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**Our ref: JRA/SRO/U0018232**

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Via email: [bankssolutionsuk@gmail.com](mailto:bankssolutionsuk@gmail.com)

Dear Ms Glancy

## **City of London City Plan 2040 Examination – Further Matters Statement – Main Matter 7 (Heritage and Tall Buildings)**

We write on behalf of our client, Aviva Investors and Obayashi Properties UK Ltd, the joint freeholders of land at 20 Gracechurch Street, EC3V 0BG, in respect of the further addendums prepared by the City of London ('the CoL') to the Strategic Visual Impact Assessment, the St Paul's Cathedral and Monument Heritage Impact Assessments and the Tall Building Topic Paper, published on 9 May ('the Addendums'). Aviva Investors and Obayashi Properties UK Ltd submitted representations to the Regulation 19 version of the City Plan in June 2024. A Statement of Common Ground, dated 25 November 2024, has also been signed in respect of additional suggested supporting policy text for City Plan Policy S12. This letter has been prepared without prejudice to the Statement of Common Ground.

### **Inclusion of 20 Gracechurch Street within the City Cluster**

We have reviewed the Addendums in light of the site at 20 Gracechurch Street. Whilst the introduction of additional sites into the agreed tall building areas under Policy S12 does not directly impact 20 Gracechurch Street, Aviva Investors and Obayashi Properties UK Ltd consider that the same justification could, and should, be applied to 20 Gracechurch Street by way of inclusion of the site within the tall building City Cluster.

At paragraph 1.6 of the Addendums, it is stated that:

*“Overall, the Addendum concludes that the proposed amendments would meet the objectives of the contour line policy mechanism, which is to minimise the possibility of harm to the settings and OUV/significance of the three Strategic Landmarks: the Tower of London, St Paul's Cathedral and the Monument.”*

Sections 7, 8 and 9 then consider the proposed line amendments in respect of the conclusions reached in the submitted Heritage Impact Assessment in terms of preserving the relevant aspects of Outstanding Universal Value of the Tower of London, the aspects of setting found to make a positive contribution to St Paul's Cathedral's and the Monument's significance.

As shown in the study prepared by PLP Architecture (in consultation with Tavenor Consultancy) (submitted alongside the June 2024 representations), the Site could be developed successfully whilst respecting each of the key townscape and heritage constraints identified in the evidence base, including strategic views of St Paul's Cathedral, the Monument and the Tower of London. The same logic which has been applied to the new sites included within the Addendum should accordingly be applied to 20 Gracechurch Street, as we consider that the conclusions in respect of heritage and visual impact would remain as per the Addendums. We therefore consider that 20 Gracechurch Street should be incorporated within the tall building City Cluster designation.

### **Flexibility within Policy S12**

Notwithstanding the above points, the position around 20 Gracechurch Street does demonstrate that there may well be sites which come forward in the future which deviate from the agreed contours and defined tall building areas, but which do not erode the objectives of those mechanisms i.e. to identify an area and heights for the cluster which will have a positive rounded composition and avoid harm to heritage.

As set out within the June 2024 representations, Aviva Investors and Obayashi Properties UK Ltd remain of the view that the draft City Plan should be targeting delivery of the higher office floorspace figure of 1.9 million sqm, as outlined in the Arup / Knight Frank evidence base report under the 'Return of In-Person' scenario. Given the importance of the City of London to the national economy, it will be important to ensure that growth within the City is not constrained, where it can be accommodated to meet other policy objectives including heritage considerations. The site at 20 Gracechurch Street could deliver a significant quantum of new office floorspace, taking advantage of the site's unusually large footprint to deliver the large office floorplates that are required by some major City occupiers but which are increasingly difficult to deliver within the Square Mile.

Accordingly, Aviva Investors and Obayashi Properties UK Ltd consider that Policy S12 should be drafted to provide greater flexibility for sites coming forward outside of designated areas – particularly part (2) of the Policy. Such sites could still follow the assessment of impacts, as contained within the London Plan and the remainder of Policy S12, in particular the criteria at part (8). Whilst the additional supporting text agreed between the CoL and Aviva Investors and Obayashi Properties UK Ltd is helpful in this regard, more specific targeted amendments to the wording of Policy S12 would be preferred.

Should you wish to discuss the content of this letter and the appendices, please do not hesitate to contact Jeremy Randall or Suzanne Thurtle of this office.

Yours sincerely



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