

RE: Proposed Submission Draft City Plan 2040 - WELPUT

R0285

Morris, Alexander [REDACTED]

Fri 6/14/2024 4:06 PM

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

📎 1 attachments (254 KB)

Regulation 19 Publication City Plan 2040 WELPUT 14 june 2024.pdf;

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**From:** Morris, Alexander

**Sent:** Friday, June 14, 2024 1:03 PM

**To:** planningpolicyconsultations@cityoflondon.gov.uk

**Subject:** Proposed Submission Draft City Plan 2040 - WELPUT

**Importance:** High

Dear Sir, Madam,

On behalf of WELPUT, please see attached representations to the Draft City Plan 2040.

Please can you confirm receipt.

Yours faithfully

Alexander



Alexander Morris

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14<sup>th</sup> June, 2024

## **Regulation 19 Publication City Plan 2040**

These representations to the Regulation 19 Publication City Plan 2040 (the 'Draft City Plan') are written to you by BGO on behalf of Welput, the owners of three freeholds at 1-4 Bury Street (Holland House), 31 Bury Street (Bury House), and 33-34 Bury Street (Renown House) and one long leasehold at 4-10 Heneage Lane (Valiant House). These assets are all located within the Eastern Cluster (as defined in both the adopted Local Plan and Draft City Plan, where it is referred to as the City Cluster) and located within the Creechurch Conservation Area, as recently designated.

For further context, in early 2024 Welput submitted applications seeking Planning Permission and Listed Building Consent in relation to a new mixed-use development on three Freeholds under references: 24/00021/FULEIA, and 24/00011/LBC.

Welput has assembled the assets over the course of the last nine years, purchasing Bury House in May 2015 and then Holland House and Renown House in December 2021. No application has been submitted for the long leasehold asset Valiant House

### ***Representations***

These representations have been prepared following participation in various Draft City Plan public consultation events and a review of the Draft City Plan itself and associated evidence base documents, including but not limited to the Tall Buildings Topic Paper (January 2024).

Welput is aligned and supports the Draft Strategic Policy S4 for the City of London to maintain its current status as a world-leading centre for financial and professional services.

A sufficient quantum of office floorspace needs to be available to meet projected economic and employment growth over the Draft City Plan period (2021- 2040), particularly through the delivery of high-quality new floorspace that is suitable for a wide range of different occupiers. This floorspace is identified as needing to be "designed to be flexible" and to "*support new uses, different layouts and configurations, different types and sizes of occupiers, and to meet the needs of Small and Medium Enterprises (SMEs), start-up companies, creative industries and those requiring move-on accommodation*".

Whilst the Policy identifies a need to deliver a minimum of 1.2 million sqm of net additional office floorspace to maintain the status, we consider this to very clearly be a 'minimum' on the basis the

evidence base document prepared by Arup and Knight Frank. This document considers a higher floorspace figure in a 'return of in person' working scenario. This suggests a minimum of 1.9 million sqm of net additional floorspace is required. We are of the view that strategic sites, such as Welput's, within the defined City Cluster, are consistent with this strategically important objective.

Turning specifically to the City Cluster and Draft Strategic Policy S21, Welput is supportive of the approach taken, that the City Cluster has been identified as the most suitable location for tall buildings and the need for this area to *"accommodate a significant growth in office floorspace and employment, including through the construction of new tall buildings"*. It expressly identifies that tall buildings are in principle acceptable, subject to meeting specific design and amenity requirements. To this end, Welput is supportive of the requirements identified in Draft Strategic Policy S12 which relates specifically to 'Tall Buildings' and their definition, defined appropriate areas and need for all impacts (heritage, environmental and other) to be carefully considered.

Draft Strategic Policy S21 supports *"delivering tall buildings on appropriate sites in line with Policy S12 (Tall buildings) ensuring they positively contribute to the City's skyline, preserving heritage assets and their settings, taking account of the effect on the London skyline and on protected views"*. As an approach, Welput is aligned with this, with support being given to tall buildings 'on appropriate sites'. and that planning applications deliver important floorspace, to meet the demand, as part of any scheme comprising a tall building within the City Cluster.

### **Summary**

On behalf of Welput, we reiterate our overall and in principle support for the Draft City Plan and its strategic objectives to deliver additional new office floorspace meeting identified existing and emerging needs; the support given to new tall buildings; and the importance of balancing these objectives with the appropriate and demonstrable preservation and protection of heritage assets and the environment.

As a landowner and stakeholder within the City of London, we wish to be kept informed of progress with the Draft City Plan and afforded the opportunity to engage with any future public consultations. Additionally, BGO and Welput wish to reserve the right to attend and participate in the Examination in Public.

Yours Faithfully



Alexander Morris