

CoL Local Plan Reg 19 - Places representations

Rosanna Sterry [Redacted]

Fri 6/14/2024 4:18 PM

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

[Redacted]

1 attachments (121 KB)

CoL Local Plan Reg 19 Places reps 14.06.2024.pdf;

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THIS IS AN EXTERNAL EMAIL

Dear Sir / Madam,

Please find attached our representations in respect of the draft City of London Local Plan (Regulation 19)

We would be grateful for confirmation that you have received our representations.

Please do not hesitate to contact us if you would like to discuss any of the matters raised.

Kind regards

Rosie

Rosie Sterry

Planning and Development Manager (Feasibility and major projects)

[Redacted signature]



Places for London
The TfL Property Company

placesforlondon.co.uk

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Date: 14/06/2024
Our Ref: TfL CD / PD / Planning / RS
Your Ref: Draft City Plan 2040

City of London Corporation
Guildhall, PO Box 270
London EC2P 2EJ
By email: localplan@cityoflondon.gov.uk

Dear Sir / Madam

RE: Consultation on the City of London Draft Local Plan (Regulation 19)

Thank you for providing the opportunity to comment on the City of London Local Plan: Draft City Plan 2036 (Regulation 19).

Please note that the views expressed in this letter and our site submissions are those of Places for London planning team in its capacity as a significant landowner and developer only, and do not form part of the Transport for London (TfL) corporate / statutory response. Our colleagues in TfL Spatial Planning will be providing a separate response in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.

Places for London

Places for London is TfL's financially independent property company, formerly known as TTL Properties/ TfL Commercial Development, the latter under which name our previous representations were submitted. Places for London provides space for over 1,500 businesses in TfL stations and railway arches and on London's high streets. It's working to release more of the untapped opportunity in TfL's property portfolio to deliver much-needed new homes and jobs to create places for Londoners to live, work and play which are sensitive to local needs and communities, and to improve access for all.

Places for London have engaged through the Local Plan preparation process and have submitted the following representations:

- City of London Local Plan: Draft City Plan 2036 Issues and Options (December 2016)
- City of London Local Plan: Draft City Plan 2036 Regulation 18 (November 2019)
- City of London Local Plan: Draft City Plan 2036 Regulation 19 (April 2021)
- City of London Local Plan Call for Sites (July 2022)
- City of London Sustainability SPD (May 2024)

We have a number of landholdings in the City of London which we are seeking to bring forwards for development during the Local Plan period. This includes the transformation of Aldgate Bus Station as part of a comprehensive mixed use development, together with our

landholdings at Puddle Dock (Blackfriars) and London Liverpool Street which would be delivered via our strategic collaboration agreement with Network Rail.

Chapter 4: Affordable Housing

Transport for London has a portfolio agreement with the Mayor. Policy H4 of the London Plan and paragraph 4.5.6 of the London Plan which stipulate that “where there is an agreement with the Mayor to deliver at least 50 per cent across the portfolio of sites, then the 35 per cent threshold should apply to individual sites”.

Strategic Policy S3: Housing (2a) in the draft Local Plan states:

Ensuring sufficient affordable housing is provided to meet the City's housing need and contributing to London's wider housing needs by: a. ensuring the delivery of a minimum of 50% affordable housing on public sector land;

Paragraph 4.2.11 states:

On public sector owned land, the higher 50% target will be applied as set out in the London Plan.

The above does not reflect Transport for London's portfolio approach. Transport for London does not have to provide 50% affordable housing on all its sites as long as it is delivering 50% affordable housing across its portfolio. Whilst Transport for London are committed to delivering 50% affordable housing across its London wide portfolio, the flexibility provided by the portfolio approach to affordable housing provision is essential for a public sector land owner/ developer such as Places, which has a current housing programme encompassing more than 100 sites across London. It enables us to take land and development values into account in order to optimise affordable housing provision across London, taking account of site specific circumstances at each site.

The abnormal costs associated with many of Transport for London's sites can be significant, and the 50% affordable housing requirement can jeopardise the viability and deliverability of many of our sites and subsequently the important provision of new homes and other substantial public benefits.

As currently worded the policy reads as a minimum 50% will be required for all public sector land. As set out in our previous representations, the portfolio approach should be reflected in the policy and the supporting text in order to make the Local Plan positively prepared and consistent with the London Plan.

In terms of the threshold approach paragraph 4.5.6 of the London Plan confirms that:

Where there is an agreement with the Mayor to deliver at least 50 per cent across the portfolio of sites, then the 35 per cent threshold should apply to individual sites.

Therefore, paragraph 4.2.10 of the draft Local Plan should also be updated to reference the portfolio approach.

Chapters 5, 6 and 7

Office, retail, culture and visitor accommodation

We welcome the policies relating to office, hotel and student accommodation uses.

Policy OFI prioritises the retrofitting of existing office buildings. While we support policies to optimise sustainability and reduce carbon emissions within the development process, we would caution that this policy needs to be carefully worded to ensure that this does not constrain major projects and land from coming forwards where there is the opportunity for major improvements to national and London transport infrastructure, with additional office modernised and energy efficient commercial floorspace, jobs and design improvements.

Pragmatic and sensible application of Policy OFI is required. This should be informed by appropriate evidence to understand and compare the implications and merits of a range of development strategies on a particular site and should take into account the range of design quality, planning, heritage sustainability, accessibility and viability objectives. We consider that guidance of this type should be set out clearly to decision makers in the supporting text.

Chapter II: Heritage and tall buildings

The definition of tall buildings within the City of London as being over 75m AOD is supported. It should be clarified that the policy applies to tall buildings (over 75m AOD) and that buildings below this height threshold are not classified as tall buildings.

The draft Plan should note that applications for tall buildings over 75 metres AOD in height outside the defined Tall Building Zones will still need to be considered on a case by case basis. These applications will need to be judged on the own merits, taking into account the range of design, heritage and environmental policies in the plan.

For example, a particular application might exceed the height threshold moderately but sufficiently demonstrate that the visual, heritage environmental and functional impacts are acceptable and have the potential to contribute towards the economic, social, cultural and environmental objectives of the draft Local Plan. We consider that this type of proposal should not be prohibited by rigid application of draft Policy S12.

Chapter 12 & 13: Open Spaces & Green Infrastructure and Climate Resilience

We have thoroughly reviewed the Sustainability SPD and we have provided detailed comments to ensure the proposed policies align with best practices in environmental stewardship. To ensure consistency between the Local Plan and the Sustainability SPD we request the council consider the points made within our response to the SPD with regard to the Local Plan as well.

Chapter 14 - Key Areas of Change

Strategic Policy S18: Blackfriars

We support the City's aspirations in identifying Blackfriars as a Key Area of Change within the proposed Draft City Plan 2040. The area represents an exciting opportunity to develop a key part of the City that can transform this prominent site on the river. Places for London is committed to working with Network Rail and the City of London in their capacity as landowners to bring forward transformational change to the area.

We support Part I of the Policy S18 which seeks to make the area's buildings, streets and public spaces more 'inclusive, accessible, welcoming and vibrant, with a mix of uses that

encourages more activity and greater enjoyment of the River Thames and Riverside Walk for all’.

To fully realise this policy objective, we believe that consideration should be given to the potential tunnelling the remaining parts of Upper Thames Street and the pedestrianisation of Puddle Dock. This would be subject to the impact on the TLRN and TfL cycle way being appropriately modelled and addressed.

This would allow for a podium to be created above with an opportunity to include below ground servicing off the tunnel, delivering a high quality fully pedestrian environment and seamless linkage to the Riverside Walk. There is also scope to open up the heart of the site to deliver a large public open space which could terrace down onto the River Thames and connect to the Riverside Walk, opening up views out of the area towards south London, the Tate Modern and St Paul’s Cathedral. We would support reference to this potential within the supporting text to Policy S18.

We consider that there is the potential to deliver high quality office floorspace in the area that can make a significant contribution to City’s office supply. Therefore, Part 2 of Policy S18 is supported, which promotes a mixture of refurbishment and redevelopment to allow for high quality office and commercial space to come forward and the space to be reimaged. The provision of commercial floorspace will support the delivery of the objectives under Part 1 and will be essential as a part of an overall re-configuration of the buildings and enhanced public realm.

Part 3 of Policy S18 is supported which aspires to create a high quality new area of public realm at Blackfriars Bridge foreshore. The policy refers to ‘Bazalgette Embankment’ as an area for public realm improvements. It is considered that there is opportunity to include the remaining stretch of the foreshore for public realm improvements within the Key Area of Change.

Part 4 of Policy S18 seeks to enhance pedestrian permeability via the riverside walk and north to south. We support the policy objective but consider that the policy should also reference enhancing cycle accessibility. As stated above, we consider there is the potential to fully tunnel Upper Thames Street with below ground servicing to fully realise the opportunity to enhance and deliver the maximum amount of public realm at grade. This would provide the opportunity for north-south connection from St Andrew’s Hill down towards the Riverside Walk and shoreline.

Part 5 of Policy S18 identifies the potential for a new entrance to the east of Blackfriars Station, which is supported. It is considered that there could be greater ambition with this part of the policy by identifying the potential to include the station as part of a comprehensive masterplan approach which seeks to improve the access and permeability around the station as it connects into the Key Area of Change.

Part 6 of Policy S18 is supported which seeks to preserve, enhance and celebrate the area’s heritage and historic assets and give careful consideration to protected views. We consider that the rich history of the site can play an important role in establishing a distinctive identify for the area.

We support Part 8 of Policy S18 but consider that additional text should be added to recognise the opportunity to provide for urban greening at roof and terrace levels in addition to the public realm at street level.

Strategic Policy S20: Aldgate, Tower and Portsoken

The identification of a Key Area of Change at Aldgate is strongly supported.

As set out in our previous Call for Sites submission, we intend to bring forwards the Aldgate Bus Station and adjacent properties in TfL ownership for development as part of a comprehensive mixed use development. This would incorporate a re-provided bus station and significant public realm improvements.

Policy S20 4b refers to Aldgate Bus Station and the need to improve air quality and deliver better access for pedestrians. This is welcomed. However, the policy should also specifically encourage the comprehensive redevelopment and redesign of the Aldgate Bus Station site, as this will be essential to help deliver these improvements.

It should be noted that the redevelopment of the site is likely to require some additional land adjacent to the site which is not owned by TfL. This would be to assist resolving some of the infrastructure and below ground engineering constraints on TfL land and ensure viability and deliverability of the scheme.

Policy S20 supports a greater mix of land uses in the area including commercial, residential, education, hotels and complementary cultural and community uses, with local retail facilities. This is welcomed.

A range of land uses could be considered including office, hotel, student and/or residential accommodation with active ground floor retail and other commercial uses. However, the exact land use mix has not yet been determined and would be subject to viability and market conditions at the point of delivery.

We welcome the fact that all of these potential land use solutions could be delivered through the draft Local Plan policies on the Aldgate site and it is essential that this supportive and enabling policy framework is reflected in the final draft Local Plan which is submitted to the Secretary of State.

The site therefore has the potential to contribute positively towards the strategic policy objectives set out in Policy S20 in terms of promoting a greater mix of development and land uses in the area, improving Aldgate Bus station, improving air quality and improving the quality of the public realm and permeability of the area and linkages with other adjacent development sites, including the nearby Mansell Street Estate.

Please do not hesitate to contact me on the details provided if you wish to discuss any of the content.

Yours faithfully

Rosanna Sterry
Places for London

cc.
Andrew Russell, Places for London
Tiaunna Martin, Places for London
Martin Teodorczyk, Places for London