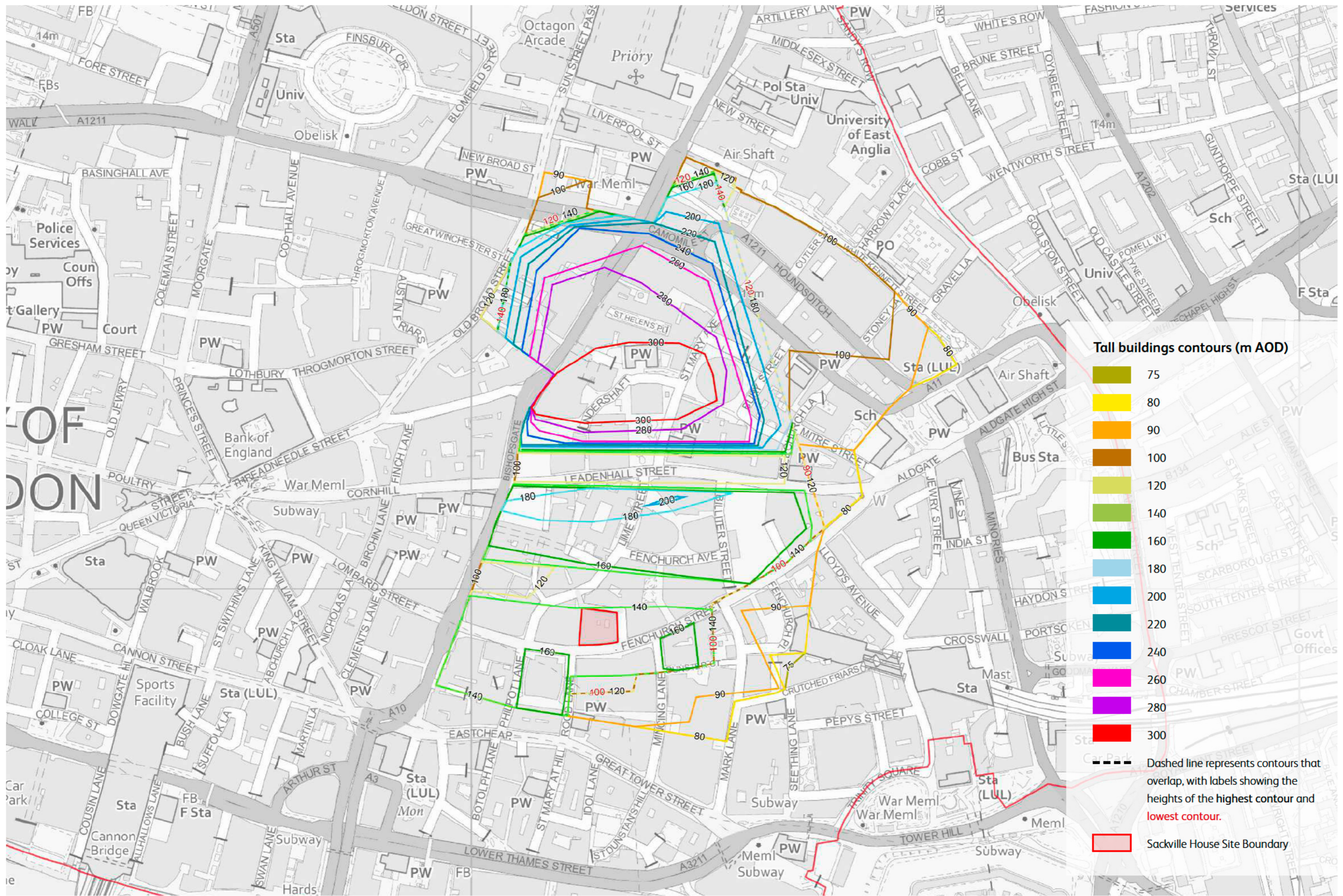
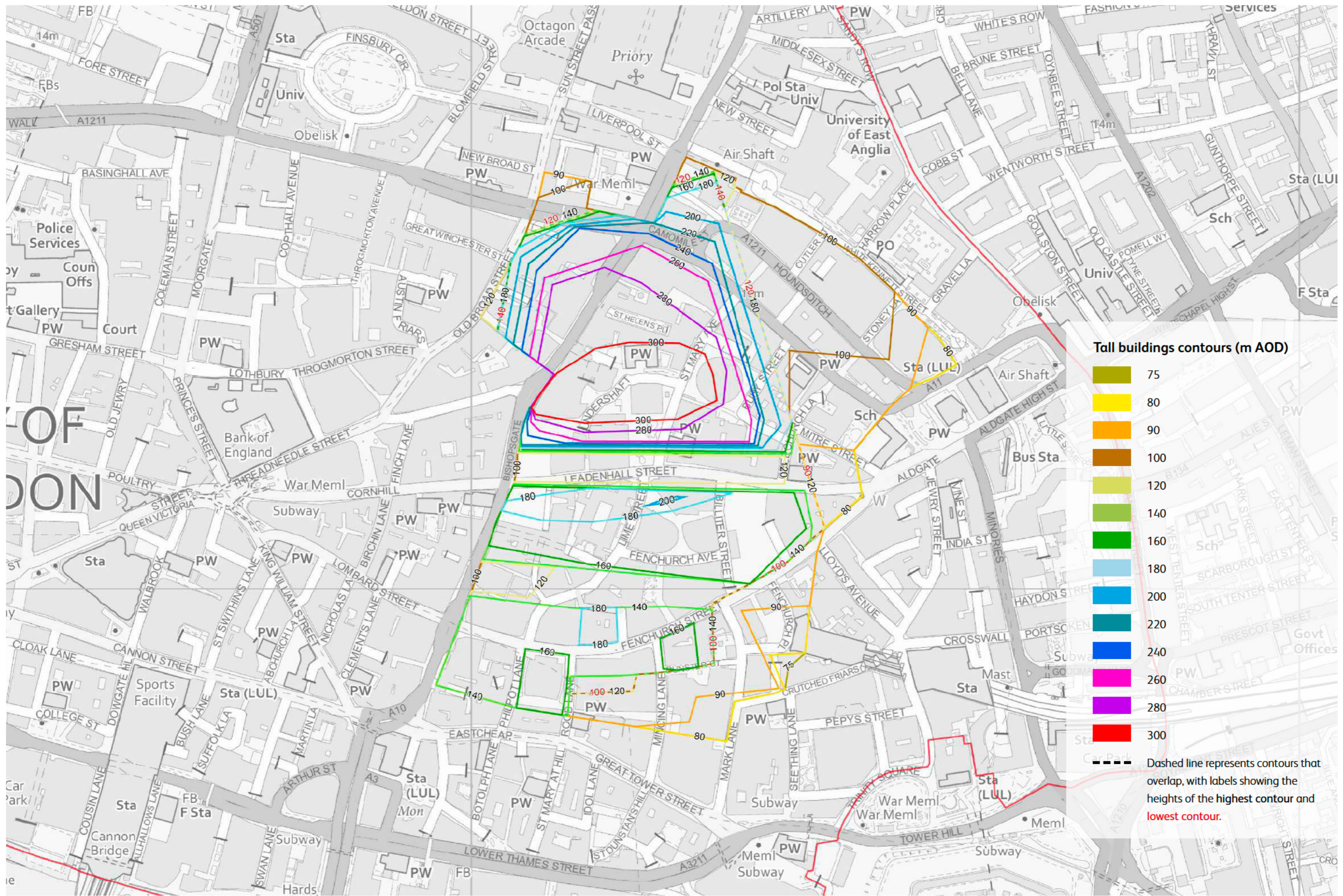
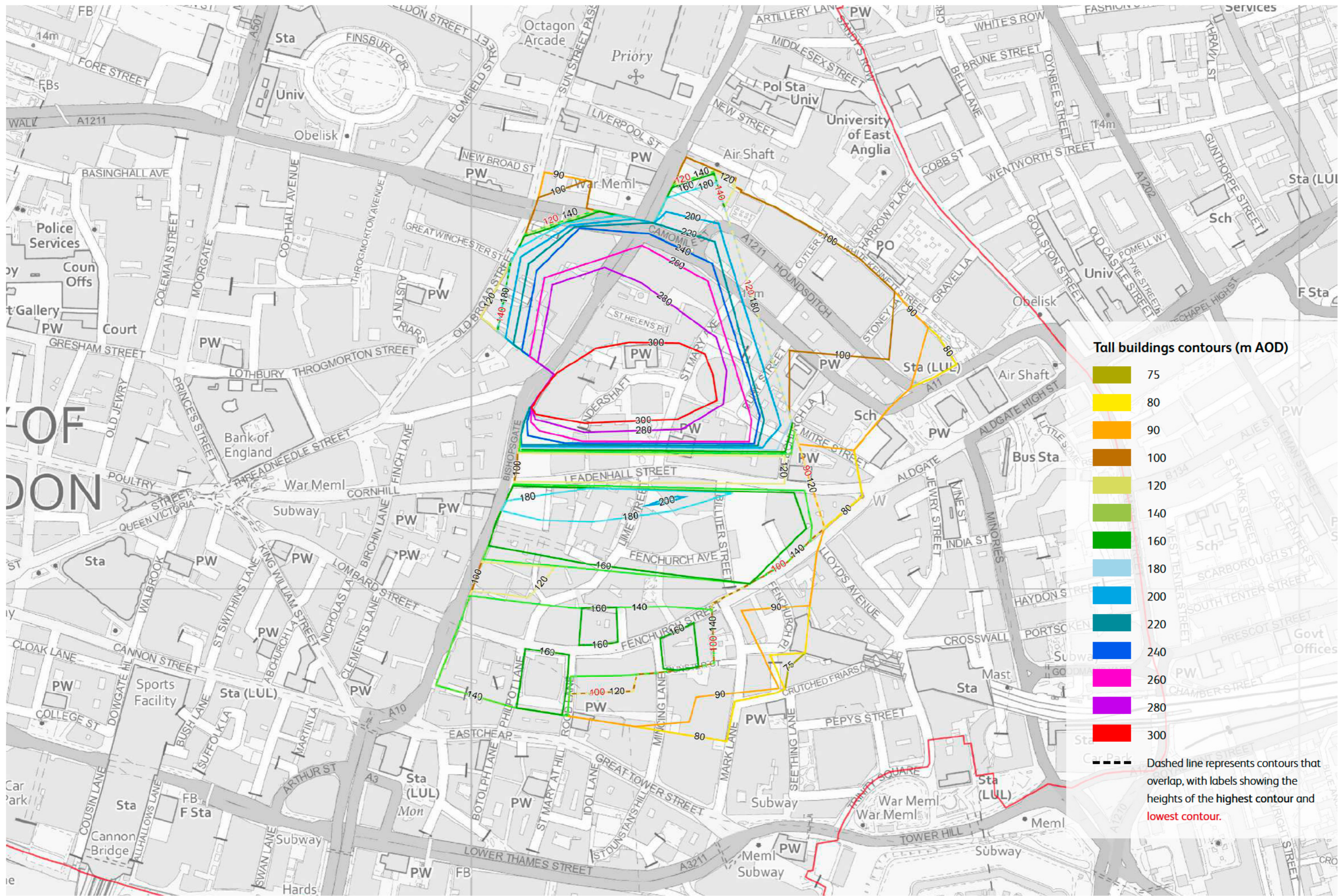




APPENDIX 3 – MODIFIED FIGURE 15










APPENDIX 4 – COMPLETED RESPONSE FORM

Model Representation Form for Local Plans

 <p>CITY OF LONDON</p>	<p>Local Plan Publication Stage Representation Form</p>	<p>Ref: Reg 19 (For official use only)</p>
------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------	-----------------------------------------------------------------------

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://cityoflondon.gov.uk/Environment-Department-Privacy-Notice) 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://City-Plan-2040-City-of-London).

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*

2. Agent's Details (if applicable)

**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

Mr

First Name

Jonathan

Last Name

Smith

Job Title

(where relevant)

Senior Director

Organisation (where relevant)	LiptonRogers Developments LLP	DP9 Ltd
Address Line 1	C/O agent	100 Pall Mall
Line 2		London
Line 3		
Line 4		
Post Code		SW1Y 5NQ
Telephone Number		██████████
E-mail Address (where relevant)		████████████████████
		████████████████████
		████████████████████

Part B – Please use a separate sheet for each representation

Name or Organisation: LiptonRogers Developments LLP

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 type="checkbox"/>	No	<input checked="" 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.

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. It is considered the current minimum floorspace is not justified or therefore sound.

This is discussed in further details within our representation letter.

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.

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.

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:

As an active real estate developer in the City of London, we would like the opportunity to participate in the relevant hearing sessions to discuss these representations and be part of the wider discussion to ensure the continued success of the City of London as a leading international financial centre.

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.

Part B – Please use a separate sheet for each representation

Name or Organisation: LiptonRogers Developments LLP

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 type="checkbox"/>	No	<input checked="" 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.

We do not consider that the contour rings on Figure 15 are drawn correctly in relation to the Sackville House 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. This is not justified or effective, or therefore sound.

This is discussed in further details within our representation letter with evidence appended.

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.

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 refer to the following documents are Appendix 3 of this letter:

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

In addition, 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.

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:

As an active real estate developer in the City of London, we would like the opportunity to participate in the relevant hearing sessions to discuss these representations and be part of the wider discussion to ensure the continued success of the City of London as a leading international financial centre.

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.

Part B – Please use a separate sheet for each representation

Name or Organisation: LiptonRogers Developments LLP

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.

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

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.

N/A

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:

As an active real estate developer in the City of London, we would like the opportunity to participate in the relevant hearing sessions to discuss these representations and be part of the wider discussion to ensure the continued success of the City of London as a leading international financial centre.

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.