

Representations to the Regulation 19 City Plan 2040 consultation

R0206

Tom Pemberton

Thu 6/13/2024 11:33 AM

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

Cc: Gareth Fox

1 attachments (181 KB)

240613 Representation to City Plan 2040 Jastar Capital.pdf;

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

On behalf of our client, Jastar Capital, please see attached representations to the Corporation's Reg 19 consultation on the Draft City Plan 2040.

I would be grateful if you could confirm receipt of this email and attachment at your earliest convenience.

Kind regards,

Tom

Please note – I will be on leave from 18th - 25th June inclusive

TOM PEMBERTON (he/him/his)
ASSOCIATE

70 St Mary Axe, London, EC3A 8BE



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PD14668/GF/TP
Email:

[REDACTED]
[REDACTED]

70 St Mary Axe
London
EC3A 8BE
Tel: 020 7493 4002
www.montagu-evans.co.uk

Planning Policy Team
City of London Corporation
Guildhall
PO Box 270
London
EC2P 2EJ

13th June 2024

Via email only to:
planningpolicyconsultations@cityoflondon.gov.uk

Dear Sir / Madam,

CUSTOM HOUSE, LOWER THAMES STREET, EC3R 6EE

CITY OF LONDON CORPORATION – DRAFT CITY PLAN 2040 (REGULATION 19)

On behalf of our client, Jastar Capital, we write to submit representations to the City of London Corporation (“CoL” / “the Corporation”) in respect of the Regulation 19 consultation on the Draft City Plan 2040. Jastar Capital are the owners of Custom House.

CUSTOM HOUSE

Custom House (‘the Site’ / ‘the building’) is bounded by the River Thames to the south and Lower Thames Street to the north. Water Lane lies to the east of the Site and Old Billingsgate Walk to the west. The Site covers an area of approximately 0.947 hectares and comprises a 19,698 sqm (GIA) office building (Use Class E) which was, until 2021, occupied by Her Majesty’s Revenue and Customs (HMRC).

The building is Grade I listed. The River Wall, Stairs and Cranes along Custom House Quay are Grade II* listed and fall within the curtilage of Custom House.

The Site does not sit within a conservation area. It lies adjacent to the Grade II listed Billingsgate Market and a Scheduled Ancient Monument comprising the Roman and Medieval waterfronts below Old Billingsgate Market.

It lies within the viewpoint setting of Monument and forms an element in views from the opposite bank of the river and Tower Bridge. Mature plane trees along the quay partly obscure the building, and the quay itself is now largely enclosed by railings and used as car parking for the Property.

Jastar Capital purchased the Site in 2023 and are currently exploring the potential to repurpose the Site for a new hotel-led mixed-use development. The emerging vision seeks to retain and celebrate the history of the building, provide new inclusive and accessible public realm, new F&B offerings and a dedicated cultural offer.

DRAFT CITY PLAN 2040

Overall, Jastar Capital are supportive of the aspirations set out within the City Plan 2040.

Rather than provide comments on all relevant policies within the City Plan 2040, we summarise our views on the key strategic policies we consider most relevant to Custom House and our emerging vision for the Site, as follows:

Strategic Priorities and Overall Aspirations of the City Plan 2040

The City Plan 2040 outlines a vision and objectives for the square mile for the next 15 years. The overarching vision and strategic priorities identified are supported.

It is considered that the repurposing of the Site for a hotel-led mixed-use development scheme can help to deliver several of the Corporation's strategic priorities including:

Economic Objectives

- Enhancing the City's evening and weekend economies;
- Creating new and enhanced culture, leisure and visitor attractions;
- Delivering the accommodation, facilities, attractions and infrastructure required for a leading destination; and
- Ensuring development plays a significant role in enhancing the life of the Square Mile and the capital as a whole, both through the uses and design of development and through appropriate planning contributions.

Social Objectives

- Delivering new, inclusive open spaces and enhancing the City's public realm for everyone;
- Enhancing the City's riverside for everyone through the delivery of new and improved public realm and greater vibrancy; and
- Engaging with the City's communities including workers and residents and other stakeholders.

Environmental Objectives

- Delivering urban greening and greater biodiversity;
- Celebrating, protecting and enhancing the City's unique heritage assets;
- Ensuring exemplary design of development;
- Promoting greater use of the River Thames for passenger and freight transport, increased enjoyment of the City's riverside and improvements to flood defences; and
- Ensuring development and infrastructure help transform the City's streets, creating attractive and accessible places to walk, wheel, cycle and spend time, and enabling sustainable transport and active travel.

Strategic Policy S19: Pool of London

Under the City Plan 2040, Custom House lies at the centre of the Pool of London Key Area of Change. We support the City's aspirations to generate renewal in this under-appreciated part of the square mile.

The emerging vision for Custom House seeks to deliver many of the key aspirations outlined within Strategic Policy S19, including:

- Delivering new inclusive, accessible, welcoming and vibrant public realm that encourages more activity and greater enjoyment of the River Thames;
- Providing retail, cultural and leisure uses that are complementary to, and do not detract from, the primary business function of the City and that enhance heritage assets;
- Providing publicly accessible leisure and cultural uses on the river frontage;

- Delivering recreation, cultural events, arts and play in public spaces along the riverside;
- Maximising opportunities to increase the quantity and quality of public open space along the riverfront and seeking public realm improvements and increased permeability;
- Optimising the use of historic assets and spaces around them in ways that help to better reveal their heritage, create inclusive and welcoming environments and help to make the riverfront more vibrant and accessible for all;
- Encouraging more diverse communities to appreciate and understand the area through creative interpretation; and
- Improving transport connections and pedestrian links.

Strategic Policy S1: Healthy and Inclusive City

We welcome the Corporation's approach to delivering a healthier and more inclusive square mile. Central to the emerging vision for Custom House is ensuring that the Site is as accessible and inclusive as possible.

Strategic Policy S6: Culture and Visitors

We support the Corporation's aspirations to enhance the City's cultural, leisure and recreation offer and visitor experiences as a means of delivering the Corporation's 'Destination City' initiative. Diversifying the square mile is crucial to the continued success of the City of London.

A hotel-led scheme at the Site will help support Strategic Policy S6 by delivering additional visitor accommodation and supporting the social, environmental and economic growth of the square mile.

Acknowledging the need to support the Corporation's Destination City initiative, culture is to be embedded at the heart of the emerging vision for Custom House. A dedicated cultural offer is to be provided, with a 'golden thread' of culture and engagement running through the Site. As a Grade I listed building, the emerging proposals seeks to celebrate the building's rich history, placing heritage at the heart of the cultural strategy for the Site.

The emerging vision includes for the provision of new public realm adjacent to the River Thames, ensuring Custom House becomes a new, vibrant and inclusive cultural destination for those living, working and visiting the square mile.

Strategic Policy S11: Historic Environment

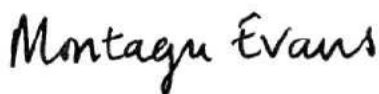
We support the Corporation's wish for the City's historic environment to be protected, celebrated and positively managed. Given its Grade I status, the emerging proposals seek to protect and celebrate the Site's heritage, promoting public enjoyment of, and access to, the Custom House.

Closing

We would be grateful for confirmation that these written representations have been received.

Should you require any clarification on the matters raised, please contact Gareth Fox [REDACTED] or Tom Pemberton [REDACTED]

Yours faithfully,



MONTAGU EVANS LLP

RE: Representations to the Regulation 19 City Plan 2040 consultation

Tom Pemberton [REDACTED]

Mon 6/17/2024 2:20 PM

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

Cc: [REDACTED]

📎 2 attachments (376 KB)

Model Representation Form for City Plan 2040 Jastar Capital.pdf; 240613 Representation to City Plan 2040 Jastar Capital.pdf;

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

I understand that submissions to the local plan must include a completed form.

Therefore, on behalf of our client, Jastar Capital, please see attached representations to the Corporation's Reg 19 consultation on the Draft City Plan 2040, including completed form.

I would be grateful if you could confirm receipt of this email and attachment at your earliest convenience.

Kind regards,
Tom

TOM PEMBERTON (he/him/his)
ASSOCIATE

70 St Mary Axe, London, EC3A 8BE
[REDACTED]





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From: Tom Pemberton
Sent: Thursday, June 13, 2024 11:32 AM
To: planningpolicyconsultations@cityoflondon.gov.uk
Cc: [REDACTED]
Subject: Representations to the Regulation 19 City Plan 2040 consultation

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Email:

[REDACTED]
[REDACTED]

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Tel: 020 7493 4002
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Planning Policy Team
City of London Corporation
Guildhall
PO Box 270
London
EC2P 2EJ

13th June 2024

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Yours faithfully,



MONTAGU EVANS LLP

Model Representation Form for Local Plans

 <p>CITY OF LONDON</p>	<h3>Local Plan</h3> <p>Publication Stage Representation Form</p>	<p>Ref: Reg 19</p> <p>(For official use only)</p>
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Name of the Local Plan to which this representation relates:

City Plan 2040

Please return to City of London Corporation BY 11:00PM 31 May 2024

emailing to: planningpolicyconsultations@cityoflondon.gov.uk

Please note that all representations will be made public on our website in line with the Town and Country Planning (Local Planning)(England) Regulations 2012. This will include the name of the person and, where relevant, the organisation making the representation. All other personal information will remain confidential and managed in line with the City Corporation's privacy notice.

For more information on how we collect and process personal information, and your rights in relation to that information, please refer to the Environment Department's privacy notice available at [Environment Department Privacy Notice \(cityoflondon.gov.uk\)](http://www.cityoflondon.gov.uk) and the City Corporation's privacy notice available at www.cityoflondon.gov.uk/privacy). Please also see our Statement of Representations Procedure available at: [City Plan 2040 - City of London](http://www.cityoflondon.gov.uk).

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title

First Name

Last Name

Job Title
(where relevant)

2. Agent's Details (if applicable)

Organisation (where relevant)	Jastar Capital	Montagu Evans LLP
Address Line 1		70 St Mary Axe
Line 2		London
Line 3		
Line 4		
Post Code		EC3A 8BE
Telephone Number		
E-mail Address (where relevant)		

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph Policy Policies Map

4. Do you consider the Local Plan is:

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

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please refer to cover letter

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to cover letter

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.