

Draft City Plan 2040 Reps

Mike Worthington [Redacted]

Mon 6/17/2024 9:01 PM

To:Environment - Local Plan <LocalPlan@cityoflondon.gov.uk>;Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>

Cc: [Redacted]

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

Please find attached representations made on behalf of British Land in relation to the Draft City Plan 2040. These representations should be read in conjunction with the attached 'Broadwalk House; Townscape and Heritage Technical Note (Appendix 1)' and the 'Liverpool Street Area Healthy Streets Plan' (Appendix 2).

Should you have any queries please contact Michael Meadows [Redacted] at British Land and (Tim Holtham [Redacted] or Mike Worthington [Redacted] of DP9 Limited.

<https://we.tl/t-9v68rkUrKz>

Kind Regards,

Mike Worthington

Associate Director

[Redacted signature block]

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17th June 2024

City Plan 2040
Development Plans Team
Department of the Built Environment
City of London Corporation
Guildhall
London
EC2P 2EJ

Also submitted via localplan@cityoflondon.gov.uk

Dear Sir/Madam,

CITY OF LONDON PROPOSED SUBMISSION DRAFT LOCAL PLAN (CITY PLAN 2040)

We are pleased to provide the following comments in response to the City of London Corporation's consultation on the proposed Submission Draft City Plan 2040 ('the draft plan').

Background

British Land jointly owns Broadgate in the City of London with GIC. They are in the process of implementing a long-term plan to transform Broadgate into a world-class, mixed-use, seven-day, central London destination. This vision is underpinned by an integrated placemaking masterplan which seeks to:

- Diversify the occupier base across business size, sector, budget and specification whilst maintaining flexibility and a consistent customer experience;
- Transform the retail, restaurant and leisure offer to meet the needs of workers, commuters and visitors and create a seven-day destination;
- Create a vibrant and exciting place with distinctive public spaces and sense of community; and
- Connect to the wider City and surrounding neighbourhoods, increasing permeability and working with other key stakeholders, including the City of London, TfL, Network Rail and surrounding landowners.

In general, British Land supports the overall vision of the City Corporation and the strategic policies set out within the Plan and the following comments/observations are made within this context.

Strategic Policy S4 - Offices

British Land supports the City's aspiration to increase office floorspace stock by a minimum of 1,200,000 m² during the period. Part of British Land's Broadgate Vision is to diversify the occupier base and provide a range of flexible and adaptable office floorspace which responds to changing work practices, which also aligns with the City's aims through Policy S4.

The evidence base, conducted by Knight Frank and Arup, indicates that the demand for future office floorspace will be for best-in-class space, which is supported and reflective of the City's policy aims in meeting 'projected employment growth and occupier demand' as stipulated within the supporting policy wording at 5.1.1 and 5.1.2.

The promotion of a retrofit first approach is supported in principle where this improves environmental performance of buildings. However, the ability to redevelop should not be precluded where it can be demonstrated that this achieves other policy aims of the development plan and contributes to the sustainable development of the City.

The provision of affordable workspace in development proposals is supported, however the definition as to what is affordable needs to allow for a variety of forms and types of affordable workspace. It is considered that the definition should account for differing ways in which affordable workspace can be provided, taking into account lease lengths, fit out, service provision and the needs of businesses as an example.

Strategic Policy OF1 – Office Development

As per Strategic Policy S4, retrofitting to improve environmental performance is supported, however each site should be considered on a case-by-case basis and this retrofit first approach should not preclude redevelopment and intensification, where this helps to achieve other strategic priorities within the City Plan.

Part F of the policy seeks to provide a proportion of flexible and affordable workspace suitable for micro businesses and SMEs where appropriate. Whilst the provision of affordable workspace is supported in principle, the current evidence base does not provide enough detail as to the City's need for this type of space and the inclusion of this element of Policy OF1 may be premature.

British Land supports encouraging a range of commercial uses at ground floor level, which help to activate the street and support the business function of the City.

Policy OF2 – Protection of Existing Office Floorspace

The protection of existing office stock is supported in principle, however, where a change of use is proposed, it is not clear from the supporting text to the policy, whether marketing evidence would be required for the whole building or parts thereof. A clarification as to whether a change of use can be applied to part of a building through marketing evidence would be helpful to include within the supporting text of the policy.

The new 'retrofit fast track' route of the policy under part b is supported, which will enable underutilised office stock to come forward for other uses sooner, removing the requirement for a viability assessment.

Reference to the 2015 Office Use SPD in Paragraph 5.3.10 of the supporting text is out of date and should be removed or updated.

Policy CV2 – Provision of Arts, Culture and Leisure Facilities

The City's aspiration to increase the provision of high quality cultural spaces and offerings is supported in principle. In terms of the requirement for major developments to provide for arts, culture and leisure facilities, it is considered rational to assess each site on a site-by-site basis as to what is appropriate and achievable on site, off site or via a financial contribution. Clarification is also sought as to whether a development will be assessed based on overall area or uplift.

On review of the wording at part 1 of the policy, the term 'vibrancy' as part of 'Culture and Vibrancy Plans' needs to be more clearly defined or omitted. At present the term is open to interpretation and reference to the submission of Culture Plans is considered sufficient and more clearly understood.

The requirement to provide a contribution towards arts, culture and leisure facilities where it is shown to be impractical to provide on site needs to be clearly defined, including how any financial contributions will be calculated and spent, which priorities sites and projects within the vicinity of the development over the wider City of London.

Policy DE4: Terraces and Elevated Public Spaces

Policy DE4, relates to 'Terraces and Elevated Spaces', within major developments. The provision of publicly accessible space in major developments is supported in principle, however each development should be considered in relation to its context and site-specific opportunities, to maximise the usability and impact of each space.

The City have approved a number of applications in recent years, which provide elevated public spaces for people to enjoy views across the City. The following approved applications, provide for elevated public spaces as an example:

- 100 Leadenhall Street (level 55 and 56 viewing gallery)
- 61-56 Holborn Viaduct (publicly accessible roof terrace)
- 120 Fleet Street (publicly accessible roof terrace)
- Seal House (publicly accessible roof terrace)
- 70 Gracechurch Street (public viewing gallery at level 29 and 30)
- 55 Gracechurch Street (public roof garden)

- 1 Undershaft (public viewing gallery at levels 71 and 72)
- 50 Fenchurch Street (public roof terrace)
- 8 Bishopsgate (roof top viewing gallery)
- 22 Bishopsgate (publicly accessible viewing gallery)
- 20 Fenchurch Street (publicly accessible Skygarden)
- 120 Fenchurch Street (publicly accessible roof garden)

Given this pipeline of existing and planned public elevated spaces it is considered that the scope of provision and potential benefit of publicly accessible spaces in the City could be widened so that the requirement is not only for elevated public spaces, but for a range of spaces, which maximise choice, diversity and social impact.

We propose that the following additional point is added to Policy DE4 to address this:

4. Alternative forms of public access and/or uses that are located elsewhere in tall building and major developments, including at lower levels, will be supported where it can be demonstrated these would lead to a better mix of facilities that would deliver greater benefits to the public compared to the provision of publicly accessible elevated spaces.

Clarity in relation to how this policy would interact CV2 would also be helpful, with the potential for public spaces to meet the aims of both policies.

Policy VT2 – Freight and Servicing

British Land supports measures to reduce the dominance and number of servicing and delivery vehicles within the City. However, we would suggest that Part 2 of the policy is amended as follows:

*“Developments must minimise the need for freight trips and ~~seek to~~ work together with adjoining owners and occupiers to manage freight and servicing on an area-wide basis, **where possible**. Major commercial development must provide for vehicle reduction methods such as freight consolidation, **preferred supplier schemes, common procurement or other appropriate methods of reducing the number servicing and delivery vehicles.** ~~and use technological and procurement solutions~~ **New technologies will be encouraged** that enable efficient servicing and deliveries to sites.”*

This policy is primarily aimed at standalone buildings and doesn't consider campus-wide strategies where multiple buildings are under a single ownership. British Land and GIC own and manage 14 buildings at Broadgate. Through virtual consolidation and the introduction of common procurement methods this has enabled the number of suppliers and deliveries to the campus to be significantly reduced.

Policy AT3 – Cycle Parking

The draft policy reflects the standards set within the London Plan. Data collection from British Land and GIC's 100 Liverpool Street development, which was completed in 2020, has shown that, at present, only around 20% of the cycle parking spaces are occupied on a given day.

Encouraging cycling and other modes of active travel is supported by British Land, 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 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.

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, and unsustainable.

We would suggest that the following approach is adopted:

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/ Cycle Promotion Plan 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.

Strategic Policy S12 – Tall Buildings

British Land recognises the detailed work that has been undertaken to inform and develop the draft tall buildings policy. This has emanated from the dividing up of the Square Mile into different 'Character Areas' and the subsequent assessment of each area to determine their sensitivity to tall building development. The findings of City of London's assessment are provided within the 'Tall Buildings Evidence Base' Topic Paper (January 2024) ('the Topic Paper').

Broadgate is located within the 'Liverpool Street & Broadgate' Character Area. As described in the Topic Paper, the Character Area is well connected by all forms of transport, with a PTAL rating of 6b. The Topic Paper describes how the uses in the Character Area are '*...largely commercial, and the buildings are large scale in terms of height and footprint.*' As set out in the Topic Paper, Broadgate occupies the majority of the Character Area directly west, north and east of the Liverpool Street Station.

With regards to the Character Area's sensitivity to tall building development, the Topic Paper reaches the following overall conclusion:

'Overall, the Character Area is considered to be very sensitive to tall buildings. The scale of building is mid-high rise; the area is largely modern in scale and appearance; the street pattern and urban structure is robustly modern. Further tall building development within the Character Area could overwhelm the westerly sky setting of St Paul's Cathedral in the aforementioned River Prospects, merge detrimentally with the existing tall buildings in the

Barbican and Golden Lane Character area and even directly clash with the Cathedral's sky silhouette.'

Following our review of the Topic Paper, although we understand the reasoning for the above conclusion being reached in relation to large parts of the Character Area, we consider that there are clear exceptions on sites within defined parts of the area.

At the time of writing the Topic Paper construction of our 2 Finsbury Avenue development, which reaches a maximum height of 170.29m AOD, had not yet begun.. The Topic Paper comments, *'If the consented scheme at 2-3 Finsbury Avenue is implemented the new building at 2-3 Finsbury Avenue will be a tower that is similar in height to Broadgate Tower, creating a change from the broader townscape character described above.'* (Paragraph 20.12, Topic Paper).

In April 2024, the Broadgate JV signed a construction contract with Sir Robert McAlpine and pre-let agreement with hedge fund and financial advisory firm Citadel to lease over 250,000sq/ft of workspace, with options to lease up to a further 130,000sq/ft within the development. This represents a minimum of 33% of the commercial floorspace being pre-let, increasing to 50% if the option space is taken. Construction is well underway, with the development due to complete in 2027.

Figure 13 – Tall Buildings distribution

On this basis, we would recommend that the status of 2 Finsbury Avenue is updated from 'Permitted Not Commenced' to 'Under Construction' for a tall building of 170m+.

Broadwalk House, 5 Appold Street and adjacent Network Rail Signal Box

Within this context we have identified that there is a further opportunity for tall building development to come forward within the northern part of the Character Area, specifically at 5 Appold Street, the site of the existing Broadwalk House, and over the Network Rail Signal Box located immediately adjacent to the east.

We have commissioned 3D modelling and a townscape and heritage assessment to identify what massing could come forward on the site, which given the existence of other existing and committed tall buildings in the immediate surrounding area, would not give rise to any conflicts with the views and overall conclusion identified in the Topic Paper. Appended to this letter is the detailed 3D modelling that has been undertaken by Millerhare, alongside an initial townscape and heritage assessment by The Townscape Consultancy.

As outlined in the 'Townscape and Heritage Technical Note' (June 2024) at Appendix 1, the indicative massing modelled identifies the potential for a maximum building height of 173.3m AOD on the site. This has been informed by an assessment of all relevant strategic

views considered in the Topic Paper for the Liverpool Street & Broadgate Character Area. The massing that has been modelled has been prepared for the purpose of assessing the building heights that are achievable on the site.

The assessment of the indicative massing undertaken by The Townscape Consultancy concludes the following:

“Verified view modelling has indicated that a taller building on the Broadwalk House site would preserve the westerly sky setting of St. Paul’s in the River Prospect views and would not merge detrimentally with the existing tall buildings in the Barbican and Golden Lane Character area. In a number of LVMF views the Indicative Massing would be entirely occluded. In the remainder of the LVMF views the indicative massing does not sit prominently or in close proximity to the westerly sky setting of St. Paul’s Cathedral...”

The ToL WHS is not considered sensitive to change in relation to the Liverpool Street and Broadgate Character area due to the location and distance. There are relevant LVMF views from Queen’s Walk and Tower Bridge to test to ensure this is the case, which this Technical Note has conducted. Verified views testing shows that the Indicative Massing would not rise above the crenelations of the Tower of London, resulting in no effect on its protected silhouette. Further testing of relevant LVMF views demonstrates that the ToL will remain the dominant Strategically Important Landmark, as demonstrated in all relevant views tested. Close range views show that the Indicative Massing sits appropriately and contextually within the Liverpool Street and Broadgate Character Area alongside constructed as well as emerging schemes.”

Based on the modelling work undertaken and the associated assessment by The Townscape Consultancy, we propose that Broadwalk House and the adjacent Network Rail Signal Box site should be identified as a future tall building location within the City Plan. In line with the approach taken elsewhere in the plan, it is proposed that this is best illustrated by a single tall building contour, which identifies a maximum building height of up to 180m AOD for the site. This should be identified within both Figure 15 of the draft plan, as well as within the policies map which accompany the plan.

Although the 3D modelling that has been undertaken identifies a range of maximum building heights across the site, it is proposed that a single building height contour is adopted for simplicity and legibility and that exact building heights are determined through the development management process, in line with the approach set out in draft Policy 12.

As identified by the 3D modelling, the maximum building height that can be accommodated on the site without conflicting with strategic views is 173.3m AOD. As this building height sits between the 160m and 180m AOD contours, used in the draft City Plan, the 180m AOD contour is considered to be the most appropriate to ensure that the future development potential of the site is not unnecessarily constrained.

Strategic Policy S25 – Liverpool Street

British Land fully supports the strategic policy aim to enhance the Liverpool Street area and the initiatives within the policy, which are aligned with the Broadgate Vision.

The City Plan should set an ambitious, future-proofed vision for Liverpool Street to 2040, as a key gateway and destination within the City, which is consistent with, but goes beyond, the Healthy Streets Plan and Transport Strategy, to create an overarching framework for the area, with a modern and integrated Liverpool Street Station at its heart. Representations we previously made on the Corporations' draft Healthy Streets Plan are appended to this letter.

The policy should prioritise permeability and connections between the station and surrounding street network, as well as through the wider area.

Pedestrian safety and experience, including full pedestrianisation, where possible, around Liverpool Street is a key priority and this should be emphasised within the policy.

The following objectives will be critical to realising the full potential of the public realm around Liverpool Street Station:

1. Pedestrianisation of Liverpool Street.
2. Greater pedestrian priority on Old Broad Street. This is a key route from the station into the City cluster and could be enhanced through pavement widening and timed closures.
3. Greater ambition for Sun Street Passage, through the introduction of traffic calming measures, shared surfaces and the removal of the fence at the rear to improve permeability in the short-term and exploring the potential for closure and dispersal of the bus stands in the longer-term.
4. Improving access to Exchange Square and the area beyond with a more accessible, legible and coherent north-south route.
5. Enhanced integration with neighbouring areas and boroughs by working with Hackney and Islington to improve the public realm on streets at the edge of the City (Wilson Street, Sun Street, Appold Street and Worship Street).

A copy of our previous representations provided to the Liverpool Street Healthy Street Plan are provided at Appendix 2.

We trust the above comments are useful and would be happy to discuss these further with officers should it be helpful.

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APPENDIX 1 - TOWNSCAPE AND HERITAGE TECHNICAL NOTE (JUNE 2024)



**THE
TOWNSCAPE
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BROADWALK HOUSE, EC2A 2DA

TOWNSCAPE AND HERITAGE TECHNICAL NOTE

1. Introduction

- 1.1 This Townscape & Heritage Technical Note has been prepared by The Townscape Consultancy (TTC) as part of written representations to the City of London in support of the establishment of a taller building at Broadwalk House, 5 Appold Street, City of London, EC2A 2DA (the 'Site') in response to the draft City Plan 2024 on behalf of British Land. Figure 1.1 identifies the location of the Site.
- 1.2 The Site is located within the Liverpool Street & Broadgate Character Area. The character areas identified by City of London (CoL) officers are outlined in detail in the Topic Paper: Tall Buildings Evidence Base (January 2024) which this report responds to.
- 1.3 The aim of this assessment is to present the findings of a height study carried out on the Site, illustrating how an indicative taller mass would sit within a series of strategic views tested. The 'Indicative Massing' has been informed by all relevant strategic views set out in the CoL Topic Paper and should be understood as an illustrative form. This is presented as a series of Accurate Visual Representations ('AVRs') produced by Millerhare, a visualisation specialist. Commentary is provided by TTC on the views, which are presented as an 'Existing' image alongside an as 'Proposed'. There are 19 views in total, shown at Figure 1.2. Please note that in some images where visibility of the Indicative Massing is heavily occluded, its position within the view is indicated with two yellow bars.



Figure 1.1: Aerial photograph showing the approximate location of the site outlined in red.

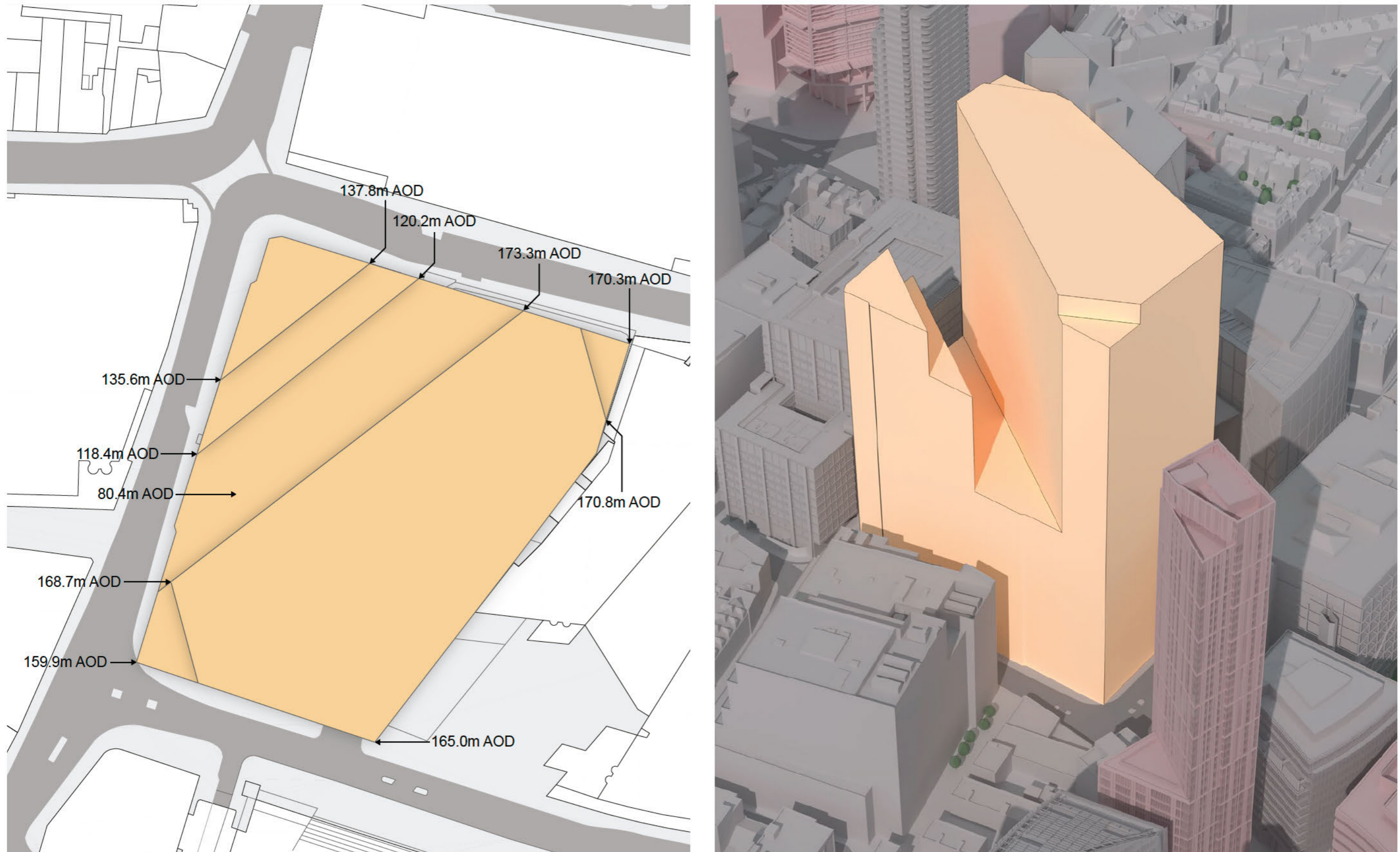


Figure 1.2: Axonometric (above right) showing the Indicative Massing model tested in the views within its immediate context. A plan is shown (above left) that illustrates the AoD heights of the Indicative Massing.

Existing and Emerging Context

1.4 The Site lies within the City of London's 'Liverpool Street and Broadgate Character Area'. Figure 1.3 is an axonometric of the Indicative Massing at Broadwalk House within the context of this character area. The axonometric shows a number of cumulative schemes with labelled AoD heights surrounding the Site. These are shown in pink and listed below. It is stated whether these are consented, under construction or completed.

- Bishopsgate Goodsyards (consented);
- 13-14 Appold Street (implemented);
- Edge Shoreditch (resolution to grant);
- 2-3 Finsbury Avenue (under construction).

1.5 Figure 1.3 also shows (in grey) existing tall buildings surrounding the Site:

- The Stage;
- Principal Place;
- Broadgate Tower;
- One Crown Place.

1.6 All the above schemes feature within the following views.



Figure 1.3: Axonometric of the Indicative Massing within its existing and emerging context.

Townscape Views

- 1 | LVMF 9A.1 | King Henry VIII's Mound - the viewing point
- 2 | LVMF 8A.1 | Westminster Pier - the orientation plaque
- 3 | LVMF 17B.1 | Golden Jubilee/Hungerford Footbridges: downstream
- 4 | LVMF 17B.2 | Golden Jubilee/Hungerford Footbridges: downstream - close to the Westminster bank
- 5 | LVMF 15B.1 | Waterloo Bridge: downstream - close to the Westminster bank
- 6 | LVMF 15B.2 | Waterloo Bridge: downstream - at the centre of the bridge
- 7 | Waterloo Bridge: Crossing the Lambeth bank
- 8 | LVMF 16B.2 | The South Bank: Gabriel's Wharf viewing platform
- 9 | Blackfriars Bridge: between third and fourth Bastions
- 10 | LVMF 13A.1 | Millennium Bridge, close to the Southwark bank
- 11 | LVMF 13B.1 | Thames side at Tate Modern - axial to St Paul's Cathedral
- 12 | The Queen's Walk: riverside in front of no.1 London Bridge
- 13 | LVMF 25A.1 | The Queen's Walk at City Hall - foot of pathway from Potter's Fields
- 14 | LVMF 25A.3 | The Queen's Walk at City Hall - close to Tower Bridge
- 15 | LVMF 10A.1 | Tower Bridge: upstream - the north bastion
- 16 | Butler's Wharf
- 17 | Finsbury Square: north-west corner, outside no.12
- 18 | Finsbury Square: west, outside no.10
- 19 | Honourable Artillery Company Grounds: north-west corner

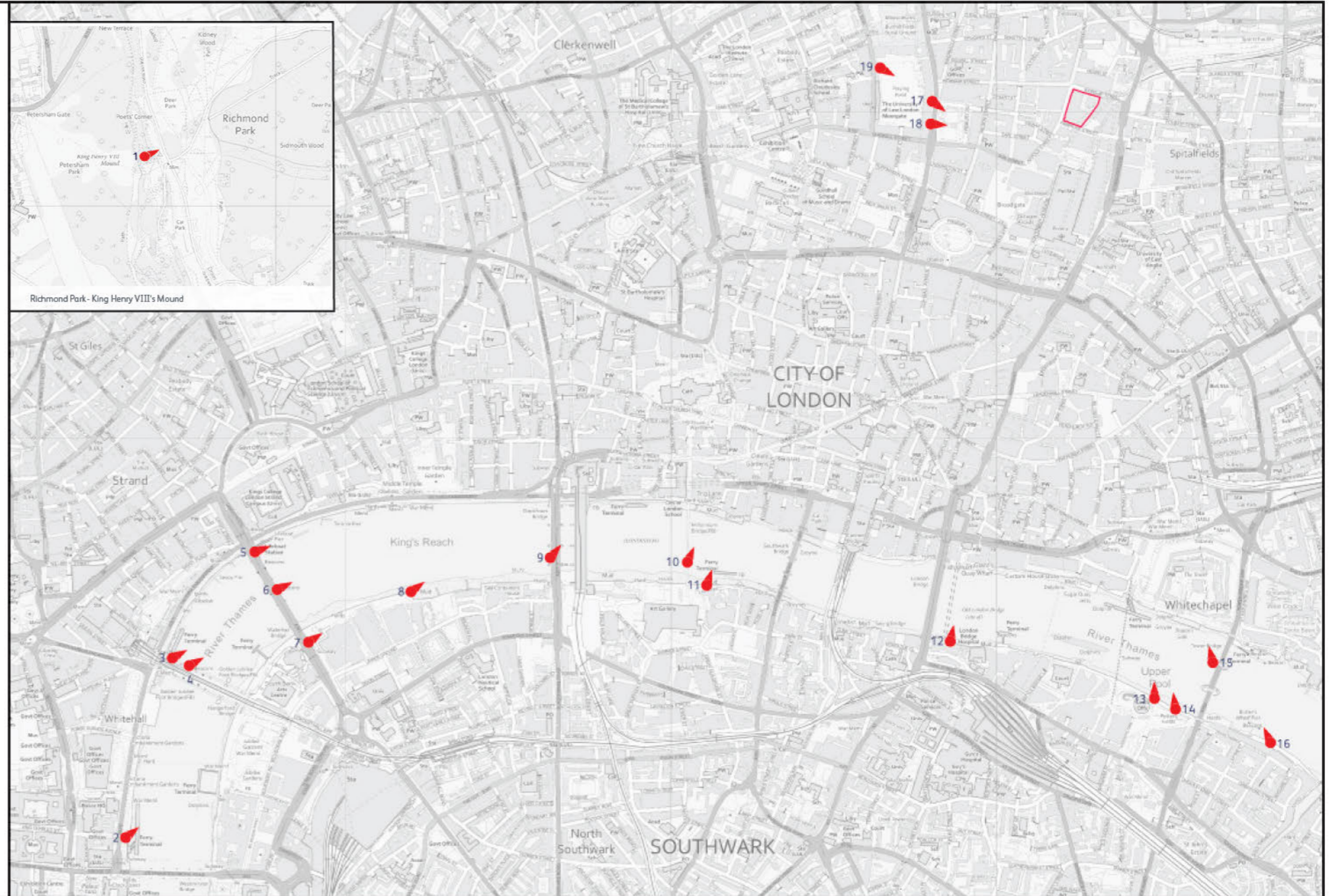


Figure 1.4: Viewpoint map, approximate site boundary marked in red for indicative purposes only.

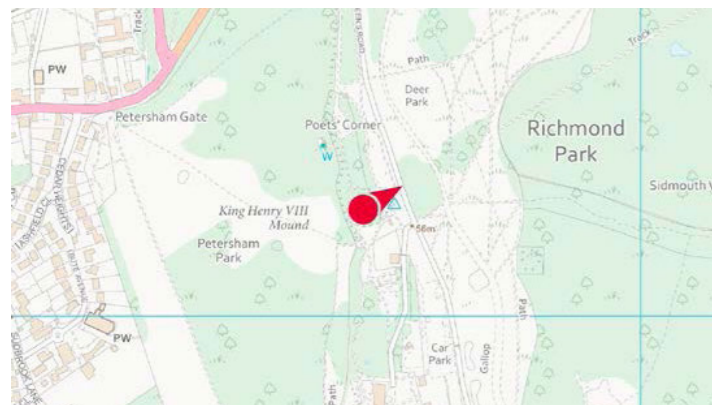
Viewpoint 1 - Existing: LVMF 9A.1 | King Henry VIII's Mound - the viewing point

View 1 Existing

- 1.7 LVMF 9A.1 is located upon King Henry VIII's mound in Richmond Park. The vegetation enclosing the view accommodates a directly linear view of St Paul's Cathedral. There is little intervening built development within the foreground with the towers, dome arcade and dome of St Paul's seen to rise above. The LVMF notes that development around Broadgate and Liverpool Street Station can be seen within the background, specifically Broadgate Tower.



Viewpoint map



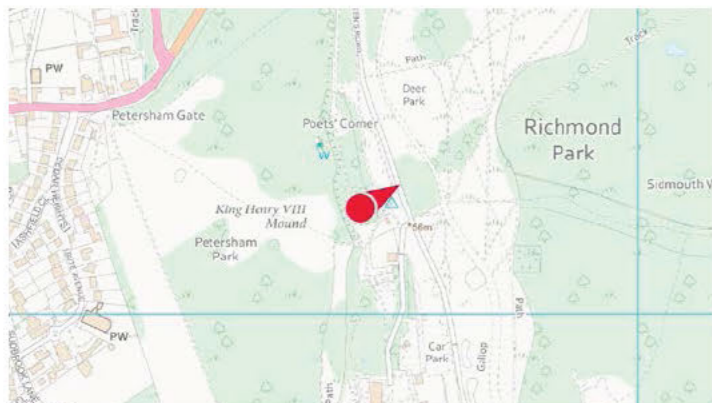
Viewpoint 1 - Proposed: LVMF 9A.1 | King Henry VIII's Mound - the viewing point

View 1 Proposed

- 1.8 The Indicative Massing is entirely occluded by existing elements within the site within this view. There would be no effect.



Viewpoint map



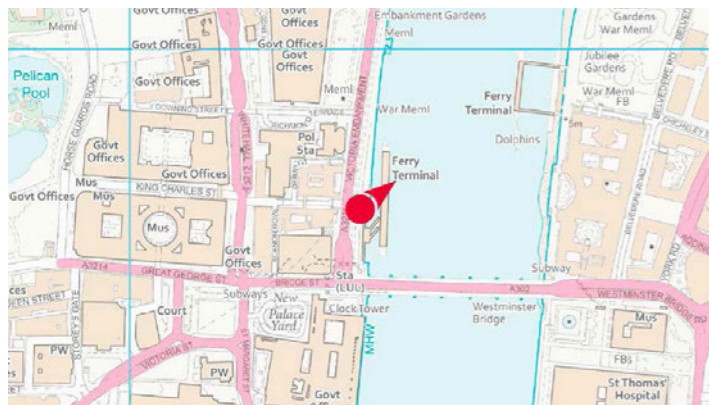
Viewpoint 2 - Existing: LVMF 8A.1 | Westminster Pier - the orientation plaque

View 2 Existing

- 1.9 This is a zoomed telephoto of the LVMF 8A.1 view taken from Westminster Pier, facing north-east from the Orientation Plaque. The view focuses directly on St Paul's Cathedral which is framed by the Whitehouse building to the north and the Royal Festival Hall to the south. Mature vegetation sits within foreground.



Viewpoint map



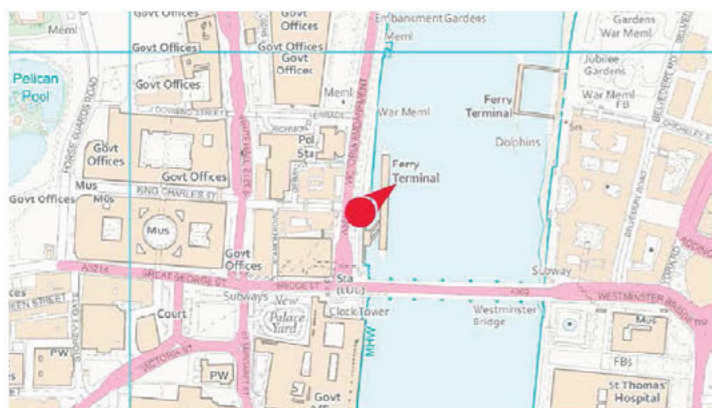
Viewpoint 2 - Proposed: LVMF 8A.1 | Westminster Pier - the orientation plaque

View 2 Proposed

1.10 The Indicative Massing is entirely concealed to the north by the Whitehouse building and to the south by the dome of St Paul's Cathedral. The shaded massing shows that the Indicative Massing is perfectly tailored to the shape of these two buildings which frame the north of the view. This is particularly evident when looking at the stepped down narrower element to the south which follows the shape of the dome and its colonnade below.



Viewpoint map



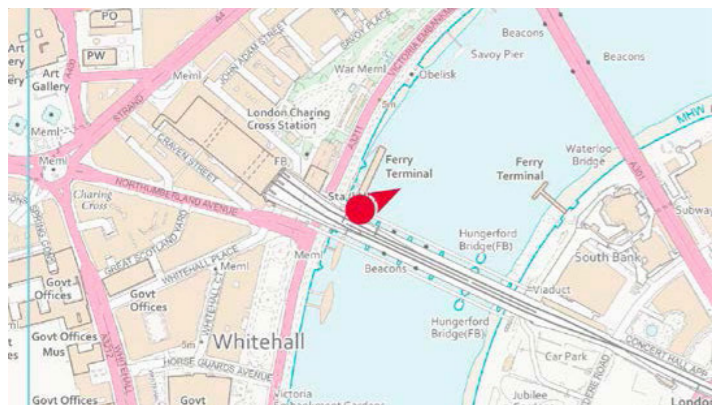
Viewpoint 3 - Existing: LVMF 17B.1 | Golden Jubilee/Hungerford Footbridges: downstream

View 3 Existing

1.11 This LVMF view is taken from the north-west of Hungerford Bridge and is oriented east. The middle-ground of the view is framed by buildings such as Shell Mex House to the north and the Royal Festival Hall to the south. The LVMF notes that the most dominant feature of the view is the river itself, with St Paul's Cathedral, noted as a Strategically Important Landmark, siting centrally within the view and the city cluster lying to the right of the frame. The LVMF view description also highlights the presence of the spire of Saint Bride's Church and the Dome of the Old Bailey to the left of St Paul's Cathedral.



Viewpoint map



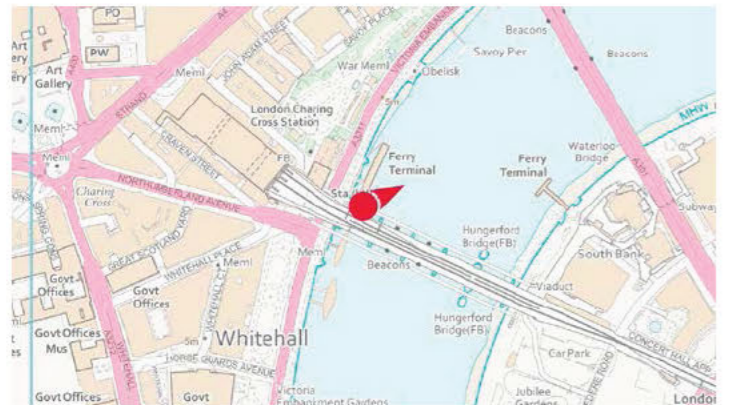
Viewpoint 3 - Proposed: LVMF 17B.1 | Golden Jubilee/Hungerford Footbridges: downstream

View 3 Proposed

1.12 The Indicative Massing would be seen in conjunction with, although largely occluded by, Nos. 2-3 Finsbury Avenue (closest west) and Nos. 13-14 Appold Street. The Indicative Massing would sit comfortably within the view alongside existing and under construction schemes. The result is a very limited level of change and contextually appearing as part of the Liverpool Street and Broadgate Character Area. Factoring this in, there would be no impact upon Strategically Important Landmarks within the view.



Viewpoint map



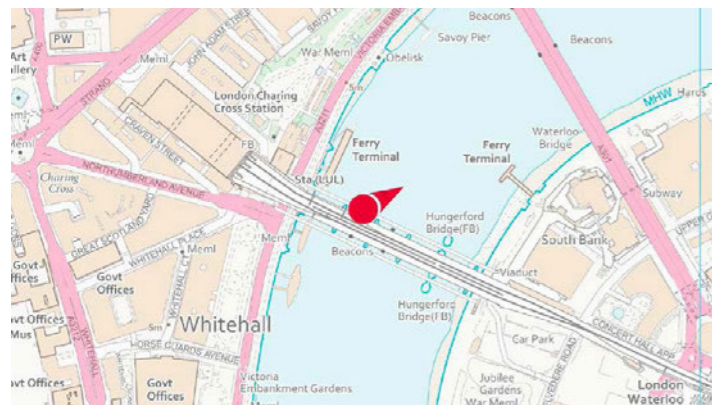
Viewpoint 4 - Existing: LVMF 17B.2 | Golden Jubilee/Hungerford Footbridges: downstream - close to the Westminster bank

View 4 Existing

- 1.13 This LVMF view is taken further south on Hungerford Bridge, oriented east. The view remains as described above, with the exception that the view takes in more of the South Bank with a shift in the perspective of the view of the towers of St Paul's Cathedral (Strategically Important Landmark).



Viewpoint map



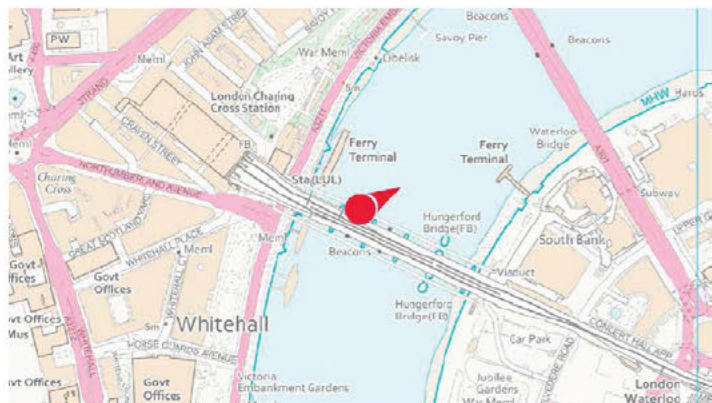
Viewpoint 4 - Proposed: LVMF 17B.2 | Golden Jubilee/Hungerford Footbridges: downstream - close to the Westminster bank

View 4 Proposed

1.14 The effect remains the same as 17B.1 but this has been concluded as limited effect.



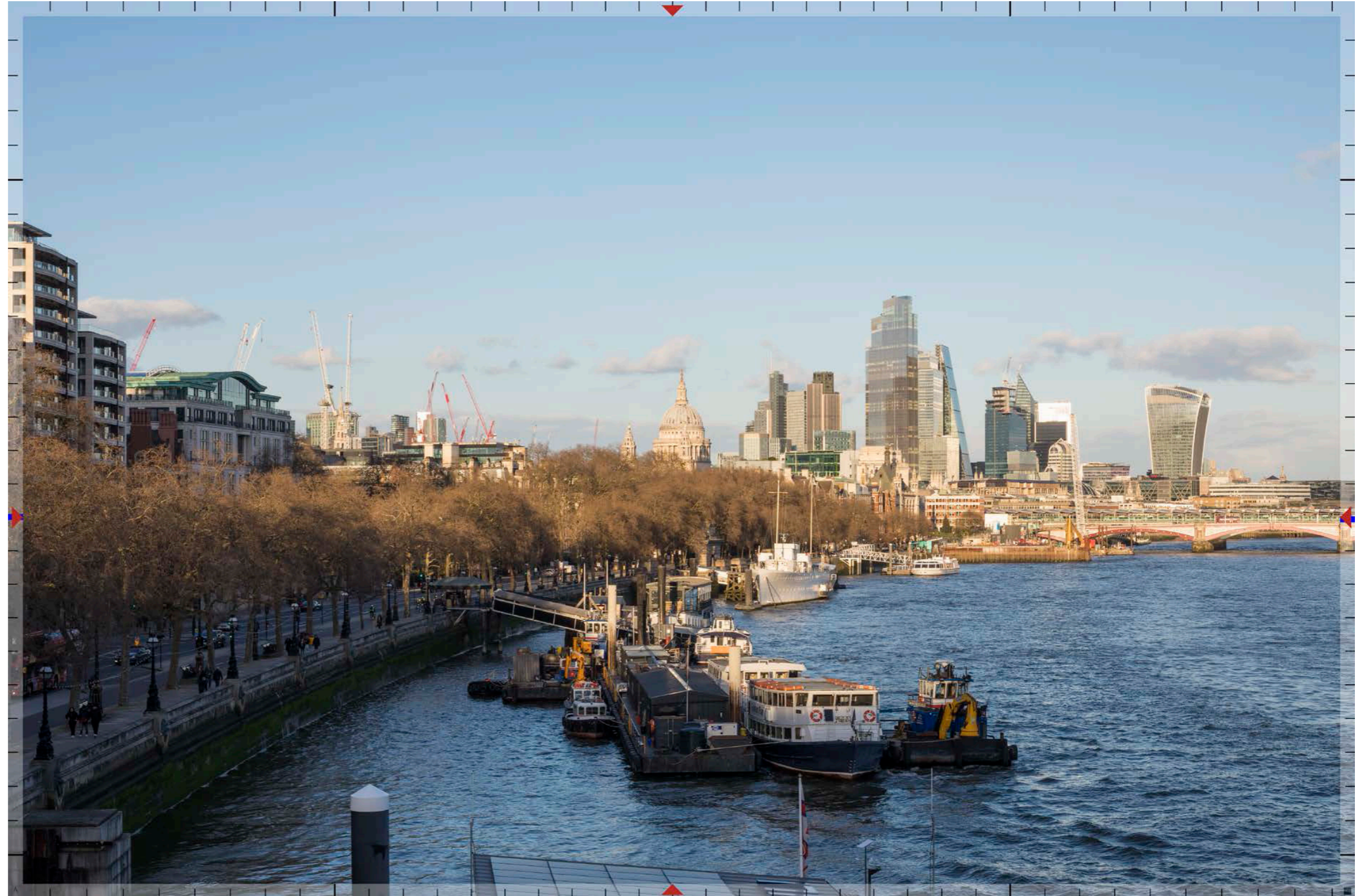
Viewpoint map



Viewpoint 5 - Existing: LVMF 15B.1 | Waterloo Bridge: downstream - close to the Westminster bank

View 5 Existing

1.15 This LVMF view is located on Waterloo Bridge, looking to the north-east. The central focus of the view is St Paul's Cathedral (Strategically Important Landmark) with the city cluster to the south. The river, its walkway and the vegetation lining it are prominent within the foreground.



Viewpoint map



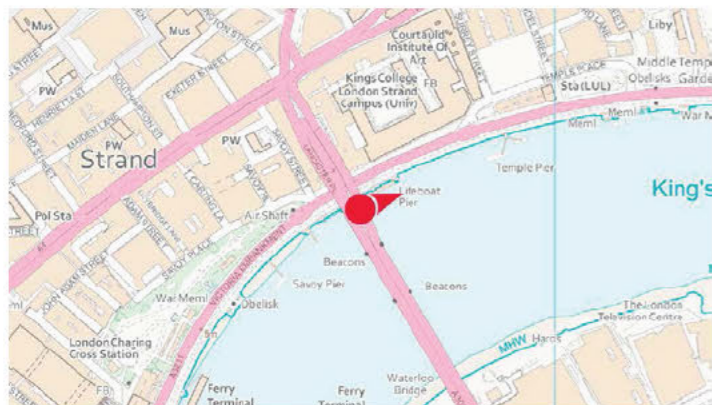
Viewpoint 5 - Proposed: LVMF 15B.1 | Waterloo Bridge: downstream - close to the Westminster bank

View 5 Proposed

1.16 The Indicative Massing is seen to the north of the view. From this perspective the massing is seen in conjunction with, although largely occluded by, Nos. 2-3 Finsbury Avenue (closest west) and Nos. 13-14 Appold Street (adjacent to the east). Principal Place sits to the rear of the Indicative Massing. Within this context the Proposed Development can be seen to form a contextual addition, stepping down behind Nos. 13-14 Appold Street. From this perspective the westerly sky setting of St Paul's Cathedral is entirely maintained.



Viewpoint map



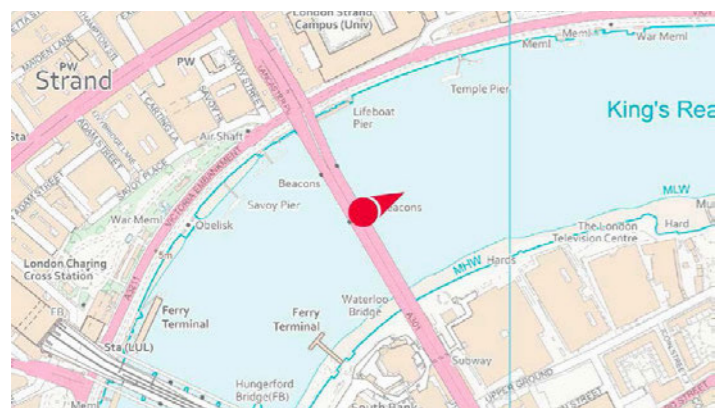
Viewpoint 6 - Existing: LVMF 15B.2 | Waterloo Bridge: downstream - at the centre of the bridge

View 6 Existing

1.17 This LVMF view is located on Waterloo Bridge, looking to the north-east. The central focus of the view is St Paul's Cathedral (Strategically Important Landmark) with the city cluster to the south. The river sits prominently within the foreground. Tall buildings, more sparsely distributed rise above the city to the north of the view.



Viewpoint map



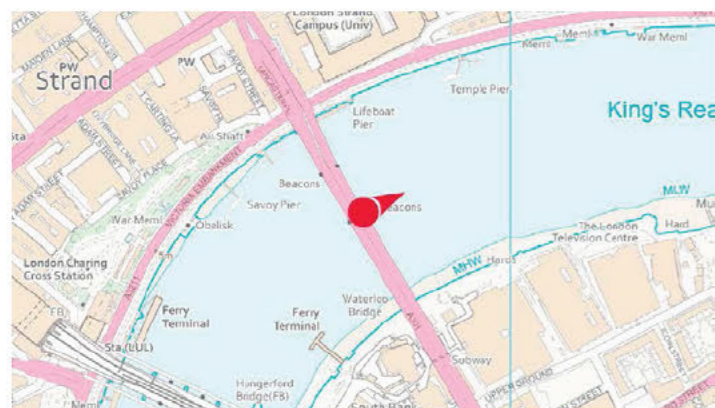
Viewpoint 6 - Proposed: LVMF 15B.2 | Waterloo Bridge: downstream - at the centre of the bridge

View 6 Proposed

1.18 In this proposed view, Principal Place sits to the rear of the Indicative Massing with Nos. 2-3 Finsbury Avenue and Nos. 13-14 Appold Street directly to the west. The latter heavily occlude views of the Indicative Massing, making it an unassuming presence within the river prospect and maintaining clear views of St Paul's, preserving its westerly sky setting and its prominence as a Strategically Important Landmark within the city.



Viewpoint map

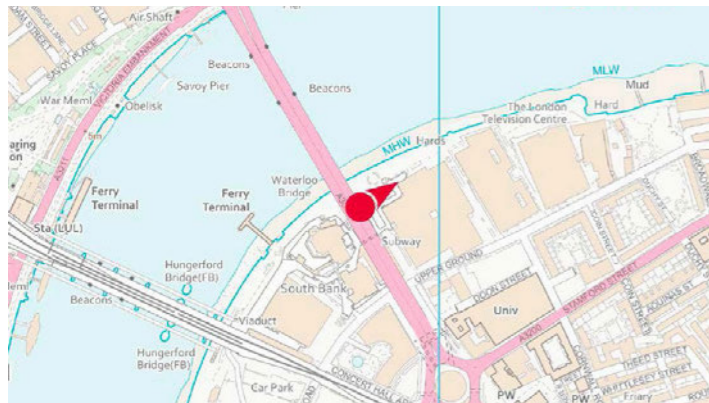


Viewpoint 7 - Existing: Waterloo Bridge: Crossing the Lambeth bank

View 7 Existing

1.19 This view is taken from the south of Waterloo Bridge. The National Theatre sits prominently within the foreground of the view, obscuring long distance views of the south. Mature vegetation lines the riverfront to the immediate north, proceeding into the middle ground. St Paul's Cathedral forms a central focus of the view in the long distance.

Viewpoint map



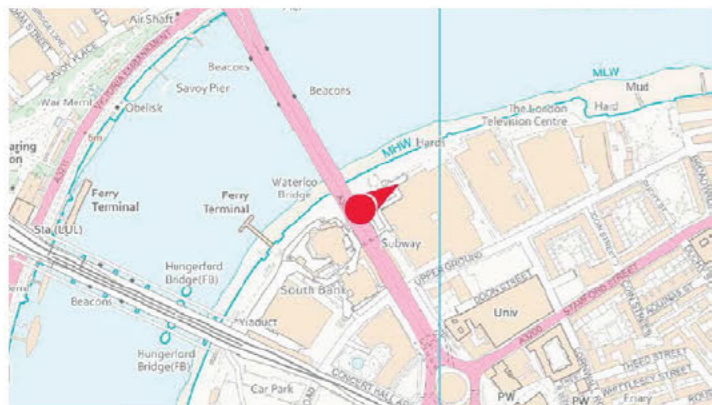
Viewpoint 7 - Proposed: Waterloo Bridge: Crossing the Lambeth bank

View 7 Proposed

1.20 The Indicative Massing is almost entirely concealed from view by Nos. 2-3 Finsbury Avenue and Nos. 13-14 Appold Street. Where seen it has a non-assertive presence, sitting comfortably among the future baseline. The existing and emerging setting of St Paul's Cathedral is preserved.



Viewpoint map



Viewpoint 8 - Existing: LVMF 16B.2 | The South Bank: Gabriel's Wharf viewing platform

View 8 Existing

1.21 This LVMF view is taken from the Gabriel's Wharf viewing platform and is oriented north. The river defines the foreground with Blackfriars Bridge and riverfront buildings seen within the middle-ground. St Paul's Cathedral (Strategically Important Landmark) is a focal point of the view, occupying a central position with generous skyline surrounding it. The city cluster sits to the right of the view frame.



Viewpoint map



Viewpoint 8 - Proposed: LVMF 16B.2 | The South Bank: Gabriel's Wharf viewing platform

View 8 Proposed

- 1.22 The Indicative Massing is entirely occluded by St Paul's Cathedral within this view. To indicate its position within the view the Indicative Massing is shown as a yellow shaded wireline. The view shows there would be no effect.



Viewpoint map



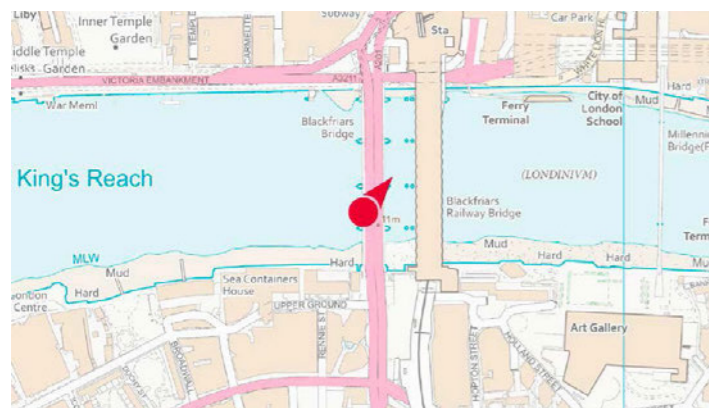
Viewpoint 9 - Existing: Blackfriars Bridge: between third and fourth Bastions

View 9 Existing

- 1.23 This view is taken from the western pedestrian walkway that crosses Blackfriars Bridge. The road sits within the foreground, the railway covering occludes middle-distance views. St Paul's Cathedral sits centrally within the view, with the Barbican Centre seen to the north.



Viewpoint map



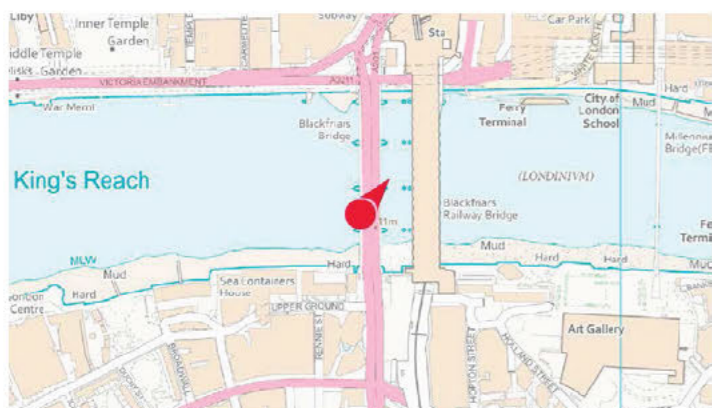
Viewpoint 9 - Proposed: Blackfriars Bridge: between third and fourth Bastions

View 9 Proposed

1.24 The upper storeys of the Indicative Massing are seen within this view to rise marginally above the rail enclosure that lines Blackfriars Bridge. From this angle the Indicative Massing appears to abut Nos. 2-3 Finsbury Avenue. St Paul's Cathedral is maintained as the focal point in this view as the strategic landmark. The height and massing appear subordinate within the view, particularly within the context of Nos. 2-3 Finsbury Avenue and retains St Paul's as the focal point, leaving plentiful space within the western sky setting of the cathedral.



Viewpoint map



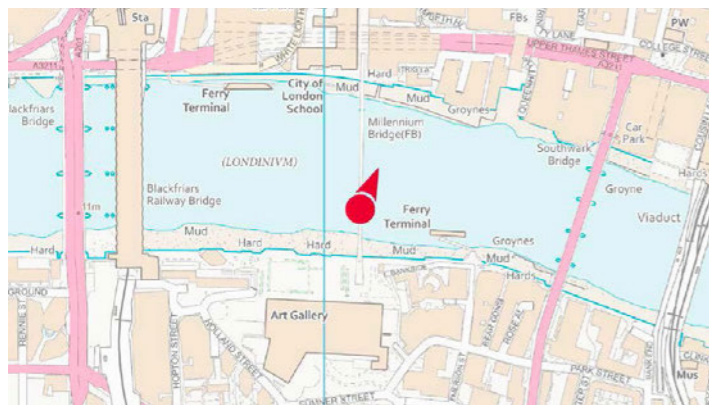
Viewpoint 10 - Existing: LVMF 13A.1 | Millennium Bridge, close to the Southwark bank

View 10 Existing

1.25 This LVMF view is located on Millenium Bridge and looks north-east. The bridge and river define the foreground. Medium rise buildings line the riverfront within the middle-ground. St Paul's Cathedral (Strategically Important Landmark) forms a clear focal point in the middle ground and its south transept clearly recognised. A clear understanding of St Paul's Heights limitations can be read along the north embankment with the wider setting characterised by taller development. The LVMF notes that Barbican Centre towers are a feature of the view, distinguished at long distance to the north.



Viewpoint map



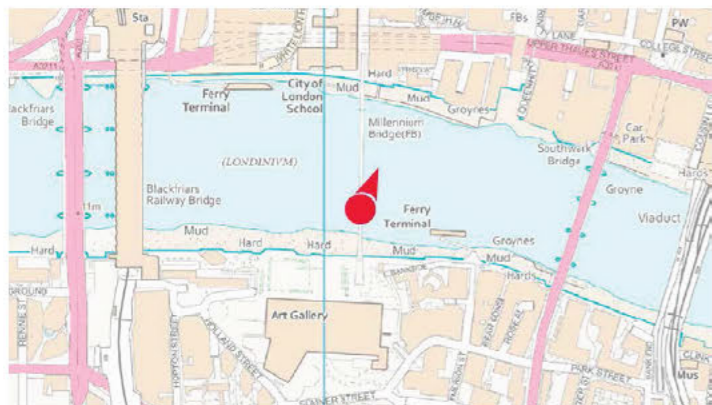
Viewpoint 10 - Proposed: LVMF 13A.1 | Millennium Bridge, close to the Southwark bank

View 10 Proposed

1.26 The Indicative Massing sits within north of this view, partially occluded by No. 3 New Globe Walk. The Indicative Massing is seen in conjunction with Nos. 2-3 Finsbury Avenue and Nos. 13-14 Appold Street, sitting at a lower height to these emerging developments. The Indicative Massing is not prominent within the view and sits comfortably within the context of the wider background and further east of St Paul's Cathedral.



Viewpoint map



Viewpoint 11 - Existing: LVMF 13B.1 | Thames side at Tate Modern - axial to St Paul's Cathedral

View 11 Existing

1.27 This LVMF viewpoint is situated on Queen's Walk and looks north-east. The river and medium rise buildings lining the northern bank define the foreground as well as middle-ground. St Paul's Cathedral (Strategically Important Landmark) forms a focal point with the Barbican Centre towers seen at longer distance.



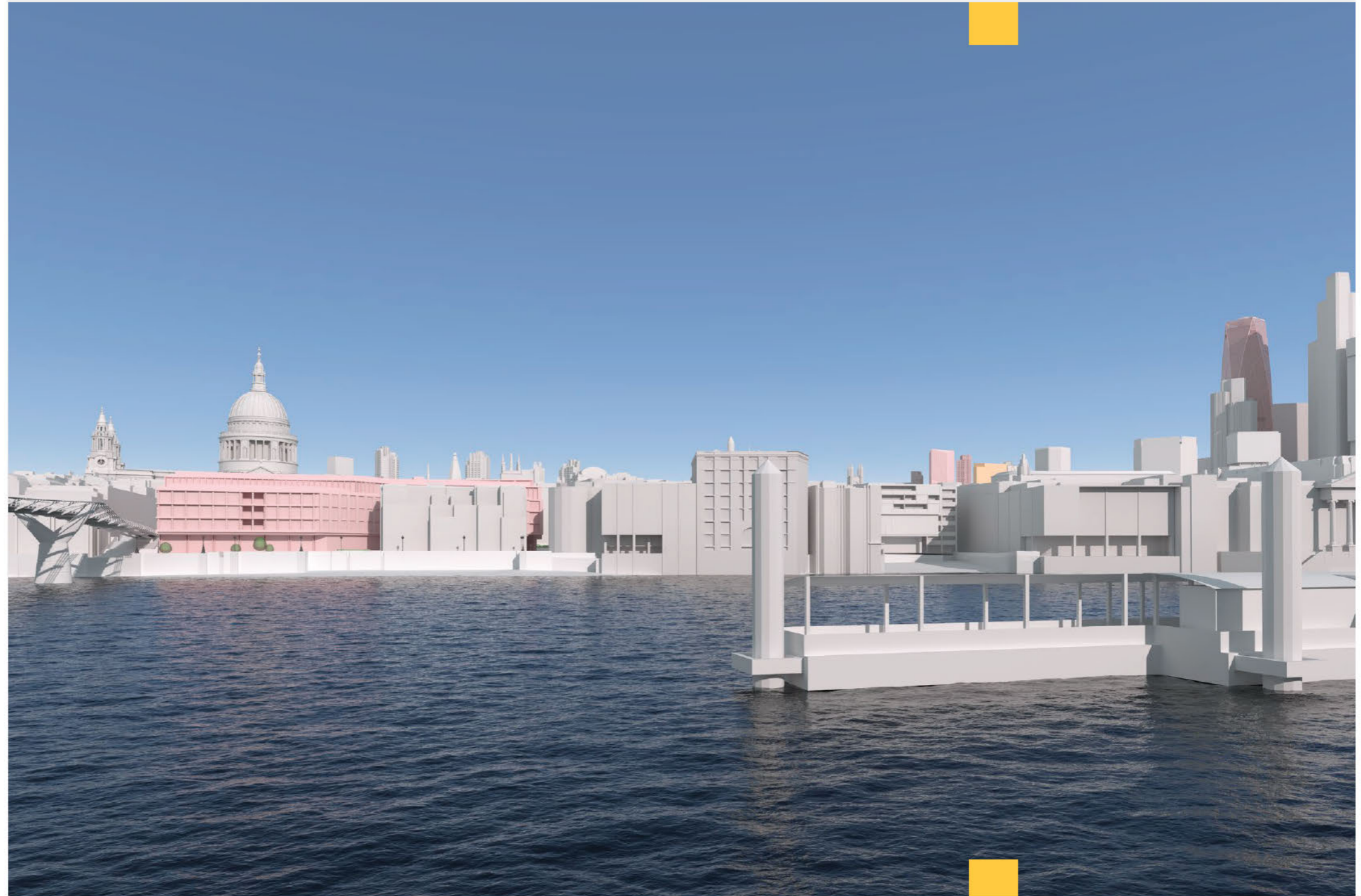
Viewpoint map



Viewpoint 11 - Proposed: LVMF 13B.1 | Thames side at Tate Modern - axial to St Paul's Cathedral

View 11 Proposed

1.28 The upper storeys of the Indicative Massing are seen within this view rising marginally above No. 1 Upper Thames Street and Bloomberg Arcade. The massing sits at a lower height to the adjacent Nos. 2-3 Finsbury Avenue and Nos. 13-14 Appold Street. Within this context the Indicative Massing is not prominent within the view and sits much further east, introducing very limited change within the wider setting of St Paul's Cathedral.



Viewpoint map



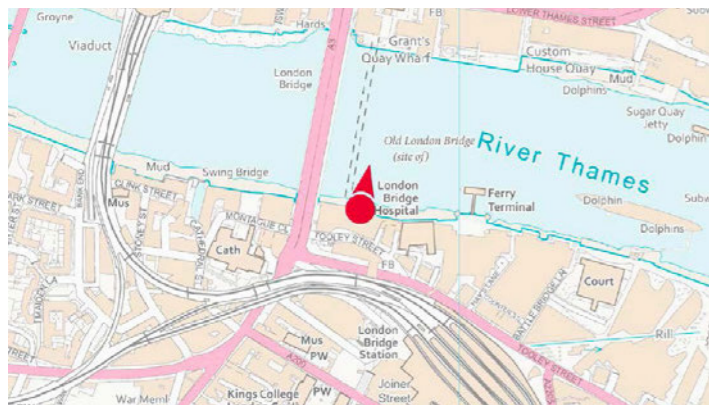
Viewpoint 12 - Existing: The Queen's Walk: riverside in front of no.1 London Bridge

View 12 Existing

- 1.29 This view is situated on Queen's Walk and looks directly towards the Monument, visible in the central middle ground along the northern embankment of the River Thames. This is Street View 4 from the Monument Views Study.



Viewpoint map



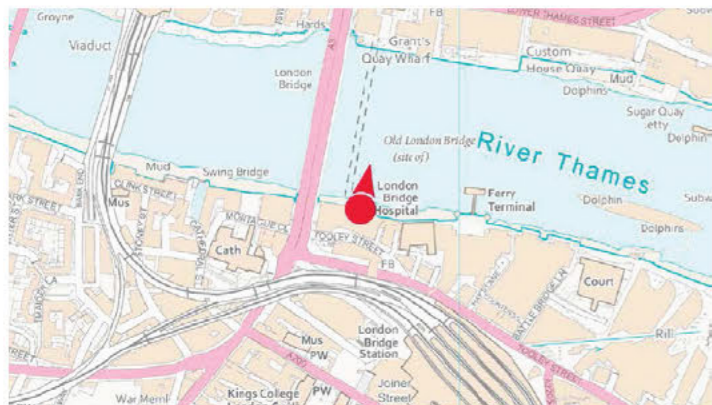
Viewpoint 12 - Proposed: The Queen's Walk: riverside in front of no.1 London Bridge

View 12 Proposed

1.30 The Indicative Massing is entirely occluded by the city cluster and buildings lining the northern riverfront within this view. The massing is shown as a shaded wireline to indicate its position. There is no effect on this view.



Viewpoint map



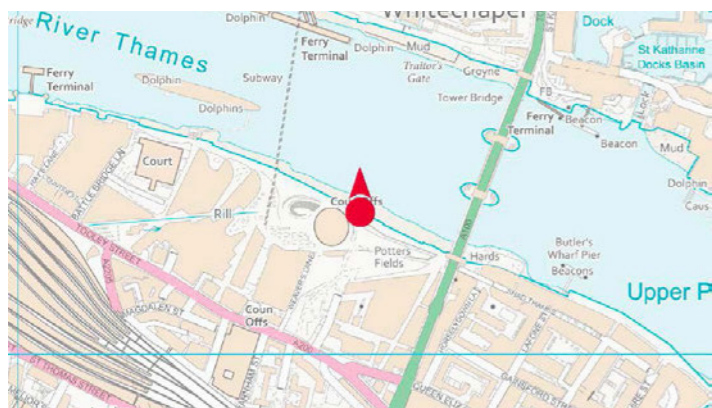
Viewpoint 13 - Existing: LVMF 25A.1 | The Queen's Walk at City Hall - foot of pathway from Potter's Fields

View 13 Existing

1.31 This LVMF view is located adjacent to the City Hall and is oriented north. The foreground is defined by the river. The Tower of London and its surrounding mature vegetation sit to the east of the view which then rises up toward the city cluster as the viewer looks to the west.



Viewpoint map



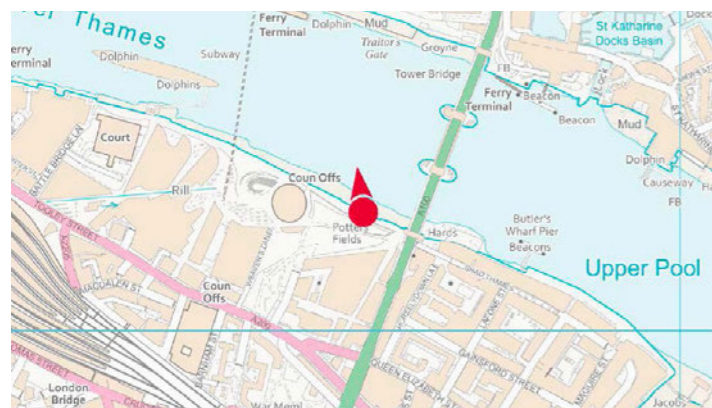
Viewpoint 14 - Existing: LVMF 25A.3 | The Queen's Walk at City Hall - close to Tower Bridge

View 14 Existing

- 1.33 This LVMF is similar in nature to LVMF 25A.1 as described above with the exception that a wider panorama is afforded of the riverfront either side of the Tower of London and City Cluster.



Viewpoint map



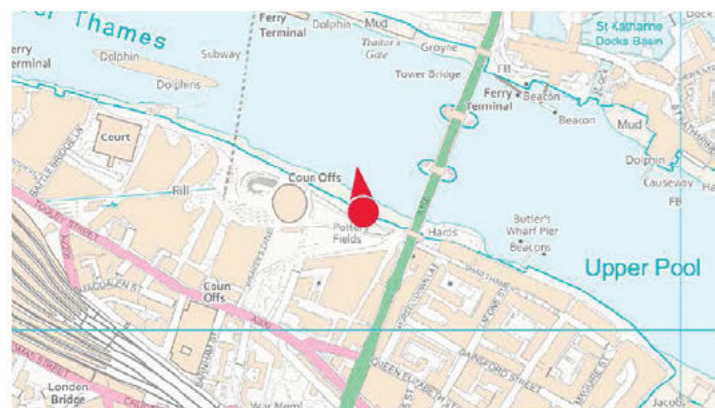
Viewpoint 14 - Proposed: LVMF 25A.3 | The Queen's Walk at City Hall - close to Tower Bridge

View 14 Proposed

1.34 As with View 11, the Indicative Massing is almost entirely occluded from view by the buildings that rise up from the north bank of the Thames. Only the uppermost storeys of the Indicative Massing can be seen, harmonising with the heights of the buildings surrounding the foot of the city cluster. The protected silhouette of the Tower of London is entirely preserved.



Viewpoint map



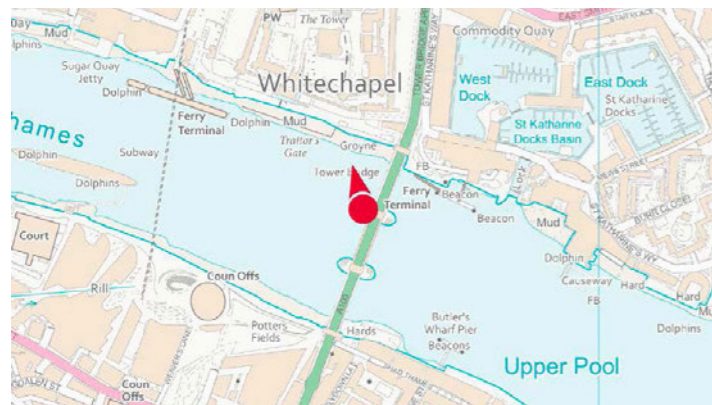
Viewpoint 15 - Existing: LVMF 10A.1 | Tower Bridge: upstream - the north bastion

View 15 Existing

1.35 This LVMF view focuses in on the Tower of London, a Strategically Important Landmark, which sits within the foreground and Middle Ground. To the west of the view the Gherkin and surrounding city cluster buildings can be seen to rise above Trinity Square.



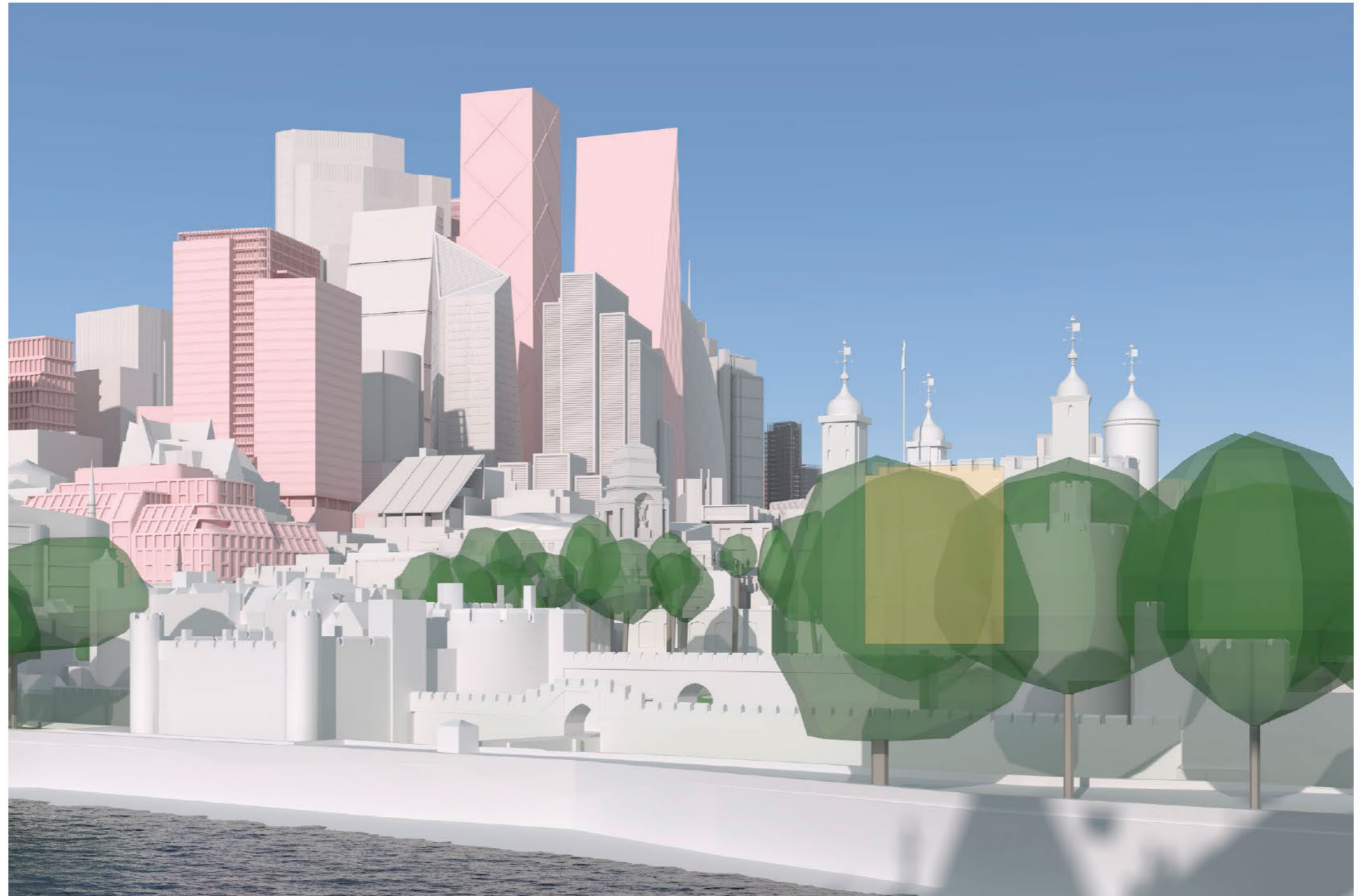
Viewpoint map



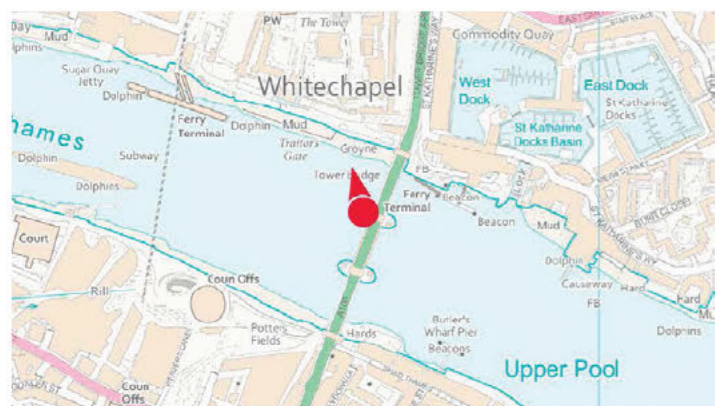
Viewpoint 15 - Proposed: LVMF 10A.1 | Tower Bridge: upstream - the north bastion

View 15 Proposed

1.36 The Indicative Massing is almost entirely occluded within this view. A shaded wireline is shown to indicate its position. The scale of the building would be appropriate to its surrounding context in terms of building heights and massing. The Indicative Massing would not rise above the crenelation of the Tower of London within the view.



Viewpoint map



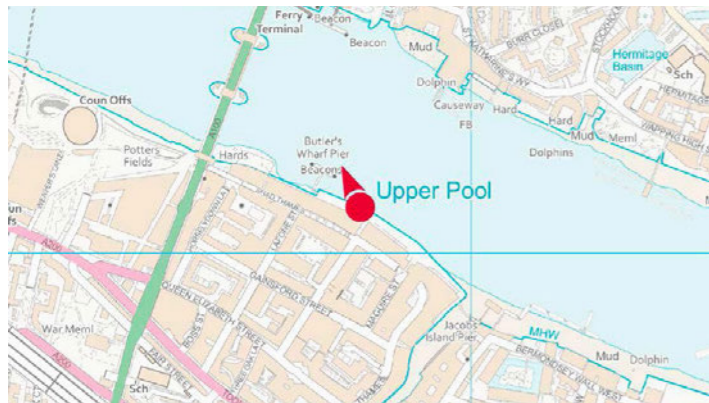
Viewpoint 16 - Existing: Butler's Wharf

View 16 Existing

1.37 This viewpoint is taken from Butler's Wharf and is oriented north-west. The river and the Butler's Wharf Pier Beacons sit within the foreground. Tower Bridge sits within the middle-ground to the west, with the Tower Thistle Hotel building to the east. The Gherkin and surrounding city cluster sit within the centre-ground at long distance.



Viewpoint map



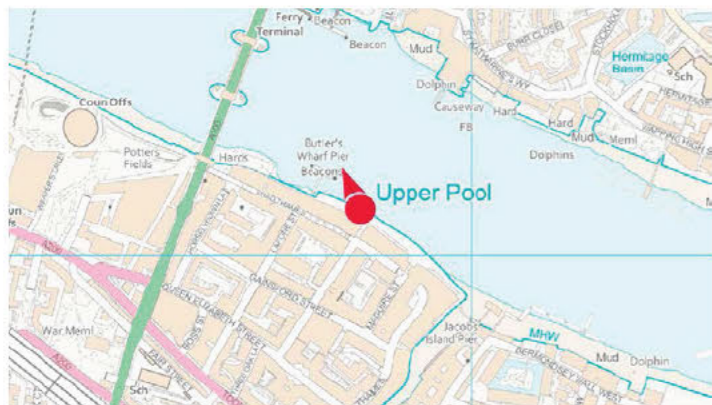
Viewpoint 16 - Proposed: Butler's Wharf

View 16 Proposed

1.38 The Indicative Massing is almost entirely occluded by built form between the Site and the North Bastion of Tower Bridge. Where visible it remains contextual to the surrounding townscape in terms of its height and massing. It is only the uppermost storeys of the Indicative Massing that can be seen.



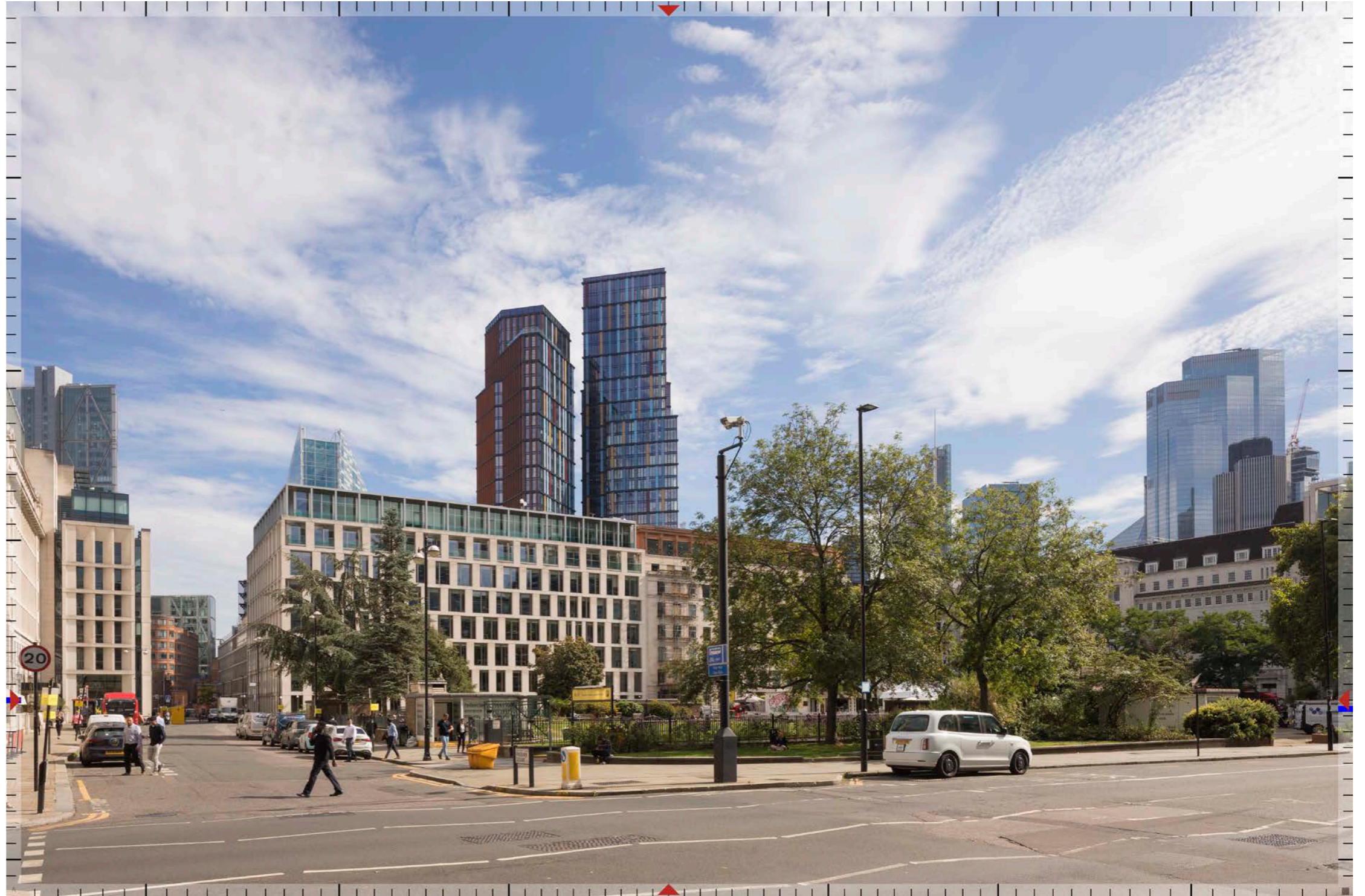
Viewpoint map



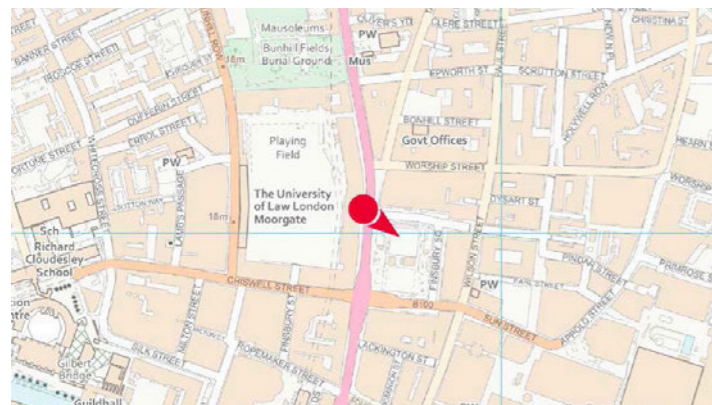
Viewpoint 17 - Existing: Finsbury Square: north-west corner, outside Master Gunner

View 17 Existing

1.39 This viewpoint is located at within the north-western corner of Finsbury Square. The road enveloping the square and the square itself sit within the foreground. The middle-ground of the view is bracketed by medium rise buildings including 18 Finsbury Square and 30 Finsbury Square which sits centrally. One Crown Place rises above the centre of the centre of the view, with tall buildings situated to the peripheral north and south.



Viewpoint map



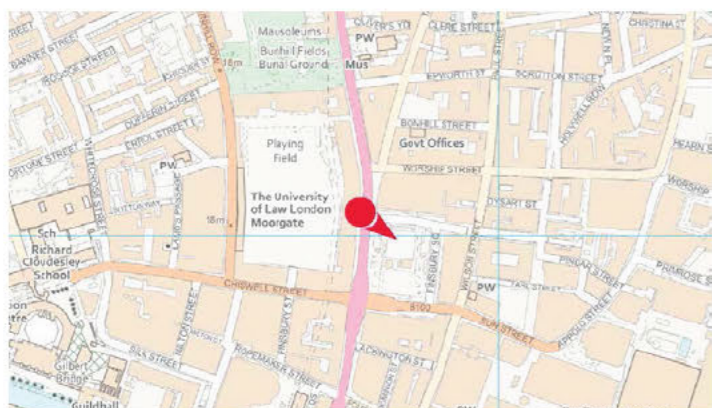
Viewpoint 17 - Proposed: Finsbury Square: north-west corner, outside Master Gunner

View 17 Proposed

1.40 The Indicative Massing is seen to the north west of the view in conjunction with the Edge Shoreditch (resolution to grant), 13-14 Appold Street (implemented) and 2-3 Finsbury Avenue (under construction) cumulative schemes. The Indicative Massing is also seen alongside the completed One Crown Place. The proximity of these developments and consistency of buildings height to the rear of Finsbury Square allow the Indicative Massing to sit contextually within the surrounding townscape, appearing subordinate in height to several schemes from this perspective.



Viewpoint map

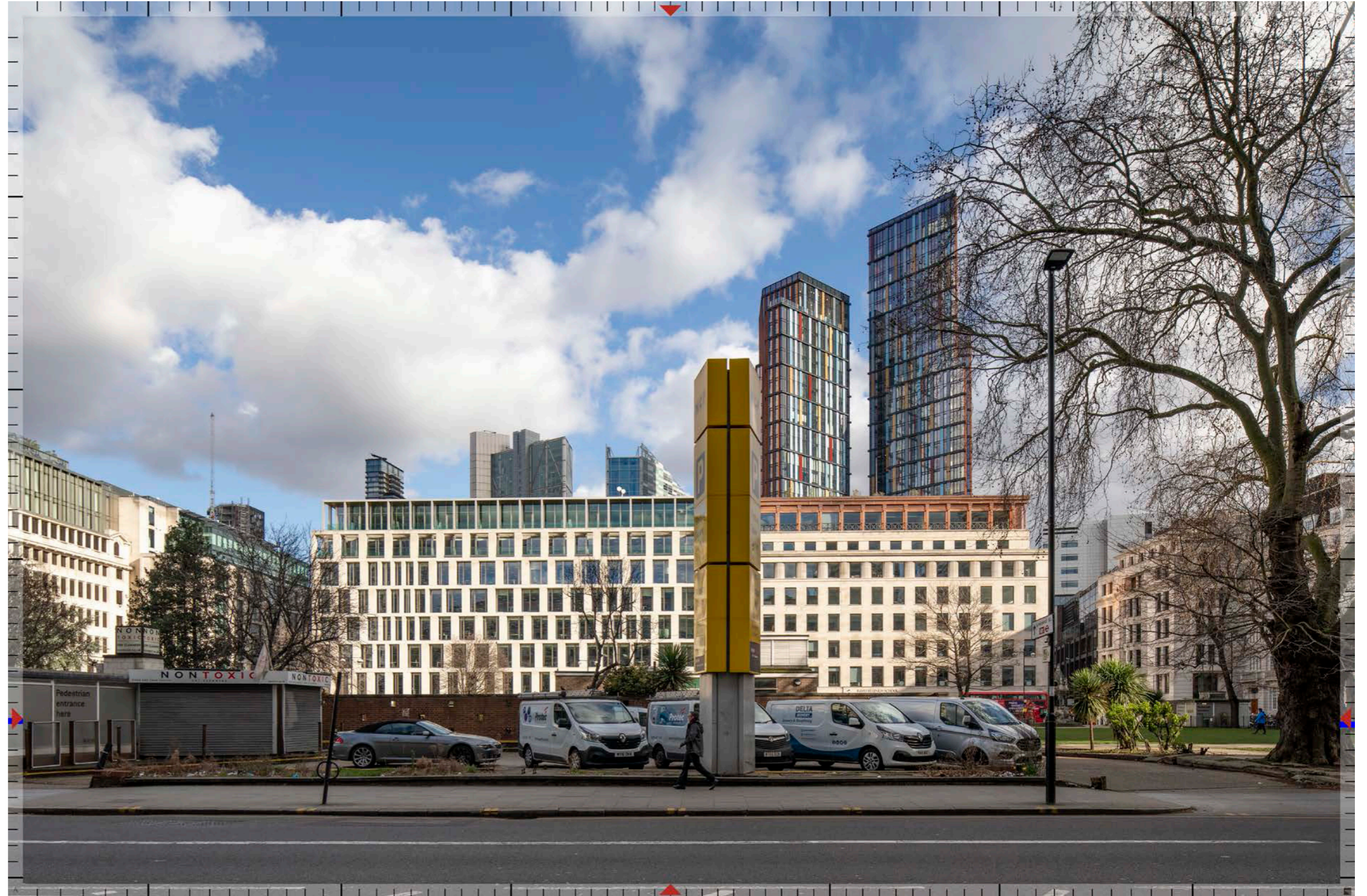
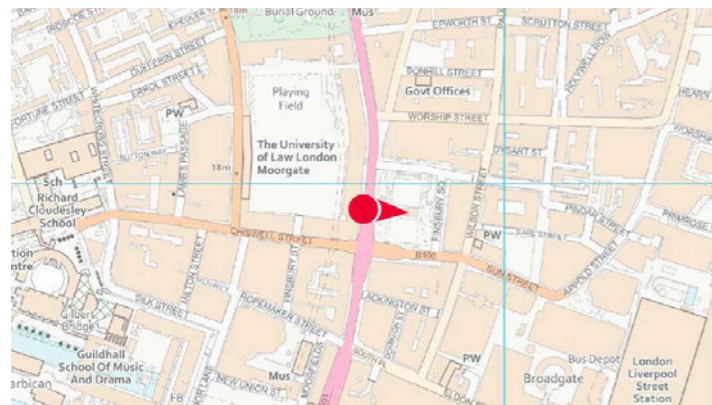


Viewpoint 18 - Existing: Finsbury Square: west, outside no.10

View 18 Existing

1.41 This viewpoint is located to the south of view 15, located centrally on the walkway to the west of Finsbury Square. A parking area sits within the foreground with No. 30 Finsbury Square located directly within the centre-ground. Rising above No. 30 to the south can be seen One Crown Place, Broadgate Tower and Principal Place.

Viewpoint map



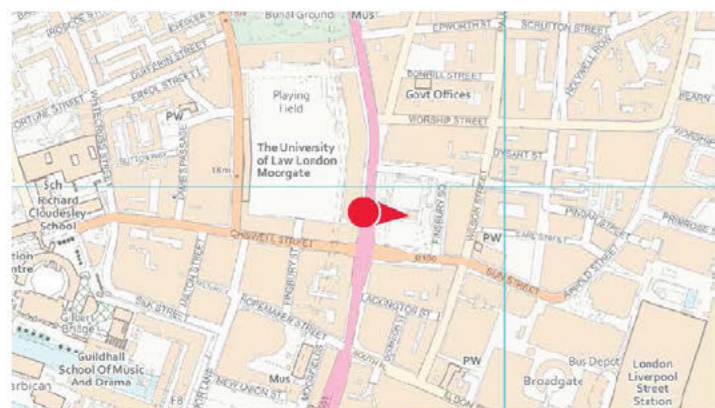
Viewpoint 18 - Proposed: Finsbury Square: west, outside no.10

View 18 Proposed

1.42 Within this view the tallest element of the Indicative Massing is partially concealed by the Edge Shoreditch (resolution to grant) cumulative scheme, harmonising with its roofline from this perspective. The smaller element of the Indicative Massing is seen stepping down to the north-west, partially occluded by No. 30 Finsbury Square. The Indicative Massing sits appropriately and contextually within this view, sited alongside Edge Shoreditch as its stepped massing rises up to meet 13-14 Appold Street (implemented) and One Crown Place.



Viewpoint map



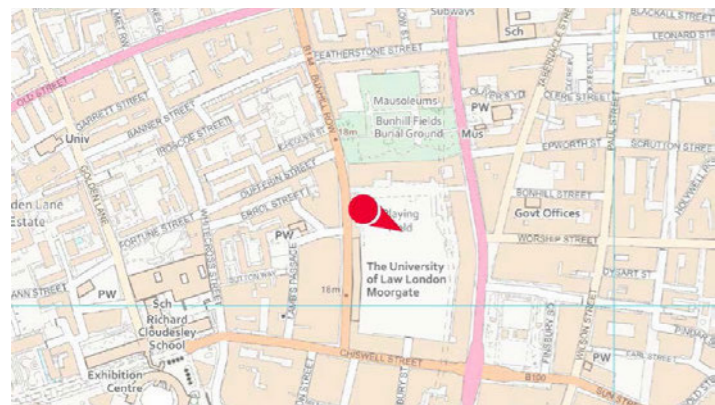
Viewpoint 19 - Existing: Honourable Artillery Company Grounds, north-west corner

View 19 Existing

1.43 This view is located within the north-western corner of the Honourable Artillery Company Grounds oriented south-east. The foreground of the view is defined by the green space and semi-mature vegetation of the Artillery Ground. The artillery Ground is framed by medium rise buildings beyond which can be seen One Crown Place, Principal Place and Broadgate Tower as well as other tall buildings.



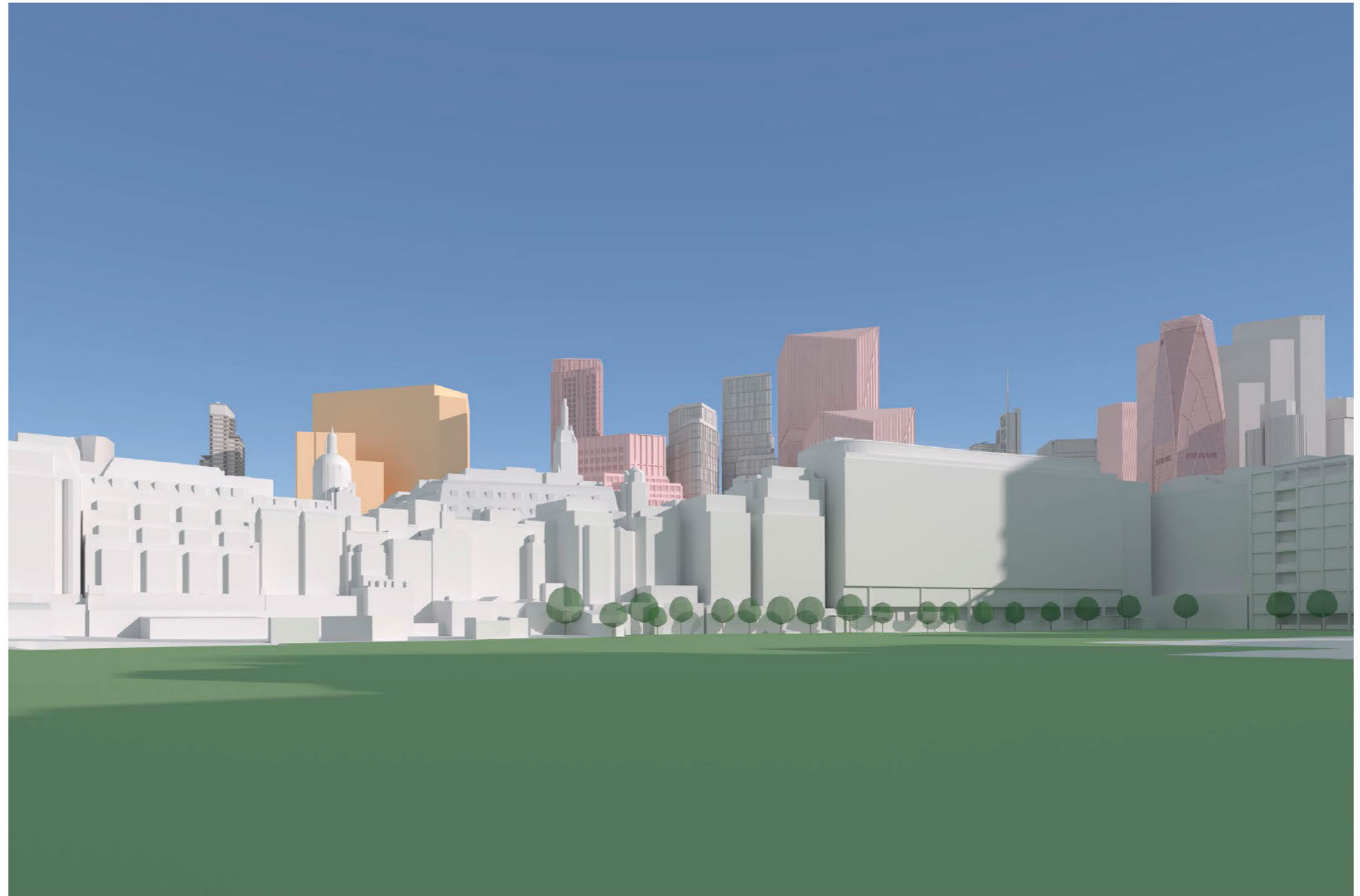
Viewpoint map



Viewpoint 19 - Proposed: Honourable Artillery Company Grounds, north-west corner

View 19 Proposed

1.44 The Indicative Massing is seen to the left of the view frame, harmonising well with the cumulative and existing built context to the rear of the Artillery Grounds, seen in conjunction with Edge Shoreditch (resolution to grant), Nos. 2-3 Finsbury Avenue, 13-14 Appold Street (implemented) and One Chapel Place. Within this view the Indicative Massing would sit contextually and appropriately to the context described.



Viewpoint map



2. Conclusions

2.1 In reference to the Liverpool Street and Broadgate Character Area, the Topic Sheet states “the Character Area is considered to be very sensitive to tall buildings. The scale of building is mid-high rise” and that “Further tall building development within the Character Area could overwhelm the westerly sky setting of St Paul’s Cathedral in...River Prospects, merge detrimentally with...existing tall buildings in...Barbican and Golden Lane Character area and...clash with...Cathedral’s sky silhouette”.

2.2 Verified views modelling has indicated that a taller building on the Broadwalk House site would preserve the westerly sky setting of St Paul’s in the River Prospect views and would not merge detrimentally with the existing tall buildings in the Barbican and Golden Lane Character area when developed within the Indicative Massing envelope. In a number of LVMF views the Indicative Massing would be entirely occluded. In the remainder of the LVMF views showing the Indicative Massing, it does not sit prominently or in close proximity to the westerly sky setting of St Paul’s Cathedral.

2.3 The ToL WHS is not considered sensitive to change in relation to the Liverpool Street and Broadgate Character area due to the location and distance. There are relevant LVMF views from Queen’s Walk and Tower Bridge to test to ensure this is the case, which this Technical Note has conducted. Verified views testing shows that the Indicative Massing would not rise above the crenellations of the Tower of London, resulting in no effect on its protected silhouette. Further testing of relevant LVMF views demonstrates that the ToL will remain the dominant Strategically Important Landmark, as demonstrated in all relevant views tested. Close range views show that the Indicative Massing sits appropriately and contextually within the Liverpool Street and Broadgate Character Area alongside constructed as well as emerging schemes. The suggested height contours map (Figure 2.1) aims to illustrate this, identifying appropriate height limits across the Site consistent with the city cluster contours to the south.

2.4 Additionally, the Site lies within one of City of London’s ‘Key Areas of Change’, specifically Key Area 6E. The 2021 document produced by CoL notes that “The Liverpool Street Key Area of Change is located near to clusters of tall buildings including a small cluster near Old Broad Street, and a denser cluster in the City Cluster”. Further that spaces outside of the western section of the key area are less affected by LVMF constraints and therefore “there are several tall buildings in the Broadgate area surrounding Liverpool Street Station with another pending commencement of works”.

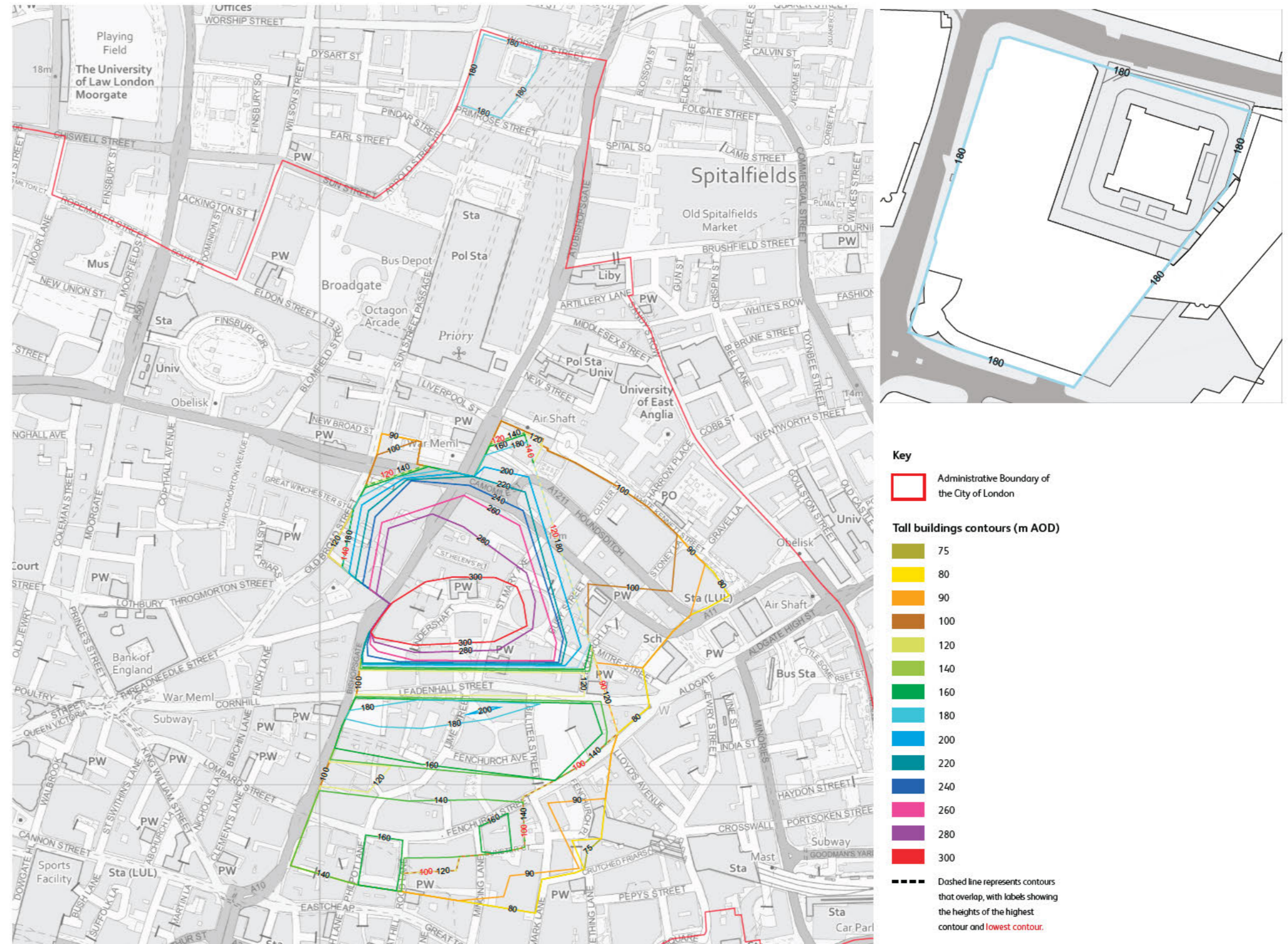


Figure 2.1: Height contours map showing city cluster to south and Site to north (above left) with Site specific contours map and key (right)



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**APPENIDX 2 – LIVERPOOL STREET HEALTHY STREET PLAN REPRESENTATIONS (18
DECEMBER 2023)**



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18 December 2023

Dear Sir/Madam,

LIVERPOOL STREET AREA HEALTHY STREETS PLAN

We are pleased to provide the following comments in response to the City of London's ('CoL') consultation on the proposed Liverpool Street Area Healthy Streets Plan that is to be adopted next year.

Background

British Land jointly owns and manages Broadgate with our JV partners, GIC. We are a key stakeholder in the Liverpool Street area owning the Broadgate Campus, a 42 acre mixed use campus. We are implementing our long-term plan to transform Broadgate into a world-class, mixed-use, seven-day, central London destination. We have invested over £2.6 billion since 2016 to realise this plan. Our vision is underpinned by an integrated placemaking masterplan which seeks to:

- Diversify the occupier base across business size, sector, budget and specification whilst maintaining flexibility and a consistent customer experience
- Transform the retail, restaurant and leisure offer to meet the needs of workers, commuters and visitors and create a seven-day destination
- Create a vibrant and exciting place with distinctive public spaces and sense of community
- Connect to the wider City and surrounding neighbourhoods, increasing permeability and working with other key stakeholders, including the City of London, TfL, Network Rail and surrounding landowners

As you will be aware, British Land forms part of a Steering Group which includes Transport for London, Network Rail, the CoL and other landowners in the Liverpool Street area. Through the Steering Group, British Land has been advocating for greater ambition and levels of intervention in the area to deliver a truly world-class, transformational approach to placemaking and public realm.

It is within the above context that we make the following comments:

High level observations

British Land and GIC fully supports the establishment of a Healthy Streets Plan (HSP) for the Liverpool Street area. The Liverpool Street area forms a key gateway into the City of London connecting a number of different destinations both within and beyond the City itself. This is part

of our shared aspirations to make this part of the City more permeable and more connected to the surrounding communities.

The Liverpool Street area currently underperforms in terms of its function and the quality of its public realm relative to its importance as a place, a transport hub and as a gateway to the City of London. Enhancing the experience of those travelling to and through the City with improved wayfinding and enhanced public realm is essential. An accompanying retail and leisure offer are considered to be critical to the City achieving its ambitions for 'Destination City'. We are big advocates of the City and believe it has incredible further potential and want it to perform to the highest possible standard with great public realm that allows people to get around easily regardless of their mode of transport. With this in mind we make the following high-level requests which we would like the City to give formal consideration to:

- The City of London to invest in a master-planned approach to placemaking which can deliver transformational change supported by an adopted planning framework and an associated funding mechanism to deliver this
- Increased investment to improving the existing streets and routes, such as Old Broad Street and Sun Street Passage. We support improving connectivity from Liverpool Street station to the Eastern Cluster and Bank making the City accessible and easy to get around
- The HSP should set a greater level of ambition and proposed intervention in relation to the future of the existing bus station underneath 100 Liverpool Street. The use of the bus station by bus routes has declined significantly since 2011; the bus routes that operate out of it could utilise on-street stands within the local area. It is key that the HSP supports the continued exploration of this given the significant benefits that it could realise to overall placemaking and permeability in the area
- The HSP should set out the clear ambition to deliver a single north-south route via a newly re-modelled and enhanced public realm along Sun Street Passage
- Re-consider the proposal for a further north south route to be located within the western side of the Liverpool Street Station train shed. We believe this will only create a more convoluted and confusing experience for pedestrians
- Consider that Old Broad Street would benefit from much greater interventions and investment. We believe this is fundamental to the creation of a truly transformational public realm in conjunction with future changes to Liverpool Street and Sun Street Passage
- Addressing the current issues associated with existing taxis and buses in the Liverpool Street Station area will be fundamental to being able to achieve truly transformational public realm
- Suggest the HSP includes reference to exploring a review of kerbside uses on Liverpool Street, including the potential for alternative arrangements for bus infrastructure, facilities and routes currently accommodated within the Liverpool Street bus station in conjunction with TfL
- The HSP should identify a programme by which the different measures will come forward alongside anticipated funding
- As part of our ongoing commitment to the City we have already contributed £14.09m in City CIL contributions, with a further £2m+ that will be committed in association with our 1 Appold Street development which received resolution to grant earlier this year. This does not include the £26m we spent in re-modelling the public realm in Exchange Square a few



years ago. We want to see these and other funds generated in the area spent wisely in pursuit of these wider place-making objectives

From the consultation website, it isn't immediately clear what the overall vision and ambition is for the Liverpool Street Area HSP as a whole. Given the HSP will form the basis for an integrated approach to improving the public realm in the area and the allocation of CIL and other funding, it is felt that the HSP could benefit from clearly identifying what the ambition is for the area. We believe the ambition should be to make the Liverpool Street Area one of the most welcoming, inclusive, safe, attractive, connected and interesting areas of public realm to move through healthily and to spend time in the City of London. Given it is the first experience that many visitors have coming to the City of London it is an area in need of transformational change to provide world class streets and spaces for all users.

The Liverpool Street area represents a substantial opportunity to deliver real enhancements to place making, particularly around Liverpool Street Station itself. As set out above and through our more specific comments below, the various initiatives outlined within the HSP are all supported in general terms, but these should not be the only proposals that can come forward.

British Land is making substantial and thoughtful investment into the transformation of Broadgate. This includes the creation of the new public park at Exchange Square and the delivery of new connections through 1 Broadgate. British Land's investment has not only delivered improvements to connectivity and permeability in the area, but importantly has realised a marked change in the quality of the public realm setting a benchmark which signals a new future for this part of the City. The vision for the Liverpool Street area and the HSP needs to build on this with placemaking, increased permeability and improvements to walking and cycling central to this.

In relation to the specific sections of the HSP we make the following comments:

Pedestrian Priority

We support the identification of Sun Street Passage as a new/improved walking route on the diagram of proposed improvements. Improving this as a walking route will better connect the Liverpool Street area with Shoreditch located to the north. This route will encourage more people to walk to and from Liverpool Street up to Shoreditch and beyond which will help realise improvements to overall health and wellbeing.

As you will be aware, British Land forms part of a Steering Group which includes Transport for London, Network Rail, the CoL and other landowners in the Liverpool Street area. Through the Steering Group, British Land has been advocating for greater ambition and levels of intervention in relation to the existing bus station underneath 100 Liverpool Street. And the role that Sun Street Passage can have in placemaking; transforming Liverpool Street Station and the surrounding area. It is believed that Sun Street Passage is critical to this and that this ambition should be set within the HSP as well as the City Plan.

It is noted that the diagram of proposed improvements also identifies two other potential north-south walking routes within the Liverpool Street Station train shed itself. We strongly believe

the proposed pedestrian route shown inside the western side of the station trainshed is a flawed proposition due to its proximity to the existing Sun Street Passage on the other side of the train shed. With Sun Street Passage identified to become a new/improved walking route, we believe the additional route inside the trainshed will only create a more convoluted and confusing experience for pedestrians heading north to Exchange Square and Shoreditch.

The internal route also raises questions in relation to management and security. Would the route be closed at night for example?

We believe the HSP should set out the clear ambition to deliver a single north-south route via a newly re-modelled and enhanced public realm along Sun Street Passage. From design work we have undertaken, this can provide a level surface all the way from Liverpool Street to Exchange Square, whilst the adjacent train shed could accommodate new retail and other active uses directly fronting onto the space. The creation of a route inside the station in such close proximity to Sun Street Passage represents a missed opportunity to deliver a much better experience for pedestrians in this part of the Liverpool Street area.

It is noted that there is reference to the potential for timed closure of streets in the 'Pedestrian Priority Improvement' section within the general overview of the HSP, but there is no reference to this in the specific pedestrian priority proposals section of the HSP. We are generally in support of timed closures being used to improve the quality and comfort of the public realm. We need to understand which streets this currently being proposed for so that we can determine if such an approach would help support the wider objectives of creating world-class placemaking and walking, cycling and wellbeing.

Public Realm Proposals

We believe that Old Broad Street represents one of the more important routes and spaces within the Liverpool Street area and that more substantial aspirations for this area should be set out in the HSP. We note that it is identified that pavement widths will be increased and crossing points improved, but feel that this area would benefit from much greater interventions and investment. We believe this is fundamental to the creation of a truly transformational public realm in conjunction with future changes to Liverpool Street and Sun Street Passage. These should be the key focus for investment and improvement given their relationship to Liverpool Street Station and the gateway they form into and out of the City of London.

It is noted that item 2.2 refers to the creation of 'a high-quality public space on Liverpool Street', but it isn't immediately clear where such public space is proposed to be located? If it is the stretch of Liverpool Street located immediately in front of the station, then addressing the current issues associated with existing taxis and buses in the area will be fundamental to being able to achieve this. Please see further comments on this in relation to the Kerbside Uses section of the HSP below.

British Land support item 2.4 of the HSP which identifies that the City will work in partnership with the London Boroughs of Islington and Hackney to explore opportunities to improve the streets located close to the administrative boundaries i.e. South Place, Sun Street, Appold Street and Worship Street.



British Land has recently obtained planning approvals for developments at 2-3 Finsbury Avenue, 1 Appold Street and currently has a planning application being determined by the CoL for an extension at lower levels to Broadgate Tower. Each of these developments include improvements to the public realm immediately surrounding them, which cumulatively will improve the conditions along Sun Street, Appold Street and at the junction of Worship Street and Norton Folgate.

A key driver behind each of these proposals has been to maximise greening via planting and the integration of new trees wherever feasible. This includes the delivery of new landscaped planters, including relocating trees along Sun Street, as well as the creation of a new area of public realm just off Appold Street opposite its junction with Earl Street to deliver a new step-free route to Exchange Square.

The planning application for the extension to Broadgate Tower will deliver significant improvements to both the greening and the provision of public seating within Broadgate Plaza located between Broadgate Tower and 201 Bishopsgate. These proposals complement the new public realm that has been delivered at Exchange Square and will work together to realise significant improvements to the pedestrian experience of people travelling in north-south direction between Liverpool Street Station.

The delivery of other public realm improvements which fill in the gaps between these interventions that have already been secured via planning would help create a continuous stretch of high quality public realm from the junction of Wilson Street with Sun Street, up to Appold Street and its junction with Primrose Street. We would welcome proposals that deliver public realm improvements to the streets such as South Place, Sun Street, Appold Street and Worship Street and would be pleased to provide support to and be part of any working groups set up to develop and deliver them.

Kerbside Activity

It is noted that neither item 4.1 or item 4.2 include reference to reviewing kerbside activities along Liverpool Street. Similar to previous representations we have made to the draft City Plan, it is suggested that the HSP includes reference to exploring a review of kerbside uses on Liverpool Street, including the potential for alternative arrangements for bus infrastructure, facilities and routes currently accommodated within the Liverpool Street bus station in conjunction with TfL.

We believe that the Liverpool Street area should be transformed into a world-class gateway to The City of London, ensuring it is a great destination within which to arrive, move around, dwell and enjoy a transformed public realm. We strongly believe that as part of the ambition to deliver transformational change that The City and other stakeholders should work together to properly consider whether the existing bus station is appropriately located for the next 50+ years.

There are clearly many different factors and issues that need to be fully explored and understood as part of this, but in light of the significant benefits that relocating the bus station could contribute to overall placemaking and permeability in the area, it is key that the HSP



supports the continued exploration of this. The potential removal of the bus station, perhaps as part of a phased journey of change of the area, would enable Sun Street Passage to become a pedestrian priority route that connects north and south without needing to go inside of Liverpool Street station.

We consider that the delivery of this north-south route along Sun Street Passage to be achievable. It is worth highlighting that the use of the bus station by bus routes has declined significantly since 2011 (pre-Crossrail works) when seven routes utilised all available stands and a further two routes utilised stops within the bus station. Currently, there are only two bus routes utilising stands within the bus station at any one time; requiring three of the eleven stands provided. There are on-street locations within the vicinity of the station, which could be utilised to accommodate the stand requirements of these bus routes as well as retaining interchange with Liverpool Street station. We believe that this opportunity should be explored fully by stakeholders.

The restriction of servicing and delivery activity on Liverpool Street for existing uses is supported in principle and further detail on this would be welcomed. This should be undertaken outside the hours of 0700 to 1900, inclusive. No additional servicing and delivery activity should be accommodated beyond the existing buildings currently in use as this is an area where pedestrian movement and dwelling should be actively prioritised.

Cycling Proposals

British Land supports the different opportunities that have been identified to improve the comfort and safety of people cycling.

It is noted that the junction of Liverpool Street with Sun Street Passage is identified as an area for a 'new or improved crossing facility'. British Land supports this area receiving specific recognition in the HSP, but it feels like it is a missed opportunity to only identify the area for a new or improved crossing.

The current mixture of buses, taxis, pedestrians and cyclists at this junction is particularly problematic and is a major contributor to the area not feeling comfortable or safe. As referred to above, it is appreciated there will be several issues that will need to be explored and addressed as part of the removal of the bus station, but as a first step, it is important that the HSP and wider City Plan set the ambition and vision for this. The wider opportunities and improvements that such a change could make to the whole of the Liverpool Street area mean this shouldn't be ignored. Whilst the delivery of an improved crossing facility would be a beneficial interim step in the short term, this shouldn't be seen as the ultimate aspiration reflected in the HSP.

The principle of increased cycle parking spaces on the streets identified is welcomed, but would note that footway capacity assessments would need to be undertaken to ensure that footways are not reduced in width to a point that pedestrian movement is restricted and capacity reduced below acceptable Pedestrian Comfort Levels.



Programme

We note the consultation website sets out that the HSP is targeting adoption for March/April 2024, but there doesn't appear to be any information regarding aspirations on the timeline for delivery of any the improvements that will be set out in the HSP. It would be helpful if the HSP could identify a programme by which the different measures will come forward alongside anticipated funding. We believe there is no reason why many of the improvements including the changes and enhancements referred to in this letter couldn't be brought forward in the short to medium term. The aspiration should be to improve the Liverpool Street area as soon as possible.

We trust the above comments are useful and would be happy to discuss these further with the City Plan team should it be helpful.