

City Plan 2040 Reg 19 Consultation - City of London Corporation Representations

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Fri 6/7/2024 12:09 PM

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

Cc: Bonner, Chris <[REDACTED]>; Hiles, Nathan <[REDACTED]>

📎 1 attachments (217 KB)

City of London Corporation City Plan 2040 Reg 19 Representations Final.pdf;

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Hello,

In response to the Regulation 19 Consultation on the Draft City Plan 2040, please find attached a letter of representation prepared by Deloitte LLP on behalf of the City of London Corporation.

We would be grateful to receive acknowledgement of your receipt of this letter.

Kind regards,

Jane Kistler

[REDACTED]

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[Redacted]

[Redacted]

[Redacted]

07 June 2024

[Redacted]

Dear Sir / Madam,

City of London City Plan 2040 Revised Proposed Submission Draft (Regulation 19) Consultation

Introduction

Deloitte LLP is instructed by the City of London Corporation ('CoLC') to advise on planning matters in respect of Smithfield Market ('the Smithfield Site'). This letter outlines CoLC's comments on the Draft City Plan 2040 Revised Proposed Submission Draft (Regulation 19) Consultation. These comments are made by CoLC in its capacity as the landowner of the Smithfield Site only (hereafter referred to as the Landowner).

Draft Strategic Policy S23: Smithfield and Barbican

The Landowner welcomes the ambitions for the Smithfield and Barbican Key Area of Change as set out in draft Strategic Policy S23. In particular, the Landowner supports flexibility in the wording of this policy to allow for development coming forward to support future mixed uses in and around the Smithfield Site.

Draft Strategic Policy S24: Smithfield

Draft Strategic Policy S24 provides detail on the spatial ambitions for the Smithfield Site and its immediate surrounds. The Landowner welcomes the support for sensitive re-use of the Smithfield Market buildings and the encouragement for a "mix of uses" to be incorporated on the Smithfield Site in the event of the Market's relocation, as set out in Paragraph 3 of draft Strategic Policy S24.

The Landowner notes that draft Strategic Policy S24 does not currently state specific uses which could be suitable for this purpose. The Landowner recommends that the wording of draft

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Strategic Policy S24 should acknowledge the types of uses that would be complementary to the vision for the Smithfield area.

To allow for a diverse range of uses to come forward which promote vibrancy of the Smithfield Site, the Landowner recommends that draft Strategic Policy S24 should reference potential land uses that would be suitable, as follows:

*“Encouraging the future sensitive re-use of the Smithfield Market building should the market relocate, requiring a world class design solution that delivers a mix of uses that celebrate and are appropriate to its sensitive heritage character, and that provide public access to the buildings. **The mix of uses could include but is not limited to cultural, higher education, retail, food and beverage, entertainment and office uses.**”*

The Landowner considers that this wording will provide clarity and flexibility around the mix of uses which could be provided on the Smithfield Site. The Landowner suggests that this wording will more robustly promote the Destination City ambition in supporting the delivery of development which creates a broad and diverse offer for visitors to the City of London.

Furthermore, the Landowner supports the recognition in Paragraph 8 of the aim for Smithfield to become an established “*leisure destination*”. However, the Landowner does not believe that establishing Smithfield for this purpose would necessitate “*resisting residential development adjacent to the current market site or future Museum of London*” as set out in Paragraph 7. The Landowner does not consider that the current market activities or the future Museum of London would negatively impact residential development which is sensitively located and designed. Instead, the restriction which this draft policy places on residential development could hinder the mixed-use redevelopment of the wider Smithfield area and its growth as a cultural destination.

The Landowner suggests that draft Strategic Policy S24 be amended to reflect the content of Paragraph 3 of the Spatial Strategy, where new housing focussed in and around the identified residential areas near to Smithfield Market is considered appropriate for development. For this reason, the Landowner recommends that Paragraph 7 is removed from the policy, to ensure flexibility is maintained for the areas surrounding the Smithfield Site. This flexibility will be essential should the wholesale market use relocate and the site be re-used as a cultural and leisure destination.

Conclusion

In summary, the Landowner is supportive of the aims in draft Strategic Policies S23 and S24 for the future of the Smithfield Site and surrounding area. The Landowner recommends that draft

Strategic Policy S24 be amended to ensure there is sufficient flexibility to promote the realisation of the ambition for the Smithfield area to become a leisure destination.

The Landowner welcomes the opportunity to comment on the Draft City Plan 2040 Regulation 19 Consultation and requests to be informed on the progress of the City Plan. In the interim, if you have any queries, please contact Nathan Hiles [REDACTED] [REDACTED] or Alex Welby [REDACTED].

Yours sincerely

Deloitte LLP

Deloitte LLP