

Morgan, Jackson

From: Jodane Walters [REDACTED]
Sent: 17 June 2024 16:10
To: Planning Policy Consultations
Cc: James Armitage-Hobbs
Subject: City Plan 2040 - Regulation 19 Written Representation obo Hub Residential Ltd
Attachments: City Plan 2040 Written Representation - DP9 obo Hub Residential Ltd (17.06.24).pdf

Categories: CONFIRMED

You don't often get email from [REDACTED] [Learn why this is important](#)

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

On behalf of my client, Hub Residential Limited, please see attached our formal written representation on the City Plan's Regulation 19 consultation.

Please can you also confirm receipt of this representation by return.

Many thanks

Jodane Walters
Senior Planner



DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ
telephone: 020 7004 1700 website: www.dp9.co.uk

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

JAH/JW/DP6657
17th June 2024

DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ

Registered No. 05092507

0207 004 1700

www.dp9.co.uk

**Environment Department
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ**

Dear Sir/Madam,

**DRAFT CITY PLAN 2040 (REGULATION 19 CONSULTATION)
REPRESENTATION ON BEHALF OF HUB LIMITED**

INTRODUCTION

This formal written representation has been prepared and submitted by DP9 Limited ('DP9') to the City of London Corporation ('CoL') on behalf of Hub Residential Limited (the 'Client'). This written representation is in respect of the Client's below sites (collectively referred to as the 'Sites') – and any other future site the Client may purchase and seek to develop:

- 45 Beech Street; and
- 150 Minories.

DP9 acts as the Client's planning advisor and agent to the submitted 45 Beech Street retrofit and shared-living scheme currently being determined by the CoL. This scheme comprises a comprehensive retrofit project including upward extension to deliver 174 shared living homes. Whilst not yet submitted to the CoL for determination, the Client's 150 Minories project also comprises an extensive retrofit and extension scheme. The 150 Minories scheme is still subject to ongoing discussions with the CoL planning and design officers, but the intention is to submit a full detailed planning application in the summer of 2024.

In light of the above, we welcome the opportunity to submit a formal written representation to the City of London's draft City Plan 2040 document under the Regulation 19 consultation process.



LOCAL PLAN-MAKING TESTS

Paragraph 35 of the National Planning Policy Framework 2023 ('NPPF') identifies that for a Local Planning Authority ('LPA') to adopt a new local plan it must be considered 'sound by the Planning Inspectorate. For it to be 'sound' it must satisfy the following criteria:

1. **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
2. **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
3. **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
4. **Consistent With National Policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

Further to the four above criteria, emerging local plans in London are also required to be in 'general conformity' with the London Plan.

REPRESENTATIONS

Draft Policy OF2: Protecting Existing Office Floorspace

Draft Policy OF2 (1) (C) seeks to resist the loss of existing office floorspace unless it can be demonstrated that, among other things, there is no demand in the office market (supported by marketing evidence covering a period of no less than 12 months). Whilst the Client appreciates the CoL's need to plan for the future and long-term employment trends, the need for a 12-month marketing period does not appear to be sufficiently grounded in evidence that demonstrates a 12-month period is the correct approach for the City of London's unique character when compared to other LPA's across London.

Furthermore, whilst the adopted CoL Local Plan requires marketing information to justify a loss of office use, the draft requirement for a minimum 12-month marketing period is an extra policy hurdle that is not seen in the City of London's current adopted Local Plan (2015).¹ This rigid approach in Draft Policy OF2 (1) (C) is therefore likely to hinder, rather than encourage, development across the City of London as applicants are unlikely to want to purchase assets for redevelopment where they will be required to hold an asset in its portfolio for one year knowing the likely outcome is that there is no market demand for the asset.

¹ Adopted Local Plan (2015) Policy DM1.1



Considering the above, we consider the approach for a 12-month marketing period to is **not justified** as it lacks sufficient evidence and it is **not effective** as it hinders development of suitable assets for other appropriate land uses. Draft Policy OF2 (1) (C) should therefore be deleted in its entirety.

Draft Policy OF2 identifies that, where the loss of office has been deemed acceptable by the CoL, development proposals can follow a number of routes, one of which is the Residential Areas Route.² This is where the loss of office floorspace is proposed on a site within or immediately adjacent to identified residential areas and would result in the provision of additional housing. Whilst the Client is supportive of the principle of this approach, we consider minor revisions necessary to ensure suitable assets are not excluded from this route and can be appropriately developed and, ultimately, assist in contributing to the City of London's overall housing delivery. Our proposed revisions to Draft Policy OF2 (2) (C) are outlined in green and red below:

*Residential areas route: the loss of office floorspace is proposed on a site within, **or immediately near to** identified residential areas, **or in highly accessible areas** and would result in the provision of additional housing;*

HOUSING

Draft Policy S3: Housing

Draft Policy S3 (1) (B) encourages housing development within identified residential areas and specifically identifies co-living (or Large-Scale Purpose-Built Shared Living ('LSPBSL', as termed in the adopted London Plan 2021) as a form of housing delivery. The Client is pleased to see LSPBSL specifically cited in the Draft City Plan 2040. However, to further increase the flexibility of the draft policy, we consider a minor amendment is required as outlined in green text below:

*Within **or near to** identified residential areas, **or in highly accessible areas**, prioritising the delivery of affordable housing, co-living, build to rent, hostels, sheltered and extra-care housing, while recognising that for sale market housing would be likely in some instances to have a role to play in making housing development viable;*

We consider the amendment above will bring the draft policy in general conformity with the London Plan.

Draft Policy HS1: Location of New Housing

Draft Policy HS1 (1) directs new housing on sites in or near identified residential areas. The Client is supportive of this approach and has no further amendments to this draft policy.

Introduction of Large-Scale Purpose-Built Shared Living Policy

We are pleased and welcome the fact that the Draft City Plan 2040 acknowledges and directs new housing to suitable locations, as outlined in Draft Policy HS1 (1) above. However, it is our view that the Draft City Plan 2040 should provide a specific and discrete planning policy guiding development of Purpose-Built Shared Living ('LSPBSL') across LPA.

² Draft Policy OF2 (2)(C)



The introduction of such a policy would assist in creating a positive policy environment through which developers such as the Client can deliver good quality, modern forms of housing typologies across the City of London. This, in turn, would help the CoL meet its minimum 1,706 net additional dwellings target identified in Draft Policy S3.

The Client is happy to enter into discussions with the City of London to discuss appropriate wording for such a policy, but as a starting point we consider any potential forthcoming LSPBSL policy should be introduced to the Draft City Plan 2040 and worded as follows:

Draft Policy HS9: Large-Scale Purpose-Built Shared Living

- 1. Proposals for large-scale purpose-built shared living (LSPBSL) will be supported in or near to identified residential areas where it can be demonstrated that:***
 - a. The proposals satisfy the definition and policy of LSPBSL set out in London Plan Policy H16; and***
 - b. It delivers a cash-in-lieu contribution toward conventional C3-residential housing to be provided off-site, elsewhere in the City of London, or somewhere of the City of London's choice.***

The above amendments contribute to ensuring the Draft City Plan 2040 is in general conformity with the London Plan.

CONCLUSION

As outlined above in this written representation, the Client considers further drafting is required for the Draft City Plan 2040 to be considered 'sound' overall – specifically in relation to the loss of office policy. It is also our view that a dedicated Large-Scale Purpose-Built Shared Living policy should be introduced into the Draft City Plan 2040.

Hub Residential Limited wish to be kept informed of the progress with the Draft City Plan 2040 and wish to be afforded the opportunity to provide further written representations at future consultations, where necessary, via the DP9 team (James Armitage-Hobbs at [REDACTED] and Jodane Walters at [REDACTED])

Yours faithfully

DP9 Ltd.

DP9 Ltd.