

Draft City Plan 2040 Consultation - Representations On behalf of LiptonRogers Developments LLP

R0270

Sinead Morrissey [REDACTED]

Fri 6/14/2024 4:53 PM

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

Cc: Jonathan Smith [REDACTED]

📎 1 attachments (8 MB)

Sackville House City Plan 2040 Representations 140624 (including attachments).pdf;

THIS IS AN EXTERNAL EMAIL

Dear Planning Policy Team,

Please find enclosed representations in relation to the draft City Plan 2040 on behalf of LiptonRogers Developments LLP.

The completed representation forms are included at appendix 4.

Any issues, please do not hesitate to get in touch.

Kind regards,

Sinéad
Sinead Morrissey
Associate Director



DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ

telephone: 020 7004 1700 website: www.dp9.co.uk

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JS/SM/DP6261

14 June 2024

**Development Plans Team
Environment Department
City of London Corporation
Guildhall
London
EC2P 2EJ**

By email to: Planningpolicyconsultations@cityoflondon.gov.uk

Dear Sir/Madam,

REPRESENTATIONS TO THE CITY OF LONDON CORPORATION'S CONSULTATION ON THE PROPOSED SUBMISSION DRAFT CITY PLAN 2040 (REGULATION 19 PUBLICATION)

LiptonRogers Developments LLP

We write in relation to the above-mentioned consultation on the Proposed Submission Draft City Plan 2040 ('the Plan') on behalf of LiptonRogers Developments LLP ('the Client'), who represent the owners of Sackville House, 143-149 Fenchurch Street EC3 ('the Site' – see Appendix 1).

Context

Sackville House is located on the north side of Fenchurch Street, and forms part of a potential redevelopment site within the City Cluster, along with adjacent buildings to the immediate east bounded by Fenchurch Street and Cullum Street.

These representations are made in order to secure the potential future optimisation of this important site for new office floorspace, and in order to more broadly ensure the continued success of the City of London as a leading international financial centre.

Summary position

On behalf of our Client, we have considered the policies of the Plan relating to the broad opportunity for development on the Site, and whether the relevant draft policies would meet the NPPF (December 2023) requirements for soundness.



We are supportive of the Plan's vision for the Square Mile and the strategic priorities it sets out, and we fully appreciate the considerable amount of work that has been put into the Plan to date. However, we do consider that the relevant draft policies are not sound i.e. not positively prepared; and/or not justified, effective or consistent with national policy, and so we propose that modifications are made in order to make the Plan sound. Our proposed modifications relate to the following policies:

- Strategic Policy S4: Offices
- Strategic Policy S12: Tall buildings
- Strategic Policy S21: City Cluster

Our detailed representations are set out below, including the elements of the Plan our client supports and suggested modifications to policies as required in order to ensure that the Plan is sound. For the proposed modifications, new text is in bold blue, deletions are struck through.

Detailed representations

Strategic Policy S4: Offices

Commentary

Draft policy S4(1) seeks to increase the City's office floorspace stock by a minimum of 1.2m sqm net during the plan period (which for clarity began in 2021, running to 2040). The requirement for new office space in the City has been informed by a number of documents from the City's evidence base, including in particular the 'Future of Office Use' report prepared by Arup and Knight Frank (dated July 2023), which identifies that anywhere between 0.55 and 1.9m sqm of net additional office space will be required by 2042, and the Offices Topic Paper (March 2024).

One key factor in determining the level of demand is the projected response of tenants and the market in respect of office attendance, office densities, occupancy rates and employment projects, which resulted in three different demand scenarios referred to as:

- Return of In-Person (requiring 1.9m sqm)
- Hybrid Peak (requiring 1.2m sqm)
- New Diverse City (requiring 0.55m sqm)

Whilst we agree with Arup and Knight Frank that much of the demand for floorspace will be for best-in-class office space, reflecting a flight to quality, we do not consider that the Plan properly reflects the latest evidence and that its minimum office floorspace targets are too low.

Para 5.1.2 of the Plan confirms that the Hybrid Peak scenario has been selected by the City as the basis for their demand target. The Offices Topic Paper states that '*current office occupancy and movement trends are showing a middle ground between the Hybrid Peak and Return of In-Person scenarios*',



which translates to a requirement for between 1.2m sqm and 1.9m sqm net additional office floorspace over the Plan period.

The Offices Topic Paper describes how the minimum objectively assessed need for office floorspace in the City is 1.2m sqm, derived from the Arup and Knight Frank report. However, this does not reflect the more recent conclusion of the Office Topic Paper, which identifies that a higher minimum requirement closer to 1.55m sqm is likely to be more appropriate. Whilst the 1.2m sqm is a minimum and does not of itself preclude the delivery of higher levels of office floorspace in response to more recent market evidence, it is critical that the Plan has been positively prepared to accommodate the minimum amount of floorspace required. In this regard, the work undertaken to inform the approach to tall buildings is of critical relevance. In its current draft it is not clear what amount of additional floorspace the allocated tall building locations can accommodate. However, taking 1 Silk Street as an example, there is clearly scope for significant additional office floorspace within parts of the City that have not been identified as appropriate locations for tall buildings, and it is critical that the Plan allows for and supports the development of these sites when they come forward.

Consequently, we consider that the office floorspace target in the draft City Plan should accommodate and support at least a midpoint between the Return of In Person and Hybrid Peak scenarios, with a minimum target of 1.55m sqm (the midpoint between 1.2 and 1.9m sqm) over the plan period, and that the Plan should ensure that capacity for this floorspace is being planned for and can be accommodated within the tall building locations, and other suitable sites.

Proposed modification (S4)

The following modification is proposed to part 1 of the policy:

Increasing the City's office floorspace stock by a minimum of ~~1,200,000~~ 1,550,000 m² net during the period 2021 to 2040, phased as follows:

There would be consequential changes to the phasing of floorspace, however we would propose for the City to identify this if it agrees to the modification.

Strategic Policy S12: Tall Buildings

Commentary

We have reviewed in detail the evidence base for the Plan that has informed the policy approach to tall buildings. We recognise that London Plan policy D9 requires the City to identify appropriate locations for tall buildings, and to set maximum heights within those locations. We also recognise and support the strategy to cluster tall buildings so that their impacts can be properly managed and so that strategic heritage assets and views can be managed. We appreciate and support the inclusion of



the Site within the City Cluster tall building location, and as such that the Plan establishes the principle for the provision of additional office floorspace on the Site, which we endorse.

Our understanding of how the Site has been considered in the volumetric testing, and subsequently the draft Plan, is as below:

- The Volumetric Testing appears to include a development envelope on the Site of 140m AOD (in Option B: stepped profile);
- On Figure 15: Tall building contours plan the Site is located in between two contour rings at 140m AOD, with 160m AOD contour rings located to the immediate SW (drawn tightly around the completed 20 Fenchurch Street) and SE (around the implemented 50 Fenchurch Street). The contour rings also reduce in height to the south, and both reduce and increase in height to the north (however it is not entirely clear what the contours are indicating here).

The Site is located within an unusual ‘dip’ in the contour rings, where height reduces down from the core of the cluster, then increases again to meet tall buildings to the south of Fenchurch Street. This dip appears to align with the backdrop of St Paul’s Cathedral in processional views from Fleet Street, however having undertaken a site-specific volumetric study to identify the potential for development on the Site within the context of key strategic views and heritage asset constraints, we do not consider that the contour rings on Figure 15 are drawn correctly in relation to the Site’s potential, and consider that as a result of the current formulation of contour rings, policy S12 is unclear in explaining how Figure 15 should be applied to the Site.

Enclosed at Appendix 2 is a volumetric study comprising a series of images prepared by Miller Hare, which represents a development envelope for the site, within which development would not be visible in the processional views along Fleet Street. This identifies a sloping maximum height of between 157.95m and 163.94m AOD. The images are as follows:

1. The existing condition
2. The indicative envelope released by the City during the consultation process
3. The form shown by the contour plan at Figure 15 of the Plan
4. The existing condition + consented schemes
5. Consented + Indicative envelope
6. Consented + solid contours
7. Consented + Sackville
8. Consented + Sackville + City envelope
9. Consented + Sackville + City envelope

This set of 9 images are then followed by zoomed-in versions of the same sequence which focus on the Sackville House site.



Image 9 in the sequence illustrates how the contour plan has been drawn in a way which excludes existing and consented tall buildings which are themselves not visible from the Fleet Street processional view. The envelope indicated for Sackville House indicates a similarly acceptable maximum height in relation to this view constraint.

At this height, development on the Site would be visible in view positions from within the Inner Ward of the Tower of London. Of particular relevance is the sequence of views c49, c50 and c51 from within the Tower of London's Inner Ward, which were tested in the Volumetric Testing undertaken as part of the evidence base. At view c51 in ED-HTB3 Tall Building Volumetric Testing 1-2, the Option B stepped envelope presents a horizontal sloping line behind the bell tower of the Chapel of St Peter ad Vincula. In our own volumetric testing provided at Appendix 2, a development envelope at 163.94m AOD on the Site establishes a visual presence that is broadly similar to this.

This appears to be a result of perspective, due to the distance between the 140m AOD contour ring on Figure 15 (which is further south, on the southern side of Fenchurch Street) and a 163.94m volume drawn on the Site further north. In view positions c49 and c50 closer in to the Chapel, the cluster recedes, and the visual presence is therefore lessened. Our own testing has not identified any other view positions which would serve to reduce the potential maximum height below 163.94m AOD.

On this basis, if Figure 15 remains in its current format, it should be amended to identify a contour ring of 180m AOD around the Site, in order to allow for a building of the same or similar height as 20 Fenchurch Street and 50 Fenchurch Street. If a contour ring at 160m AOD was added, the acceptable development on the Site could extend above that height without avoidable harm to the relevant heritage assets, and so in that scenario we would request that additional wording is added into policy S12 to take account of this position. To support these modifications, please find enclosed at Appendix 3:

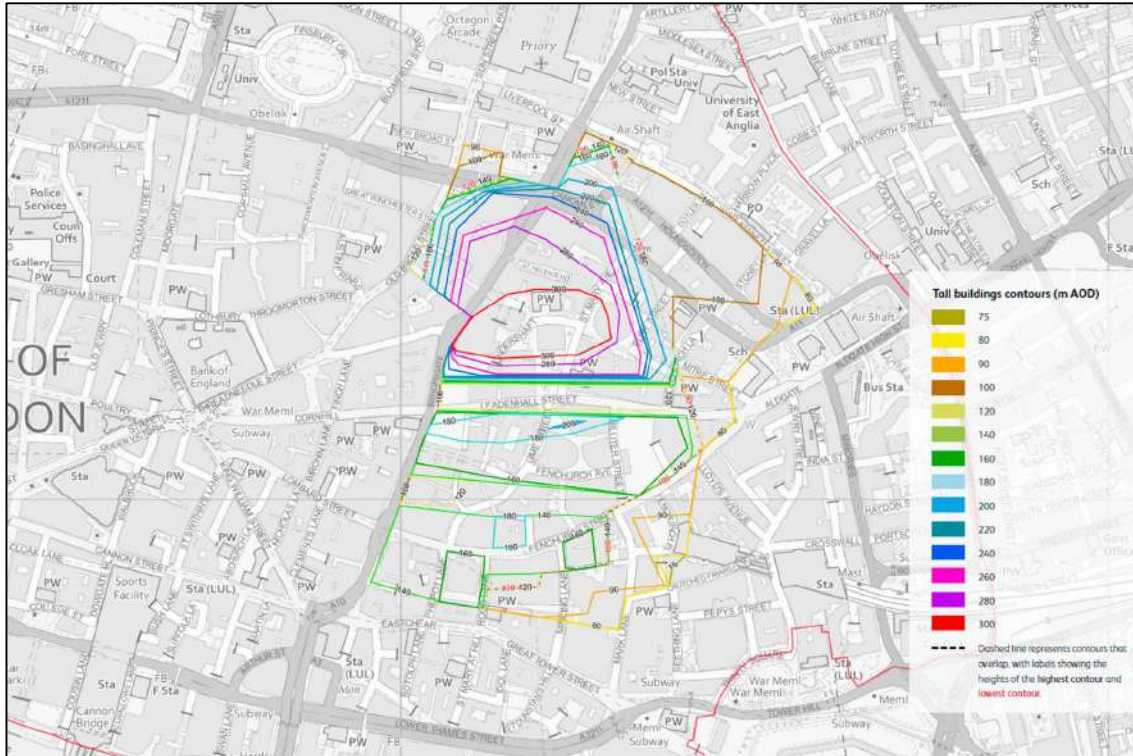
1. The Site marked on to Figure 15
2. Option 1 – Figure 15 showing a contour ring around the site at 180m AOD
3. Option 2 – Figure 15 showing a contour ring around the site at 160m AOD

Proposed modification (S12)

A modification is proposed to Figure 15: Tall building contours plan (and Policies Maps C and D), for one of the following two options:

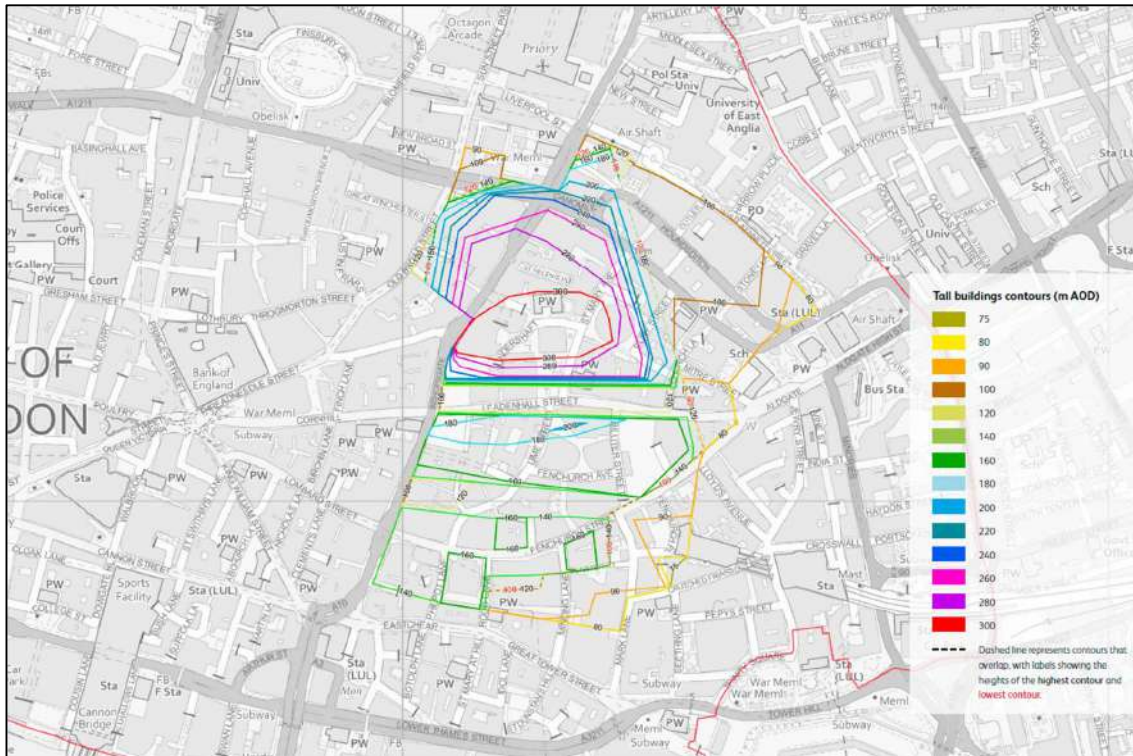
Option 1

To substitute Figure 15 for the modified plan below (Option 1 in Appendix 3), with an additional contour ring at 180m AOD around the Site:



Option 2

To substitute Figure 15 for the modified plan below (Option 2 in Appendix 3), with an additional contour ring at 160m AOD around the Site:



The following modification is also proposed to the Locations and height part of policy S12 (part 2)

*The maximum permissible tall building heights within the identified tall building areas are depicted as contour rings on Policies Maps C and D and Figure 15. Tall buildings should not exceed the height of the relevant contour rings, **except where it can be demonstrated through a detailed Townscape and Visual Impact Assessment that this would not result in unacceptable harm to key views or heritage assets**. In areas between the contour rings, tall buildings should be designed to successfully mediate between the contour ring heights and should not exceed the next higher contour. Tall buildings should not necessarily be designed to maximise height; instead they should be thoughtfully designed to create built form that contributes positively to the skyline and townscape character, creating a coherent cluster form and a varied and animated skyline, and should have architectural integrity.*

Either of the modifications provided above would ensure that the optimal development capacity for the site is fully accommodated in the Plan.

Strategic Policy S21: City Cluster

Commentary

We support the inclusion of the Site within the City Cluster Key Area of Change.



Conclusion

In summary, we consider that the draft City Plan 2040 sets out a bold and ambitious vision for the City of London, but in order for the Plan to be considered sound, we request a number of minor modifications to ensure that its policies operate in a coordinated manner which will support and encourage the development that the City needs.

We respectfully request that due consideration is given to these representations and would like to be kept informed of progress with the Plan. In addition, we would like the opportunity to attend and participate in relevant examination hearing sessions.

Should you wish to discuss any aspect of these representations, please contact Jonathan Smith of this office.

Yours faithfully

DP9 Ltd

DP9 Ltd.

Enc.



APPENDIX 1 – SITE LOCATION PLAN



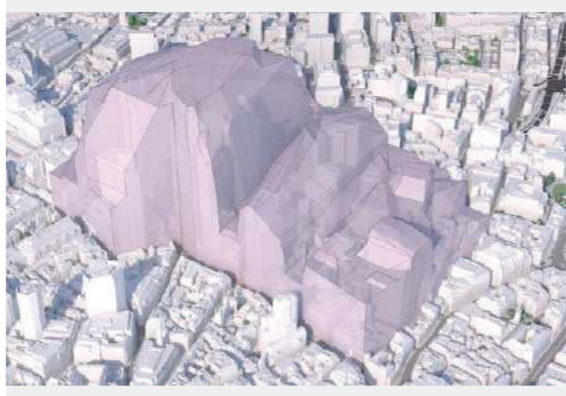
Building Location
Site Plan



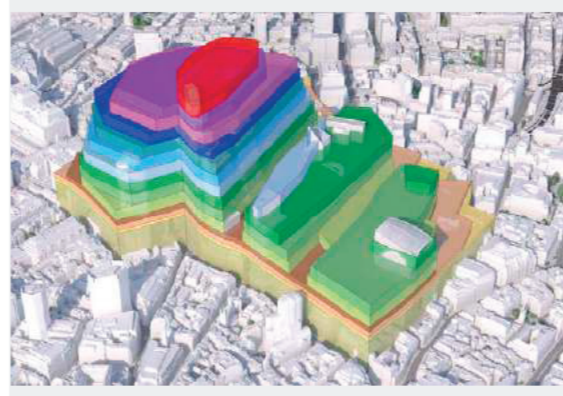
APPENDIX 2 – SACKVILLE HOUSE SITE-SPECIFIC VOLUMETRIC TESTING



Overview of site - Existing
4652_8021 version 240524



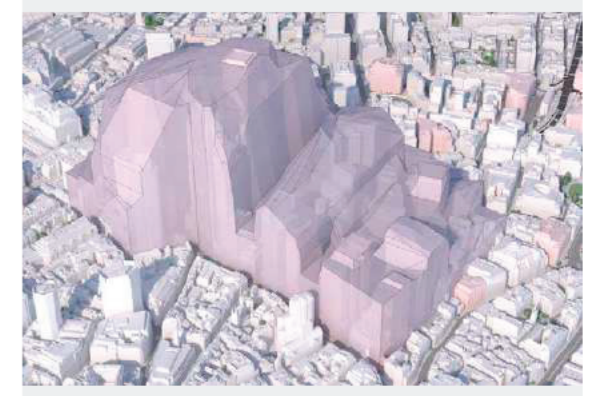
Overview of site - Existing with City of London Indicative Envelope
4652_8022 version 240524



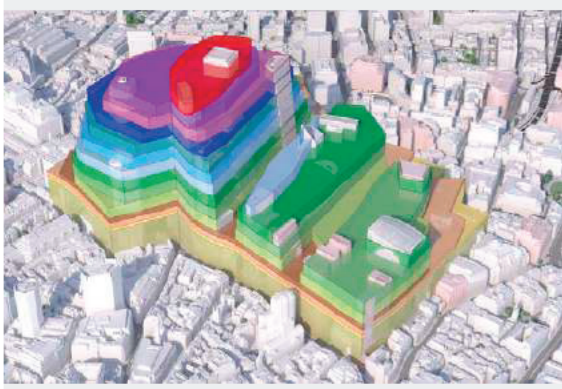
Overview of site - Existing with City of London Contours
4652_8023 version 240524



Overview of site - Cumulative
4652_8024 version 240524



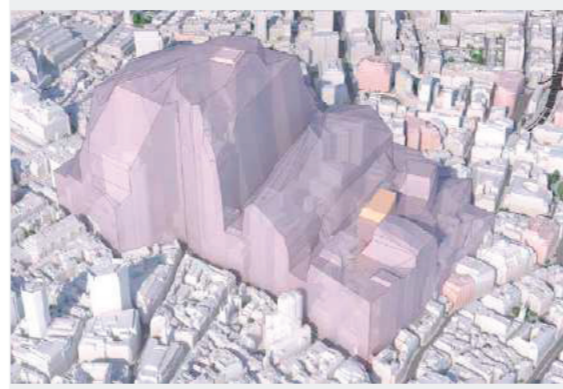
Overview of site - Cumulative with City of London Indicative Envelope
4652_8025 version 240524



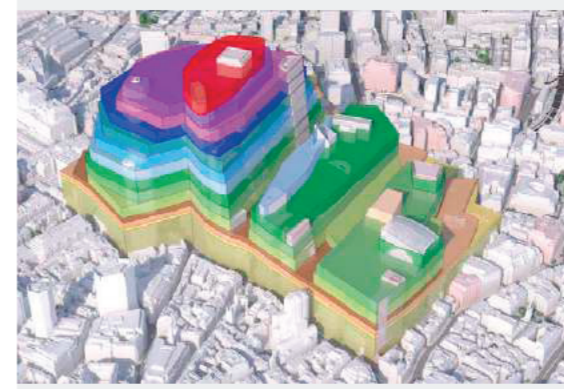
Overview of site - Cumulative with City of London Contours
4652_8026 version 240524



Overview of site - Indicative Massing
4652_8027 version 240524



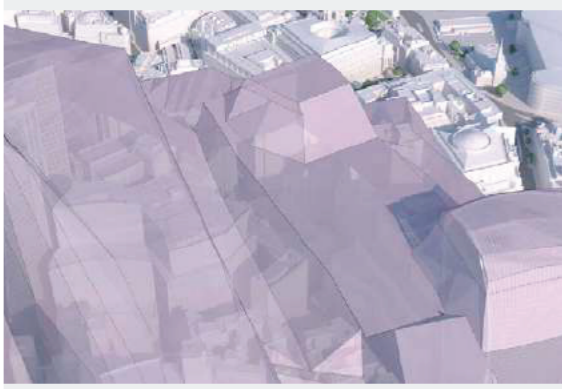
Overview of site - Indicative Massing with City of London Indicative Envelope
4652_8028 version 240524



Overview of site - Indicative Massing with City of London Contours
4652_8029 version 240524



Overview of Tall Buildings Area - Existing
4652_8031 version 240524



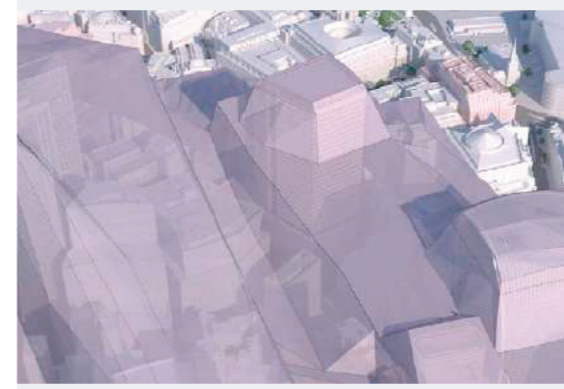
Overview of Tall Buildings Area - Existing, City of London Indicative Envelope
4652_8032 version 240524



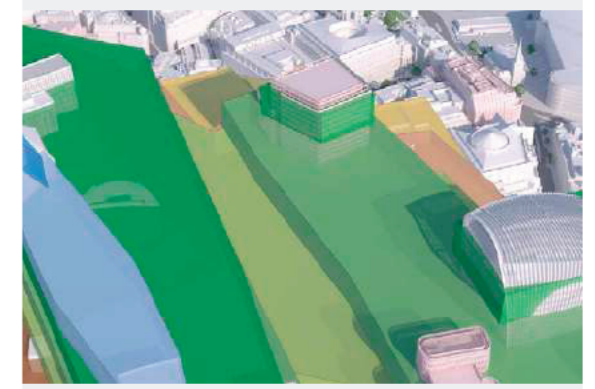
Overview of Tall Buildings Area - Existing with City of London Contours
4652_8033 version 240524



Overview of Tall Buildings Area - Cumulative
4652_8034 version 240524



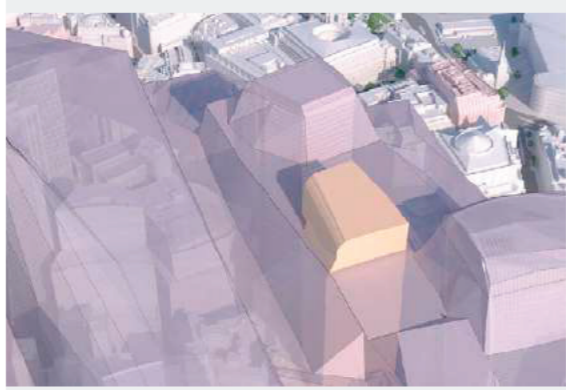
Overview of Tall Buildings Area - Cumulative, City of London Indicative Envelope
4652_8035 version 240524



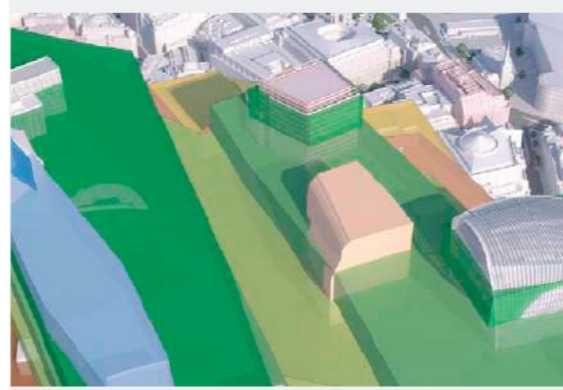
Overview of Tall Buildings Area - Cumulative with City of London Contours
4652_8036 version 240524



Overview of Tall Buildings Area - Indicative Massing
4652_8037 version 240524



Overview of Tall Buildings Area - Indicative Massing, City of London Indicative
4652_8038 version 240524



Overview of Tall Buildings Area - Indicative Massing, City of London Contours
4652_8039 version 240524



