

draft local plan representation

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Mon 6/17/2024 11:19 AM

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

📎 1 attachments (181 KB)

CoL Local Plan Reg 19 reps submitted.pdf;

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Please find a representation in response to the current draft local plan regulation 19 consultation on behalf of the Berkeley Group.

Kind regards,  
Lucy

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CITY OF LONDON DRAFT LOCAL PLAN REGULATION 19 CONSULTATION  
WRITTEN REPRESENTATION  
BERKELEY GROUP  
JUNE 2024

1. The Berkeley Group welcomes the opportunity to respond to the City of London (CoL) draft Local Plan Regulation 19 (2024) and we actively seek engagement with the Council's policy team going forward.
2. The Berkeley Group focuses on transforming urban brownfield sites into exceptional places, creating homes and neighbourhoods where sustainable communities can thrive. Regenerating brownfield land transforms neglected or under used sites into places of lasting benefit and beauty and brings new investment and amenities to the heart of existing communities. It is a vital driver for growth, it is the most sustainable way to solve the housing crisis, achieve net zero and tackle deepening inequalities in London.
3. Berkeley specialises in long-term brownfield regeneration, focusing on challenging and complex sites that are beyond the scope of conventional homebuilders. We are highly collaborative, working with councils and communities to transform underused spaces and unlock a mix of social, environmental, economic and commercial benefits.
4. An up to date and fit for purpose local plan provides the framework to support sustainable growth and deliver economic well-being and has a role to play in tackling the homes shortage in London. Berkeley are encouraged to see an emerging local plan for the Borough. The text below provides comments and support for the draft local plan (Reg. 19).

**Overarching comments**

5. Berkeley strongly supports the overall tone of the plan, generally the policies are worded with a level of flexibility in mind, such a pragmatic approach to plan making and policy formation allows for longevity of the plan and will help support the correct development in the future.
6. The simplification of local plans and the removal of repetition of national and regional policy at the local level is a key part of current government planning reforms. A local plan needs to be clear, concise and achievable, yet set policy objectives that are considered important at a local level.
7. The draft CoL plan is clear on local priorities and provides a suitable framework for the unique area of the City of London; however, as currently drafted, there are many elements of policies that are considered repetition of either London Plan and/or national planning policy, for example policy HE1, '*Managing change to the historic environment*' sets out a presumption against heritage harm – this is already set out clearly in the NPPF and the London Plan, therefore there is no need to repeat this at a local level. In addition, draft policy '*OS2: Urban Greening*' merely repeats the requirements set out in London Plan policy G5 and other elements of London plan Chapter 8 '*Green Infrastructure*'. It is therefore suggested that the draft CoL is reviewed

and any repetition removed to create a more concise, streamlined plan.

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### **Strategic priorities and the spatial strategy**

8. Despite the unique characterises of the City of London, Berkeley are strongly supportive of the need to deliver homes as part of the spatial strategy. The spatial strategy (2) point 3 states that *'additional housing will be focussed in and around the identified residential areas, with consideration given to student housing in other suitable areas'*. Further to this, the strategy notes that the 'key areas of change' will be recognised as areas suitable for residential development. This is supported, however, the delivery of homes should not be restricted to these areas only, residential development alongside commercial and other town centre uses creates a vibrant mix of uses and creates sustainable communities. Given the acute housing need in London, the plan should seek to maximise the delivery of homes.
9. Berkeley supports Strategic policy S1: *'Healthy and Inclusive City'* which seeks to create a healthy and inclusive environment, promote social and economic inclusivity and enable all communities to access a wide range of facilities.

### **Housing**

10. The need for housing is recognised in the draft plan and seen as vital for the City's future economy and its communities. The plan acknowledges that a shortage of housing, is one of the main barriers to future business and community growth in the City and across London. Given Berkeley's successful track record of housing delivery and our expertise on urban regeneration sites, we would welcome further discussion with the council on how we can support the Council in achieving this.
11. The draft plan indicates that new housing development will be clustered in or near to existing residential areas, allowing greater opportunity to protect residential amenity and deliver a high-quality residential environment. Draft policy HS1: *'Location of new housing'* makes it clear that new housing will be encouraged on suitable sites in or near identified residential areas. Given the acute housing issue London currently faces, it will be important that the plan does not preclude housing anywhere across the borough and residential use outside these areas should be considered, where it can be robustly justified, particularly, areas around city fringe to the east and along the borough border with Tower Hamlets.
12. To maximise housing across the borough, it is suggested that the plan sets out some further policy, detailing how residential uses could be incorporated into commercially led mixed use schemes.

### **Housing Numbers**

13. The draft plan recognises that the wider housing need across London supports a case for a

higher level of housing in the City than indicated by the national standard method and the plan

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sets out a requirement of 1,706 net dwellings for the plan period; however, given the housing crisis, the plan must make it clear that the targets set are a minimum.

### **Design**

14. Draft strategic policy S8: '*Design*' and draft policy DE1: '*Sustainable design*' takes a retrofit first approach. The merit of such an approach is understood, however, the policy needs to acknowledge that this will not always be feasible. The retrofitting of an older commercial space to residential use for example, is likely to result in poorer residential internal design quality, residential amenity and a poorer residential environment despite any environmental sustainability credentials. There is a balance to be made, there will be circumstances where retrofit will not be suitable and the policies should enable some flexibility to reflect this.
15. Once again Berkeley welcomes the opportunity to submit representations to the draft CoL local plan. As the plan is taken forward it will be essential that developers are given the full opportunity to engage further. The Berkeley Group seeks to actively engage with Council officers and explore ways in which we can work in partnership. Berkeley hope the above comments are helpful and trust that these comments will be duly considered as the draft plan is progressed.