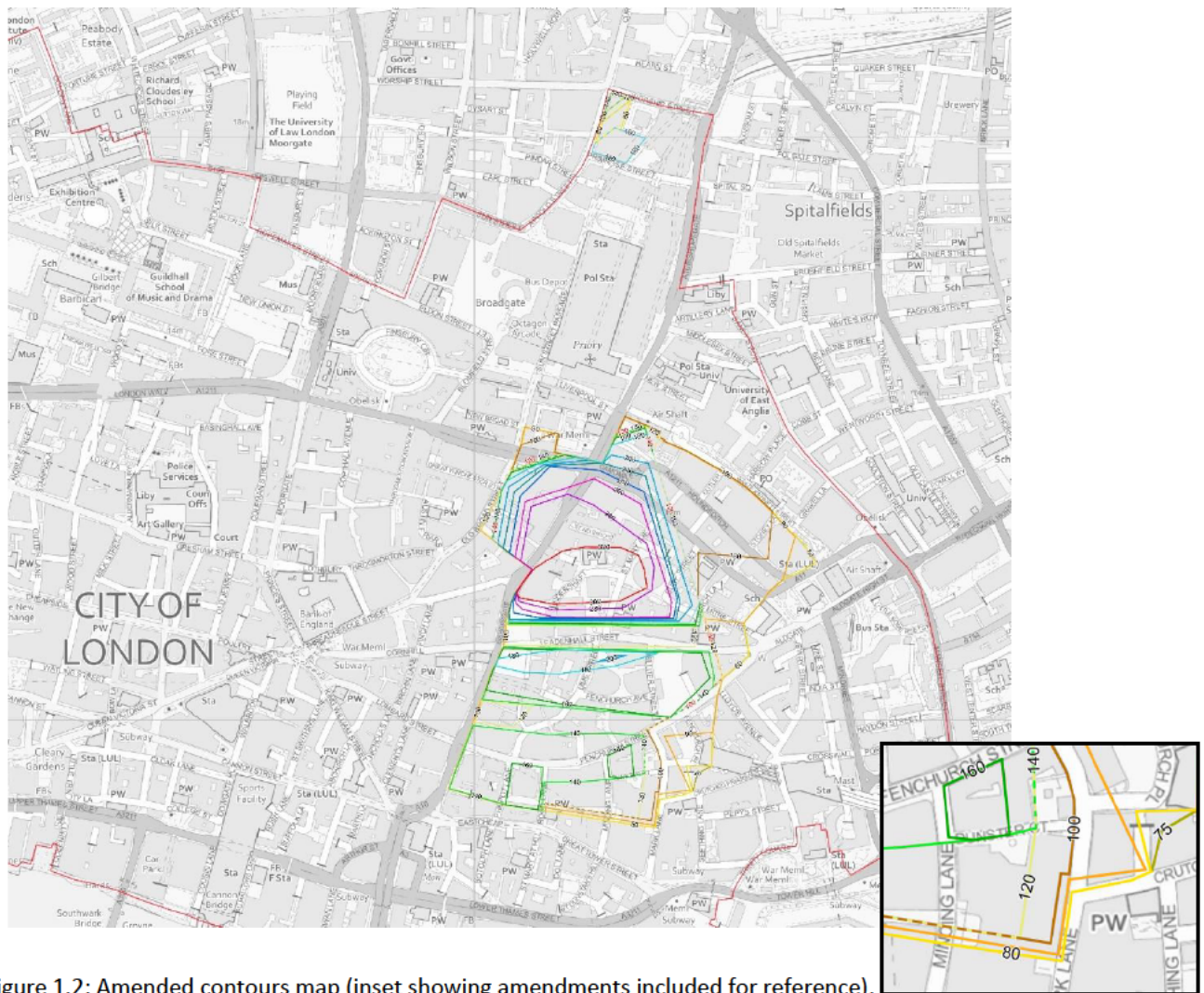


Figure 1.2: Amended contours map (inset showing amendments included for reference).

- 1.18 The analysis below demonstrates that any development on the Site would need to respond to sensitive views from St Paul's Cathedral, the Monument, and the Tower of London. These highly graded heritage assets are identified as three Strategically Important Landmarks which, alongside hard constraints including viewing corridors, have informed the indicative shape of the 'jelly mould', as presented in the SVIA.
- 1.19 Given its location in the cluster relative to the three Strategically Important Landmarks, of most relevance to any development on the Site is its relationship with the setting of the Tower of London World Heritage Site. Having carried out a high-level analysis of the potential effects of extra height on the Site on the setting of St Paul's Cathedral and the Monument to the Great Fire, our conclusions are that there would be no detrimental effects on these landmarks.
- 1.20 In relation to effects on the setting of the Tower of London, the most relevant townscape views are those from the Tower of London Inner Ward, and the LVMF views from Tower Bridge, the Queen's Walk, London Bridge and Waterloo Bridge. Figure 1.3 shows a map with the viewpoints considered for this exercise in relation to the Site, and the relevant views are presented in Appendix 1. For the purposes of these representations the relevant views are presented as Vu.City model shots, showing an indicative massing in green, comprising three interlocking volumes rising up to a height of 120m AOD on the north-west corner of the Site and 110m AOD to the north-east corner of the Site. The indicative massing steps down from 100m AOD to 90m AOD on the southern portion of the Site. With this approach, though taller, the direction of stepping in height within the City Cluster from east to west, away from the Tower of London, would be preserved as in the draft Local Plan.





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

- 1.21 The SVIA assesses a number of views from the Tower of London Inner Ward looking towards the proposed City Cluster (views 31-36 of the SVIA), demonstrating that there is not one established view from this part of the WHS looking towards the City Cluster. In these views, a scheme on the Site stepping from 120m AOD to 90m AOD, north-west to south-east would be visible in the context of other existing and consented tall buildings within the City Cluster (Views 1-6 at Appendix 1). Such a scheme would further consolidate the form of the City Cluster and would be read as separate from the historic foreground buildings within the boundary of the WHS, including the Grade I listed Chapel Royal of St Peter ad Vincula. The scheme would not be visible within SVIA View 31, which is closest to St Peter ad Vincula and is best preserved.

#### LVMF Views

- 1.22 LVMF view 10A.1 from Tower Bridge (SVIA view 1) demonstrates that the Site falls within the lower foothills of the proposed City Cluster. The SVIA states that within the view the form of the City Cluster descends towards the south and south-east *“in order to mediate successfully between it, the river and the WHS.”* (SVIA, p. 21). View 7 at Appendix 1 demonstrates that the indicative massing on the Site rising to an indicative height of 120m AOD would produce a series of forms which step up and away from the Tower of London WHS in the foreground and would mediate between the tallest buildings within the City Cluster, softening its southern edge. The scheme would add to the existing backdrop of the City Cluster within the view and would form an effective transition up to the height of the consented scheme at 50 Fenchurch Street.
- 1.23 Views 8-10 at Appendix 1 (LVMF views 25A.1-3 from the Queen’s Walk (SVIA views 11-13)) demonstrate that a building rising to an indicative height of 120m AOD on the Site would contribute to a sense of layering back from the river and would further consolidate the City Cluster *“with the form stepping up to the taller elements of the Cluster”* (SVIA, pg. 67). The scheme would adhere to the Visual Management Guidance set out in the LVMF as it would be of an appropriate height, scale and massing when appreciated from the Queen’s Walk and would not affect the ability of viewers to appreciate the OUV of the WHS.
- 1.24 Views 11 and 12 at Appendix 1 (LVMF views 11B.1 and 11B.2 from London Bridge (SVIA Views 2a and 2b)) show that a scheme gradually stepping to an indicative height of up to 120m AOD on the Site would successfully mediate between the tallest elements of the City Cluster and the lower buildings along the river frontage. Alongside the consented development at 50 Fenchurch Street, the scheme would continue the language of *“stepping down to meet the more sensitive context around the riverside and*

*WHS*" (SVIA, pg. 28). The more open quality of the Tower of London on the river's edge, and its skyline presence would be maintained.

- 1.25 Views 13 and 14 at Appendix 1 (LVMF views 15B.1 and 15B.2 from Waterloo Bridge (SVIA Views 6 and 7)) to the south-west of the Site demonstrate that a scheme rising to an indicative height 120m AOD on the Site would successfully complete the cluster's south-eastern edge from experienced from Waterloo Bridge, stepping down from the taller buildings and mitigating the cliff edge effect created by the existing building at 20 Fenchurch Street. Development on the Site has the potential to help consolidate the cluster, while maintaining the intention of the 'jelly mould' to step down in scale towards the Monument, the clear sky setting of which would be preserved.

## Summary

- 1.26 The Prudential Assurance Company Limited supports in principle the approach taken to identifying permissible heights within the City Cluster through the use of a contours map. However, we would argue that the contours map as drafted is overall too conservative and leads to confusion, when considering it in the context of the evidence base provided with the draft City Plan. We would argue that a modified map, which increases height in certain areas to allow for the full integration of existing and consented developments, would better reflect the real development potential within the City Cluster and remove confusion in its interpretation.
- 1.27 Regarding the text accompanying the policy, we have recommended amendments that we consider would make it easier to understand and interpret, reducing room for confusion and ensuring the optimisation of the cluster's volume.
- 1.28 Having tested the relevant views in relation to the Site at 1-2 Minster Court, we argue the Site is capable of accommodating a scheme exceeding the draft contour map heights without causing any detrimental effects to the setting of the three Strategically Important Landmarks, or compromising any of the hard constraints that have defined the shape and form of the City Cluster. Based on our analysis, we suggest that the Site can accommodate more than the 100m AOD as denoted by the contour map, while conforming with the overall intentions of the City Cluster's south-eastern edge, in particular with regards to its relationship to the Tower of London World Heritage Site and the Monument. Accordingly, we respectfully ask that the contour map be amended as proposed in these Representations (as shown at Figure 1.2) to optimise the development potential of the Site.

## Appendix 1: Vu.City Model Shots

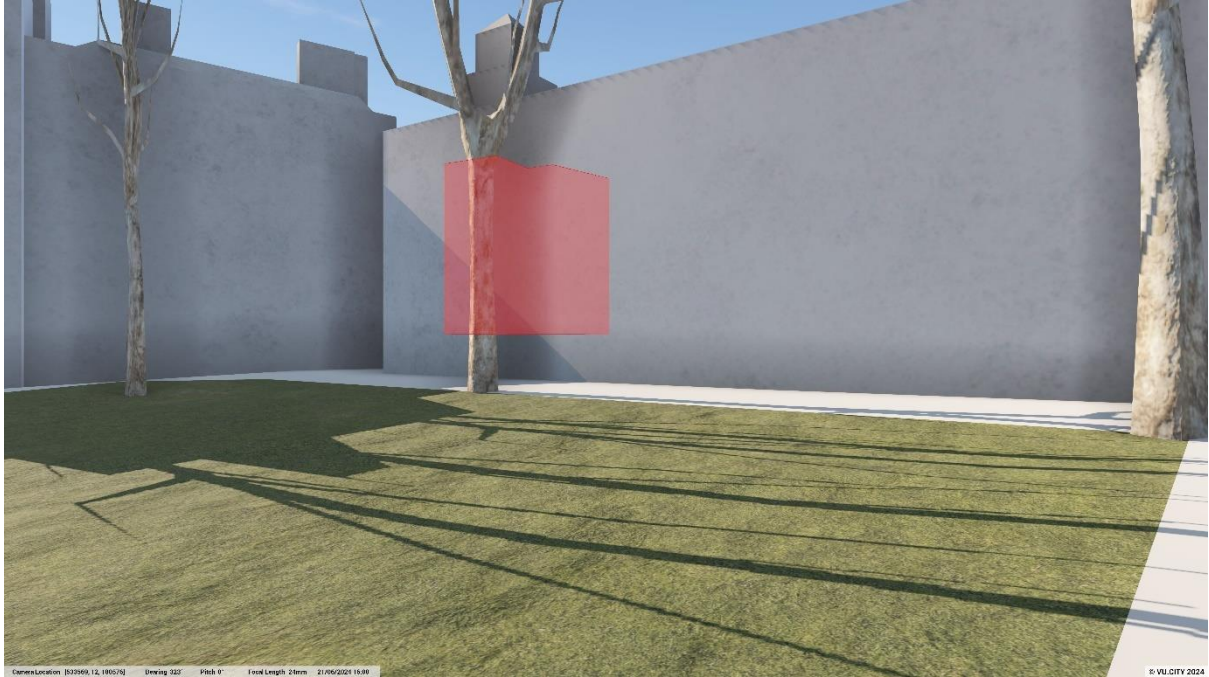


Figure A1.1: View 1- Representative Viewpoint Tower Green, Inner Ward (SVIA View 31)



Figure A1.2: View 2- Representative Viewpoint Tower Green, Inner Ward (SVIA View 32)



Figure A1.3: View 3- Representative Viewpoint Tower Green, Inner Ward (SVIA View 33)



Figure A1.4: View 4- Representative Viewpoint Tower Green, Inner Ward (SVIA View 34)



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



Figure A1.6: View 6- Representative Viewpoint Tower Green, Inner Ward (SVIA View 36)



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



Figure A1.8: View 8- LVMF 25A.3 City Hall- The Public Terraces (SVIA view 11)



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

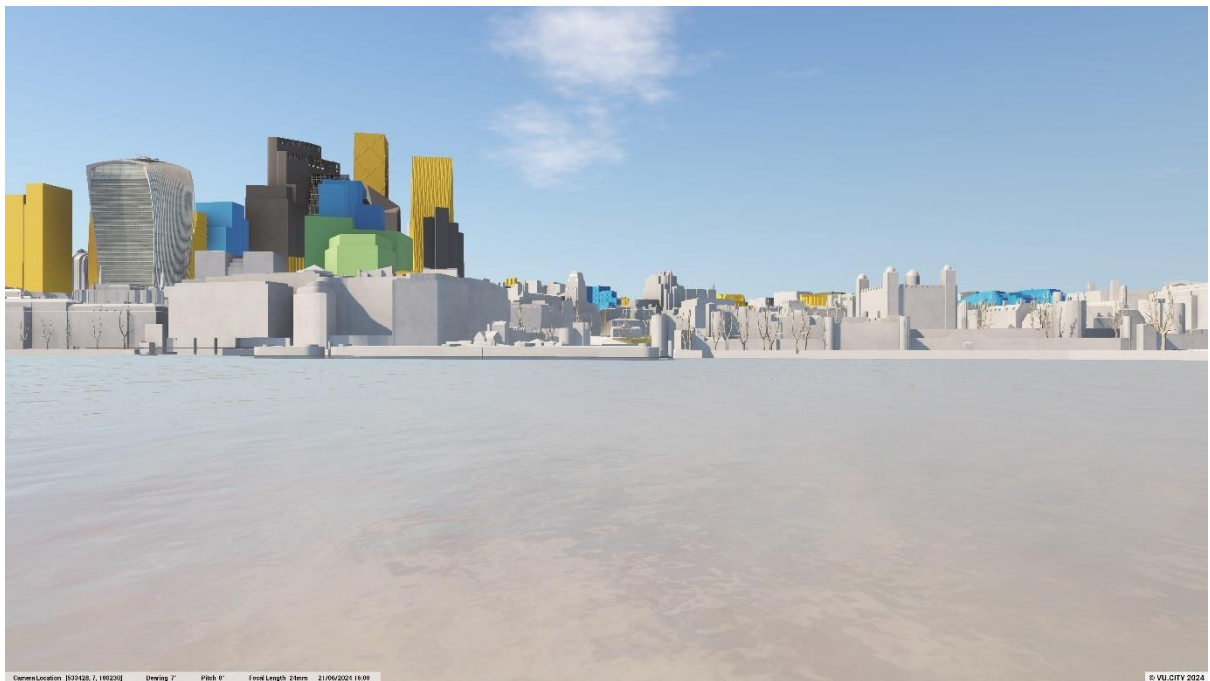


Figure A1.10: View 10- LVMF 25A.2 City Hall- The Public Terraces (SVIA view 12)





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



Figure A1.12: View 12- LVMF 11B.1 London Bridge- The Downstream Pavement (SVIA view 2a)

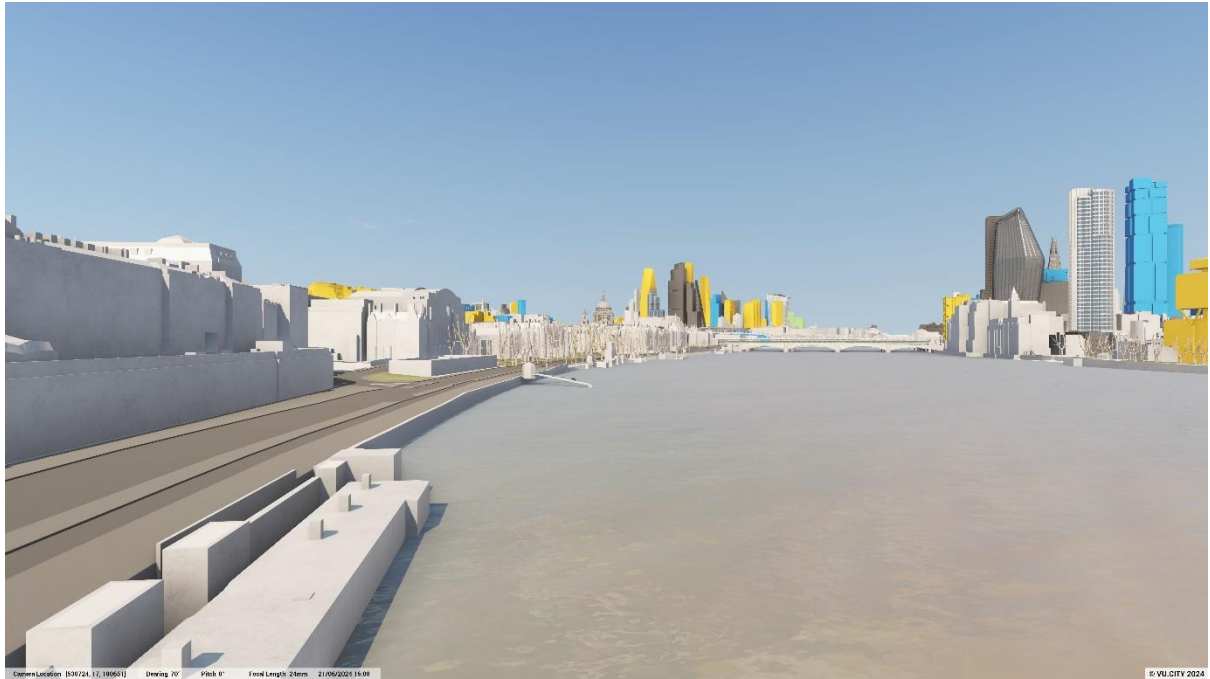


Figure A1.13: View 13- LVMF 15B.1 Waterloo Bridge- The Downstream Pavement (SVIA view 6)



Figure A1.14: View 14- LVMF 15B.2 Waterloo Bridge- The Downstream Pavement (SVIA view 7)

DP6380/CPB

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17 June 2024

Dear Sir

**CITY PLAN 2040 REGULATION 19 CONSULTATION:**

**REPRESENTATIONS BY THE PRUDENTIAL ASSURANCE COMPANY LIMITED**

These representations are submitted on behalf of our client, The Prudential Assurance Company Limited, who have a number of significant interests in the City of London including the freehold of 1-2 Minster Court, London EC3R 7PD. These representations are made in response to the Regulation 19 consultation on the Draft City Plan 2040 (April 2024).

Together with this letter we are enclosing specific expert representations prepared by The Townscape Consultancy in respect of draft Strategic Policy S12 on Tall Buildings which proposes revisions to the headline policy wording, a revised 2D contour map promoting amendments to the Figure 15 tall building contours and Policies Map C. Site specific evidence is provided to support the proposed revisions to the 2D contours in the form of revised VuCity modelling and assessment to inform an updated evidence base.

We welcome much of the approach within the City Plan and its aspirations, particularly in relation to sustainability, inclusiveness, economic growth through new economic development and creating an evening, night time and weekend ecosystem of culture and leisure uses within the Square Mile.

In preparing these representations, we have considered the tests within the National Planning Policy Framework ("NPPF") and whether the City Plan and its policies are sound, meaning; positively prepared, justified, effective and consistent with national policy. We have also reviewed and analysed the evidence base where relevant to interrogate certain policies in detail.



## REPRESENTATIONS TO DRAFT CITY PLAN 2040

Where relevant, the CPA recommend changes to draft Plan policies – deletions are identified through ~~strikethrough~~ and additional text is identified in green text.

### CHAPTER 1 – STRATEGIC POLICIES

#### *1.2 Economic Objective*

We support the City Corporation’s aspiration for growth and the need to set out a minimum requirement for 1.2 million sqm net additional office floorspace by 2040.

We support the delivery of significant new office floorspace, aligned with the ‘return of in-person scenario’ of 1.8 million sqm, as set out in the Offices Topic Paper, across the plan period. The Strategic Priority also acknowledges the need to provide more vibrant and diverse retail and cultural, leisure and visitor attractions, demonstrating the City’s aspiration to become a leading leisure destination. We endorse the development of the Destination City and the desire to provide a strong attraction and visitor sector within the Square Mile.

#### *1.3 Social Objective*

We support the objective to deliver new, inclusive open spaces to create public realm for everyone within the City.

#### *1.4 Environmental Objective*

We support the aspiration to deliver exemplary designed developments and to respond to the City’s unique heritage assets whilst working towards the delivery of net zero carbon by 2040.

### CHAPTER 4 – HOUSING

Paragraph 4.1.8 identifies that the commercial core of the City of London is inappropriate for residential development. We agree with the City Property Association that this point should be expanded to explain this position and clarify this “*having regard to economic growth and job creation within the Central Activity Zone (CAZ)* to reflects the prominent role the commercial core plays in providing capacity for world city business functions”.

### CHAPTER 5 – OFFICES

The draft Plan states that the office market is the primary function of the City and identifies significant economic and employment growth over the plan period. We agree that to maintain the City’s position as a world leading financial and professional services centre, it is vital that sufficient office floorspace is available to meet projected employment growth and demand from a range of occupiers over the plan period.

Cont.



## **Strategic Policy S4: Offices**

Draft Strategic Policy S4 is clear that for the City of London to maintain its current status as a world-leading centre for financial and professional services, a sufficient quantum of office floorspace needs to be available to meet projected economic and employment growth over the Draft City Plan period (2021- 2040), particularly through the delivery of high-quality new floorspace that is suitable for a wide range of different occupiers. This floorspace is identified as needing to be “*designed to be flexible*” and to “*support new uses, different layouts and configurations, different types and sizes of occupiers, and to meet the needs of Small and Medium Enterprises (SMEs), start-up companies, creative industries and those requiring move-on accommodation*”. We support these important strategic objectives.

Draft policy S4(1) seeks to increase the City’s office floorspace stock by a minimum of 1.2 million sq m net during the plan period. Elsewhere at paragraph 5.1.1, the 1.2 million sqm figure is described as a “target”. Paragraph 5.1.2 confirms that the demand target is intended to reflect the central of three projections based on different scenarios for office attendance, office densities, occupancy rates and employment projects.

The City’s evidence base, ‘Future of Office Use’ prepared by Arup and Knight Frank and the Offices Topic Paper, identifies that anywhere between 6 and 20 million sq ft of net additional office space will be required by 2040. We agree that much of the demand for floorspace will be for best-in-class office space, reflecting a flight to quality.

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 1.9 million sqm.

The City’s unique make up of financial and professional services businesses including a very high proportion of SMEs is resulting in a much more consistent return to work in person post Covid than in other office occupancy sectors. We therefore conclude that the office floorspace target should be at the higher end of the range identified by the Arup / Knight Frank assessment at 1.9m sqm over the Plan period.

We encourage the City to be ambitious in planning for economic growth and the consequent policies which seek to direct growth to key areas of change whilst ensuring that there is sufficient capacity allowed for in other areas of the plan, including particularly draft strategic Policy S12 (Tall Buildings).

## **CHAPTER 6 – RETAIL**

### **Strategic Policy S5: Retail and Active Frontages**

We support the strategic approach to delivering a greater mix of retail, leisure, entertainment, culture and other appropriate uses, to enrich the ‘*ground floor economy*’. The approach to encouraging the opening of retail and other uses in the evenings and weekends also reflects the City Corporation’s Destination City vision. The draft Strategic Policy seeks to broaden the retail offer within the City and recognises the value of alternative uses.



## **Policy RE2: Active Frontages**

We do not support the blanket requirement for the loss of existing active frontages to be justified by way of a 12-month marketing period. The policy should be more flexibly applied to allow for site specific considerations, and to consider instances whereby a qualitative over quantitative approach could be beneficial to the overall active frontage offering. Therefore, we propose the following amendments to part 2 of the policy:

“The loss of existing active frontage uses will be resisted. Development that proposes their loss should be supported by evidence demonstrating that there is no demand for active frontage uses ~~and that premises have been actively marketed for a period of no less than 12 months~~. Alternative uses that would support the retail environment should be provided”.

## **CHAPTER 7 – CULTURE AND VISITORS**

We support the City’s aspirations to maintain and enhance the cultural, leisure and recreation offer and the City’s evening and weekend economies. However, we have specific concerns about the inclusion of reference to the Cultural Planning Framework as set out below.

### **Strategic Policy S6: Culture and Visitors**

Draft Policy S6 Culture and Visitors, refers to a Culture Planning Framework (CPF), and notes that cultural, leisure and recreational facilities should be in line with the “Culture Planning Framework”. We are concerned that the Framework has not been the subject of consultation or scrutiny, includes proposals for formulas for financial contributions in lieu of on-site provision which appear arbitrary and untested from a viability perspective and for these reasons reference to the CPF is unsound.

The Cultural Planning Framework explains in its introduction that *“...it creates an evidence base and set of recommendations that can underpin the production of new planning guidance for culture to be introduced to complement the City Plan 2040”*. It is not itself planning guidance or an SPD and therefore no weight should be applied to it in planning decision making.

We therefore propose removal of reference in the supporting text to developments being “in line” with the Framework.

### **Policy CV2: Provision of Arts, Culture and Leisure Facilities**

As set out above, again there is reference to and reliance on the Cultural Policy Framework, which itself confirms is not new planning guidance. We propose that part 1 of the policy is amended as follows to delete reference to the Cultural Planning Framework:

“Requiring major developments to submit Culture and Vibrancy Plans setting out how their development will culturally enrich the Square Mile, ~~informed by the City Corporation’s Cultural Planning Framework (CPF)~~”.



## **CHAPTER 9 – DESIGN**

### **Strategic Policy S8: Design**

The ambitions and introduction of a retrofit first approach to sustainable design is supported. The “experience” section of draft strategic policy S8 (design) rightly promotes the maximisation of active, public facing, permeable and usable frontages.

The policy should recognise that there is a need to deliver some private spaces (such as office receptions) and back of house spaces (loading bays, sub stations etc) and that a balance should be struck between the functional components of buildings, particularly large developments and the public experience at ground floor level.

### **Policy DE1: Sustainable Design**

To ensure the draft Plan as a whole is positively prepared and effective, 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.

Sustainability Standards (3, bullet point 3) refers to carbon offsetting requirements to take account of shortfalls in achieving London Plan guidance on carbon emissions and air quality requirements to be secured by S106 Agreement with the contributions to be ring fenced. The policy does not explain how these contributions are calculated. We presume with reference to the London Plan and SPD at a rate of £95 per tonne but we recommend that this is clarified as a minor modification before submission for Examination in Public.

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

As drafted the policy would require all major development regardless of floorspace uplift to provide new facilities. This is not reasonable or practical in all instances.

We also consider that the policy should be amended to acknowledge that other facilities for public benefit may be included in developments which may not specifically provide views of the skyline but may make a significant contribution to the City and the benefits inherent in the development.

For these reasons we propose the following amendments to draft Policy DE4:

We propose that draft policy DE4 is amended as follows:



“Requiring all tall buildings or major developments to provide free to enter, publicly accessible elevated spaces **where appropriate**, which may include roof gardens, terraces, public viewing galleries, or other retail or leisure facilities **as part of the development** to create attractive destinations for people to enjoy ~~the City’s spectacular skyline and views~~”.

## CHAPTER 10 – TRAVEL

### Policy AT1: Pedestrian movement, permeability and wayfinding

The aspirations to improve pedestrian movement, permeability and wayfinding are supported, however part 8 of policy AT1 should recognise that permissive paths on larger sites can facilitate transformational public realm, particularly where public highway is poor quality and does not provide any permeability and would remove the ability for a site to be properly optimised. This part of the policy should be altered:-

“The replacement of a route over which pedestrians have rights with one to which the public have access only with permission will not **normally** be acceptable, **unless as part of a larger transformational public realm proposal**”.

### Policy AT2: Active Travel including Cycling

We support the objective of promoting and encouraging active travel through making appropriate provision for people who walk, wheel and cycle.

The specific reference in bullet point 2 of the policy requiring developments to provide sufficient shower and changing facilities, and lockers/storage in accordance with the London Cycling Design Standards is overly prescriptive and generic particular in assessing the largest developments which are capable of providing very significant facilities that cater for cyclists without necessarily achieving the prescribed ratios in the London Cycling Design Standards. We therefore propose the following amendments to draft Policy AT2 (bullet point 2):

- “incorporating sufficient shower and changing facilities, and lockers/storage to support walking and cycling ~~in accordance with~~ **taking account of the recommendations contained in the London Cycling Design Standards.**”

### Policy AT3: Cycle Parking

The concern arises for draft Policy AT3 and we propose the following amendment:

3. “All long stay on site cycle parking must be secure, undercover and preferably enclosed, ~~in accordance with~~ **taking account of the recommendations contained in the London Cycle Design Standards.**”





## CHAPTER 11 – HERITAGE AND TALL BUILDINGS

### Strategic Policy S12: Tall Buildings

Please refer to the enclosed specific expert representations prepared by The Townscape Consultancy in respect of draft Strategic Policy S12 on Tall Buildings which proposes revisions to the headline policy wording, a revised 2D contour map promoting amendments to the Figure 15 tall building contours and Policies Map C. Site specific evidence is provided to support the proposed revisions to the 2D contours in the form of revised VuCity modelling and assessment to inform an updated evidence base.

As set out in the enclosed evidence we propose the following revisions to the wording of Strategic Policy S12:

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

We propose minor modifications to the 2D contour Map C as enclosed.

## CHAPTER 12 – OPEN SPACES AND GREEN INFRASTRUCTURE

### Policy OS2: Urban Greening

The introduction of a City Urban Greening Factor score is welcomed, however, it will not always be possible to achieve these targets in the City. There needs to be flexibility to take account of circumstance of sites, particularly where roof space is constrained or can better serve other priorities in the draft Plan including public access where this is feasible.

The highly urbanised nature of the City, and constraints in terms of availability of land, roof space and public realm, and proximity of neighbouring buildings restrict the ability to include features that will assist in achieving urban greening on all developments.

We propose that Policy OS2 (2) should be amended as follows:

“Major development proposals will be required to - Include an Urban Greening Factor (UGF) calculation demonstrating how the development will meet the City’s target UGF score of 0.3 as a minimum, ~~unless site specific considerations make this unachievable~~”.



## **SUMMARY**

We thank you for the opportunity to be consulted on the City Plan 2040. There is much within the draft Plan that is supported and we look forward to continuing discussions with the City of London about our exciting pipeline of new projects, and being party to an Examination in Public in due course.

We trust that this submission will be taken into consideration in the formulation of any modifications to the City Plan prior to its submission to the Secretary of State. Our client requests the opportunity to appear at the Examination in Public in relation to these representations and would be grateful to be kept informed of the progress of the City Plan.

If you have any queries or require any further information please contact Chris Beard or Theo Barker at this office.

Yours faithfully

*DP9 Limited*

## **DP9 Ltd.**

Enc. The Townscape Consultancy representations on Policy S12 and 2D contours Map C, dated 12 June 2024