

From: [Barnaby Collins](#)
To: [Planning Policy Consultations](#)
Subject: RE: Baynard House - Representation by DP9 on behalf of TT Group
Date: 14 June 2024 14:21:43
Attachments: [Col. Local Plan 2040 - TT Group Rep - June 2024 Rev 02.docx](#)

R0273

THIS IS AN EXTERNAL EMAIL

Hello again,

Please receive Rev 02 in place of Rev 01 as it corrects two minor typos.

Kind regards,

Barnaby Collins

Board Director

[REDACTED]
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From: Barnaby Collins

Sent: Friday, June 14, 2024 2:03 PM

To: planningpolicyconsultations@cityoflondon.gov.uk

Subject: Baynard House - Representation by DP9 on behalf of TT Group

Hello,

Please see attached.

Kind regards,

Barnaby Collins

Board Director

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**Representation to the City of London Development Plan ('City Plan 2040'), revised
proposed submission draft April 2024 on behalf of TT Group with particular regard to
Baynard House, London, EC4V 4AA.**

June 2024

Introduction

This representation is made by DP9 Limited on behalf of TT Group ('Telereal Trillium'), the owner of Baynard House. The post war building of circa 48,500 sqm GIA is currently occupied by BT Group and also contains a City of London Corporation public car park of circa 9,000 sqm GIA at below ground levels.

Baynard House commands a prominent site within the City's identified 'Blackfriars Area of Change' ('KAOC'), a key 'jigsaw piece' of the potential to comprehensively masterplan one of the last remaining areas of the City capable of meeting the City's regenerative ambitions set out in the draft City Plan 2040. As such, it is considered critical that whilst the City should receive these representations with the understanding that the ambitions are shared, it is also critical that the proposed planning polices should not stymie or otherwise unnecessarily constrain delivery of transformational development.

Overall Strategic Objectives

TT Group endorses the Strategic Priorities, agreeing that the City must be economically, environmentally and socially sustainable, shaped by history and heritage, and open to regeneration.

Chapter 2 – Spatial Strategy

TT Group endorses the Spatial Strategy that seeks to retain the City's function as an international and national commercial centre with growth and net addition of office floorspace to be largely delivered in the City Cluster and supplemented by other Key Areas of Change.

Strategic Policy S18: Blackfriars

TT Group endorses the enhancements to the character and amenities of the area, in particular the promotion of comprehensive redevelopment or refurbishment of existing post war buildings for a mix of uses. These enhancements include improved public realm and walkways.

Whilst a comprehensive redevelopment of the area (Ludgate style or Broadgate style) will hopefully enhance land values, it must be recognised that the provision of these improvements comes at a considerable cost which may be unsustainable for comparatively lower existing land values to withstand.

The Blackfriars KAOC represents a largely forgotten part of the City and, despite its potential to be 'place changing', it requires imagination and flexibility to deliver shared enhancement objectives. In this regard, TT Group is willing to support a Vision Statement for the area so that stakeholders can participate in shaping the future of the KAOC in advance of progressing specific site redevelopment proposals. The Vision Statement should note the KAOC's fractured ownership and need for a master-planned approach, including phased delivery.

Policy S18 promotes office and commercial accommodation, but should not, by implication, discount consideration of other uses such as PBSA, residential, shared living and other such uses, including possible other new uses. In order to create a new place, imagination is required and as long as other Plan objectives are not prejudiced, the City's policies should remain open and flexible.

Strategic Policy S4: Offices

Draft policy S4(1) seeks to increase the City's office floorspace stock by a minimum of 1.2 million sqm net during the plan period, described elsewhere as a target. The City's evidence base, 'Future of Office Use' prepared by Arup and Knight Frank and the Offices Topic Paper, identifies that anywhere between 1.2 million sqm and 1.9 million sqm of net additional office space will be required by 2040.

Given current demand projections and above average return to work statistics, it is considered advisable for the Plan not to constrain itself by promoting a 'mid range'. If the Plan is to be robust, meet its stated ambitions and accommodate the potential need for 1.9 million sqm, it must provide for this.

Policy OF1: Office Development

TT Group, endorses the 'retrofit first' approach adopted by the City. In respect of Baynard House, a purpose built telephone exchange and a basement public car park, it should be recognised that retrofitting optioneering and assessment needs to be cognisant of the abnormal structural components of the existing building, requiring flexibility and understanding that conventional analysis of typical office buildings is not directly comparable.

In respect of affordable workspace, the policy needs to reflect proportionality, recognising that provision of SME accommodation may be mutually advantageous in core office areas, but less so in areas not recognised as locationally preferable. In any event, the London Plan (Policy E3 – G) makes it clear that account should be taken of the need for affordable workspace. The City Plan does not provide any evidence of need and, in any event, >98% of the City is occupied by SME's.

Policy OF2: Protection of Existing Office Floorspace

The principle of protecting office floorspace is supported, given the strategic function it provides, but the sequential approach to considering loss of office is unnecessarily

prescriptive and strict, not reflective of the City's practice of practical and flexible application of policy to changing market conditions.

Chapter 4 – Housing

TT Group endorses the general approach to housing development, particularly the encouragement of suitability for appropriate locations, but Policy HS1 should reflect that 'housing' is defined by many forms, including new forms (PBSA and Co-Living for example), that did not exist in the City or did not have recognised need when the City Plan 2040 was first prepared in 2016. Some of these non-traditional forms of housing, due to their transitory occupation, do not necessarily require standard levels of amenity or would inhibit surrounding business functions.

Identified residential 'hubs' already exist on the Thames side, enjoying similar conditions to Blackfriars such that the KAOC Policy S18: Blackfriars should recognise the potential for residential uses to contribute to the desired "*mix of uses*".

Strategic Policy S12: Tall Buildings

Policy S12 makes clear that each individual application for a tall building within the City will require comprehensive, site-specific analysis, including the provision of accurate three-dimensional computer models and Accurate Visual Representations. It is considered important that the policy incorporates some degree of flexibility and not prescribe 'maximum permissible' heights across all sites. Prescription may prevent specific sites with specific public benefits accruing from being fully optimised if breaching a height restriction is inconsequential or outweighed by limited harm.

End

DP9 Limited 14 June 2024