


City Plan 2040 - Reg 19 - 5 Acre Square

Luke Emmerton 

Wed 5/29/2024 2:13 PM

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

 1 attachments (254 KB)

5Acre Sq COL Reps May 24.pdf;

THIS IS AN EXTERNAL EMAIL

Good afternoon,

Please find attached representations to the Draft Plan on behalf of our client Northwood Investors Limited.

Best

Luke

Luke Emmerton

Senior Director


DP9 Ltd

100 Pall Mall

London

SW1Y 5NQ

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

This e-mail and any attachments hereto are strictly confidential and intended solely for the addressee. It may contain information which is privileged. If you are not the intended addressee, you must not disclose, forward, copy or take any action in relation to this e-mail or attachments. If you have received this e-mail in error, please delete it and notify postmaster@dp9.co.uk

DP6826/LCRE

29 May 2024

Planning Policy Team

City of London

PO Box 270

Guildhall

London EC2P 2EJ

DP9 Ltd
100 Pall Mall 1
London SW1Y 5NQ

Registered No. 05092507

telephone 020 7004 1700

facsimile 020 7004 1790

www.dp9.co.uk

Dear Sir/Madam,

**CITY OF LONDON LOCAL PLAN 2040
CONSULTATION RESPONSE: REGULATION 19**

Thank you for providing the opportunity to comment on the City of London Local Plan Revised Proposed Submission Draft (April 2024) (herein referred to as the 'Draft Plan'). On behalf of our clients, Northwood Investors Limited ("NIL") representations on the Draft Plan are outlined within this letter.

Background

Northwood Investors Limited hold the freehold of the site at 133 Houndsditch (known as 5 Acre Square) and have undertaken a feasibility study over the past 12 months that considers the development opportunity that exists in seeking to optimise the site and the delivery of high quality commercial office floorspace. The site has not yet been the subject of any discussions with officers at the City of London but a review is anticipated later this year. It is therefore important that this opportunity is highlighted at this stage and that moving forward can form part of the City of London's assessment and forecast for pipeline supply in the heart of the City. This is relevant when reviewing draft policies regarding supply and demand.

Response to the City of London Local Plan Revised Proposed Submission Draft

Chapter 1 - Strategic Priorities

1.2 Economic Objective – NIL endorses the City Corporation's aspiration for growth and the need to set out a minimum requirement for net additional office floorspace by 2040. There should be a strong presumption within the Plan to deliver beyond the minimum targets set out and this should be based on the various studies that have supported the development of the Draft Plan and Policy S4.



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 with reference to this being a 'target' within the supporting paragraphs. Whilst it is clearly not in the City Corporation's interest to inhibit the development of sites that will further increase or exceed the 1.2m sqm figure, NIL suggest that greater flexibility in the City Cluster Tall Buildings Area should be applied to ensure that 'windfall' sites such as 133 Houndsditch are included and optimised as part of the pipeline of development that will ultimately secure in excess of the target set out in Policy S4.

We would suggest that greater clarity is required in respect to Part F of the policy which states, "where appropriate, provide a proportion of flexible and affordable workspace suitable for micro, SMEs". London Plan Policy E3 'Affordable Workspace' Part C, states that boroughs, in their development plans, should consider detailed affordable workspace policies in light of local evidence of need and viability. It is however clear that from within the evidence base supporting this policy, there is no evidence provided to demonstrate a need for affordable workspace.

Policy DE4: Terraces and Elevated Public Spaces

As currently worded, the draft policy would require all major developments to provide free to enter, publicly accessible elevated space. This will not be justified, reasonable or practical in many instances, especially given the existing and consented provisions across the City. The potential scenario of having back to back or clustered elevated spaces (which is already evident in the heart of the City cluster) will only lead to a dilution of the 'visitor experience'. They need to be carefully planned and located where such spaces will provide a meaningful space, view or experience which is different than the next.

In our view this policy should be amended to make clear that publicly accessible elevated spaces will only be appropriate in specific circumstances, having regard to the overall scale of development and the wider public benefits that development may deliver, including any retail, leisure or cultural offer.

We suggest that draft policy DE4 is amended as follows ***"Requiring all tall buildings ~~or major developments~~ to provide free to enter, publicly accessible elevated spaces where appropriate, which may include roof gardens, terraces, public viewing galleries, or other retail or leisure facilities to create attractive destinations for people to enjoy the City's spectacular skyline and views"***.



Strategic Policy S12: Tall Buildings
City Cluster 'Jelly Mould'

133 Houndsditch is located within an area defined as the City Cluster Tall Buildings Area where tall buildings will be permitted where they comply with other key policy requirements alongside the contour rings that suggest a maximum permitted height for the site would be 100m AOD.

NIL support the principles of the policy however question the rigidity with which these parameters may be imposed and the impact this may have on the broader policy targets for commercial floorspace within the City cluster. By reference, the adjoining site at 115-123 Houndsditch received planning consent in 2021 for a development height of 116.99m for which all relevant townscape and visual assessments were undertaken and considered to be acceptable. Accordingly, there should be some flexibility on a site by site basis that may allow for some exceedance of the suggested contours where townscape, visual or heritage harm are determined to be acceptable.

We trust that these comments will be considered as part of the ongoing review and we would welcome the opportunity to discuss these matters further with officers.

Yours faithfully

DP9 Ltd