

Felgate, Gavin

From: Peter Twemlow [REDACTED]
Sent: 14 June 2024 11:58
To: Planning Policy Consultations
Cc: Michael Green
Subject: Proposed Submission Draft City Plan 2040 - 60 Gracechurch Street - Obayashi
Attachments: 60 Gracechurch Street Draft City Plan Reps FINAL MERGED 14062024.pdf

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Dear Sir, Madam,

On behalf of our client, 60 Gracechurch Street (General Partner) Ltd, please see attached representations to the Draft City Plan 2040.

These representations, submitted as a single pdf for ease, comprise a main letter from DP9 and also a technical note from The Townscape Consultancy.

Please can you confirm receipt.

Kind regards

Peter

Peter Twemlow
Director

[REDACTED]

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PT/MG/DP6681
14th June 2024

**Development Plans Team,
Environment Department,
City of London Corporation,
Guildhall,
London,
E2P 2EJ.**

By Email.

Dear Sir/Madam,

DRAFT CITY PLAN 2040 (REGULATION 19 CONSULTATION) REPRESENTATIONS IN RESPECT OF 60 GRACECHURCH STREET, EC3V 0HR

Introduction

These representations are submitted by DP9 Limited ('DP9') to the City of London Corporation ('the CoL') on behalf of '60 Gracechurch Street (General Partners) Ltd' (the 'Client') in respect of the above address (the 'Site'). For context, we are acting as planning advisors and agents to the Client as part of the proposed redevelopment of the Site (the 'Proposals'), with an application for full planning permission due to be submitted in the next few months, in July 2024. We welcome the opportunity to make representations on the Draft City Plan 2040 under the Regulation 19 consultation.

The Client is a development vehicle established by the owner of the Site, Obayashi Corporation ("Obayashi"), who are working in collaboration with Sellar who are acting as Development Managers to bring forward the Proposals for a new tall building on the Site, within the defined Eastern Cluster area. Alongside the Client and their wider team we have been engaging with the CoL, and other stakeholders, for almost 12 months.

Obayashi was established in Japan in 1892 and have offices in 15 countries and employ more than 15,000 people around the world. Obayashi have an existing presence within the City of London, being the developers and long term owners of Bracken House, near St Paul's Cathedral since the 1980s. Sellar is an independent, design-led developer and asset manager with a reputation for delivering innovative and high-quality mixed-use projects. Sellar is internationally recognised for conceiving and delivering the Shard Quarter development at London Bridge, as well as the delivery of many other projects including Paddington Square, Canada Water Dockside and Seal House.

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Representations

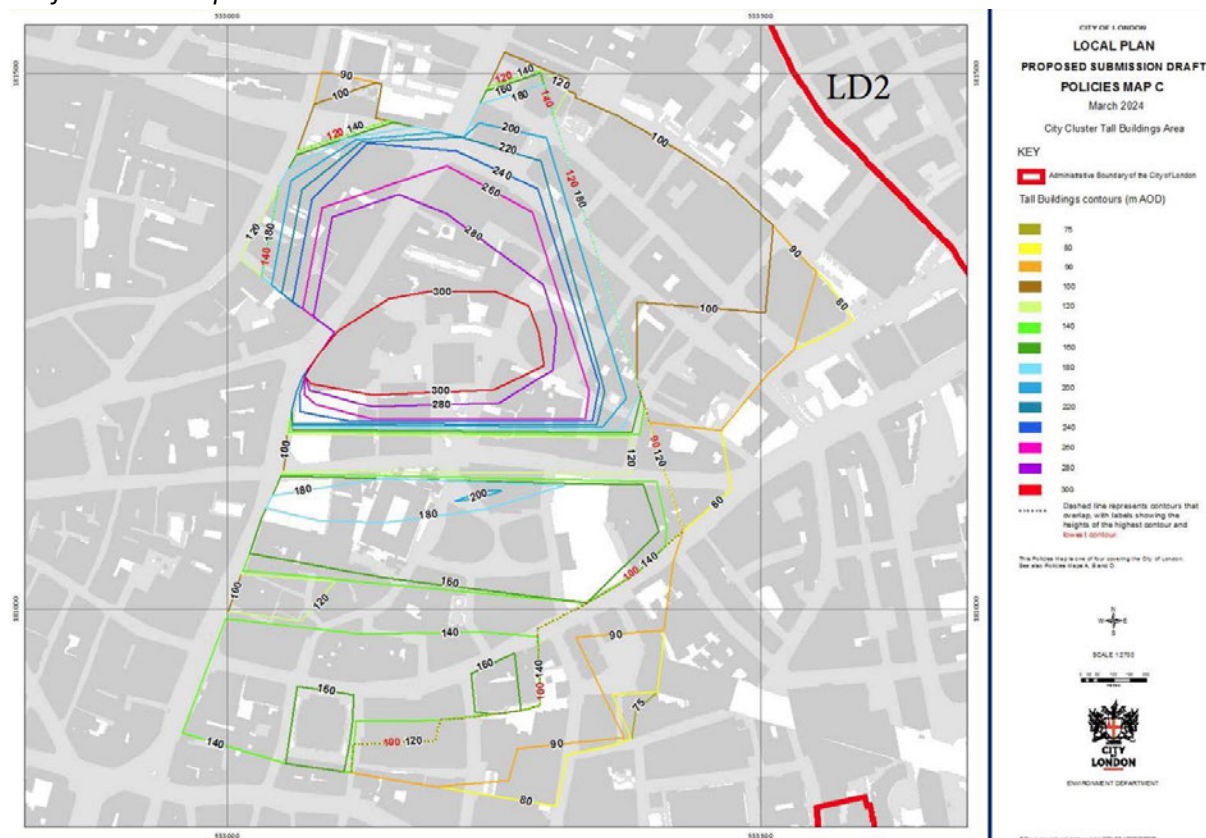
Strategic Policy S12 defines tall buildings as anything over 75m AOD and identifies appropriate two specific locations for tall buildings, within the defined Eastern Cluster and also within Fleet Valley. Of particular interest to our Client and this representation is the drawn boundary of the Eastern Cluster which, like the existing and adopted Local Plan, includes the Site. This is therefore supported in so far as it continues to recognise the Site as appropriate for a tall building.

We have considered the Col's approach taken to go beyond a 2D drawn boundary (as in the adopted Local Plan) and determine appropriate building heights within these two tall building areas. This approach, using 3-dimensional computer models to depict suitable building heights identified in the form of contour rings, is welcomed in principle, recognising that it seeks to respond directly to and align with the adopted London Plan (Policy D9).

We also acknowledge that the approach to and application of these contours is intended to help shape the existing and emerging cluster in such a way that appropriately supports and facilitates important further growth within the Square Mile (and designated Eastern Cluster in particular), whilst balancing any harmful impacts on three 'strategic landmarks' (heritage assets), namely St Paul's Cathedral, the Tower of London World Heritage Site and the Monument.

The Site is identified on draft 'Policies Map C' (extract below: referred to as 'Figure 15: Tall building contours' within the Draft City Plan 2040) as being appropriate for a building of up to 140m AOD.

Draft Policies Map C





As part of the pre-application process with the CoL, our Client's design team has tested the emerging Proposals within a number of key views and CoL officers have been supportive, in principle, of a building extending to 162.3m AOD at the northern most point, descending to 152.7m AOD to the south.

In light of this, it is recommended that an amendment to the contours of this specific part of the Eastern Cluster is considered as a 'modification' to the Regulation 19 draft City Plan 2040, prior to its submission to the Secretary of State. The proposed amended contour plan reflecting this is shown within the accompanying note prepared by The Townscape Consultancy.

This modification is considered to be appropriate as it would meet the objectives of draft Policy S12, and align with London Plan Policy D9 whilst, importantly, optimising this important strategic site in terms of delivering new, world class office space, within the designated Eastern Cluster area, in a highly sustainable location. The Proposals would deliver circa 50,000 sqm GIA of office floorspace. This would align with and positively contribute to the CoL's strategic objectives set out in **Strategic Policy S4**, to increase the stock of office space by a minimum of 1.2 million sqm net in the plan period up to 2040.

More widely, we support a number of the broad objectives of the draft City Plan 2040, having prepared our future planning application for the Proposals working collaboratively with the CoL's planning team and with site of these draft emerging policies. In particular, we are supportive of the relevant design policies within Section 9 of the draft City Plan 2040, sitting beneath **Strategic Policy S8**, and the relevant green infrastructure, climate resilience and environmental sustainability policies within Sections 12 and 13, alongside **Strategic Policy S14** and **Strategic Policy 15**. The Proposals will align with these strategic policies and assist in delivering these important objectives.

Whilst we welcome the ambitions to encourage diversification of uses and attracting culture and visitors (**Strategic Policy S6** and **Policy CV5** in particular), we note the challenges that come with developing a tall building and delivering 'free to enter, publicly accessible elevated spaces at upper levels' (as set out in draft **Strategic Policy S12**). The Proposals include such an offer, reflecting positive discussions with officers, but as a more general comment, it is considered that alternative free public offers within buildings should also be actively pursued to ensure a variety of destination attractions which are made available to the public that are co-ordinated and meet user requirements.

Summary

We submit these representations on behalf of our Client, who are developing Proposals for the redevelopment of the Site, with a planning application due to be submitted in July 2024. We are broadly supportive of the strategic objectives of the draft City Plan 2024, and welcome a number of the detailed policies, where relevant, noting that the emerging Proposals are in alignment with these, as they are with the wider existing Development Plan, when taken as a whole.

As stated in these representations, whilst we welcome the approach to the identification of specific tall building heights within the Eastern Cluster, we suggest a modification to the proposed contours in this part of the Eastern Cluster specifically. This modification is reflective of the pre-application discussions undertaken in relation to the Site and which is considered to appropriately and successfully align with and balance the strategic 'Tall Buildings' and 'Offices' policies.



As stated, and on behalf of our Client, we welcome the opportunity to make these representations to the Regulation 19 of the Draft City Plan 2040. We trust you will take our comments into account and if you require clarification on any matters, please do not hesitate to contact Michael Green or Peter Twemlow of this office.

Yours faithfully

DP9 Ltd.

DP9 Ltd.

Regulation 19 Publication City Plan 2040
Representations on behalf of 60 Gracechurch Street GP
Allianz House, 60 Gracechurch Street, City of London, EC3V 0HR

14th June 2024

- 1.1 These representations have been made by The Townscape Consultancy Ltd on behalf of Obayashi Corporation (“Obayashi”), the freehold owner of Allianz House at 60 Gracechurch Street, City of London, EC3V 0HR (the ‘Site’). The representations have been made in response to the Regulation 19 consultation on the Draft City Plan 2040 to demonstrate how the proposed contours referred to in Strategic Policy S12 can be modified to better respond to the development potential of the Site.
- 1.2 Please refer to the cover letter by DP9 Limited (‘DP9’) to the City of London Corporation (the ‘CoL’) on behalf of ‘60 Gracechurch Street GP’ (the ‘Client’) in respect of the above address (the ‘Site’); ‘DRAFT CITY PLAN 2040 (REGULATION 19 CONSULTATION) - REPRESENTATIONS IN RESPECT OF 60 GRACECHURCH STREET, EC3V 0HR’.

Evidence base

- 1.3 A Strategic Visual Impact Assessment (SVIA) was undertaken as part of the evidence base to inform the draft Strategic Policy S12 on Tall Buildings. This assessed an indicative massing for the City Cluster in the form of a three-dimensional ‘jelly mould’.
- 1.4 The shaping of the indicative Proposed Cluster’s form, as assessed in the evidence base, was informed by a ‘*Select Criteria*’ of hard constraints identified by CoL; these are established, adopted macro-level strategic views and heritage constraints in relation to three Strategically Important Landmarks: The Tower of London World Heritage Site, St Paul’s Cathedral, and The Monument to the Great Fire.
- 1.5 The Select Criteria considered includes:
- The Tower of London World Heritage Site (WHS), and associated policy and guidance;
 - St Paul’s Cathedral, and associated policy and guidance;
 - The London View Management Framework (LVMF), and associated policy and guidance;
 - City Landmarks and Skyline Features, and associated policy and guidance and;

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- The Monument to the Great Fire, and associated policy and guidance.
- 1.6 The hard constraints, i.e. protected vistas, silhouettes, and St Paul's Heights, were combined and modelled as maximum parameters for the indicative massing of the City Cluster.
- 1.7 In addition to the hard constraints, which are based on objective three-dimensional data, qualitative constraints, based on more subjective interpretations of what the shape of the cluster should be, further shaped the indicative massing. These included more qualitative elements of the LVMF visual management guidance, which seek to allow for the potential of new development to be visible in a Designated View. This is, noting that any new development should be of appropriate height and incorporate excellent architectural design quality, while safeguarding the setting of strategic landmarks.
- 1.8 The qualitative criteria include:
- Potential impacts on the setting of local (non-strategically important) heritage assets;
 - Potential impacts on the character of the local townscape; and
 - The future baseline including consented schemes.
- 1.9 The indicative massing presented in the 'jelly mould' was achieved through a series of model-testing studies from a large set of viewpoints undertaken by CoLC, combining the hard and qualitative constraints. The influence of the qualitative constraints on the cluster's massing has been at the subjective discretion of CoL, and the draft City Plan does not offer a clear description of how these influenced the 2D contour map included in the Strategic Policy S12 on Tall Buildings.

Policy and the 2D contours map

- 1.10 Draft Strategic Policy S12 relates to tall buildings. The draft policy defines tall buildings as anything over 75m AOD and identifies appropriate locations for tall buildings within the City Cluster and Fleet Valley Tall Building Areas. As with the existing and adopted Local Plan, the drawn boundary of the City Cluster includes our Site. It follows, therefore, that the Site is in principle suitable for a tall building, provided that the proposals satisfy the requirements of Policy S12 and other policies contained within the London Plan and emerging City Plan.
- 1.11 The Client recognises and welcomes in principle the approach the CoL has undertaken in identifying appropriate locations for tall buildings using 3-dimensional computer models to depict suitable building heights identified in the form of contour rings within 'Policies Map C' (referred to as 'Figure 15: tall building contours') within the Draft City Plan 2040. This is considered to respond to and align with

adopted London Plan Policy D9. The supporting text at paragraph 11.5.11 within the emerging Local Plan sets out that the contour rings represent the maximum tall building heights that the CoL considers to be appropriate, based on an assessment of the potential impacts on strategic views and St Paul's Cathedral, The Monument, and the Tower of London World Heritage Site.

- 1.12 Draft Policy S12 sets out that the contour rings represent the “*maximum permissible*” tall building heights that the CoL considers to be appropriate, as evidenced by the Strategic Visual Impact Assessment (SVIA) which forms part of the evidence base to the emerging Local Plan. The Strategic Visual Impact Assessment (SVIA, April 2024) illustrates that the proposed contours are more conservative than the 3-dimensional jelly mould, and there are instances where some existing and consented schemes protrude beyond the proposed contours making them hard to interpret. While it is understood that the jelly mould used in the evidence base is illustrative, the fact that the evidence used to prepare the contours allows for a greater volume than when using the contours alone, only creates confusion, which could be avoided. As a solution, we would argue that the contours map should be revised, increasing its heights where necessary, to allow for the heights of the existing and consented schemes to be fully integrated, as in the jelly mould presented in the evidence base.
- 1.13 Given the inconsistency between the proposed contours and the jelly mould we recommend the wording of draft Policy S12 is amended as follows:

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 normally not exceed the height of the relevant contour rings applicable to a development site. Where multiple contour rings cross over a development site, ~~in areas between the contour rings~~, tall buildings should be designed to successfully mediate between the contour ring heights. Equally, where the next taller contour ring is beyond the site boundary, tall buildings may be designed to successfully mediate towards the next height ~~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.

- 1.14 These representations have been made to demonstrate how the proposed contours can be modified to better respond to the development potential of the Site and to reflect ongoing pre-application discussions with City officers.

Site-specific Evidence Response

- 1.15 The Proposed Development at 60 Gracechurch Street does not break any of the 'hard constraints' as outlined on pg. 14 within the SVIA.
- 1.16 The design has been developed to respond to sensitive views from St Paul's Cathedral, the Monument and the Tower of London. Figure 1.1 shows a map with the viewpoints considered for this exercise in relation to the Site and the relevant views are presented in Appendix 1. Views 1, 2, 3, 4 & 5 (attached) demonstrate that from these sensitive views and considering heritage constraints, the Proposed Development at 60 Gracechurch Street will add to the existing backdrop of the City of London Cluster, sitting comfortably within its profile.

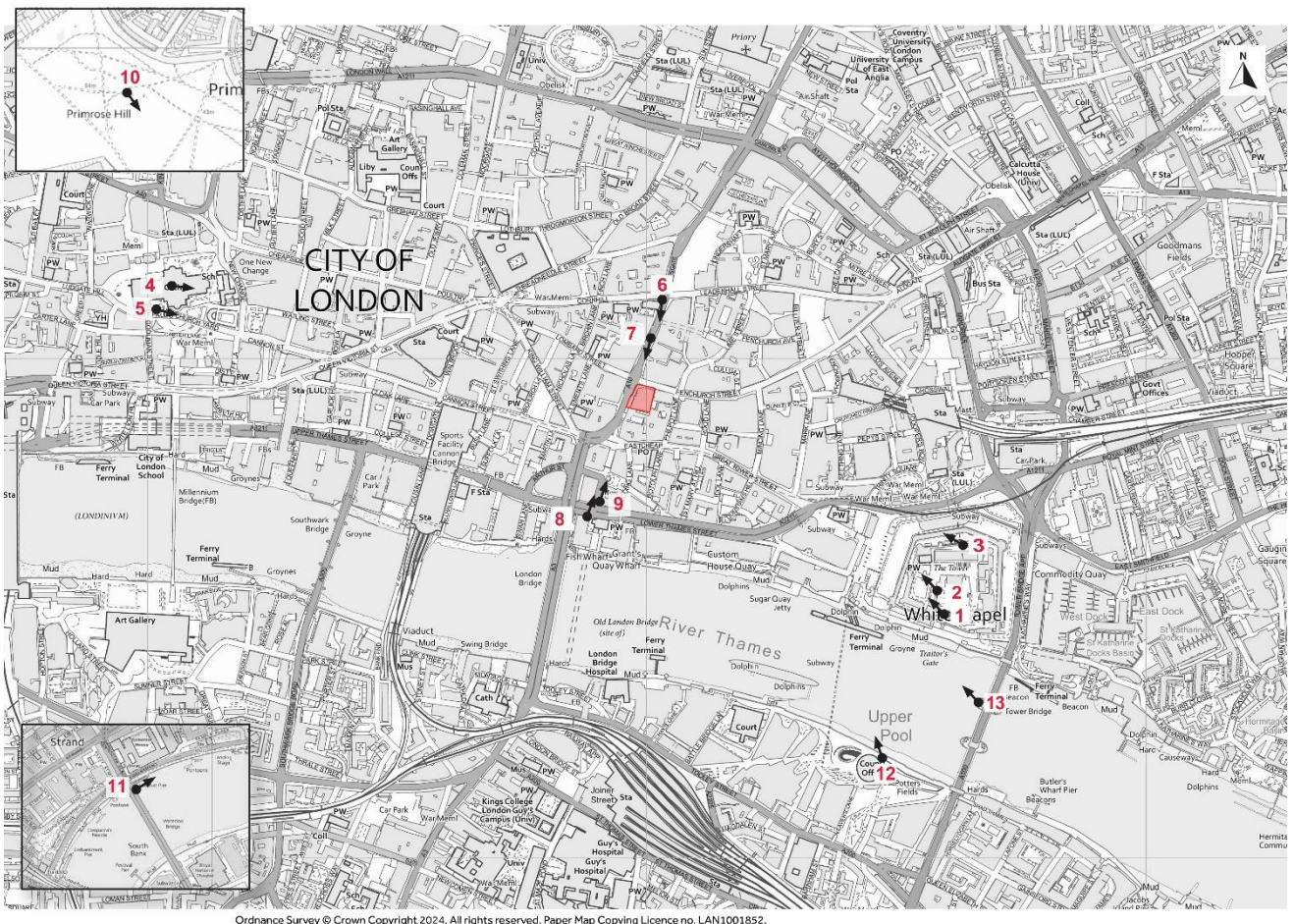
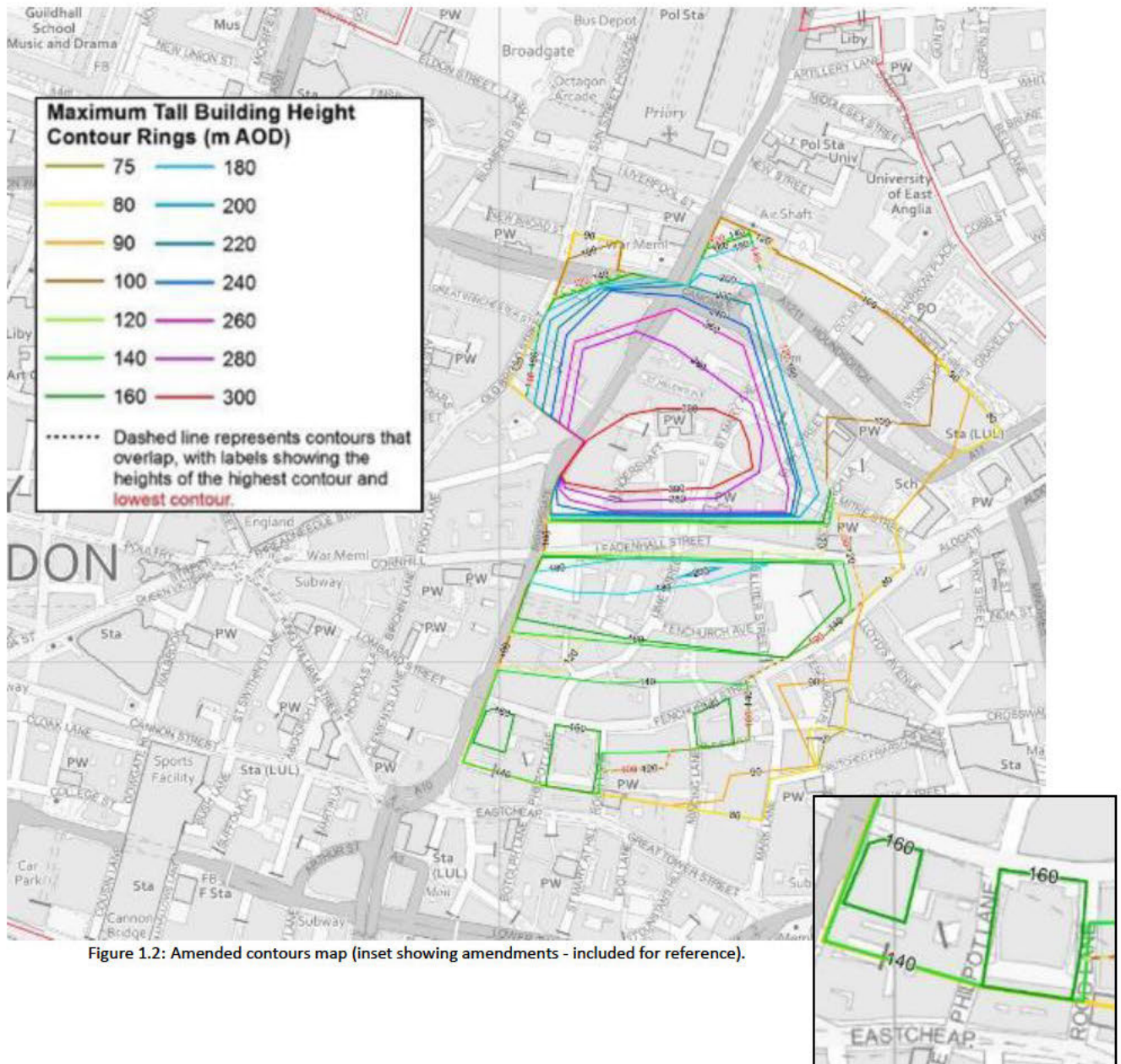


Figure 1.1: Viewpoints considered.

- 1.17 Views of the Monument from Bishopsgate looking south would enhance the setting of the heritage asset from the existing condition and provide more sky space further framing the Monument's gull top, as can be seen within views 6 and 7 (attached).
- 1.18 Views 8 and 9 (attached) looking north towards the Monument form part of a kinetic experience. View 8 shows that some convergence with the top of the Monument and the full height of the column will be experienced, but this is a small moment in time of what is a wider kinetic view sequence, meaning any harm caused to its heritage significance owing to changes to its setting would be very localised and minimal.
- 1.19 LVMF views 10 (4a.1) and 11 (15b.1) (attached) demonstrate that the addition of 60 Gracechurch Street would continue to *'draw the schemes on Gracechurch and Fenchurch Streets into a consolidated form, to the benefit of the Cluster as a composition maintaining the reading of the riverside townscape'* (SVIA, pg. 31). With 20 Fenchurch Street as a taller element behind the proposals, the building at 60 Gracechurch Street will sit within the silhouette of the existing mass.
- 1.20 LVMF views 12 (25a.1) and 13 (10a.1) (attached) from the southeast of the Site demonstrate that 60 Gracechurch Street will be mostly occluded and sitting behind 55 Gracechurch Street and 20 Fenchurch Street. It is on the eastern side and will not form part of the foothills or dominate the White Tower. As the SVIA states, *'To the west, the Proposed Cluster form would be tightly wrapped around the silhouette of 55 Gracechurch Street, leaving a considerable sky gap between the Cluster, the Monument and St Paul's Cathedral'*, which the scheme maintains. (SVIA, pg. 22).
- 1.21 The existing building at 20 Fenchurch Street rises to c. 177m AOD, c. 17m over the contour ring of 160m AOD indicated on its site. Consented schemes in the vicinity, including the consented 55 Gracechurch Street and 70 Gracechurch Street add to the emerging context. The contour covering these sites shows 140m AOD, the same as on the Site. However, as consented, the 70 Gracechurch Street rises to 154.7m AOD and breaks the contour line of 140m AOD by over 14m. 55 also breaches the *'maximum permissible'* height indicated by 6m, currently consented, and sitting at 146m AOD.
- 1.22 We therefore argue that the Site can allow for more than the 140m AOD denoted by the contour map, due to the existing heights of neighbouring buildings and the emerging local context, and because the extra height would not cause any significant harm to the three strategic landmarks considered. The suggested amended contours map at figure 1.2 shows an increase in the contour height over the site, from 140m to 160m AOD, which would allow for all the development being currently proposed to be within the contour. We feel that this will, along with the added flexibility within the text, help with mediation of the building heights and therefore is appropriate for a 160m contour.



Summary

- 1.23 In summary, our Client supports in principle the approach taken to identifying permissible heights within the cluster using a contours map. However, we would argue that the contours map as drafted is overall too conservative and leads to confusion, when considering it in the context of the evidence base

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provided with the draft local plan. We would argue that a modified map, which increases height in certain areas to allow for the full integration of existing and consented schemes, would better reflect the real capacity of height within the cluster and remove confusion in its interpretation.

1.24 Regarding the text accompanying the policy, we have recommended amendments that we consider would make it easier to understand and interpret, reducing room for confusion and ensuring the optimisation of the cluster’s volume.

1.25 In relation to the Site at 60 Gracechurch Street, we have tested the relevant views in regard to the three strategic landmarks and, as a result, we would argue that the Site can allow for more height, without causing any significant detrimental effects to the setting of the landmarks or compromising any of the hard constraints that are shaping the cluster. As a result, we would argue that the height presented in the contours map of 140m AOD is insufficient and should be increased to 160m AOD over the Site.

Appendix 1



Figure 1.3: View 1 - Tower of London: Inner Curtain Wall, south – between Wakefield and Lanthorn Towers (SVIA View: 40).

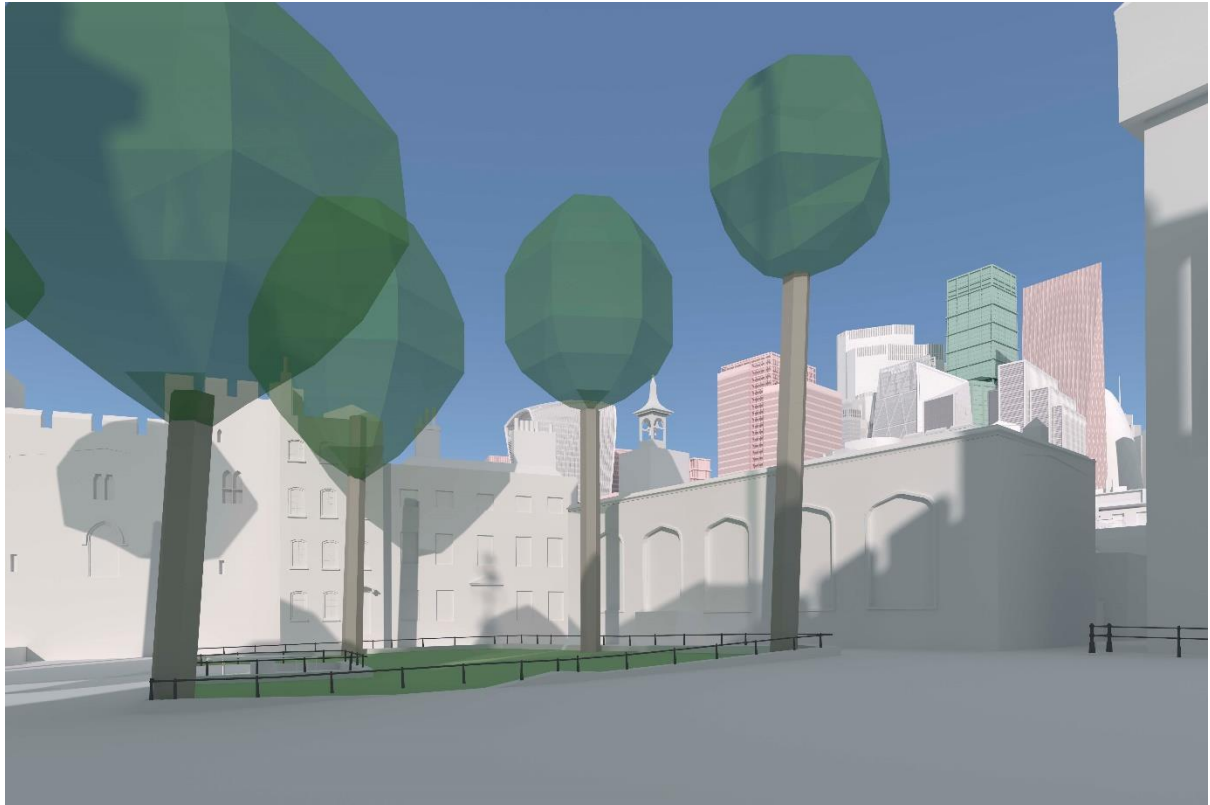


Figure 1.4: View 2 - Tower of London: Inner Ward – West of the White Tower (SVIA View: 36).



Figure 1.5: View 3 - Tower of London: Inner Curtain Wall, north – West of Bowyer Tower (SVIA View: 37).

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Figure 1.6: View 4 – St Paul’s Churchyard, opposite Godliman Street.



Figure 1.7: View 5 – St Paul’s Cathedral: Golden Gallery.

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Figure 1.8: View 6 – Gracechurch Street, junction with Cornhill and Leadenhall Street.

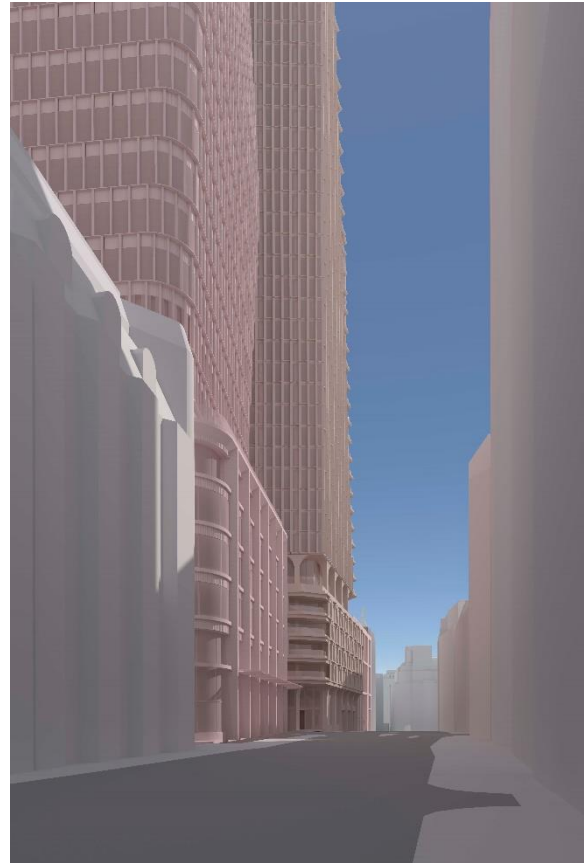


Figure 1.9: View 7 – Gracechurch Street, Bell Inn Yard.

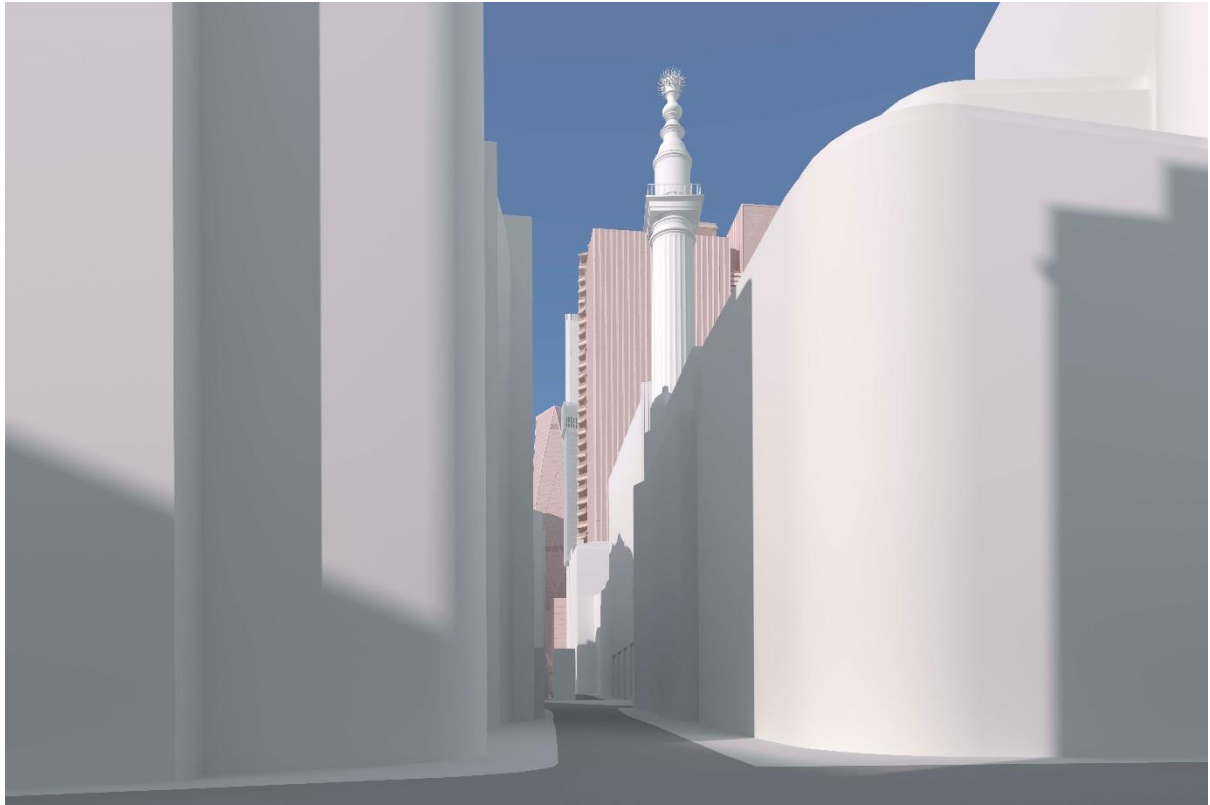


Figure 1.10: View 8 – Lower Thames Street, outside gates of the Church of St Magnus-the-Martyr.

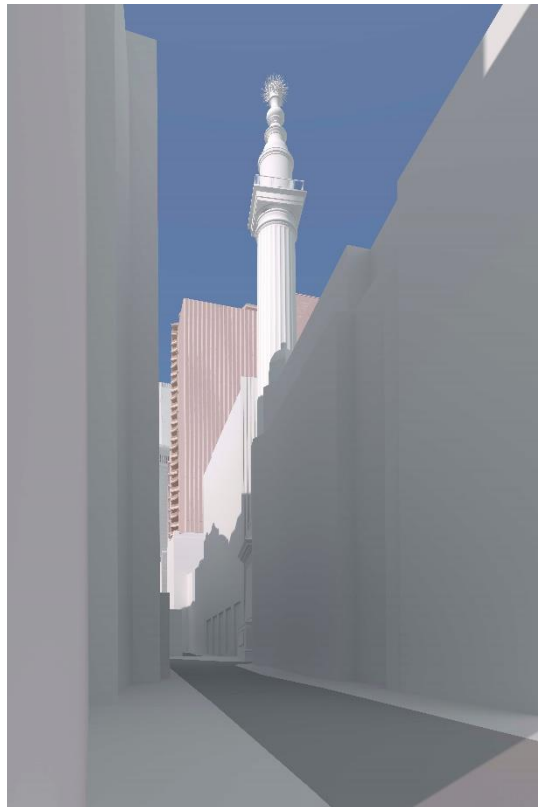


Figure 1.11: View 9 – Fish Street Hill, corner with Lower Thames Street.

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Figure 1.12: View 10 – LVMF 4a.1 Primrose Hill, The Summit (SVIA View: 20).



Figure 1.13: View 11 – LVMF 15b.1 Waterloo Bridge, downstream (SVIA View: 6).

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Figure 1.14: View 12 – LVMF 25a.1 The Queen’s Walk at City Hall (SVIA View: 10c).

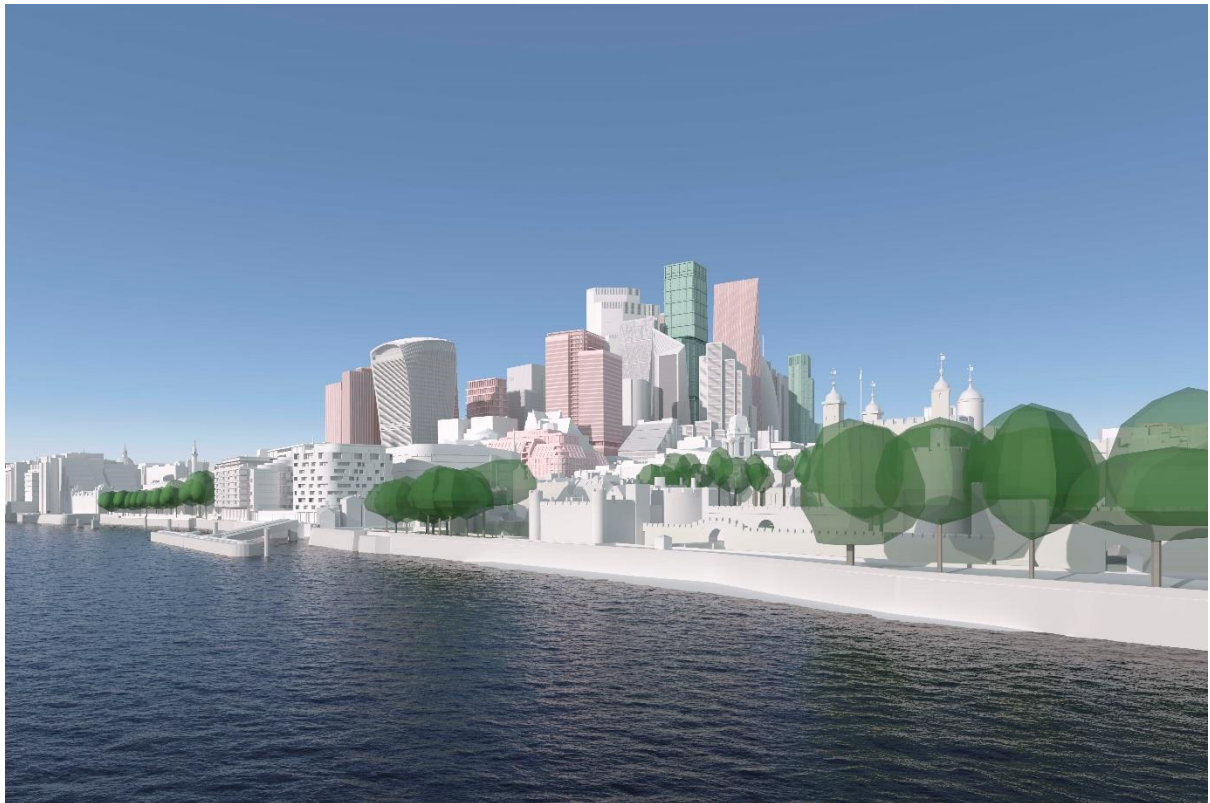


Figure 1.15: View 13 – LVMF 10a.1 Tower Bridge Upstream (SVIA View: 1).

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