

# The Guinness Partnerships Representations to the City Of London's Regulation 19 consultation

R0281

Hannah Rodger [Redacted]

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

📎 1 attachments (145 KB)

TGPL Reps to COL 2040 Local Plan.pdf;

THIS IS AN EXTERNAL EMAIL

Good Afternoon,

Please find attached The Guinness Partnerships representations to the City of London's 2040 Local Plan.

Please can you confirm receipt of the representations, as I have seen two different consultation end dates on line.

Kind Regards,  
Hannah

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[Redacted]

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## **The Guinness Partnership: Response to Consultation**

### **City of London Corporation**

Regulation 19 Consultation of the Emerging City Plan 2040

May 2024

## About the Guinness Partnership

The Guinness Partnership is a 73,000-home housing association delivering housing and care services to 160,000 residents across England. We were founded in 1890 to improve people's lives and create possibilities for them. That mission continues today.

Our vision is for Guinness to:

- be one of the best service providers in the housing and care sectors;
- provide as many high-quality homes as possible, and to play a significant part in tackling the country's housing crisis;
- be one of the best employers in the country; and
- be a strong and efficient business that does things well, and that people can trust and rely on.

Guinness has homes and tenants within the City of London and within a Key Area of Change (KAOC) identified in the emerging local plan.

## Summary

The Guinness Partnership (TGP) supports the City of London's City Plan 2040.

TGP realises the importance of a plan-led system in delivering affordable housing in the areas that need it most. Having an up-to-date Local Plan in place is paramount to delivering the economic, social and environmental priorities set out by the City of London (COL) and therefore we welcome the consultation on the submission draft of the City Plan 2040.

TGP's focus in these representations will be on housing policy and those policies that affect the delivery of housing in this region.

Overall, we support the City of London's City Plan 2040 and the ambition to further increase both market and affordable housing in this region. Policies in relation to housing and design have been created to ensure new homes are built to a high standard and have strong sustainability credentials, which we support.

## City Plan 2040: Policy Review

### Spatial Strategy:

Guinness supports COL's spatial strategy in relation to focusing greater levels of growth in Key Areas of Change (KAOC). Focusing additional housing growth in and around residential areas will allow for the most sustainable growth and will create better places to live in the City for new and existing residents.

### Section 4: Housing

#### Policy HS1: Location of New Housing

TGP supports new housing being located near current residential areas as this will create the most sustainable communities that have access to services and facilities for both new and existing residents. TGP supports COL's resolve that redevelopments of existing housing stock should provide the same number of affordable homes with at least the equivalent floorspace and tenure of the current affordable housing and should be provided to existing tenants first.

#### Policy HS3: Residential Environment

TGP agrees with policy HS3 and its onus on protecting the amenity of existing residents in the City of London and discouraging forms of development that may cause unacceptable living conditions for

those residing in the city. Whilst we acknowledge the City needs to have a diverse range of developments for both commercial and residential use to maintain vibrant communities and economies, the living standards of those living in the city should be a priority.

#### Policy HS4: Housing quality standards

TGP supports policy HS4's aim to make sure all new development in the City meets high quality design standards and meets the London Plan housing space standards. Housing should stand the test of time so it is important that we build any new homes to a high quality that lasts whilst supporting the health and wellbeing of its occupants.

### Section 9: Design

#### Strategic Policy S8: Design

TGP acknowledges the importance of good design when planning new developments. Time should be taken to embed sustainability principles into a scheme from the initial design. This will ensure that new and existing residents can live in high quality homes that people want to live in and can be proud of.

#### Policy DE1: Sustainable Design

TGP supports COLs aim to promote innovative, sustainable and inclusive high quality buildings, street and spaces. TGP agree that sustainable development should be the starting point of all developments and retrofitting and recycling materials should be explored. However, this is not always possible when redeveloping older housing stock and the cost-benefit of constructing new developments should be weighed against this when it isn't possible.

#### Policy DE2: Design Quality

TGP supports all new developments striving to be of a high design quality. It is important that new developments stand the test of time in both quality and sustainability terms. However, developing in the city can prove to be very costly, especially with recent inflation and build costs increasing significantly over a relatively short period of time. Whilst quality should always be a priority, over-designed schemes can result in developments not getting built. Therefore a balance between design and quality needs to be struck to ensure much needed housing gets built which meets the needs of residents now and in the future.

### Section 14 The Temple, the Thames Policy Area & the Key Areas of Change

#### Strategic Policy S20: Aldgate, Tower and Portsoken

TGP supports the identified area shown in figure 25 as being a Key Area of Change. This provides the opportunity to promote a mixed-use area, balancing the needs of those currently residing in it as well as those visiting and working in the area.

This is an appropriate location for further residential development. The area has an appropriate range of services and facilities that could be further enhanced to support more residents and add further vibrancy to the existing community. Striking the correct balance between visitors to the area and creating a neighbourhood for local residents will be crucial.