

**From:** Edward Kitchen [REDACTED]  
**Sent:** 17 June 2024 13:05  
**To:** Planning Policy Consultations  
**Cc:** Jeremy Randall  
**Subject:** Draft City Plan 2040 - Representations on behalf of Aviva Investors and Obayashi Properties UK Ltd  
**Attachments:** 240614 Representations Aviva Investors and Obayashi Properties.pdf; 240522\_20 Gracechurch St - Appendix A.pdf  
**Categories:** CONFIRMED

THIS IS AN EXTERNAL EMAIL

Dear Sir or Madam

On behalf of our clients, Aviva Investors and Obayashi Properties UK Ltd, I am pleased to attach representations on the Draft City Plan 2040.

Yours faithfully

**Edward Kitchen**  
Senior Associate



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14 June 2024

**Our ref:** JRA/EKI

Dear Sir

**Regulation 19 Publication City Plan 2040**  
**Representations on behalf of Aviva Investors and Obayashi Properties UK Ltd: 20 Gracechurch Street**

We write to submit representations on the draft City Plan 2040 (the 'DLP') on behalf of Aviva Investors and Obayashi Properties UK Ltd, the joint freeholders of land at 20 Gracechurch Street, EC3V 0BG.

Background

20 Gracechurch Street comprises a 16-storey, mixed-use office and retail building occupying a prominent position at the junction of Gracechurch Street and Lombard Street. The Site comprises retail uses at ground and basement levels with commercial office floorspace to the upper floors.

The Site immediately adjoins, but is currently excluded from, the draft City Cluster Tall Buildings Area in the Draft Local Plan (DLP). However, the existing building meets the DLP's definition of a tall building, being over 75m AOD. For the reasons set out below and in the supporting Appendix A, we believe the City Cluster Tall Buildings Area and Contour Lines at Policies Map C should be revised to incorporate the existing tall building at 20 Gracechurch Street and also to reflect the Site's future potential to deliver positive and transformative change at this key junction.

Our initial analysis demonstrates that the property has the potential to make a very significant contribution to future growth in the Square Mile, consistent with the London Plan's Good Growth objectives, London Plan Policies D3 and SD4, and the wider spatial vision promoted by the City Corporation through the DLP. Development of the site could deliver significant new office accommodation whilst respecting the historic environment, enhancing the public realm and complementing the City's skyline with new architecture of the highest quality.

On the specific policies of the DLP, we make the following representations:

## **Strategic Policy S4: Offices**

As the DLP makes clear, for the City to maintain its status as a world-leading centre for financial and professional services, it is vital to ensure that sufficient office floorspace is available to meet projected economic and employment growth over the Plan period, particularly through the delivery of high-quality new floorspace that is suitable for a wide range of different occupiers. Yet the draft Plan's target to deliver a minimum of 1.2 million sqm of net additional office floorspace is unlikely to reflect the City's objectively assessed need. Taking account of the continuing trend towards in-person office attendance in the City, we believe the Plan should target 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.

We expect the Regulation 19 consultation on the DLP to attract many similar representations on this issue from a range of stakeholders, informed by the latest available Transport for London data for the Square Mile, recent research undertaken by the Centre of Cities (<https://www.centreforcities.org/blog/how-much-closer-is-the-city-to-pre-pandemic-levels-of-office-working/>), and reports in the national press which evidence a clear and consistent trend for a return to in-person working (see, for instance, *Financial Times*, 17 May 2024, Top London landlord says return to the office is gathering pace) ([ft.com](https://www.ft.com)). The City's evidence base has modelled the demand for office floorspace that will be required in the scenario now unfolding, but the DLP is not currently positively prepared to deliver against the identified need.

We also endorse the City Property Association's analysis and position on this issue.

## **Strategic Policy S12: Tall Buildings / Policies Map C**

For the reasons set out in relation to Policy S4 of the DLP, we believe the City's objectively assessed need for office floorspace over the plan period is considerably higher than the 1.2 million sqm minimum figure, and closer to the 1.9 million sqm requirement forecast in the evidence base report under the 'Return of In-Person' scenario.

The only realistic way for the DLP to accommodate the additional office floorspace requirement over the Plan period is for growth to be optimised in and around the City Cluster, where the evidence base acknowledges that some 85% of the City's future office floorspace will be concentrated. This requires flexibility in the definition and application of the contour heights and the extension of the tall buildings area itself *where* this can be achieved without compromising the DLP's overarching objective to deliver sustainable development.

In our submission (and as demonstrated in the accompanying design brochure prepared by PLP Architecture), the site at 20 Gracechurch Street presents a clear and obvious opportunity to extend the City Cluster Tall Buildings Area. Having reviewed the Tall Buildings Topic Paper and the supporting evidence base in detail, we believe the main reason for the Site's current exclusion to be a generalised preference for the major thoroughfares of Bishopsgate and Gracechurch Street to provide a line of demarcation between the Bank and City Cluster Character Areas. This reasoning does not withstand scrutiny on the ground, where the existing tall building at 20 Gracechurch Street and the Site's wider characteristics clearly belong more naturally within the Cluster.

If a more nuanced and considered approach to the City Cluster boundary is adopted - as it has been elsewhere - it becomes clear that 20 Gracechurch Street should form part of the tall buildings area. An amendment to the tall buildings area would not only properly reflect the presence of the existing tall building but would also acknowledge the Site's potential for a reconfigured or replacement tall building



to bring about positive and transformative change, whilst helping to meet the City additional office floorspace requirement.

The existing tall building on the Site reads as part of the City Cluster in the extensive volumetric testing undertaken by the City. This is clear from the evidence base and the further work undertaken by PLP Architecture in relation to the site at Appendix A.

#### Future Development Potential

The study prepared by PLP Architecture, in consultation with Tavernors Consultancy, demonstrates that the Site 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.

The Site could deliver the accommodation outlined above whilst retaining or reusing a substantial proportion of the existing structure. This would make a significant contribution to the City's office floorspace requirements whilst also minimising whole life cycle carbon.

Located on a highly prominent junction at the corner of Gracechurch Street and Lombard Street, the Site also has the potential for significant public realm enhancements around George Yard, which would serve to mediate more effectively between the Bank Conservation Area to the west and the City Cluster.

The Site's potential for a significant uplift in floorspace is also likely to support opportunities to incorporate a strong cultural offer, and a meaningful contribution to the Destination City initiative.

Further, the Site has the potential to introduce new architecture of the very highest quality, that justifies its prominence on the western aspect of the City Cluster and complements the City's skyline in local and strategic views.

Finally, and as demonstrated in the supporting study at Appendix A, we believe the Site can 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.

#### Conformity with London Plan Policy D9: Tall Buildings

Policy D9 of the London Plan is clear that tall buildings should only be developed in locations that are identified as suitable in Development Plans. In early pre-application discussions on 20 Gracechurch Street, it has been suggested that the Site's future reconfiguration or redevelopment with a replacement tall building could be realised as an exception to this policy and the DLP, with the existing tall building on the Site providing a material consideration of significant weight. Whilst we do not discount this possibility, we believe a plan-led approach through revision of the City Cluster Tall Buildings Area represents the more appropriate and sound course of action at this stage.

#### **Summary**

In summary, Aviva and Obayashi support the adoption of an ambitious Plan which reflects a positive outlook for the Square Mile as a global centre for business. The DLP should be amended to meet the objectively assessed need for additional office accommodation, based on the latest available evidence, and should support the growth in office floorspace necessary to drive attainment of the DLP's wider environmental, social and cultural objectives.

In the context of the City's objectively assessed need for additional office floorspace, and the requirement for a plan-led approach to tall buildings, it is not appropriate to exclude 20 Gracechurch Street from the City Cluster Tall Buildings Area, a key site immediately adjoining that area which is already occupied by a tall building. The exclusion is not justified in the evidence base and would fail to reflect the Site's abundant potential for the positive and transformative change illustrated in Appendix A.

Yours faithfully



**Jeremy Randa**  
Partner



Enc. **Appendix A: City Plan 2040 Tall Buildings Policy Volumetric Testing, PLP Architecture**

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# 20 GRACECHURCH STREET

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CITY PLAN 2040 TALL BUILDINGS POLICY  
VOLUMETRIC TESTING

MAY 2024

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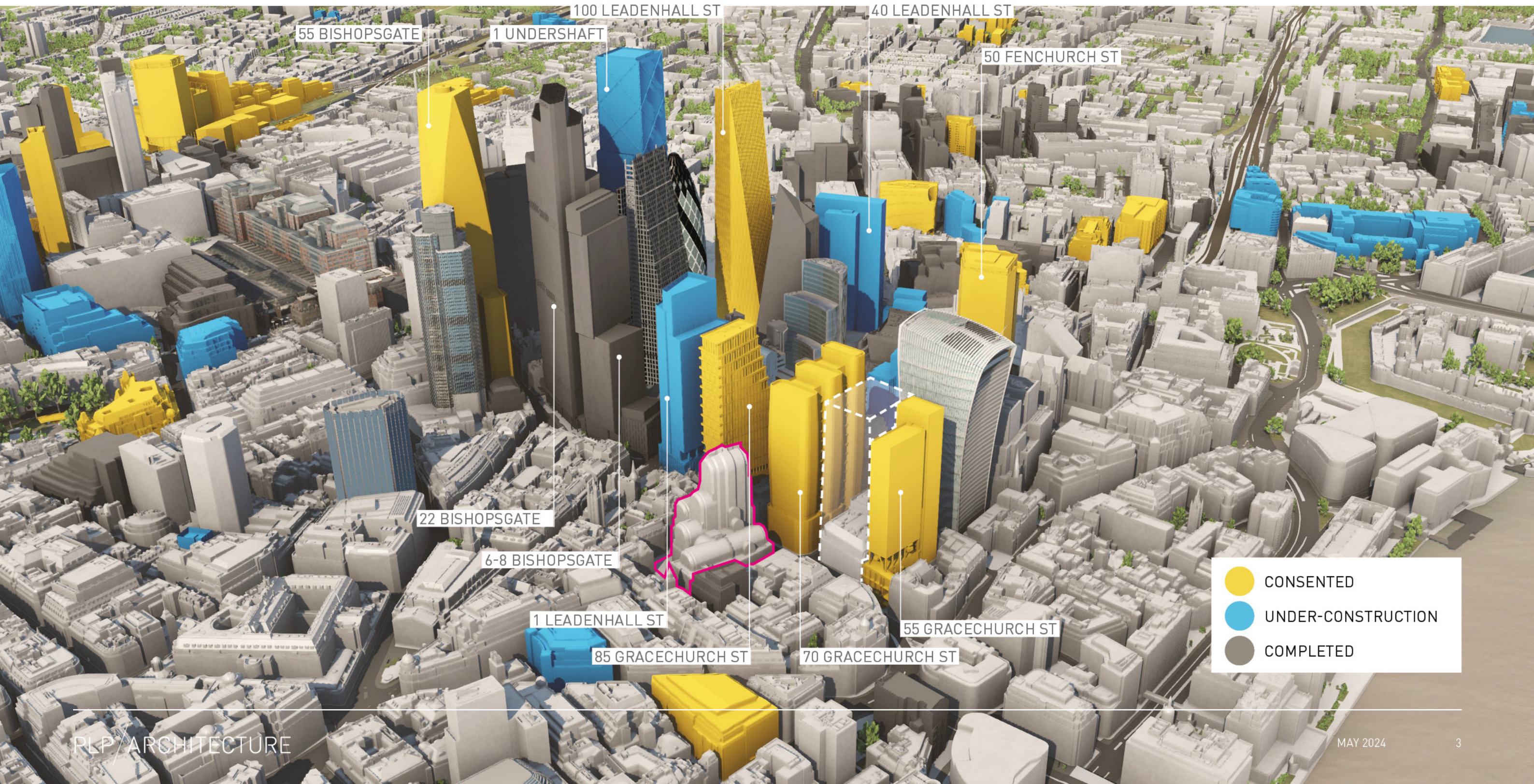


## THE SITE





EMERGING CONTEXT





## SITE AND EMERGING CONTEXT - Future City of London Skyline 2030





## CITY OF LONDON - DESTINATION CITY EMBRACING THE ESSENCE



CREATING A NEW DESTINATION



RE-IMAGINING SPACES TO ADAPT  
TO SOCIAL DYNAMICS AND NEW  
CAREERS



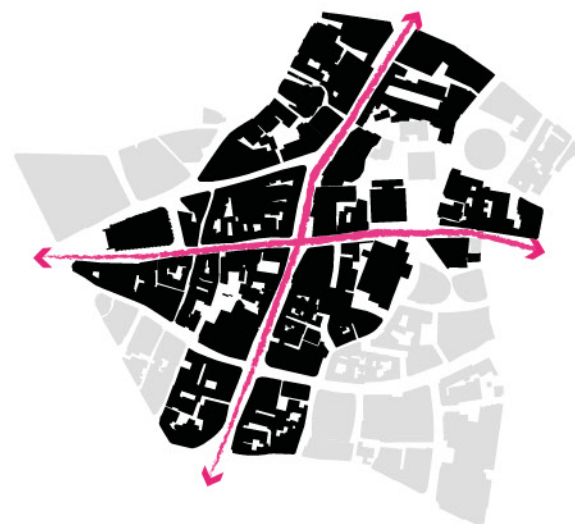
ECONOMIC DEVELOPMENT AND  
DIVERSIFICATION



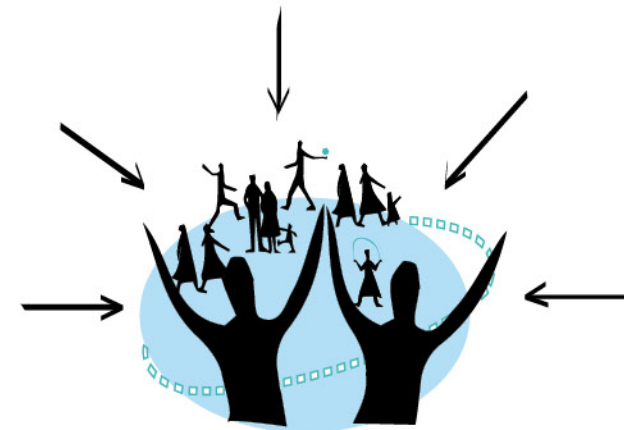
PROVISION OF RECREATIONAL  
AREAS AND BIOPHILIA



DELIVERING A RANGE OF NEW  
PUBLIC USES/PUBLIC SPACES  
THROUGH DEVELOPMENT



CELEBRATING THE CITY'S  
HERITAGE



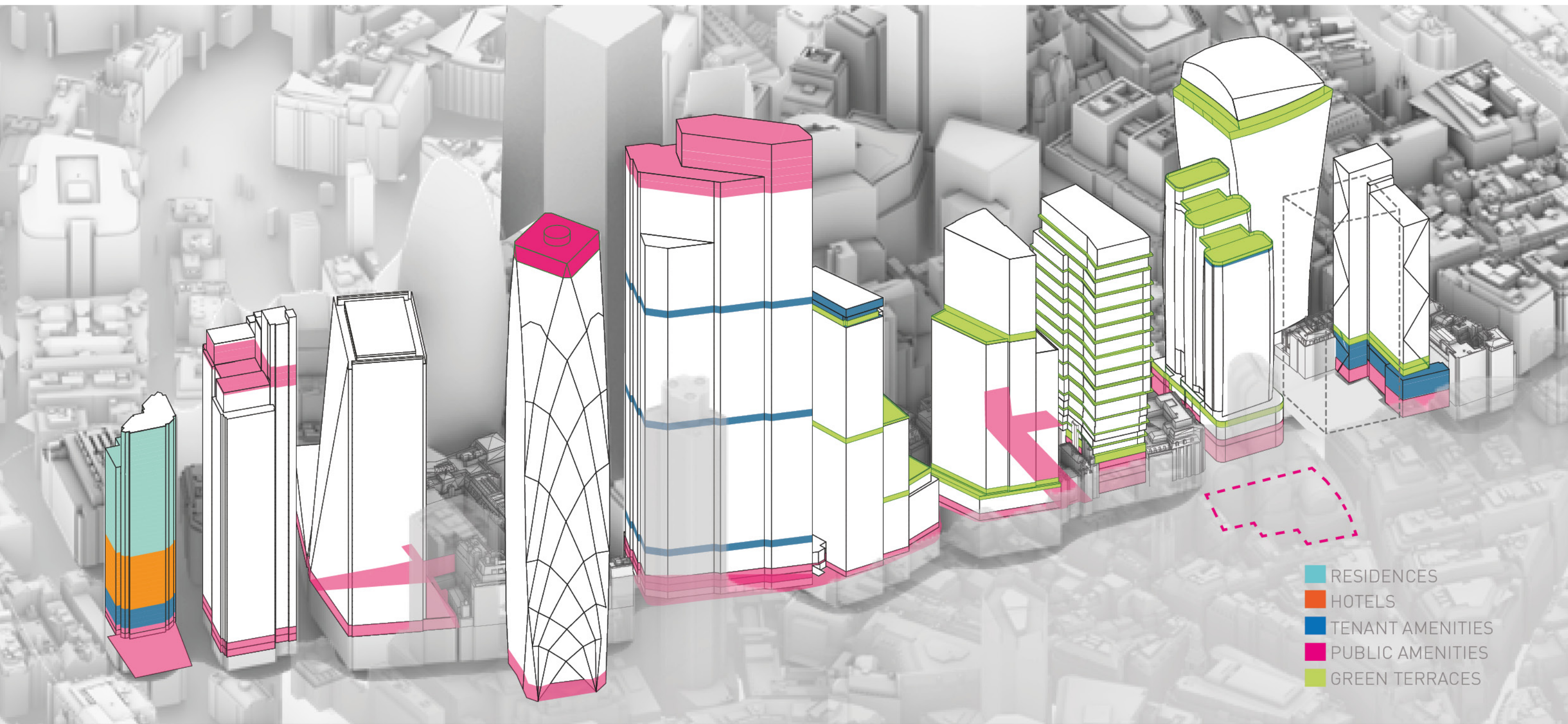
INCLUSION AND ACCESSIBILITY



DE CARBONIZATION STRATEGY  
AND CIRCULAR ECONOMY  
DESIGN APPROACHES



EXISTING AND PROPOSED PUBLIC REALM AND AMENITIES

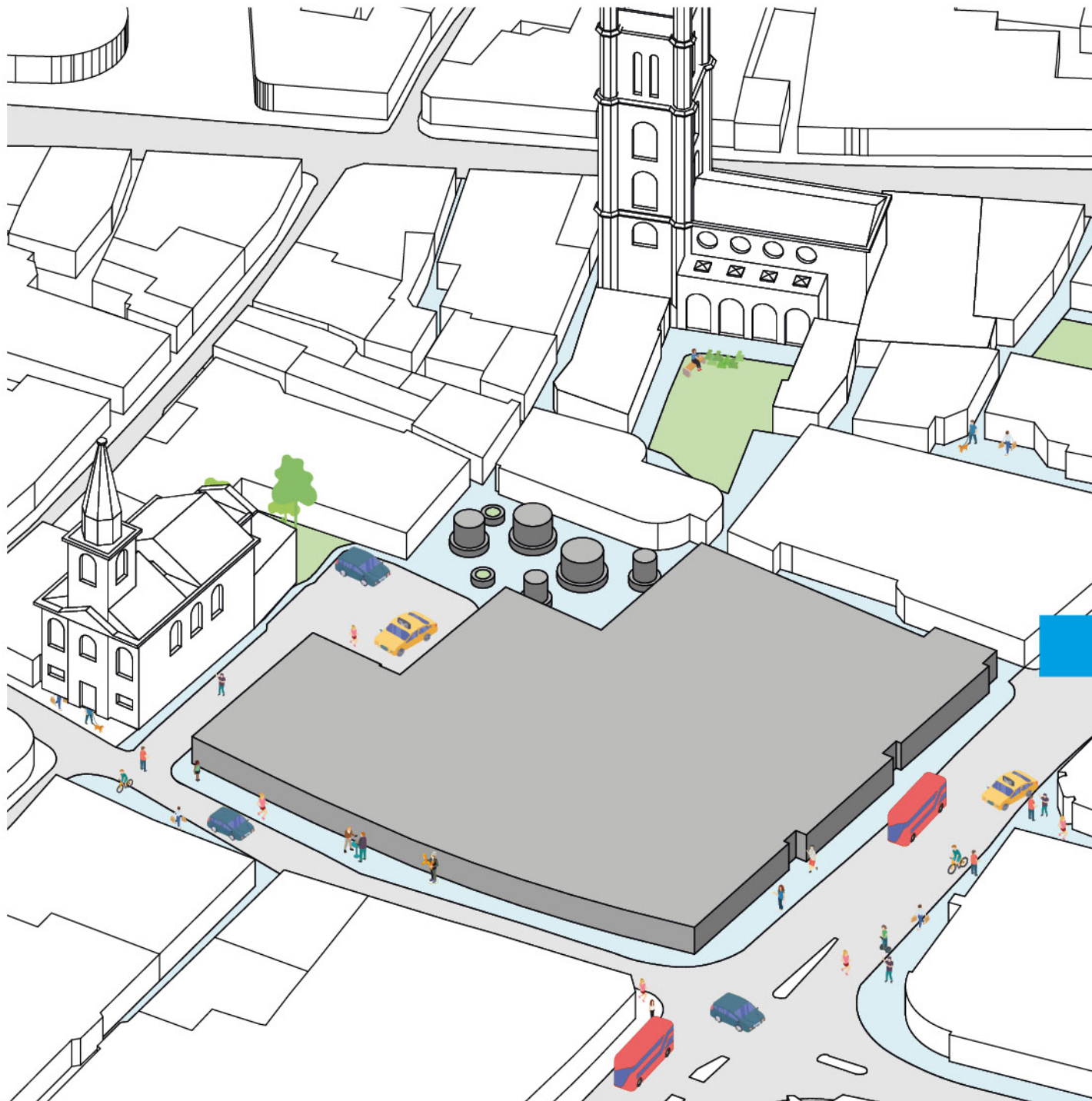




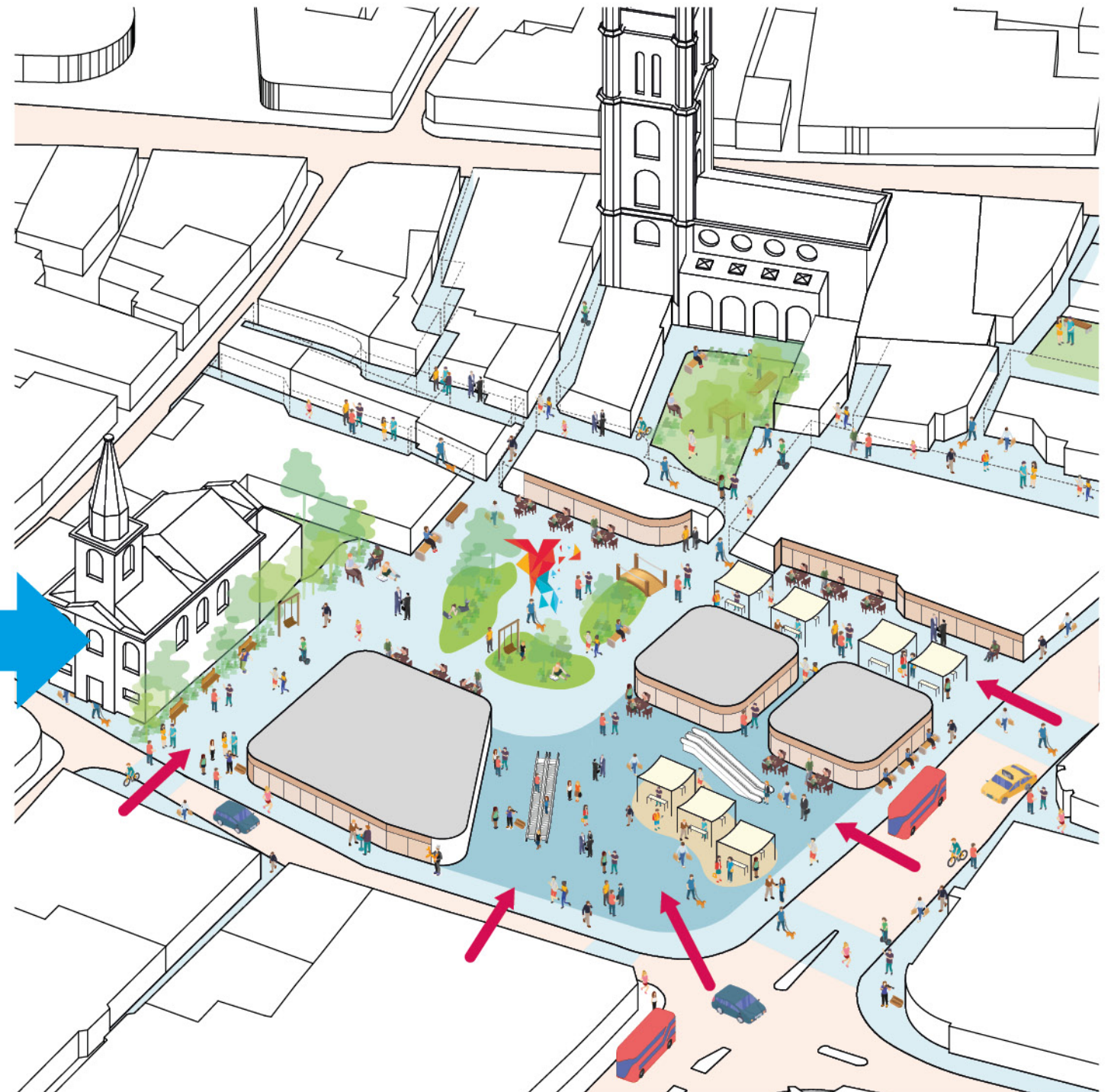
## REDEVELOPMENT POTENTIAL

Ground floor public uses and George Yard revamp opportunity

CURRENT STATUS



FUTURE VISION





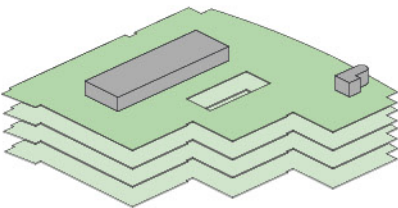
# REDEVELOPMENT POTENTIAL

## Existing building analysis and sustainability key points

### FLOOR PLANS

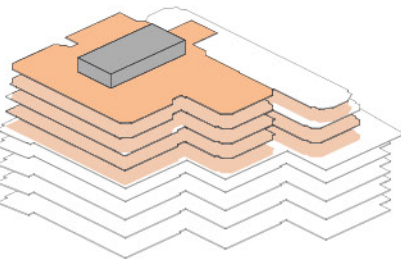
PODIUM: 4 FLOORS

FLOORPLATE SIZE (ca. 3820M<sup>2</sup>)  
NET TO GROSS RATIO (ca. 12.5%)  
FLOOR FLEXIBILITY



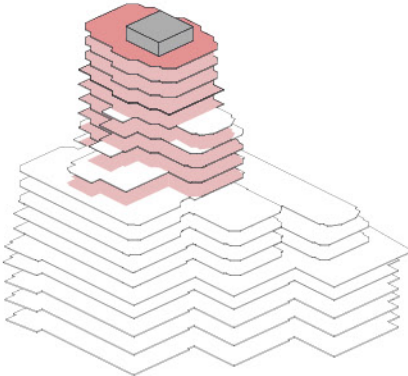
INTERMEDIATE TOWER: 5 FLOORS

FLOORPLATE SIZE (ca. 1650-3150M<sup>2</sup>)  
NET TO GROSS RATIO (ca. 17.5%)  
FLOOR FLEXIBILITY



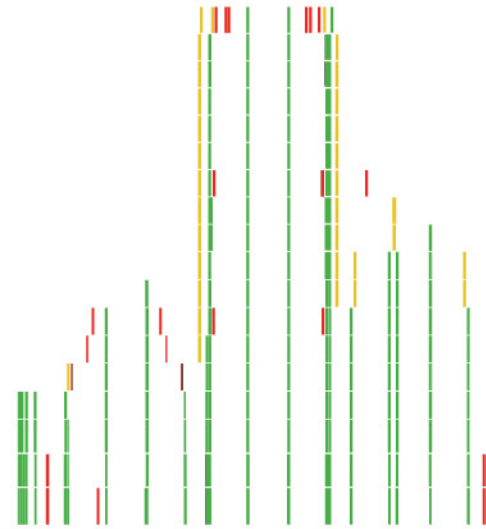
TOP TOWER: 9 FLOORS

FLOORPLATE SIZE (ca. 650-960M<sup>2</sup>)  
NET TO GROSS RATIO (ca 21%)  
FLOOR FLEXIBILITY

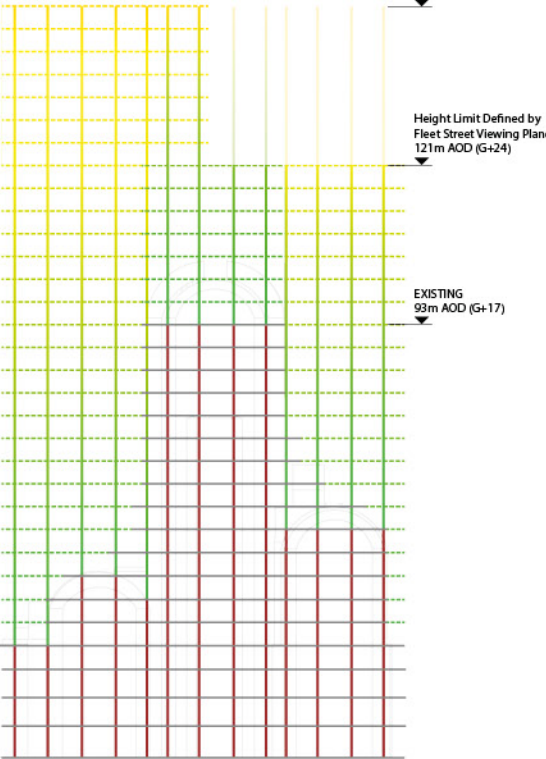


### STRUCTURE

POTENTIALLY UP TO APPROX 90% OF RETAINED STRUCTURE  
CONTINUOUS SHIFTED ISOLATED

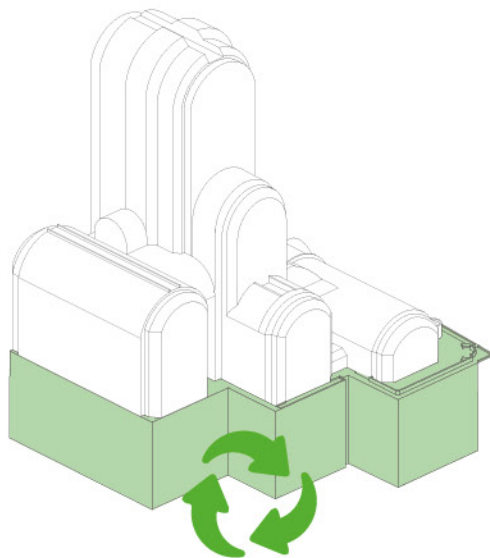


POTENTIAL FOR HIGHEST AOD  
MOST STRUCTURE TO BE ADDED

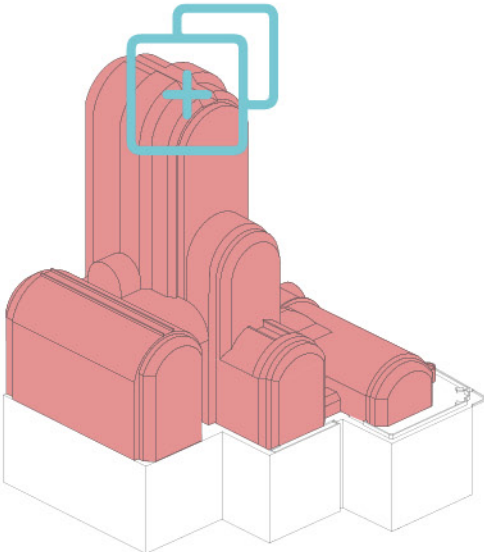


### EXTERNAL FABRIC

The 2009 podium level refurbishment used Portland stone for the cladding, this is in a very good state and can be reused within new development

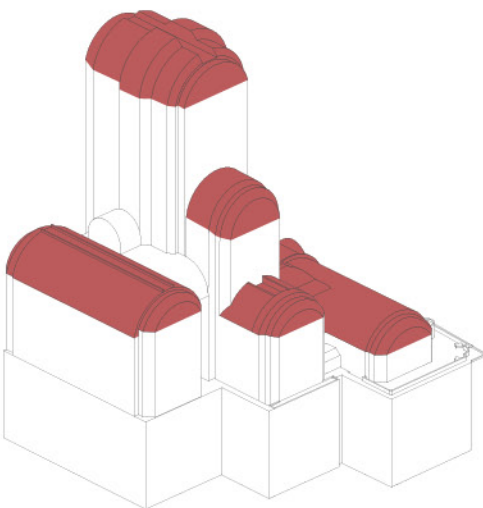


original facade from the 1990s has poor thermal performance and would require a major upgrade

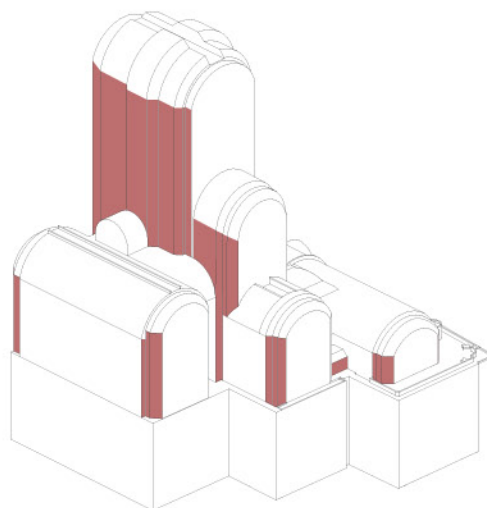


### MASSING AND FORM

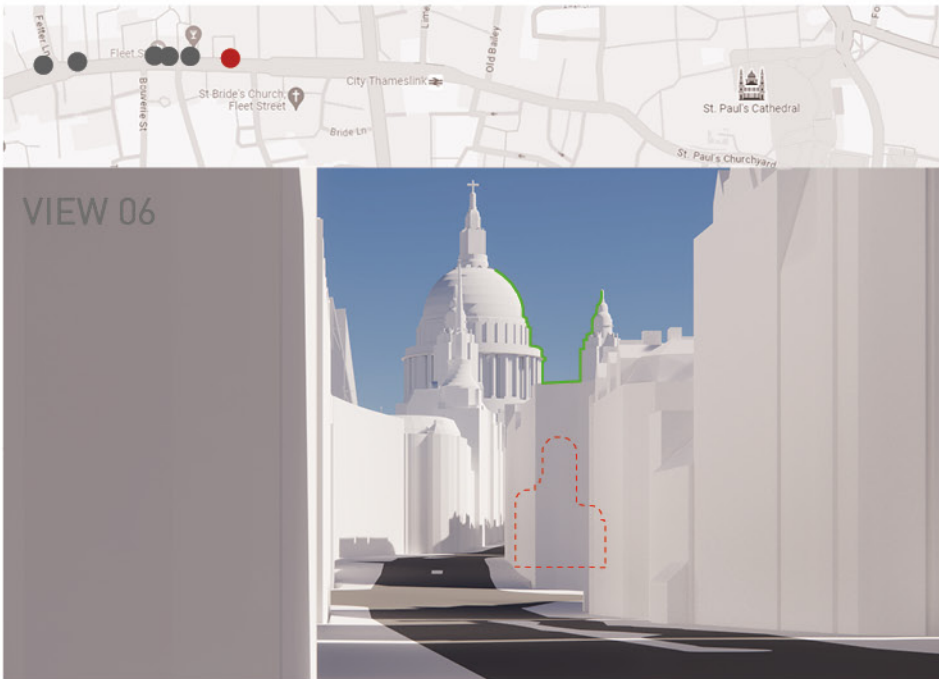
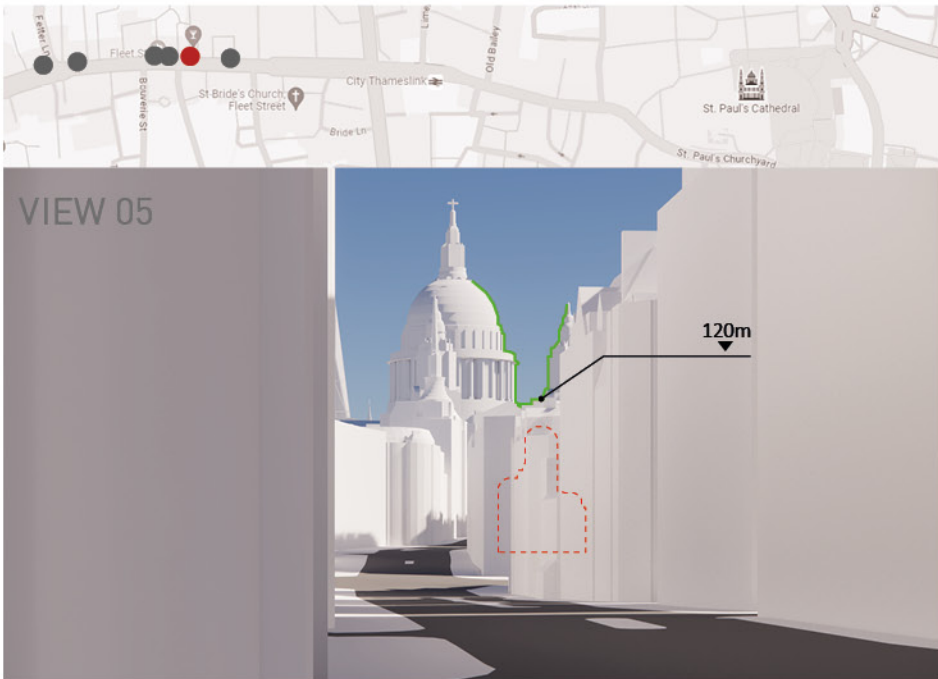
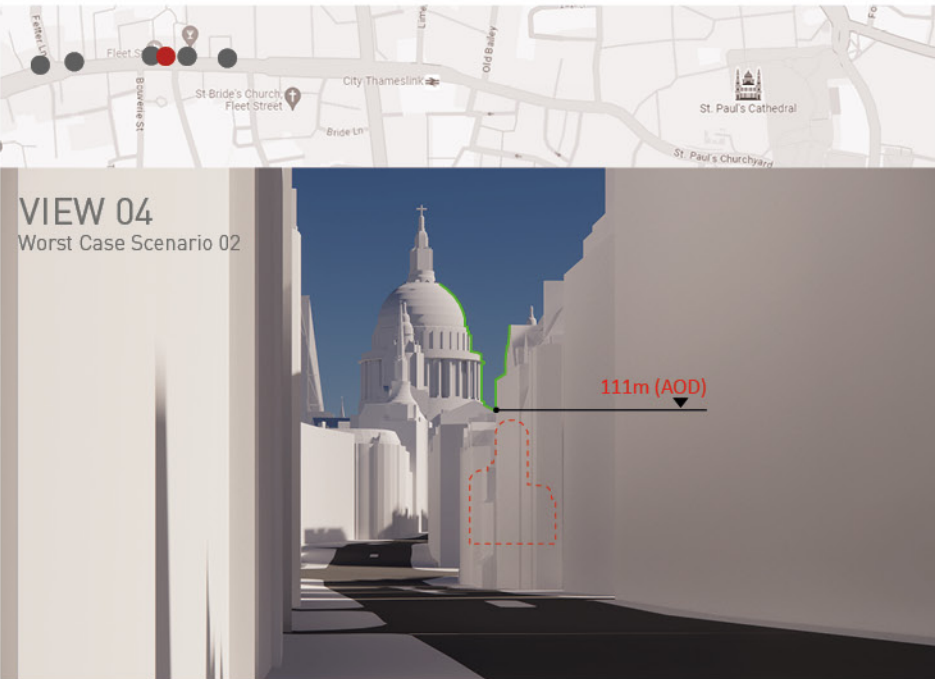
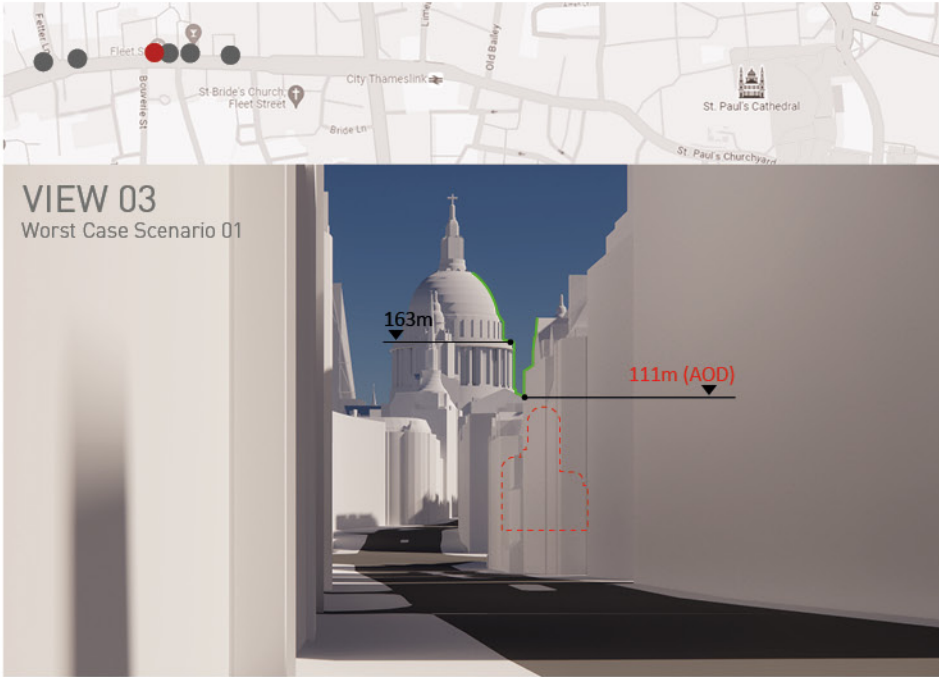
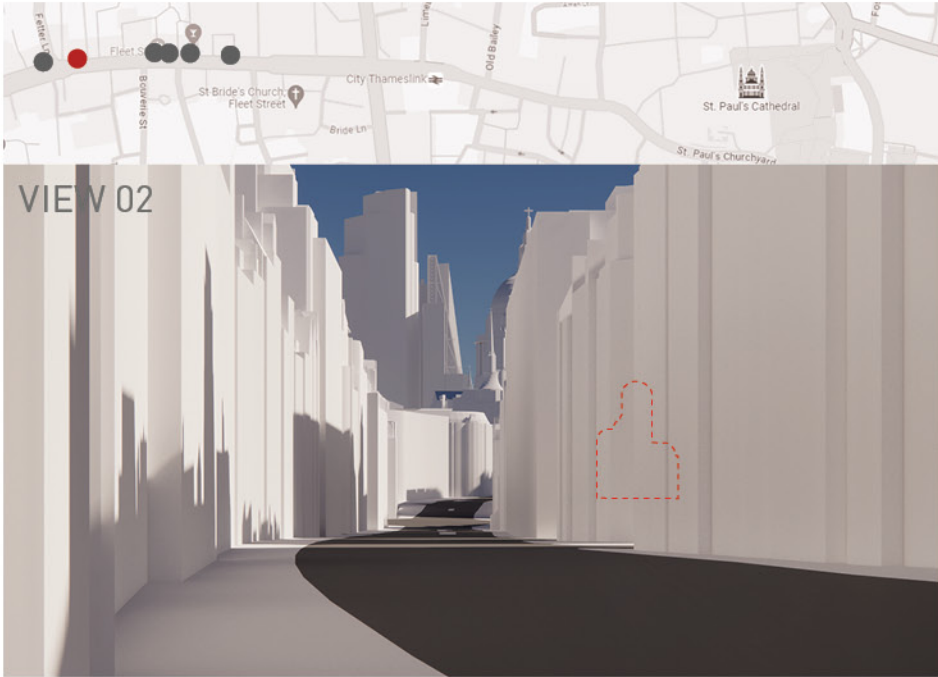
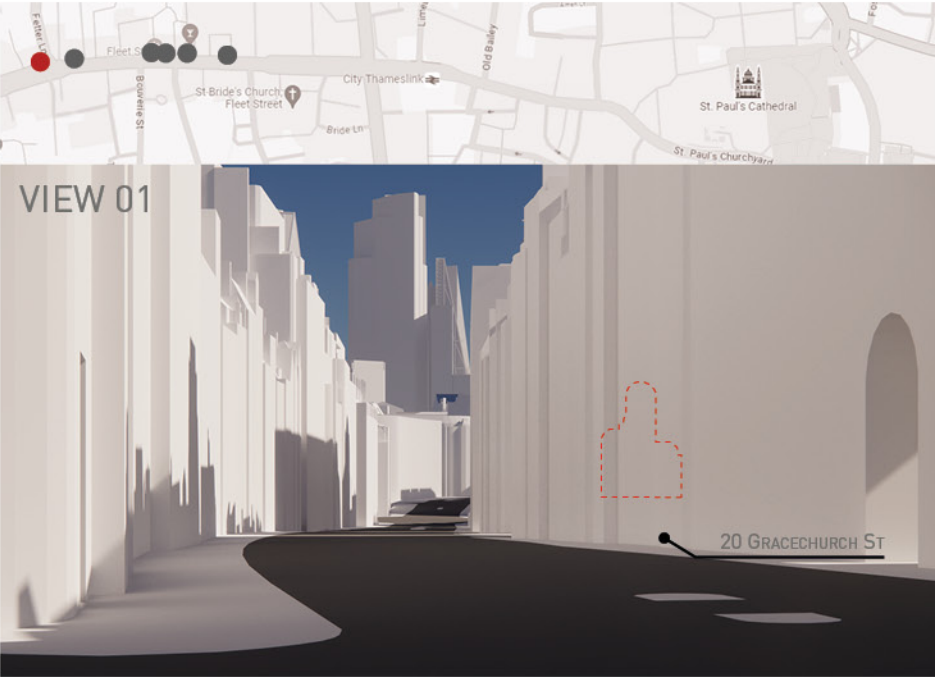
roof vaults of the towers add further complexity and inefficiency to the building's envelope and internal layouts.



constant shifts and varying planes in the facade increase the wall to floor ration further reducing efficiency and thermal performance

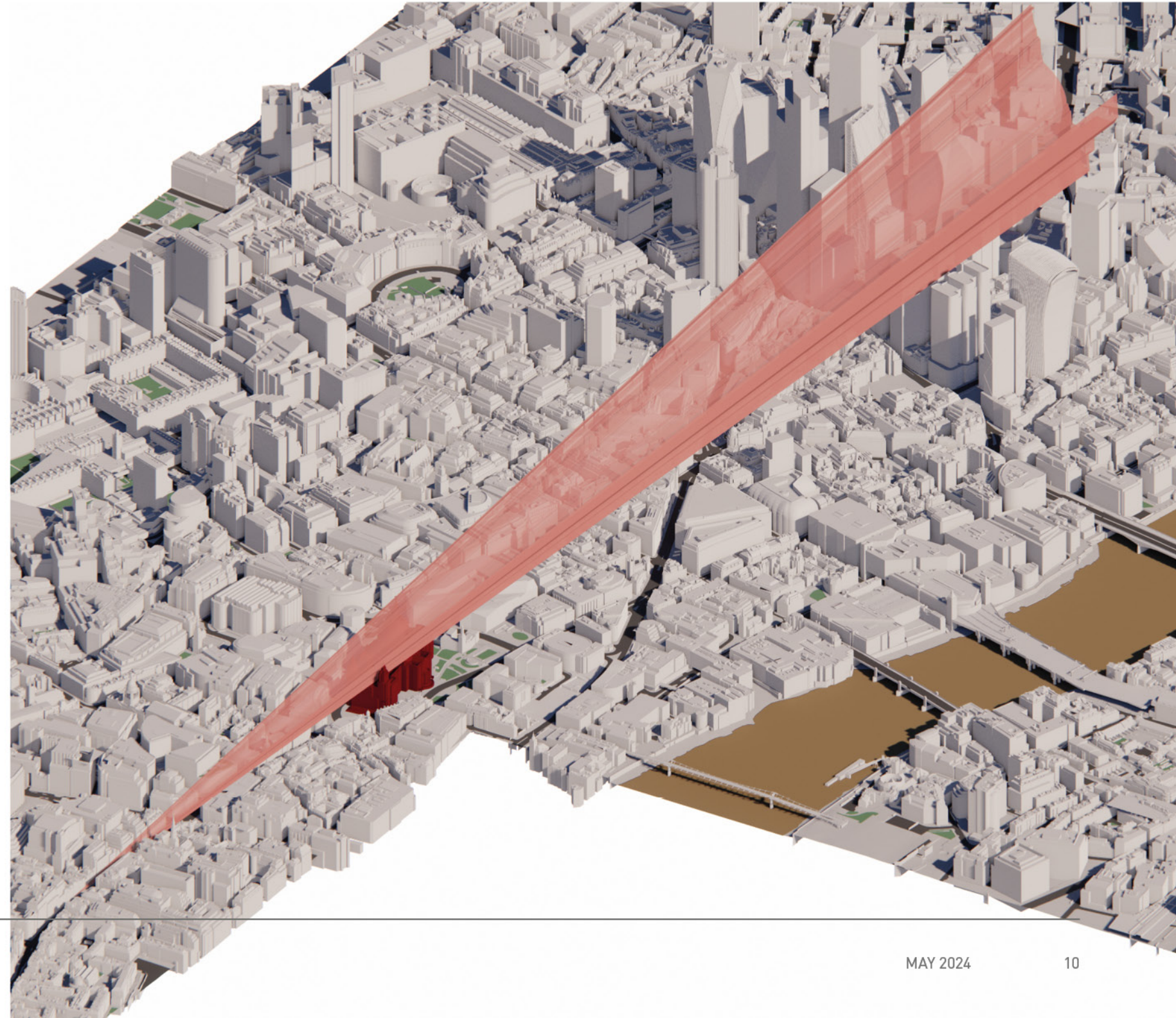
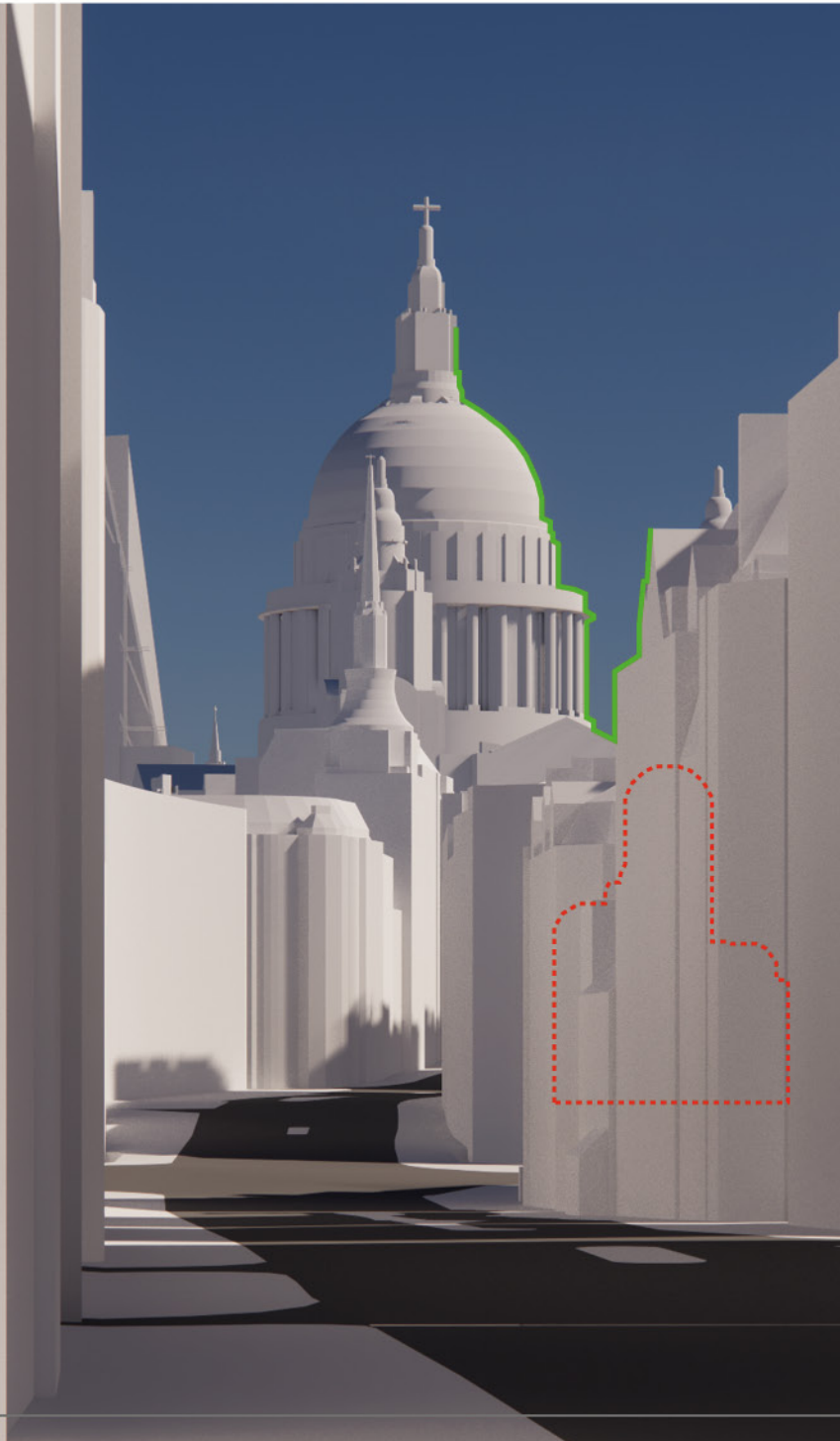


KEY VIEWS CONSIDERATIONS  
Fleet St Kinetic Views



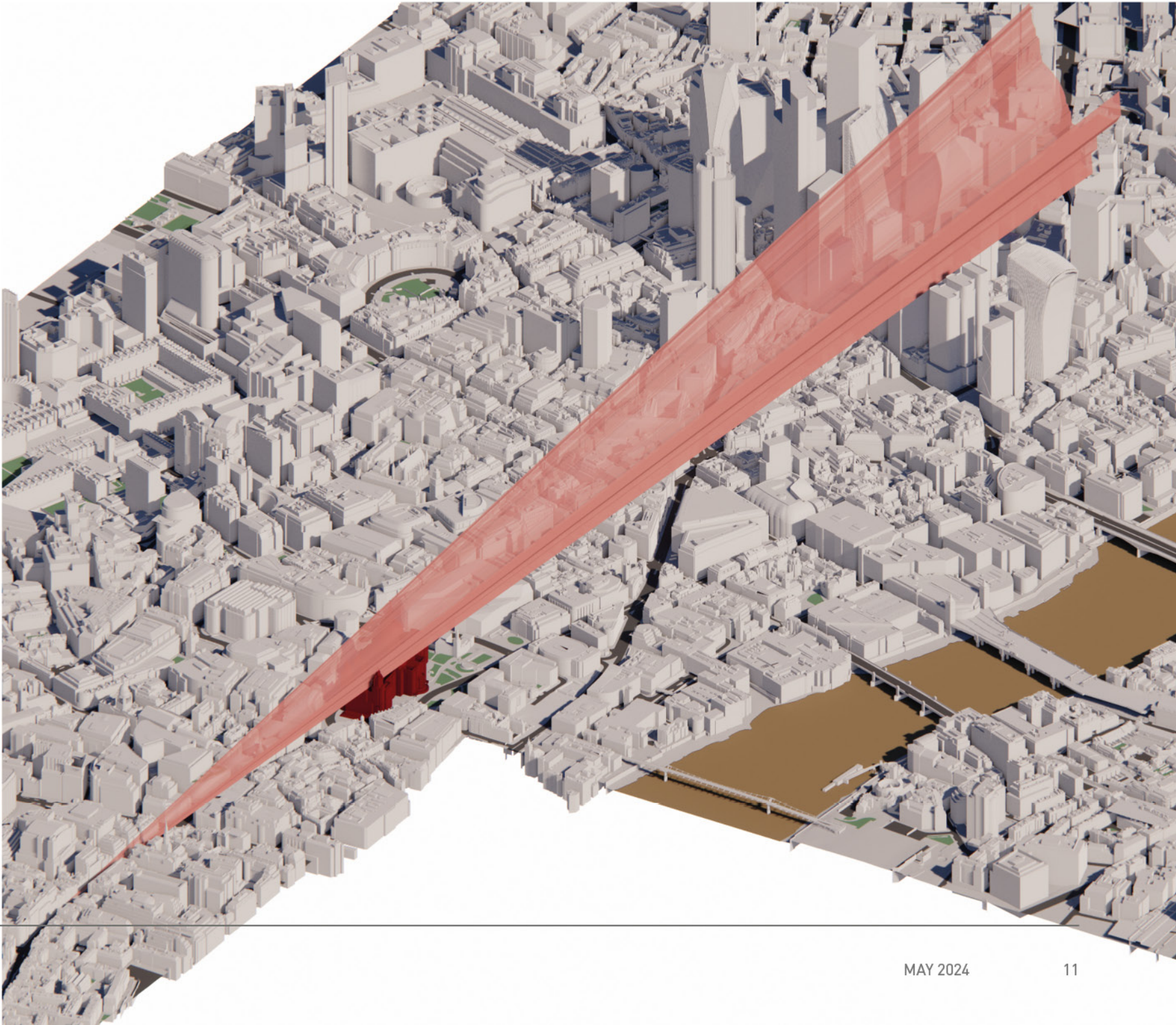
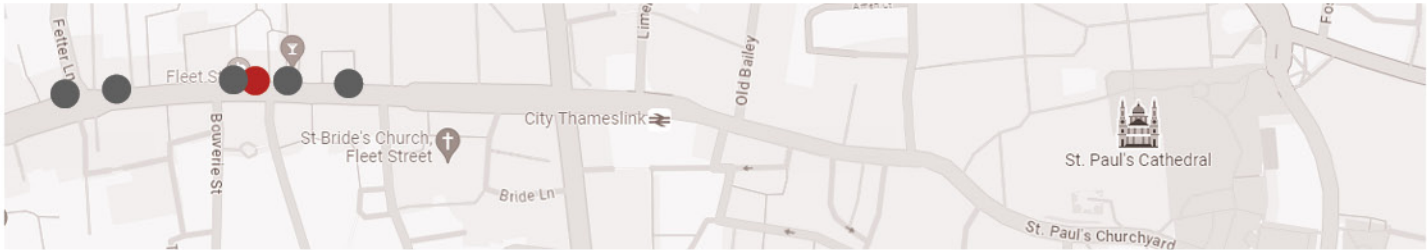


## VIEW 03 - FROM YE OLDE CHESHIRE CHEESE Worst Case Scenario 01



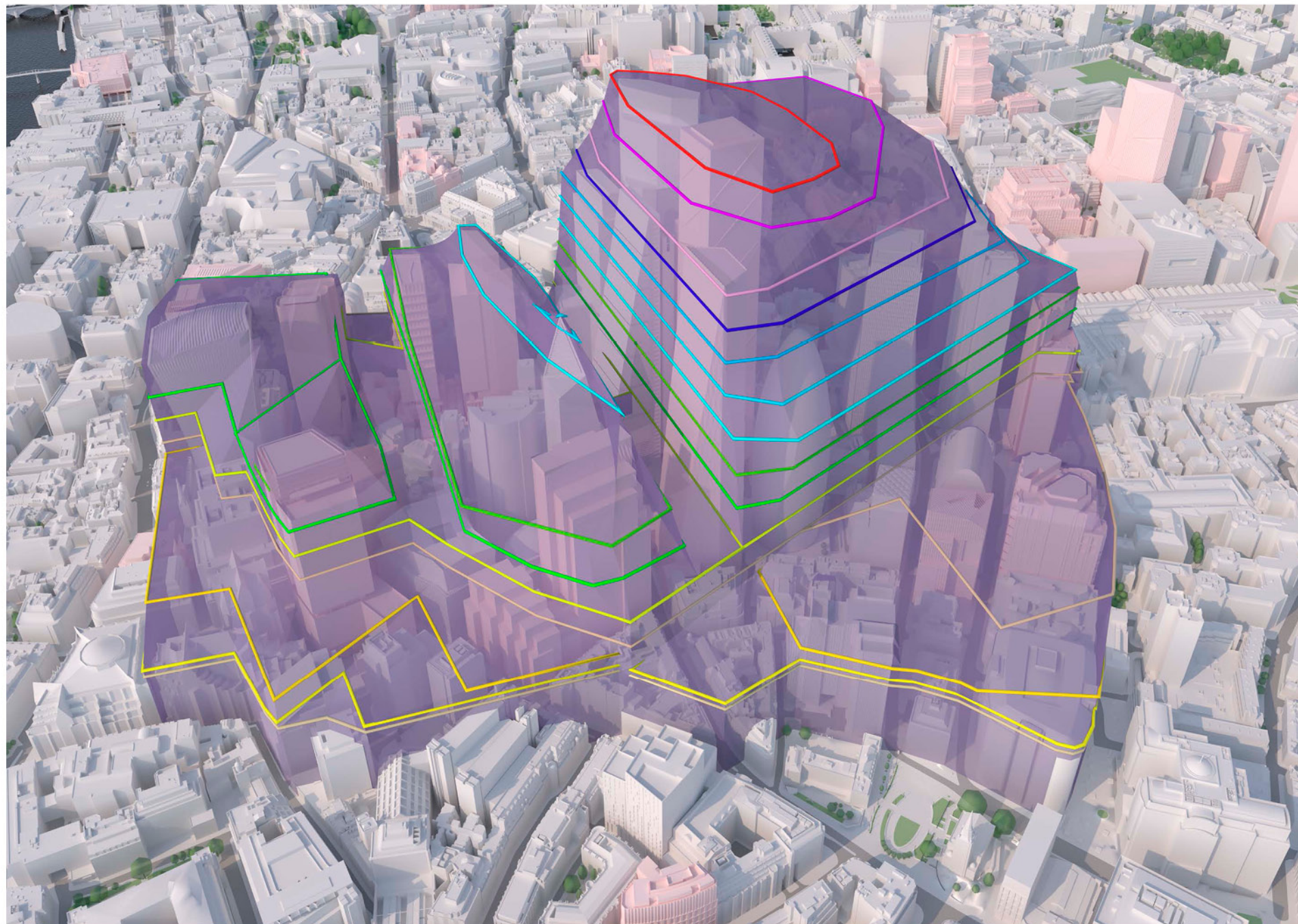


VIEW 04  
Worst Case Scenario 02





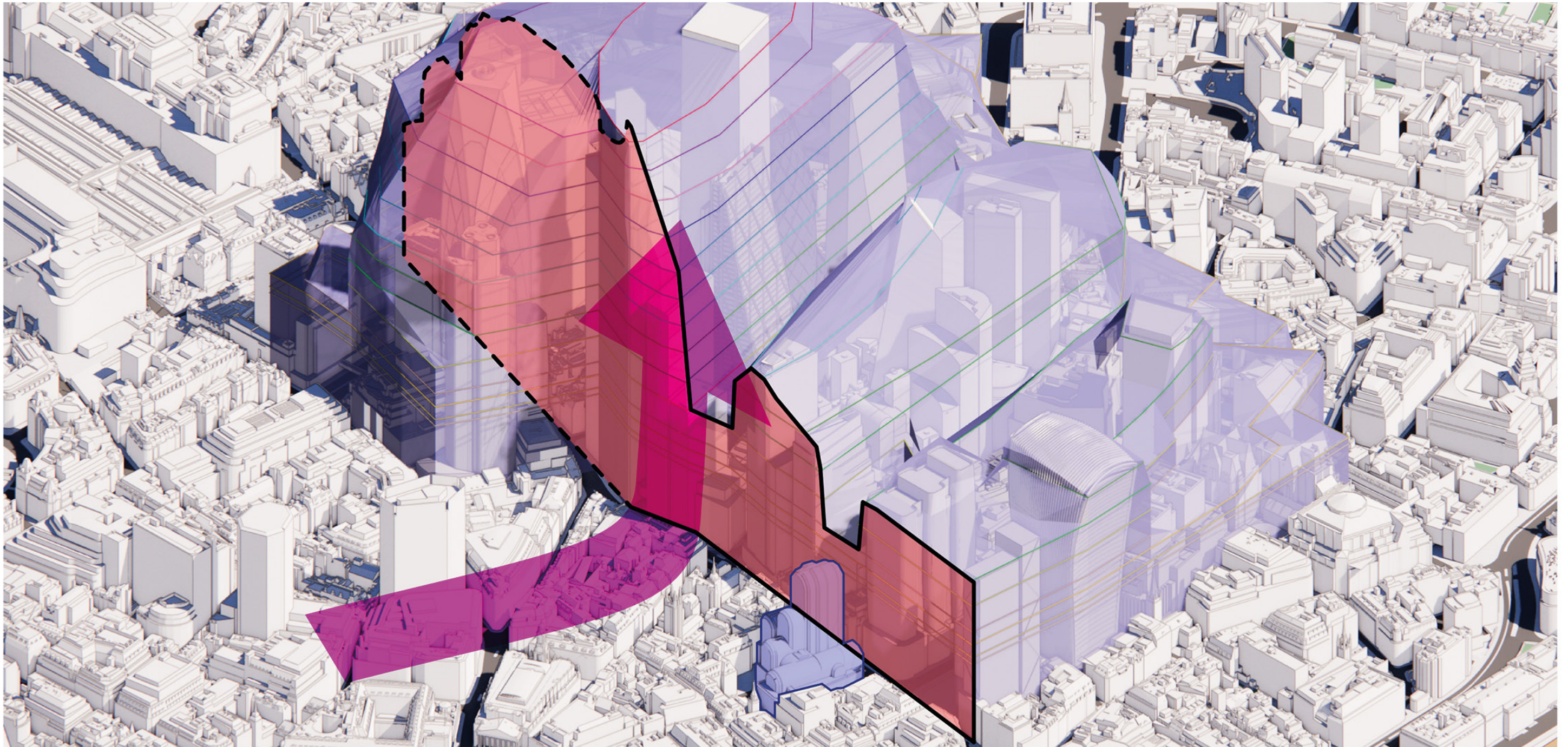
## CITY PLAN 2040 TALL BUILDINGS POLICY / VOLUMETRIC TESTING





## CITY PLAN 2040 TALL BUILDINGS POLICY / VOLUMETRIC TESTING

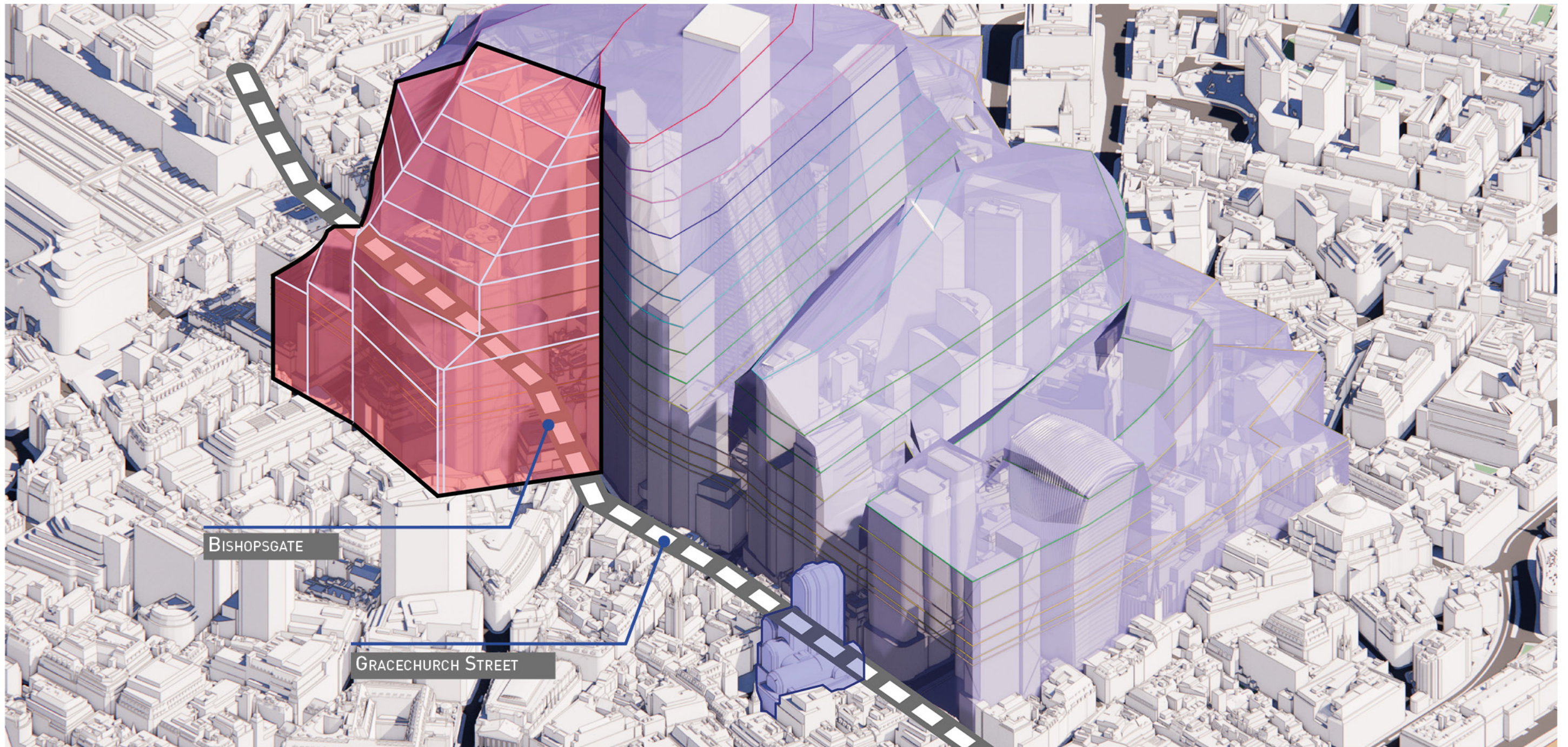
Analysis and considerations - "Wall Effect" to the west of Bishopsgate / Gracechurch St





## CITY PLAN 2040 TALL BUILDINGS POLICY / VOLUMETRIC TESTING

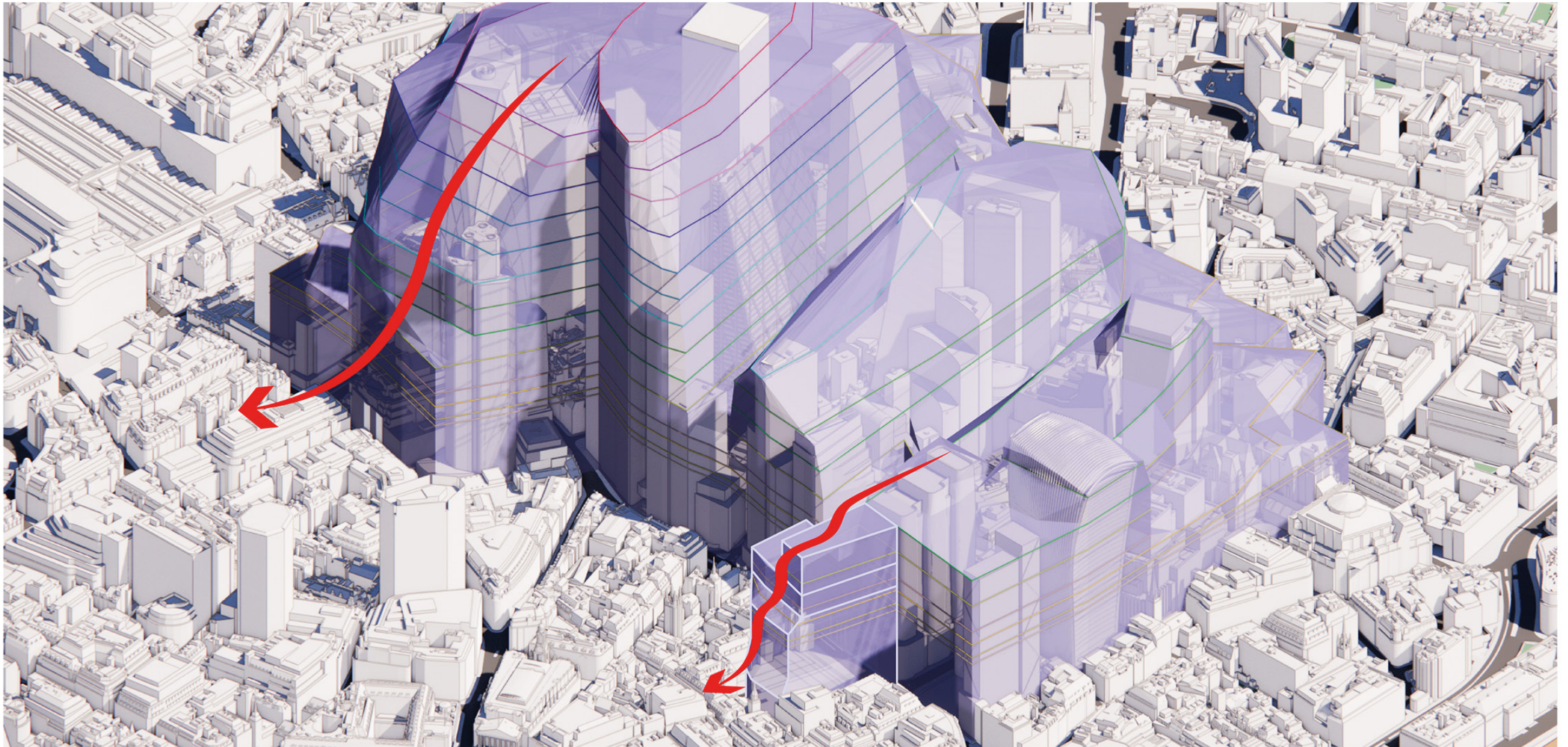
Analysis and considerations - Tall building volume extending to the west of Bishopsgate





## CITY PLAN 2040 TALL BUILDINGS POLICY / VOLUMETRIC TESTING

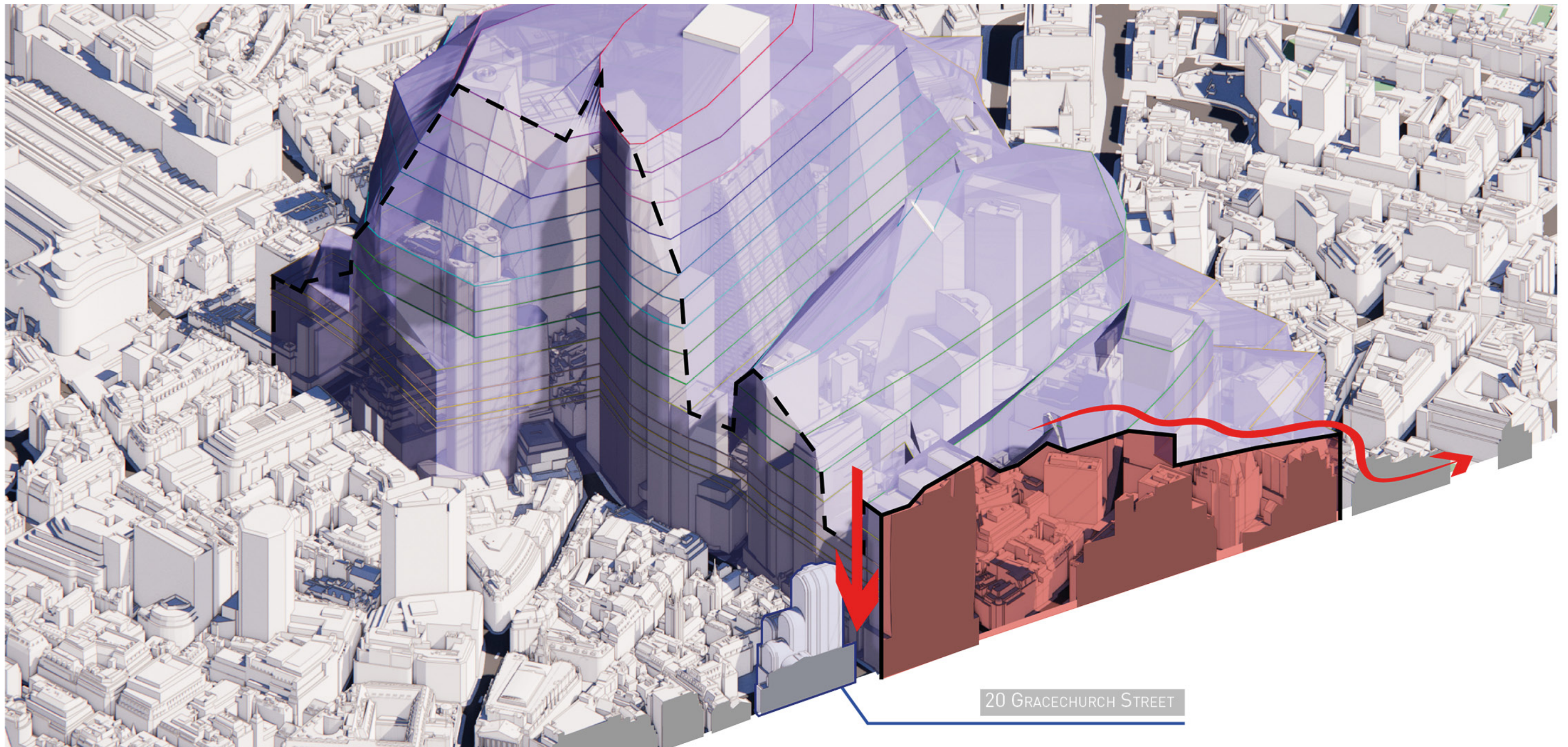
Analysis and considerations - Similar approach applied to 20 Gracechurch site





## CITY PLAN 2040 TALL BUILDINGS POLICY / VOLUMETRIC TESTING

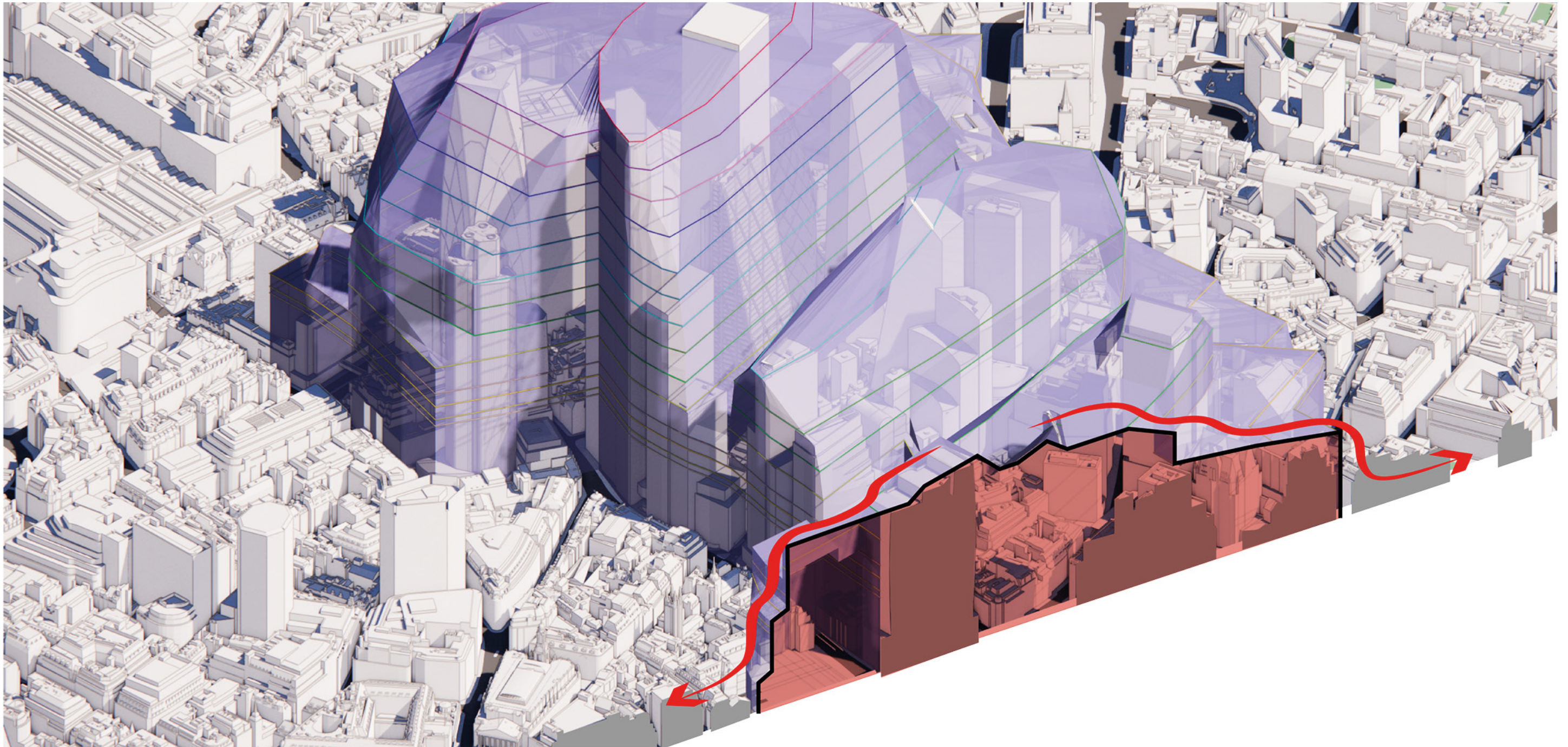
Analysis and considerations - Abrupt vertical cut on the west vs a softer height transition on the east towards the lower context





## CITY PLAN 2040 TALL BUILDINGS POLICY / VOLUMETRIC TESTING

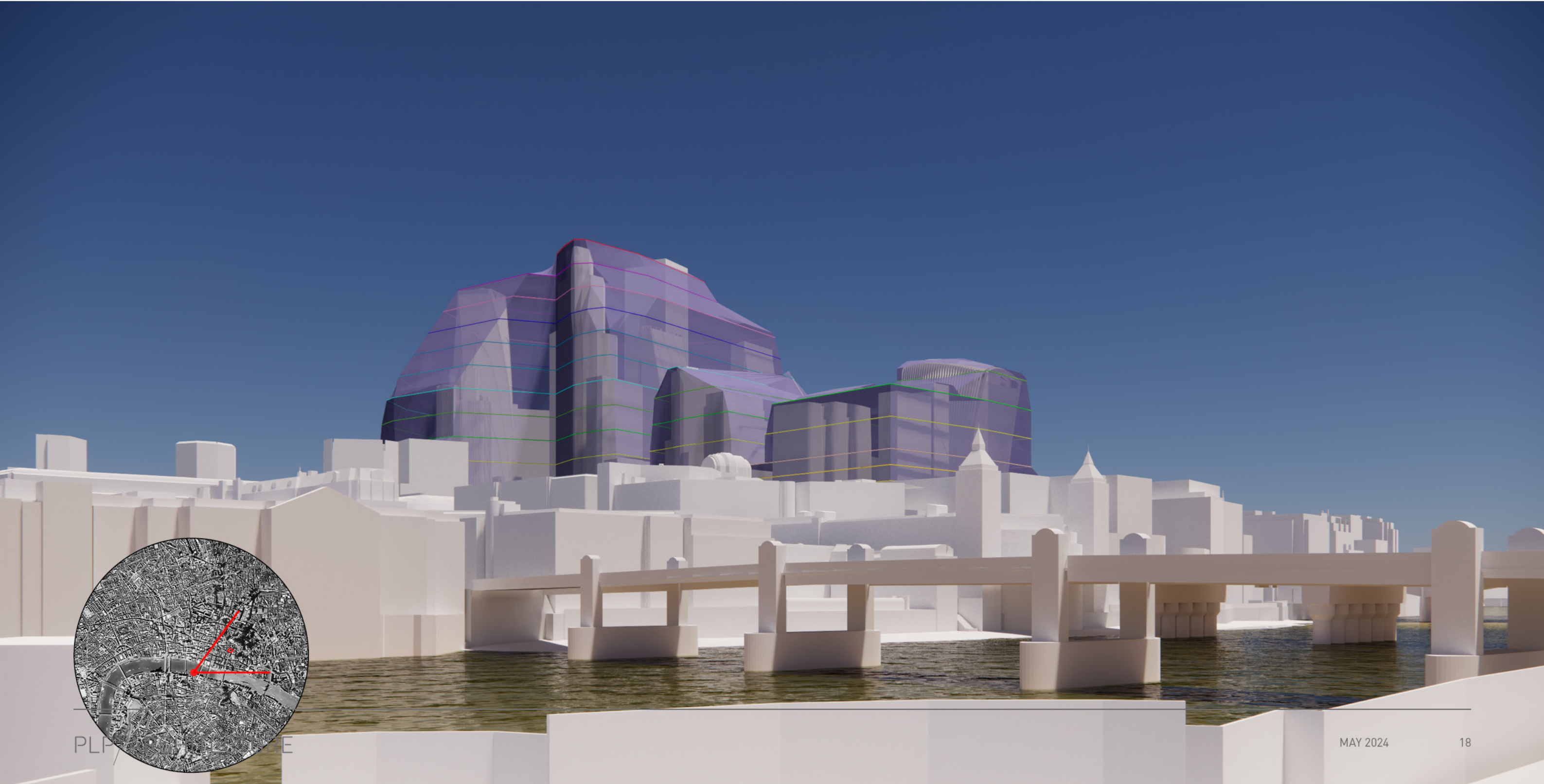
Analysis and considerations - Propose a softer transition towards the lower building context within Bank Conservation Area





# CITY PLAN 2040 TALL BUILDINGS POLICY / VOLUMETRIC TESTING

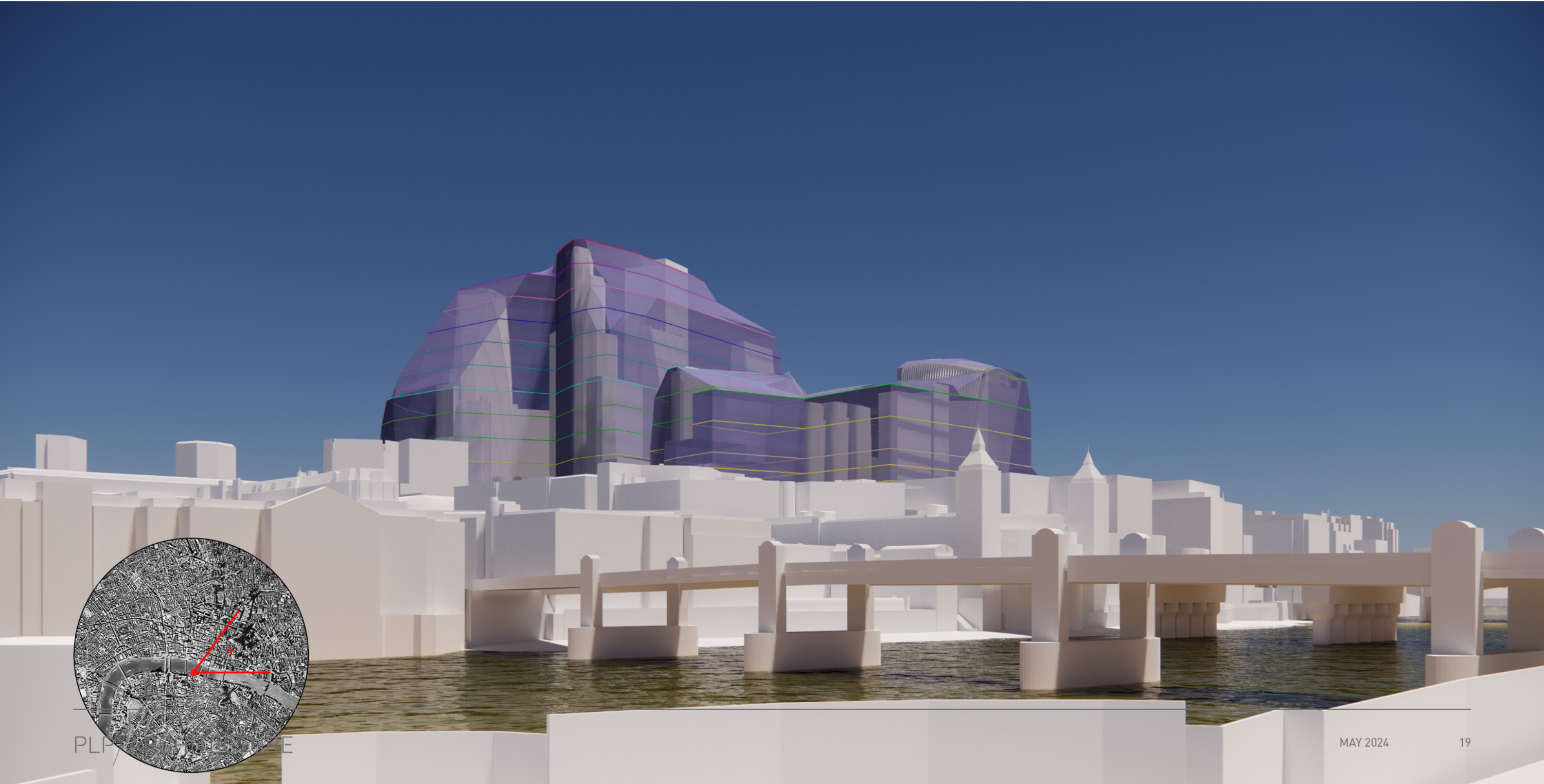
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View from Bankside Pier





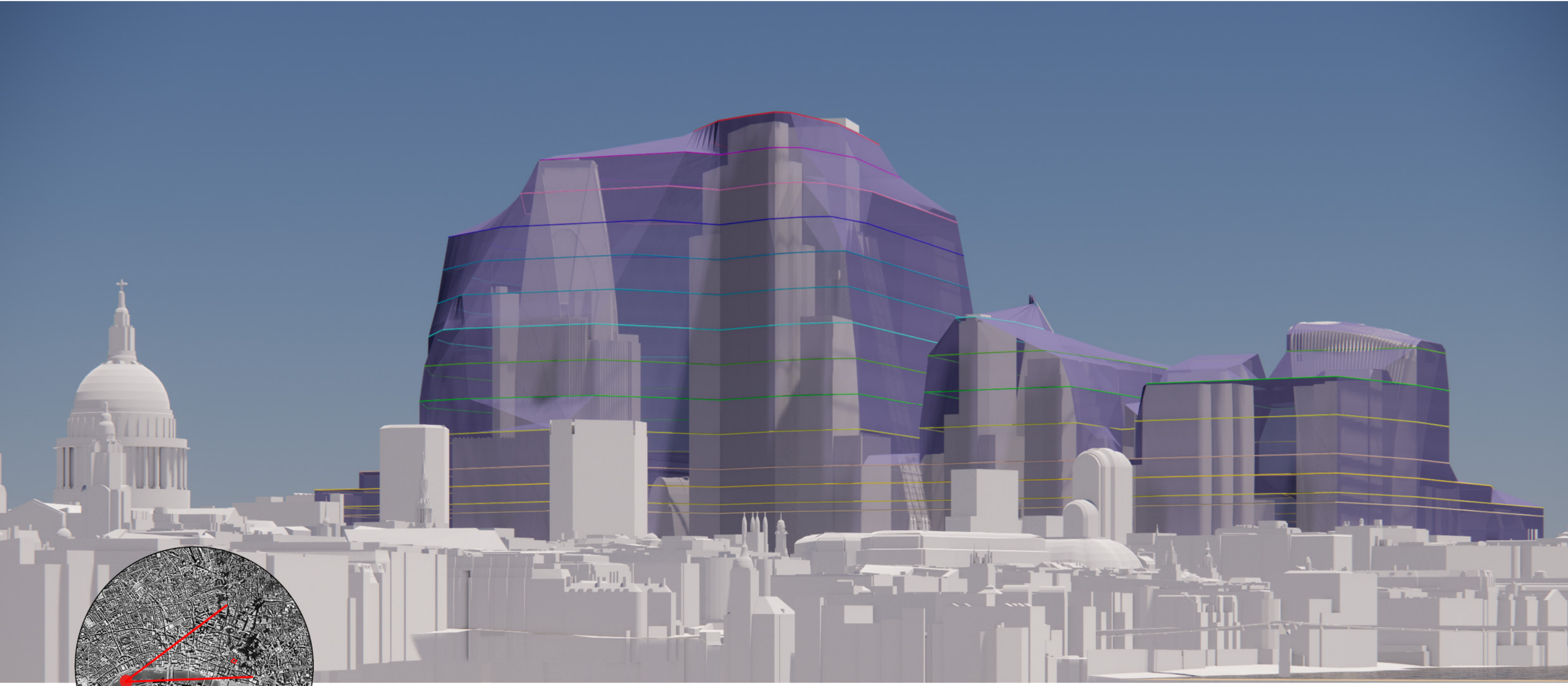
# CITY PLAN 2040 TALL BUILDINGS POLICY / VOLUMETRIC TESTING

Potential Outcome  
View from Bankside Pier



# CITY PLAN 2040 TALL BUILDINGS POLICY / VOLUMETRIC TESTING

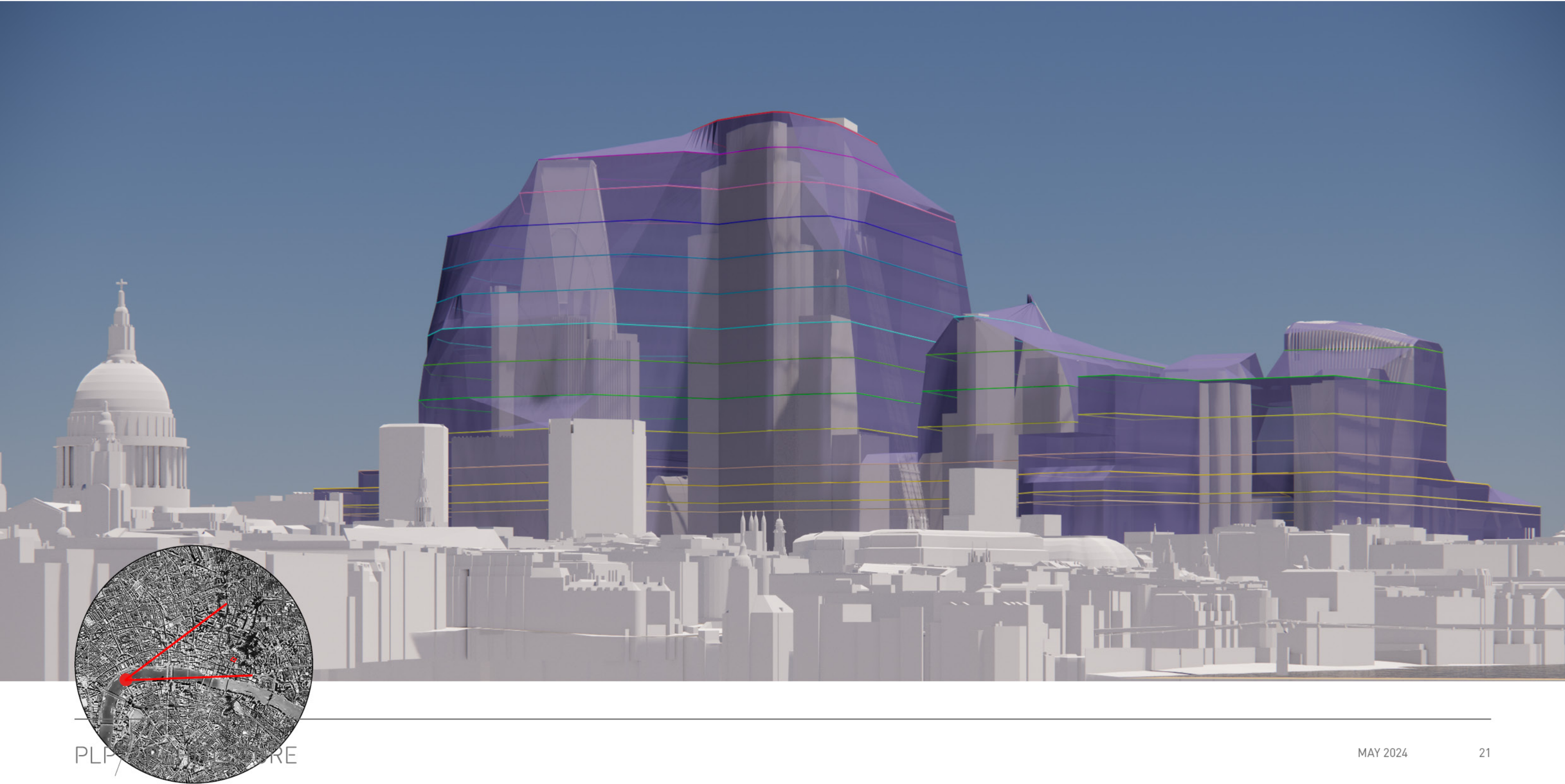
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View from Waterloo Bridge





# CITY PLAN 2040 TALL BUILDINGS POLICY / VOLUMETRIC TESTING

Potential Outcome  
View from Waterloo Bridge



# CITY PLAN 2040 TALL BUILDINGS POLICY / VOLUMETRIC TESTING

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View C12 from Southwark Bridge





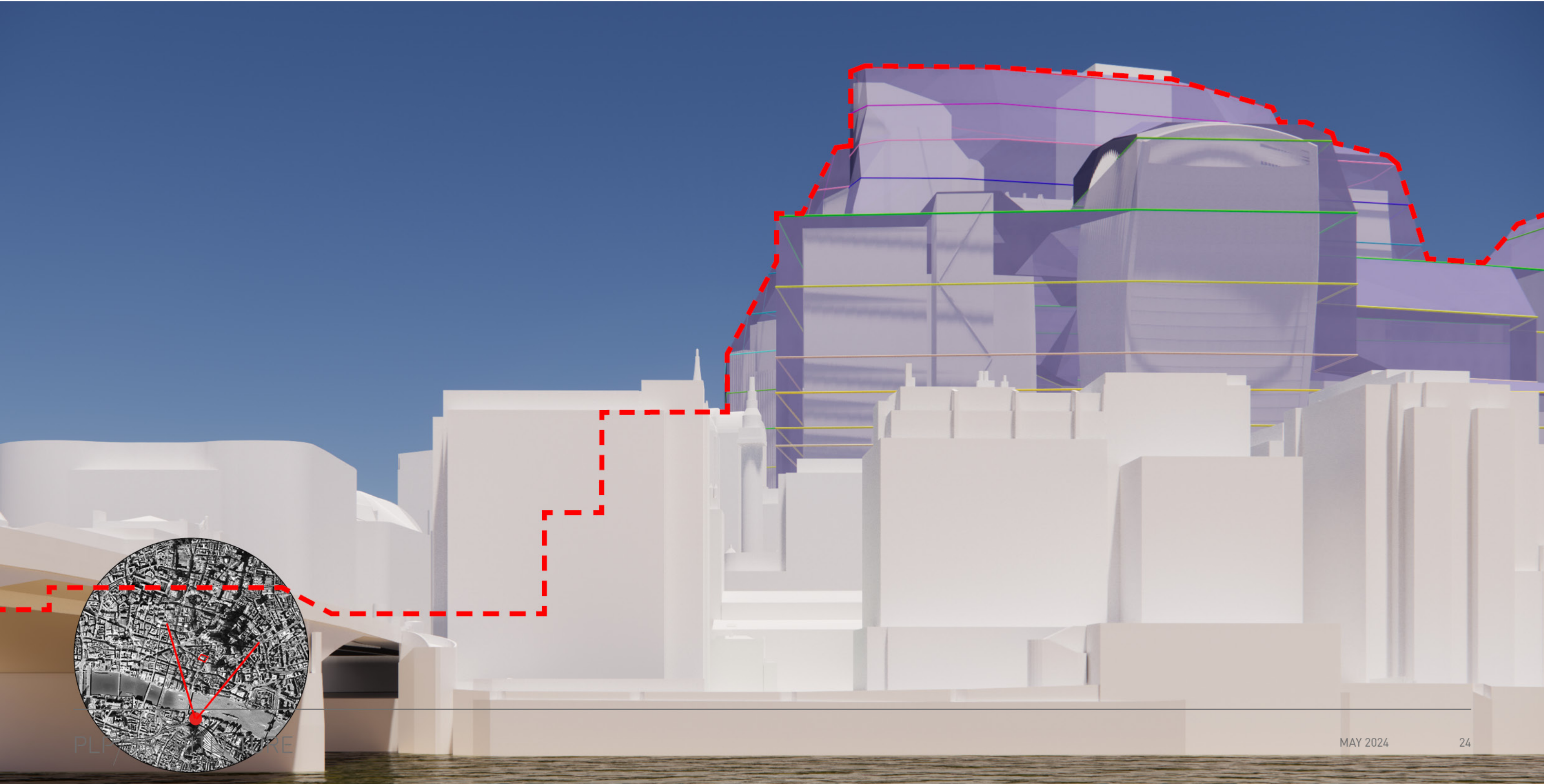
# CITY PLAN 2040 TALL BUILDINGS POLICY / VOLUMETRIC TESTING

Potential Outcome  
View C12 from Southwark Bridge



# CITY PLAN 2040 TALL BUILDINGS POLICY / VOLUMETRIC TESTING

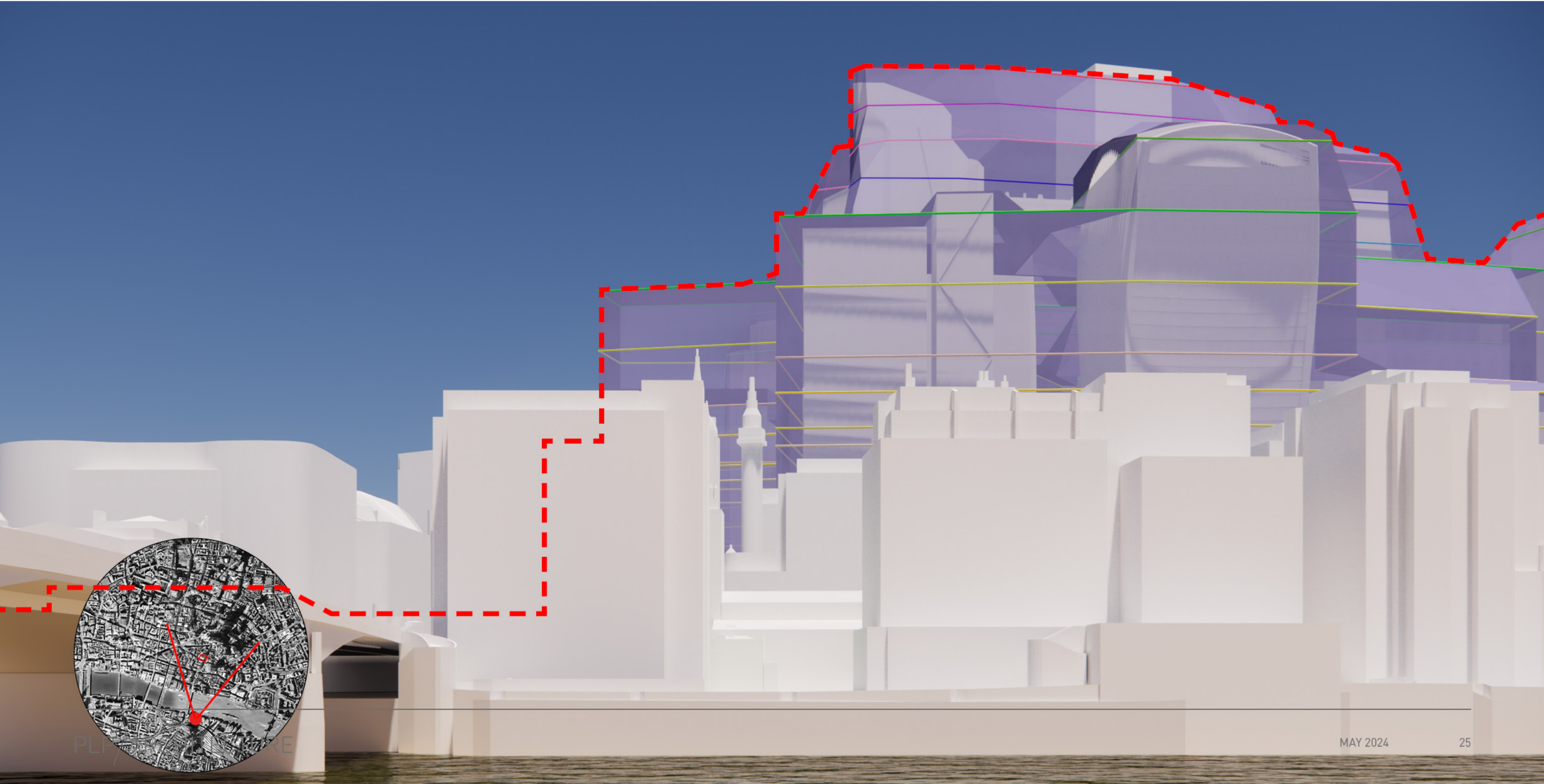
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View C28 from The Queen's Walk





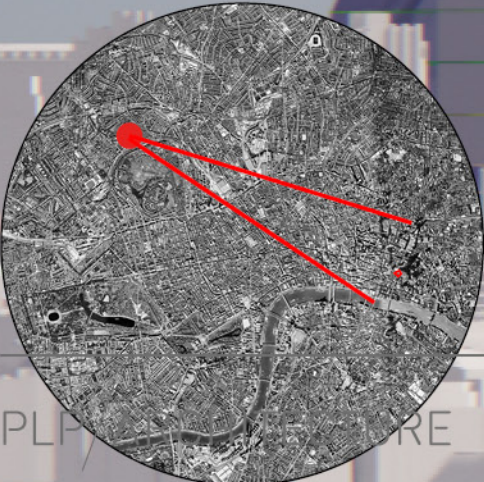
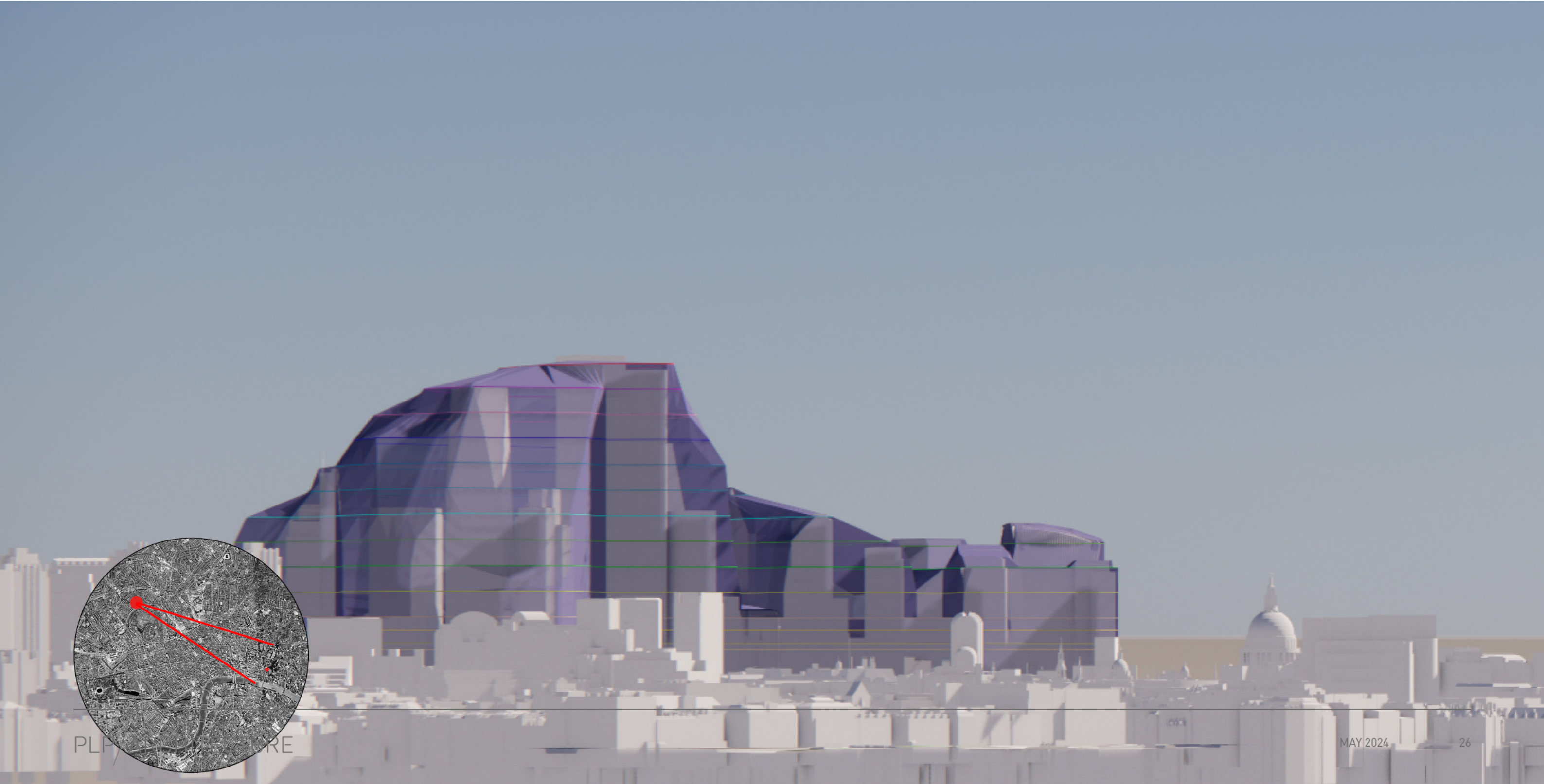
# CITY PLAN 2040 TALL BUILDINGS POLICY / VOLUMETRIC TESTING

Potential Outcome  
View C28 from The Queen's Walk



# CITY PLAN 2040 TALL BUILDINGS POLICY / VOLUMETRIC TESTING

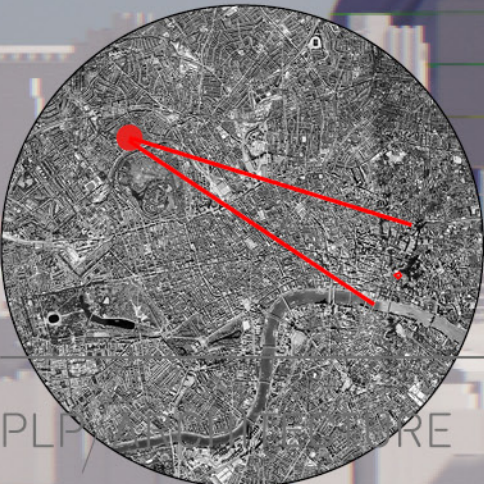
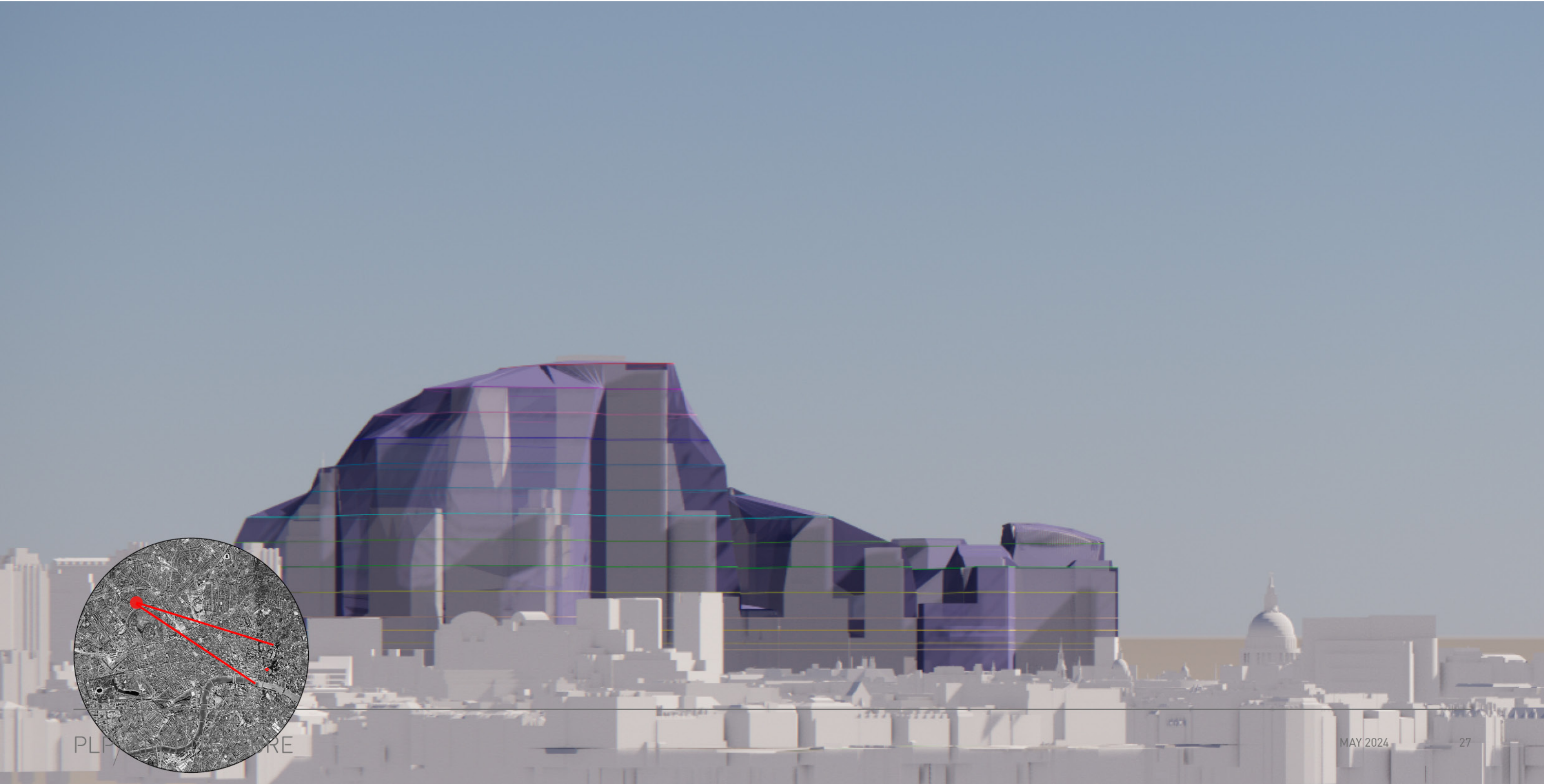
COL Envelope  
View 4A.2 from Primrose Hill





# CITY PLAN 2040 TALL BUILDINGS POLICY / VOLUMETRIC TESTING

Potential Outcome  
View 4A.2 from Primrose Hill



## CITY PLAN 2040 TALL BUILDINGS POLICY / VOLUMETRIC TESTING

COL Envelope

View from Fleet Street / Ye Olde Cheshire Cheese

Worst Case Scenario 01



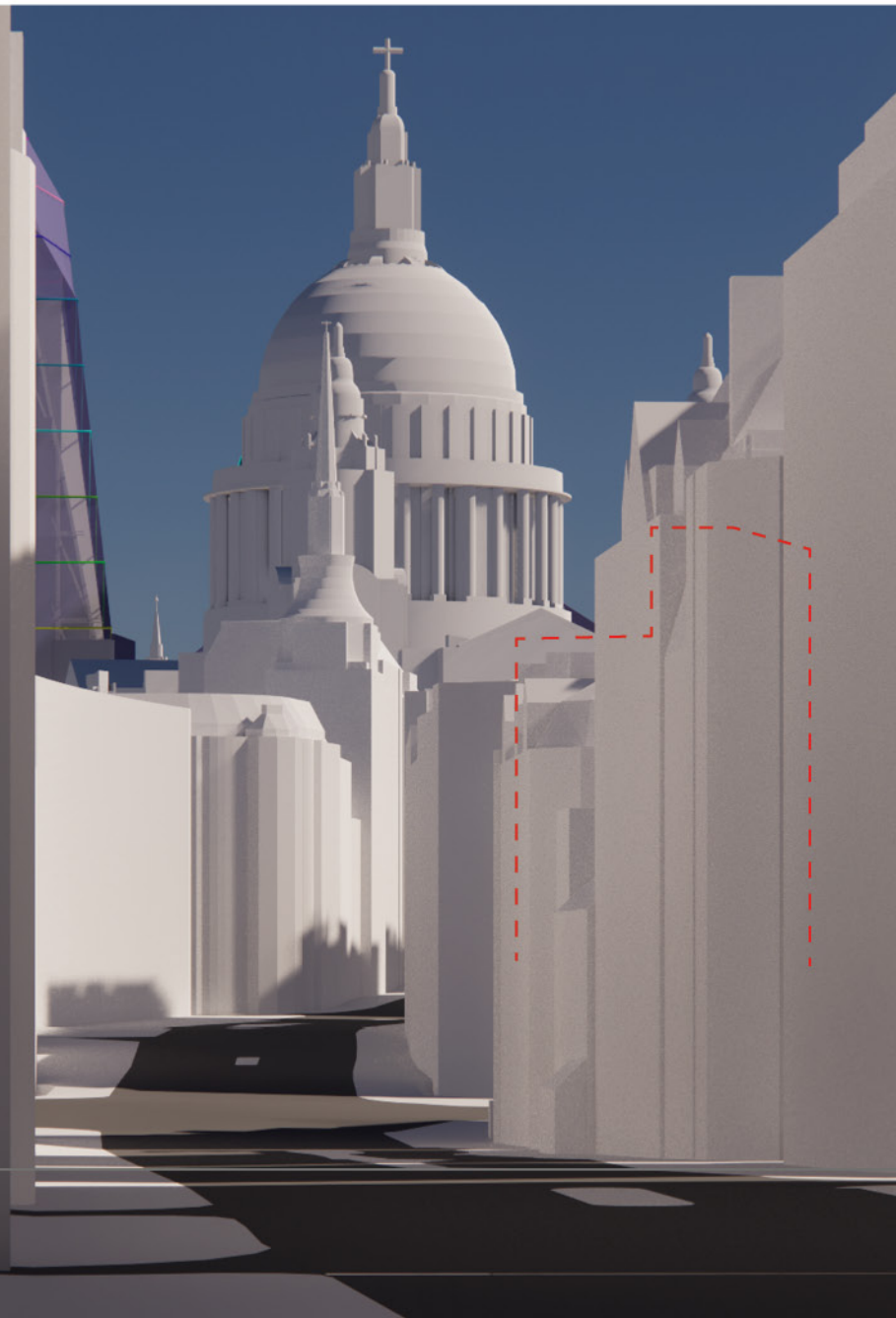


## CITY PLAN 2040 TALL BUILDINGS POLICY / VOLUMETRIC TESTING

Potential Outcome

View from Fleet Street / Ye Olde Cheshire Cheese

Worst Case Scenario 01



## CITY PLAN 2040 TALL BUILDINGS POLICY / VOLUMETRIC TESTING

COL Envelope

View from Fleet Street / Ye Olde Cheshire Cheese

Worst Case Scenario 02



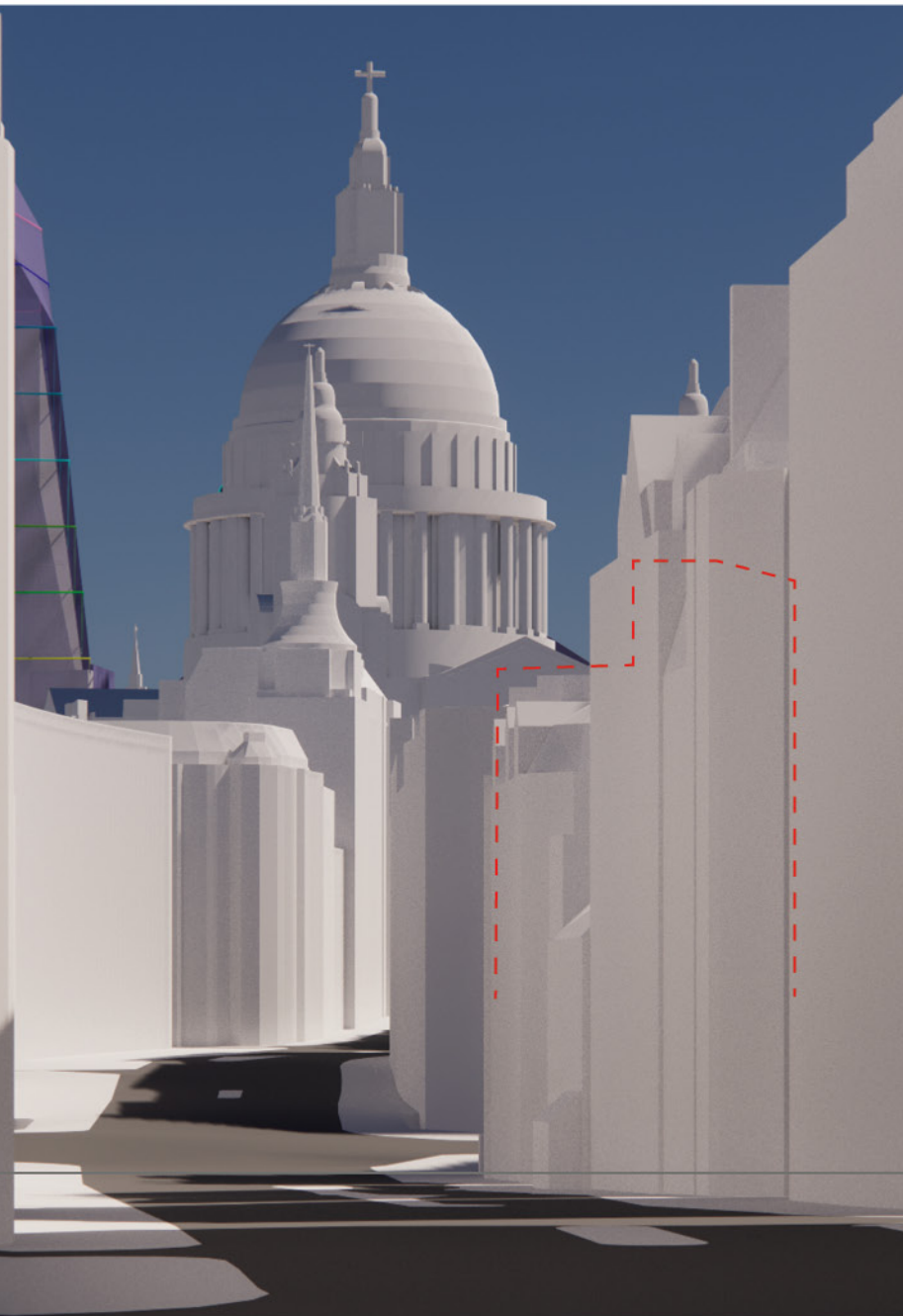


## CITY PLAN 2040 TALL BUILDINGS POLICY / VOLUMETRIC TESTING

Potential Outcome

View from Fleet Street / Ye Olde Cheshire Cheese

Worst Case Scenario 02





## CITY PLAN 2040 TALL BUILDINGS POLICY / VOLUMETRIC TESTING

COL Envelope

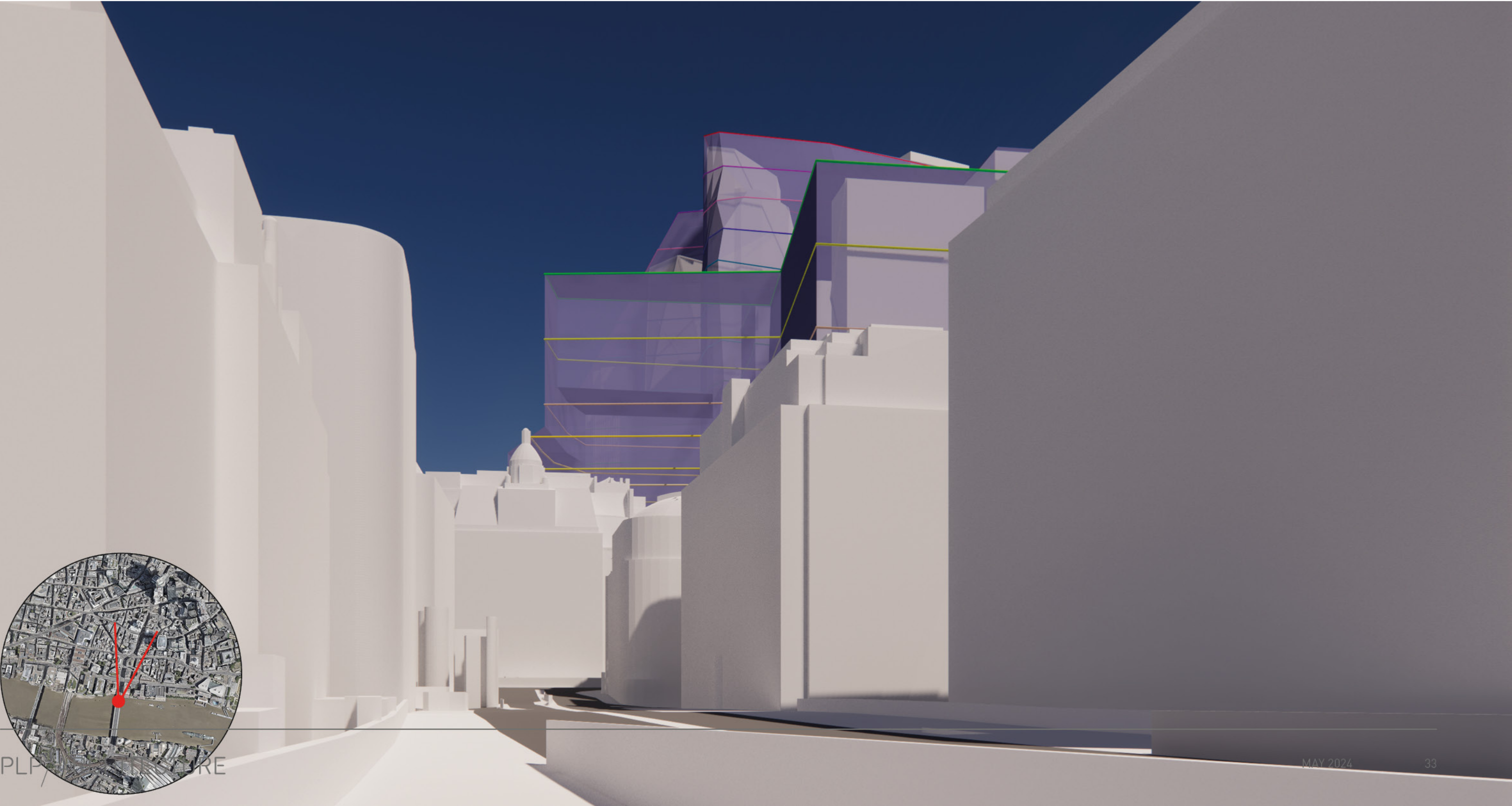
View from London Bridge





# CITY PLAN 2040 TALL BUILDINGS POLICY / VOLUMETRIC TESTING

Potential Outcome  
View from London Bridge





# CITY PLAN 2040 TALL BUILDINGS POLICY / VOLUMETRIC TESTING

COL Envelope  
View from Bank Junction





# CITY PLAN 2040 TALL BUILDINGS POLICY / VOLUMETRIC TESTING

Potential Outcome  
View from Bank Junction





