
City Plan 2036

Public Consultation
February 2019



MERCHANT
LAND

City Plan 2036
Development Plans Team
Department of the Built Environment
City of London Corporation
Guildhall
London
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Sent via email

28 February 2019

To the Developments Plan Team,

Re: CITY PLAN 2036 - REGULATION 19 – PROPOSED SUBMISSION CONSULTATION FEBRUARY 2019

Merchant Land welcomes the opportunity to respond to this consultation and the City's vision in providing an environment which encourages appropriate development and is responsive and adaptable to change.

Merchant Land is a property development and investment company and has been a landowner within the City of London since 2004. We take a keen interest in the ongoing successful operation of the City and its commercial function. One asset sits within the City Cluster Key Area of Change element of the City; an area considered for change in respect of further development of tall buildings. We are strongly in support of the delivery of further tall buildings in this location to retain the City's competitive edge in attracting a range of businesses and to maintain the City's place on the global stage.

The planning representations fall under the following headings as per the consultation document:

- **Draft Vision and Strategic Objectives**
- **Healthy and Inclusive City**
- **Offices**
- **Retailing**
- **Design**
- **Vehicular Transport and Servicing**
- **Tall Buildings and Protected Views**
- **Key Areas of Change**

We trust this submission provides sufficient information. Please get in touch should you require any further information or clarification. We are keen to remain involved in the 'City Plan 2036' consultation process and reserve the right to attend the Examination in Public at the next stage of policy preparation.

Yours sincerely,

Katherine McCullough
Head of UK Property
Merchant Land

Sophie Taysom
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Merchant Land

DRAFT VISION AND STRATEGIC OBJECTIVES

General Comments

We welcome the overarching vision and strategic aims of how the City can contribute to a flourishing society; support a thriving economy; and shape outstanding environments.

We value the recognition of the essential role that Small and Medium Enterprises (SMEs) play in the City's success. These businesses are attracted by the prestige, dynamism, and the opportunities it has on offer. There is an urgent and real need to supply high quality office accommodation, with floorspace that is flexible and adaptable, to meet the demands of different types of business occupiers. Essential here too, and as noted, office space will be complemented by other commercial, cultural and leisure uses adding vibrancy and animation to the City's streets.

Suggested Amendments

We propose a change to the definition of major development, which in turn triggers many of the draft policies within the Plan, as the current threshold of 1000 sqm may impact on the viability of smaller schemes that sit within this definition of a major development. In addition, in reviewing the threshold levels, we would suggest the City consider incentives for smaller (say sub 5000 sqm schemes) making measurable contributions towards the objectives these policies set out to achieve.

HEALTHY AND INCLUSIVE CITY

General Comments

We strongly support active policy measures to enhance the public realm which will have direct benefits of residents, workers, and visitors. Lack of green and community spaces, and space to exercise, is an issue for health and wellbeing. This is compounded by air and noise pollution. Appropriate public realm enhancements can ameliorate some of these factors, promote biodiversity, and support making the City an attractive place to live, work, and visit.

We welcome the implementation as part of the Plan of the principles of the City of London's Joint Health and Wellbeing Strategy as this will be critical for improving health and wellbeing outcomes, particularly in the most deprived areas of the City. As noted in our report, *Meeting the Evolving Needs of the City*, there is clear evidence that local environments are critical for shaping physical and mental health outcomes by encouraging physical exercise, reducing stress and improving overall well-being. But for workers and residents in the City, the lack of green and community spaces, and space to exercise, are an issue.

We have taken note of the projected growth in employment and population in and around the City of London, and that there is significant variation in indices of deprivation. It is right that the Plan flags the importance of promoting opportunities for training and skills development to improve access to employment, particularly for City residents and those in neighbouring boroughs.

Suggested Amendments

The inclusion of Health Impact Assessment for major developments (Part 3), as well as expectations of community engagement throughout the entirety of the planning and building process are positive (4.1.20). However, we are concerned that the trigger level for this at 1000 sqm could be onerous for smaller scale developments just over this threshold. We have similar concerns in terms of practicability and viability of requiring new developments to provide facilities such as drinking water and accessible toilets to the public.

Policy H1C1- Inclusive Building and Spaces

We encourage the policy to encourage inclusive design consultation at detailed design stage. We wonder if this could be focussed specifically on implementing consultation with relevant local community groups and local residents with a particular focus on how participation in such consultation could tie in and give participants further access to employment and training opportunities within the development and construction industries within the City.

Policy HIC5 – Location and protection of social and community facilities

We would suggest that the scope of this policy be increased to incentivise provision of community facilities within new developments/new floor space such as drop in surgeries offering a range of services such as mentoring, counselling and other services with community value.

OFFICES

General Comments

We appreciate the emphasis on the role of The City Corporation in facilitating growth in office development of the highest quality to meet projected economic and employment growth as outlined in Strategic Policy S4 and with an emphasis on flexibility in new development to meet the needs of a range of occupiers.

Suggested Amendments

We feel the purpose of this policy ought to be to allow the market to respond to these needs within a supportive planning framework rather than err towards market intervention.

Policy 01 – Office Development

We agree with the spirit of Policy 01 with its focus on micro and SMEs and development focus on office floorspace suitable for a range of occupiers including other commercial uses at street level that will contribute to activating streets and provide services for residents, workers and larger businesses.

However, we would add that market forces also need to be able play out to achieve the best outcome for a robust business district during future property cycles. We feel the emphasis should be

on challenging all new office floor space to be flexible and adaptable to suit a wide range of business types and sizes and therefore future proof office stock.

In line with this, we would suggest that 'Office development should aim to incorporate the following priorities...' as stated to allow for a more flexible approach.

We would also suggest that the supporting narrative to Policy O1 be updated to include reference to development viability as a consideration in requiring design and sustainability standards to be applied, and that these should not be applied mechanistically where this would conflict with the broad requirements established in Policy S4, namely to deliver 2,000,000sqm net new office floorspace over the plan period to 2036. Over-encumbering new development will serve to constrain delivery and reduce the overall ability for the sector to meet this ambitious target.

Policy 02 – Protection of Existing Office Floor Space

The proposed introduction of a 18 month marketing period by way of justification of loss of office floor space appears contrived and we feel viability assessments and a proper examination of specific issues on a case by case basis is more appropriate.

RETAILING

General Comments

We very much appreciate the value of active frontages and a diverse retail offer that supports the needs to communities, workers and visitors, as well as micro businesses and SMEs. Coupled with this retail offer is the need to support a 24/7 economy.

Suggested Amendments

As leisure uses are an important partner to a successful retail landscape we would suggest that SP5 is expanded to include such uses.

Whilst outside the scope of the Draft City Plan we would also comment that business rates for retailers/leisure premises will impact on deliverability of SP5 if a truly diverse and vibrant range of occupiers is sought.

DESIGN

General Comments

We welcome the focus on promoting innovative, sustainable and inclusive high-quality buildings, streets and spaces as detailed in Strategic Policy S8. As part of this, we agree on the importance of delivering world class sustainable buildings which are mixed-use, resilient, adaptable and contribute towards a zero emission, zero carbon and climate resilient City.

Suggested Amendments

With regard to design, we wonder if zero carbon emissions is realistic for new buildings within this timescale. We would suggest a more realistic target such as reducing carbon emissions by 50% in new buildings by 2030.

In addition, it is essential that developers deliver high quality sustainable architecture of a height, bulk, massing, scale, urban grain, material, quality and depth of modelling and detail which conserves and enhances the City's local and wider character and appearance; and are appropriate in relation to their surrounds.

As part of this, we would welcome the addition of reference to the role of local community groups, in particular those in more deprived areas, and their role in becoming involved in a community driven design and build projects (the design and construction of new pocket parks, community centres, renovations and so on).

VEHICULAR TRANSPORT AND SERVICING

General Comments

We are in support of the requirements for major commercial development to provide for freight consolidation.

Suggested Amendments

We would add that this must be clarified to confirm the schemes liable for this on the basis that the practical implications of freight consolidation will vary from occupant size and types, i.e. micro and small the medium sized business occupants. We would suggest that the threshold for freight consolidation be set at 10 000sqm; a reasonable bar above which consolidation would have operational efficiency and ensure that developments are able to meet such requirements.

In respect of the requirement for vehicles to enter and exit the site in forward gear, it is clear that the City (incorporating significant elements of the Eastern Cluster) is characterised in places by narrow lanes, pedestrian routes, and small building footprints. The requirement for servicing vehicles to enter and exit small sites is therefore impractical for some sites and is simply not

possible. On this basis, we would propose an exception in relation to sites which feasibly cannot incorporate such a servicing layout.

TALL BUILDINGS AND PROTECTED VIEWS

Suggested Amendments

The provision of publicly accessible open space/upper levels by all new buildings of 75m or higher could have adverse impacts on viability and practicality and should be reconsidered to allow a more flexible case by case approach

Managing Change to Heritage Assets – Policy HE1

We welcome an amendment to this policy to be more in line with the NPPF and increase its flexibility of policy to allow public benefit and opportunity to enhance heritage assets to be weighed against loss of significance (as per the NPPF). We also feel the word ‘strengthens’ should be replaced with ‘conserve and enhance’.

KEY AREAS OF CHANGE

General Comments

Policy S21 - City Cluster Key Area of Change

We fully support this draft policy. We have an asset on the edge of the City Cluster Key Area of Change and our comments here build on those submitted as part of the *Eastern Cluster Strategy Public Consultation*. We recognise that the area will need to accommodate a significant growth in office floorspace and employment, together with complementary land uses, transport, public realm and security enhancements, going forward.

We agree with the policy as outlined on increasing the provision of world class buildings that are sustainable and offer a range of office floorspace accommodation to cater for the needs of varied office occupiers. This is particularly relevant given the growing needs of micro businesses and SMEs. Enhancements to the area will need to focus on an active, attractive, and as far as possible, biodiverse public realms to offset the lack of green and community spaces. This will be further enhanced by active frontages.