

Morgan, Jackson

From: Maddison Driver [REDACTED]
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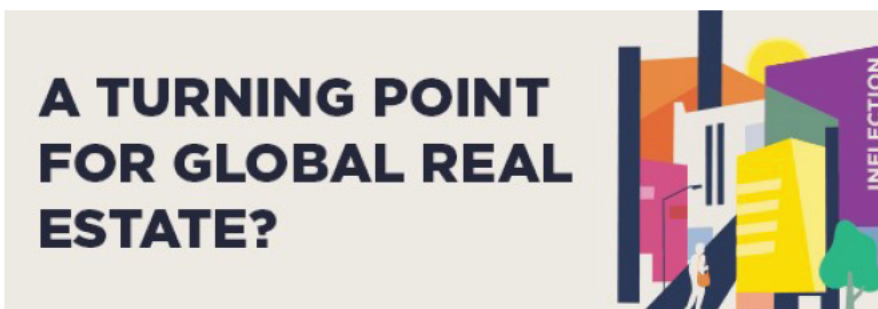
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Please find attached the written representation for the City Plan 2040 Regulation 19 consultation, made on behalf of Aviva Investors, for your consideration.
The associated appendices are contained within the Box link, here:
<https://savillsglobal.box.com/s/lk4bylt2lle4uiergva0pcfhezck7qe>
Please could you confirm receipt of both documents?
Kind regards,
Maddi
Maddi Driver BA MSc (She/Her)
Planning



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May 2024

Environment Department
City of London
PO Box 270
Guildhall
London EC2P 2EJ

Submitted via email

Dear Sir/Madam,

CITY OF LONDON CORPORATION – NEW LOCAL PLAN REGULATION 19 CONSULTATION – COMPREHENSIVE REPRESENTATION SUBMITTED BY AVIVA INVESTORS

Introduction

This representation is a collaborative work prepared by Savills (UK) Limited (hereafter 'Savills') and DP9 Limited (hereafter 'DP9') on behalf of Aviva Investors (hereafter 'Aviva'), in response to the City of London Corporation's invitation to submit written comments in respect of the consultation on the draft new Local Plan ('DNLP'), known as the **City Plan 2040**.

This document represents a comprehensive response to the DNLP on behalf of Aviva, concerning its property portfolio within the City of London.

The main body of this representation provides substantive comments on the suite of policies proposed in the DNLP. The related appendices contain site-specific responses relating to each of Aviva's sites. All components of this representation must be read as one comprehensive submission.

Aviva Investors in the City of London

Aviva has a longstanding reputation within the City of London, with an extensive portfolio of high-profile developments. They operate 5 sites within the Square Mile:

- 101 Moorgate
- 1 Liverpool Street
- New Broad Street House
- 130 Fenchurch Street
- 20 Gracechurch Street

Savills is appointed to act for Aviva on **101 Moorgate** and **New Broad Street House**. Gerald Eve is appointed to act for **20 Gracechurch Street**. DP9 is appointed to act for **130 Fenchurch Street (Fountain House)** and **1 Liverpool Street**.

20 Gracechurch Street will be the subject of an independent representation.

Aviva is a major developer and investor across London and is recognised for its outstanding commitment to research and action in the areas of climate change mitigation, green infrastructure, and long-term sustainability.

Aviva creates lifetime developments that are designed to reflect the ever-changing aims of the city. Aviva is committed to good growth and invests heavily in the long-term futures of their buildings with a strong emphasis on sustainability credentials.

This representation is submitted to the City of London Corporation in a bid to work collaboratively with the Corporation to optimise the chances of success for these sites to contribute to local growth targets and objectives.

101 Moorgate

101 Moorgate is a fully-electric 10-storey development located over Moorgate Station. It consists of 70,095 sqft of grade A best-in-class office floorspace above 2,605 sqft of ground floor retail. The building has a sustainable and wellness-focused design, with high-quality urban greening incorporated throughout, via 4,208 sqft of large external terraces at levels 5, 8 and 9. The development is targeting BREEAM Outstanding, Well Platinum, Nabers 5 Star, EPC A and Net Zero in operation. Practical completion is expected in October 2024.

One Liverpool Street

One Liverpool Street is a fully electric 10-storey development located at the junction of Liverpool Street and Blomfield Street. The mixed-use development will provide 176,000 sqft of premium office and retail space, spread across the ground and upper ten floors. The building is targeting BREEAM 'Outstanding' and is aligned with Carbon Risk Real Estate Monitor's (CRREM) decarbonisation pathway requirements. Practical competition is expected in January 2026.

New Broad Street House

New Broad Street House is a 7-storey mixed-use development, with serviced offices spread over floors 1-6, and retail on the ground floor. The Site represents a prime opportunity for potential uplift, in light of the surrounding development context, and is currently undergoing feasibility optioneering to explore opportunities for its redevelopment and expansion.

130 Fenchurch Street

130 Fenchurch Street is an existing 14-storey building which is located within the City Cluster and has been identified in principle as appropriate for tall buildings. The site has commenced pre-application dialogue and would provide an exciting opportunity to contribute meaningfully to the City skyline and further consolidation of the form of the established tall buildings cluster.

Current Planning Policy Context

Given Aviva's ambition for its portfolio to make a significant contribution to the Corporation's vision of the Square Mile up to 2040, where the right policy environment can be found, Aviva would be excited to see the delivery of these sites over the DNLP period.

Our observations on the DNLP are offered in the context of this opportunity and as part of future dialogue with the borough about the transformation of these key Sites.

City Plan 2040

The Regulation 19 DNLP, also known as the City Plan 2040, is a plan for the development of the Square Mile, setting the City Corporation's priorities for development up to 2040, together with policies that will guide future decisions on planning applications.

Substantive comments are set out within this representation.

Legislative framework

The Planning and Compulsory Purchase Act 2004 is the primary legislative act that provides the basis for the plan-led system in England. It is supported by other legislative instruments, including the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), which provide further details on the process for the council to prepare and adopt the Local Plan and other supporting documents.

National Policy Context

For the City of London to adopt a new Local Plan, it must be 'sound' as considered by the Planning Inspectorate. In that vein, Paragraph 35 of the National Planning Policy Framework ('NPPF', December 2023) states that for an emerging Local Plan to be found 'sound', it must satisfy the below four criteria:

1. **Positively prepared** – *providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
2. **Justified** – *an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
3. **Effective** – *deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
4. **Consistent with national policy** – *enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*

Further to the four tests above, Local Plans in London are also required to be in "general conformity" with the London Plan. Any comments and suggestions we make within this representation are cognisant of this legislative framework.

The Square Mile, its Potential, and the City Corporation's Strategic Ambition

The City of London is a key driver of the national and global economy. As set out in the March 2024 City Statistics Briefing, the Square Mile generates over £90bn in economic output annually. Financial and professional services alone produced £294bn in economic output, contributed nearly £100bn in taxes, exported over £150bn and generated nearly £2bn in FDI for the UK economy. Diving these numbers are the 615,000 City workers, who represent 1 in every 52 GB workers and 1 in every 5 financial service jobs in GB. City jobs have grown over 13% since pre-pandemic 2019 to 2022, with nearly 73,000 more jobs than in 2019.

The introduction of Crossrail marks only the beginning of a new era for the City as a national gateway. Liverpool Street has now been named the country's busiest railway station¹, rising from fourth place in 2022 after an additional 50 million passengers made use of the station in the 12 months to April 2023. This translates to 80.4 million entries and exits, allowing Liverpool Street to officially overtake London Waterloo, which had been the busiest station in 17 of the previous 18 years on record. As summarised by the Office of Rail and Road (ORR), the *"full opening of the Elizabeth line has changed the way people travel"*. The City is already home to one of the youngest, most highly skilled, and international workforces across the country, and the introduction of the Elizabeth Line will only broaden the pool of individuals that will join this demographic.

Furthermore, despite a global move toward hybrid working following the COVID-19 pandemic, as of January 2024, the City is one of the only areas of London reporting a lack of available stock, in certain locations in the Square Mile, as a challenge to its market². Aviva Investors recently highlighted the strong investment case it believes exists for London offices, noting that occupiers are increasingly aware of the limited choice available and are looking for and committing to new offices much earlier as and when they become available³.

As a result of these compounding factors, the City is uniquely placed as a global business destination that has the power and demand to expand beyond its existing constraints as a 9-5, Monday to Friday location. Destination City marks the next phase in the City's evolution and plans to build on the role of the City as a hub of cultural significance, with a planned £2.5 million annual investment to boost the City's leisure offer. The initiative marks a "once-in-a-generation opportunity to redefine the City of London"⁴ and further demonstrates how well-placed the City is to grow and reinvent itself.

It is clear that in light of a period of immense turbulence, compounding a global pandemic, multiple international conflicts, and a period of economic recession, the City has retained its title as the primary Central Business District (CBD) and a leading financial and business centre for the capital.

Accordingly, the City Plan 2040 is a chance to be ambitious. This DNLP is an opportunity not only to formalise a new strategy to support this upcoming period of growth but also to drive this change. In light of the successes outlined above, we consider that the City Corporation should be thinking 'bigger' in terms of its long-term potential and must push to exceed its targets.

The Corporation has full control of the regulatory environment it wishes to foster, and is well known for its progressive stance to both development and developers. As set out by Chris Hayward, there are 'no deal breakers' for the area, and the public recognition that investors are an essential component to driving the DNLP's aims has fostered a perception of trust and ambition for the Local Planning Authority; in return, the district offers unparalleled support for businesses across diverse sectors, and this symbiotic relationship between regulation and growth has set the stage for the upcoming Local Plan Period to be one of immense prosperity.

Aviva believes in the role of the City and its power to shape the future of London and believes its position as a national and global leader should be fully reflected in its development framework. Strong but ambitious development management policies are the most direct way to set the City up for success as it approaches a period of intense growth. As part of this, Aviva recognises that the City needs to balance, more than ever, competing land use requirements as well as finding a suite of development management policies which aid the delivery of its growth objectives. Our comments seek to aid the City Corporation with this balancing exercise.

¹ Office of Rail and Road, Estimates of Station Usage April 2022 to March 2023

² Savills Commercial Investment, Market in Minutes: City Investment Watch February 2024

³ Aviva, Why London remains the ultimate city of the future

⁴ Policy Chairman sets out ambitious 'Destination City' vision for the Square Mile

Main Representation

In this section, we set out our detailed comments on the DNLP. Any suggestions to delete text are shown with a ~~strike through~~ and additional text is shown in green.

1. Spatial Strategy

Aviva welcomes the introduction of a new spatial strategy for the DNLP and recognises the importance of a spatial element of the DNLP to ensure a sustainable pattern of development is delivered. Ensuring the correct approach to development and growth is taken in different parts of the City is fundamental to the DNLP's effective execution.

Aviva agrees in principle with the strategy set out in **Chapter 2** of the DNLP, but raises the following queries:

- **Point 1** of the new Spatial Strategy refers to the Key Areas of Change ('KAOC') – areas which will see a greater proportion of net additional floorspace than other parts of the City, or that will undergo significant change to their built form. Aviva welcomes the 7 identified areas and acknowledges their geographical significance. Aviva is supportive in principle of the area-based policies set out in **Chapter 14** of the DNLP.
- **Point 4** of the new Spatial Strategy states that *“Demand for retail growth is likely to be focussed in the four principal shopping centres (PSC) of Moorgate and Liverpool Street; Leadenhall Market; Cheapside; and Fleet Street”*. Aviva recognises the significance of these areas and the emerging demand for retail in the City, however, raises that the wider potential of these areas, beyond their role as a location for comparison good retailing, should be more strongly acknowledged. Furthermore, Aviva welcomes that *“Active frontages, with uses that are suitable for their context, will be delivered in all parts of the Square Mile”*. Both PSCs and Active Frontages are discussed later in this representation.

2. Offices

The office market remains the primary function of the City of London, with significant economic and employment growth anticipated over the plan period. Despite this anticipated period of demand, like all other parts of the capital, the City must respond to the changing office market as hybrid working becomes the 'new normal'. Due to its role as a world-leading international financial and services centre, and the intense concentration of occupiers in such a small area, the City must be more abreast of these challenges than other parts of London, to weather the changing market and maintain its nationally significant role in the London economy.

As noted above, where other boroughs are struggling with both vacancy and oversupply of office stock, the City's priority is to ensure that sufficient office floorspace is available to meet projected employment growth and occupier demand, and that additional office development is of sufficient quality and suitability for a variety of occupiers, especially within the Liverpool Street and City Cluster areas.

As a result, there is a city-wide desire for high-quality office stock with a heightened expectation for amenity and well-being offers. This is primarily being seen via a retrofit first approach, however, new office stock is essential, with a targeted increase of 1,200,000 sqm net during the period 2021 to 2040.

In turn, the City requires not only more offices, but of better quality; new office floor space must be designed to be flexible to allow long-term transformation and adaptation to support new uses, different layouts and configurations, and different types and sizes of occupiers.

Draft Policy S4

Aviva supports a targeted increase in the quantum of office space, in line with the City Corporation's ambition to *“facilitate significant growth in office development of the highest quality to meet projected economic and employment growth”* set out in **draft Policy S4**.

Supporting policy text in **Paragraph 5.1.1** sets out that, to maintain its position as a world-leading international financial and professional services centre, *“it is vital to ensure that sufficient office floorspace is available to*

meet projected employment growth and occupier demand and that additional office development is of high quality and suitable for a variety of occupiers”.

Paragraphs 5.1.1 to 5.1.2 set out that the minimum office floorspace target of 1,200,000 sqm is derived from the estimated growth in office employment between 2021 and 2040 and represents a 13% increase in floorspace. This target is the central of three projections from the evidence base document prepared by Arup (*City of London – Future of Office Growth, Arup (2023)*), and is based on different scenarios for office attendance, office densities, occupancy rates and employment projections. The chosen central target is aligned with GLA 2022-based long-term employment projections for London and the Square Mile.

Paragraph 5.1.2 also states that capacity modelling demonstrates that there are sufficient sites to meet this demand, provided primarily within the City Cluster area, supplemented by additional capacity elsewhere in the City. However, the Arup report highlights the potential for *more* space to be required. The ‘Return of In-Person’ scenario set out by Arup estimates the need for an additional 20 million sq ft of net office space by 2042. The overall demand for office floor space would be expected to exceed 2022 office stock capacity by 2024 progressively increasing until 2035. Further, this scenario implies that the supply of high-quality office stock may struggle to meet demand in the short term if the flight to quality continues, due to sustained high demand and low turnover in office spaces not allowing for refurbishment and upgrade of stranded assets in the City.

Accordingly, should businesses return to a more intense occupation, the DNLP must be sufficiently flexible to accommodate that potential growth. While Aviva welcomes the minimum targets proposed, given the post-COVID return to the workplace and high demand for office space in the City Cluster and Liverpool Street KAOC already being experienced, there is an eminent possibility that future growth in the City would better represent a pre-COVID environment. Thus, while the flight to quality is key, it is redundant if the Corporation has not first considered *where* this grade-A office stock will be delivered.

The clarification that the targeted increase of 1,200,000 sqm between 2021 and 2040 is a minimum figure is essential. This same clarification should be applied to the proposed phasing set out in the draft policy, to avoid the implication that the projected phasing could be capped at these figures for each respective phasing period. It should also be clarified that this figure represents a net figure, constituting both newly built office floorspace and an increase in existing office space that will be made available via retrofit and refurbishment, as confirmed at the launch of the City Plan 2040.

Further to this, Aviva supports an overall target of up to 2,000,000 sqm to account for the higher growth scenario set out within the evidence base. The supporting text should include a reference to the more demanding growth scenario presented, noting that, while **draft Policy S4** sets out a minimum target of 1,200,000 sqm, there is a likelihood that a figure closer to 1,900,000 sqm may be required and effected throughout the life of the plan.

Point 2 of **draft Policy S4** sets out that office growth will be facilitated by “*ensuring that new floorspace is designed to be flexible to allow the transformation and adaptation of space 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*”. Aviva welcomes this prioritisation of flexibility that is discussed throughout **Chapter 5** of the DNLP, however, it is currently unclear if this policy wording gives greater emphasis to SMEs over large HQ-style office buildings.

Draft Policy OF1

Aviva supports a number of the principles set out in **draft Policy OF1**. Specifically, the prioritisation of a retrofit-first approach to existing buildings; ensuring that office development is designed for future flexibility to future-proof stock; the provision of office floor space for a range of occupiers; and the provision of healthy and inclusive working environments that promote well-being. The latter is well placed to support **draft Policy S1** and Aviva strongly supports the increased focus throughout the DNLP on the impact of office environments on people’s mental and physical health, as part of striving to create a healthy city environment.

Aviva also supports the requirement for high-quality office stock in terms of outstanding design, sustainability standards, and health and inclusivity to promote wellbeing. However, it is unclear how “*outstanding design and an exemplar of sustainability*” is defined and how this expectation will interact with the prioritisation of retrofitting. For example, retrofit projects are often challenged when it comes to EPC ratings and BREEAM targets due to the imposed limitations of the existing building fabric, when compared to demolition and rebuild or new build

developments. Further clarification should be given as to what 'exemplar' or 'outstanding' may mean in practice so that these standards can be better understood and delivered.

Part 2 of **draft Policy OF1** sets out that *"other commercial uses will be encouraged as part of office-led development, particularly at ground and basement levels, where such uses would not compromise the operation of office premises, would activate streets and provide supporting services for businesses, workers and residents"*. **Paragraph 5.2.1** states that *"a mix of commercial land uses, in particular at the ground floor and basement levels, will be required to create active frontages to enhance an area's vitality and provide important complementary services"*. In turn, there is clearly an emerging expectation for office developments to do more to provide dynamic ground-level uses which provide opportunities for creativity, collaboration and social interaction.

As set out in **Chapter 5**, many office lobbies have been designed to project a corporate image and function as through space to access lifts which can lead to a blank frontage on the street, especially with large windows on the facade with minimal internal activity and no public access. Instead, the Corporation now views that a lobby has the potential to be a more interesting and multifunctional space, to provide a location for engagement, interaction and positive contribution to the life of the City. This may involve the addition of publicly accessible facilities, co-working spaces, breakout spaces, art galleries or cafes. To facilitate this, **Paragraph 5.2.3** states that *"office buildings should include dynamic ground-level uses, with entrances that are easy to identify and should allow everyone to use them independently without additional effort, separation or special treatment"*.

Aviva echoes the importance of complementary uses to support the high quantum of office space in the City, which provides supporting activities and services for businesses, workers and residents. Accordingly, Aviva supports that other commercial uses will be encouraged as part of office-led development, particularly at ground and basement levels, where such uses would not compromise the operation of office premises, would activate streets and provide support services for businesses, workers and residents.

However, Aviva also raises this increased expectation for ground lobby spaces to act as multifunctional public spaces, with the introduction of publicly accessible facilities (including public toilets), co-working spaces, breakout spaces, art galleries or cafes suggested by **Paragraph 5.2.3** creating viability implications for the creation and maintenance of these spaces. While these additions can contribute to creating a more active lobby, these should only be expected of proposed development where appropriate and feasible.

This emerging requirement should be also considered in conjunction with **draft Policy S5** (Retail and Active Frontages) which is discussed later in this representation.

Draft Policy OF2

Aviva supports the maintenance, improvement, and increased provision of office space in Key Areas of Change across the Square Mile. However, the DNLP should accommodate flexibility for a long-term view of the office market up to 2040. 'Flexibility', as the Corporation is applying it, should also be considered in terms of Use Class, in addition to internal flexibility of spaces within new and existing office developments. That is to say, a change of use from existing office use to an alternative use should be robustly considered as another means of futureproofing the City's office stock.

As set out in **Paragraph 5.3.4**, *"there are instances where conversion of office buildings to other uses may assist in making the retention of existing buildings a more attractive investment opportunity, contributing to the 'retrofit first' approach promoted in this Plan. This approach could also assist in delivering a greater range of facilities and uses in the City, complementing the primary function of the Square Mile while helping to deliver more vibrancy and a focus on increasing visitors"*.

Due to the high quantity of office stock and its monopoly as a real estate product, the potential to accommodate the loss of office to any alternative use (be it to hotel, residential, student, hostel, or accommodation to older people) is led directly by **draft Policy OF2**.

Accordingly, associated **draft Policies CV, HS6, and HS7** become secondary to the mechanism set out in **draft Policy OF2**, when considering potential future uses. Conflict arises, for example, from **draft Policy S6** which seeks to allow hotel development where it supports the primary business or cultural role of the City. However, this relies in the first instance on satisfying the requirements of **draft Policy OF2** where the existing

use is office. Similarly, **draft Policy S3** seeks to direct new housing to suitable sites in or near identified residential areas. However, **Paragraph 4.3.3** goes on to state that *“in reality, the majority of proposals for new housing in and around these areas would be likely to be on sites occupied by office uses”*, and thus must be read in conjunction with the loss of office policy.

Ensuring this flexibility for future uses is secured in policy terms means the loss of office mechanism must be designed to fully capture the nuance required to balance the business function of the city with the potential for alternative uses to come forward.

Aviva welcomes the introduction of new routes to accommodate the change of use of existing office stock, such as the Retrofit Fast Track, however, finds that the policy cascade as it is written is overly restrictive. The criteria for a change of use involving the loss of existing office floorspace must be effective to secure existing floorspace, but also achievable so as not to withhold development potential where a change of use would make a more attractive investment opportunity.

Specifically, the requirement for 12 months of marketing does not serve to benefit the aim of the DNLN to foster dynamic economic growth. While marketing evidence is one means of evidencing demand, leaving buildings vacant for 12 months is an ineffective means of doing so. There are other much more effective methods of capturing data on the office market.

We suggest this criterion is amended to take a similar approach to **draft Policy CV1**, which sets out that *“the City Corporation will resist the loss of existing visitor, arts, and cultural facilities, unless [...] It has been demonstrated that there is no realistic prospect of the premises being used for a similar purpose in the foreseeable future.”*

Draft Policy OF2 should instead read:

*There is no demand in the office market, supported by marketing evidence covering a period of no less than 12 months **realistic prospect of the premises being used for office use in the foreseeable future.***

Regarding Part 2 of the policy, Aviva suggests the following amendments:

- Route A, the ‘Viability-tested route’, should be included as a primary criterion and moved to Part 1 of the policy.
- Route B, the ‘Retrofit fast track’ route states that *“Proposed development will be required to retain the substantial majority of the superstructure of the existing building”*. It is not clear how ‘substantial majority’ is to be defined, and a clearer threshold should be introduced for clarity.
- Route C, the ‘Residential areas route’ should add clarification that the ‘identified residential areas’ include all forms of housing, such as PBSA and co-living.

Draft Policy OF3

Point 1 of **draft Policy OF3** sets out the DNLN’s approach to temporary ‘meanwhile’ uses, and states that *“Where temporary permission is granted, it will be for a period not exceeding 36 months and the site will revert to its prior lawful use thereafter.”*

Aviva supports the facilitation of meanwhile uses and recognises the benefits that can be derived from a social value perspective through such initiatives. However, it will be important to ensure that the structure of any planning application or permission ensures that the loss of any meanwhile use is not given weight in any assessment for the comprehensive redevelopment of sites.

Affordable Workspace

Aviva supports the provision of affordable office workspace that allows small and growing businesses the opportunity to take up space within the City, as set out in **draft Policy S4** and **draft Policy OF1**. Specifically, Aviva supports that the DNLN does not set a minimum or prescriptive requirement for affordable workspace

provision, and instead encourages office development to provide affordable workspaces “*where appropriate*”, akin to the approach set out in London Plan Policy E3

The DNLP defines Affordable Workspace as: “*Workspace that is provided at rents maintained below the market rate for that space for a **special social, cultural, or economic development purpose***”.

Aviva greatly welcomes the inclusion of social, economic, and cultural uses within this definition, and believes it hugely broadens the potential for what affordable workspace can look like in the Square Mile and the different benefits that it can offer the City as a place and destination. This wider definition also allows for tessellation between the policies throughout the DNLP which relate to the diversification of ground floor uses, active ground floors, protected retail frontages, and affordable workspace, as discussed below.

3. Retail

The City’s retail offer has seen significant challenges in recent years as a result of the COVID-19 pandemic and changing working patterns, followed by notable retail growth in the Liverpool Street area bolstered by the opening of the Elizabeth line. Over the longer term, evidence shows significant demand for growth in retail uses in the City, with an aspirational target for approximately 192,200 sqm of additional retail floorspace up to 2040, based principally on projected employment and visitor number growth in the City.

As discussed in Section 2 of this representation, retail is considered to be a **complementary use** which contributes to the City’s economy, and the Corporation will support proposals that contribute towards the delivery of additional retail floorspace across the City to meet future demand up to 2040. It also provides a means to further the nighttime economy by encouraging extended openings in the evenings and weekends.

However, perhaps more significantly, the DNLP seeks to create a more vibrant and diverse retail economy with a greater mix of retail, leisure, entertainment, experience, culture, and other appropriate uses across the City.

Paragraph 6.1.6 defines ‘Retail’ for the purposes of applying all retail policies in **Chapter 6** as shops, cafes restaurants, and services for use by the general public (i.e. those uses covered by use class E(a)-(c)). However, the DNLP also notes that other uses within Class E (use classes E(d)-(e)) can also be suitable in retail areas, as can a range of other community and cultural uses and those frequented by members of the public, such as public houses, wine bars or drinking establishments. Collectively, these uses are referred to as **active frontages** or **active frontage uses**, provided the design of the premises creates a frontage that facilitates the visual and physical permeability of the building.

By broadening this definition of suitable uses in retail areas, the DNLP offers further opportunities to develop the City’s retail offer beyond traditional expectations, allowing for a broad mix of suitable facilities while maintaining a predominance of comparison and convenience retail uses.

Draft Policy S5 and RE1

Aviva strongly supports the Corporation’s aim to make the City’s retail areas more vibrant, with a greater mix of retail, leisure, entertainment, experience, culture, and other appropriate uses across the City, as set out in **draft Policy S5**. Of note is the Corporation’s aim to “*enrich the ‘ground floor economy’, encourage active frontages and to provide different offers across different parts of the Square Mile, informed by their character, function and potential*”.

While this strategic policy aims to broaden the definition of a ‘retail’ offer, these policy aims do not translate consistently to the wider policies set out in **Chapter 7**. These are discussed in turn below.

Aviva queries the City’s aim for the predominant use within the Principle Shopping Centre (‘PSC’) to be “*concentrations of comparison and convenience shopping*” with “*a broader mix of retail and other active, publicly accessible frontage uses on the peripheries of the centres*” as set out in **draft Policy RE1** and **draft Policy S5** respectively.

Aviva finds this contrary to **Paragraph 6.1.5** which states that “*the PSCs are recognised in the London Plan as ‘CAZ Retail Clusters’ that accommodate a range of other commercial uses alongside the retail function*” and

the overarching aims for **draft Policy S5** to create retail areas that are “*more vibrant, with a greater mix of retail, leisure, entertainment, experience, culture, and other appropriate uses*”.

Draft Policy RE1 sets out that, within PSCs, “*the loss of existing ground floor retail frontages and/or floorspace will be resisted and additional retail provision of varied unit sizes and frontage lengths will be encouraged, supported by complementary uses that increase footfall and provide active frontages*”.

It is not clear if the loss of existing retail frontage or floorspace would be acceptable if it were to be replaced with a ‘complementary use’ that would increase footfall and provide active frontages. This is particularly relevant as a number of Aviva’s Sites are allocated as designated frontages within a PSC. **New Broad Street House, 101 Moorgate, and 1 Liverpool Street** are identified as designated frontages within the Moorgate/Liverpool Street PSC, where this loss of existing ground-floor retail is resisted.

As set out above, the DNLP makes a strong case for the suitability of other active frontages such as Use Classes E(d)-(e)), community, and cultural spaces in retail areas. However, this is not reflected in **draft Policy RE1**. Instead, the DNLP looks to continue to retain PSC areas as ‘shopping destinations’ with a predominance of comparison and convenience retail uses, supported by other town centre uses which provide activity at street level. It is assumed that “comparison and convenience retail” in this instance relates to Class E(a) display or retail sale of goods other than hot food, as this is not defined in the DNLP.

Aviva finds the policy focuses too heavily on the concentration of comparison and convenience uses which in turn will hinder the wider aim to “*create a welcoming and attractive environment for people to shop, access services and spend leisure time*”; this goal will only be fostered through a diverse and active town centre.

Draft Policy RE1 should be applied flexibly in instances where other town centre and active uses could be more appropriate and successful to the vitality of the PSC and achieving Destination City objectives; particularly for sites with a limited number of retail units where diversity is more restricted and when taking into account the range of wider retail uses in the area.

More broadly, it should be more strongly recognised in **draft Policy S5** and **draft Policy RE1** that other commercial uses can enhance footfall to retail and also provide active frontages. For example, given the City’s Destination City initiative, community and cultural uses and those frequented by members of the public, such as public houses, wine bars or drinking establishments should be encouraged as part of the call for enriching the ground floor economy.

Further, it should be clear in the policy wording that a change of use from retail to another complementary active frontage use is acceptable, the policy should allow for flexible application on larger sites, and allow for alterations to protected PSC frontages. This is particularly important for **130 Fenchurch Street** which would seek to revisit the extent and location of retail frontage as identified on the draft policies map as part of the ground floor in order to provide complimentary uses for other uses alongside a potential revised building line to facilitate public realm improvements.

Additionally, as discussed earlier in this representation, office-led development is strongly encouraged to provide dynamic ground-level uses to “*activate streets and provide supporting services for businesses, workers and residents*”. However, the addition of publicly accessible facilities, co-working spaces, breakout spaces, art galleries or cafes as part of office-led development is not currently encouraged if proposed in a PSC. Sites with potential to increase their office floorspace such as **New Broad Street House**, for example, would struggle in principle to meet the DNLP’s wider ambition for office-led development to provide dynamic ground-level uses such as those listed previously, as it would require the loss of the existing retail provision.

While the role of the PSC should be to encourage a presumption for new retail development, it should be treated that a change of use from existing retail use to an alternative, complementary, active frontage use is acceptable as any potential active frontage use would increase footfall and ought not to compromise the vitality of the PSCs. As the DNLP calls strongly for these elements in other chapters, these should not be excluded from the policy wording.

Other active frontage uses such as community and cultural uses and those frequented by members of the public like public houses, wine bars or drinking establishments would all be very well placed to enrich the area’s expanding ground floor economy, in line with the evidenced demand, and Aviva reiterates that additional

flexibility is required. Further, this flexibility is essential for effective placemaking to encourage developments in areas of very high footfall for dwelling and spending time as part of the Destination City agenda.

Policy RE2: Active Frontages

The DNLG Glossary defines '**Active frontage**' as "*Fronts of buildings that facilitate visual and physical permeability*".

'**Active frontage use**' is defined as "*those uses that fall within use classes E(a)-(e), where they have an active frontage. These use classes include shops, cafes and restaurants, and services for use by the general public such as hairdressers, banks and building societies, shoe repair and dry cleaning, gyms, and health centres. Pubs and other community and cultural uses may also be active frontage uses, where they are frequented by members of the public*".

Aviva supports the encouragement of active uses at ground floor level across the city, as set out in **draft Policy RE2**.

Aviva queries, however, Point 2 of the policy which states "*the loss of existing active frontage uses will be resisted*". As the definition within the glossary offers an extensive range of uses, it is not clear how this policy protection will interact with other policy mechanisms. For example, according to the definition given above, office use would constitute an active frontage use, where the front of an office building would facilitate visual and physical permeability. It is not clear then, therefore, how the requirement from **draft Policy RE2** to resist the loss of existing active frontage uses, would interact with the mechanism in **draft Policy OF2**.

Further, while there is a clear that an element of flexibility is built into the emerging retail policies to broaden the possibilities of what an active frontage or complementary use could look like, this in turn is diminished by the requirement for 12 months of marketing to provide alternative uses that would support the retail environment.

4. Culture, Visitors, and Destination City

Destination City, the City Corporation's flagship strategy, seeks to ensure that the City is a global destination for workers, visitors and residents. The City is estimated to have attracted 23.3 million international and domestic tourists in 2019. Despite the impact of the COVID-19 pandemic on the visitor economy, the evidence base document prepared by Avison Young (*City of London Visitor Accommodation Sector Commercial Needs Study (2023)*) reports that consultations with key stakeholders involved in the City's hotel sector have demonstrated that demand across all segments has largely returned to pre-Covid levels, which has been ahead of forecasts. In an effort to capitalise on this public interest in the City and the remarkable recovery of the visitor economy, the strategy seeks to activate the City's evening and weekend economies to position the Square Mile as a key cultural and leisure destination.

Draft Policy S6

Aviva supports the DNLG's aim to encourage cultural placemaking and the creation of vibrant and inclusive places that contribute to the experience of living, working and visiting the City, while addressing the needs and aspirations of the City's communities.

Points 6 and 7 of **draft Policy S6** sets out that the DNLG will support "*the development of creative industries and encouraging appropriate workspace and digital infrastructure to facilitate their development*", and "*hotel development where it supports the primary business or cultural role of the City*". While welcome, Aviva feels the goes beyond a 'cultural offer'.

Draft Policy CV1

Aviva welcomes the protection of existing visitors, arts, and cultural facilities, however specifically supports the policy cascade associated with the loss of these facilities. As set out in section 2 of this representation, the policy test for the loss of existing visitor, arts, and cultural facilities requires that these will be protected "*unless [...] it has been demonstrated that there is no realistic prospect of the premises being used for a similar purpose in the foreseeable future*".

This level of resistance affords an effective level of protection for these existing facilities without restricting future alternative development. This approach to policy testing should be applied throughout the DNLP in place of other suggested methods of capturing and reporting demand,

Draft Policy CV2

Aviva queries the requirement for all major developments to make provision on-site for arts, culture or leisure facilities in some capacity. **Draft Policy CV2** would require “*large scale development proposals of 10,000 sqm or more in size to make provision on-site for arts, culture or leisure facilities*”, and “*major developments below 10,000 sqm in size to make provision for arts, culture or leisure facilities of a scale commensurate with the size of the development, or to provide off-site provision or contributions towards arts, culture and leisure facilities and infrastructure*”. The policy adds that “*on-site provision will be preferred, with off-site provision only being appropriate where a specific project has been identified through partnership working*”.

While Aviva supports the Corporation’s aim to provide new arts, cultural, and leisure facilities that offer unique experiences at different times of the day and week in principle, the provision of these facilities should be considered on a case-by-case basis, with due consideration of the viability implications for the creation and maintenance of these spaces. Subsequently, Aviva raises the same query regarding the requirement for all major developments to submit Culture and Vibrancy Plans setting out how their development will culturally enrich the Square Mile.

It is also considered that reference to the Cultural Planning Framework (“CPF”) should be omitted and the City should progress this (alongside any revisions to the Planning Obligations SPD) to allow for a cascade approach to the provision of culture and visitor facilities, i.e. on site, off site and through a contribution to culture, as the CPF forms part of the DNLP’s evidence base, it is not considered appropriate to introduce financial contributions in the plan without setting out how contributions would be pooled, allocated and spent. The concept of financial contributions to culture could be supported to fund emerging institutions and contributing more widely, particularly for smaller sites to the provision of culture and wider aspirations for Destination City.

Draft Policy CV6

Aviva supports the encouragement of the provision of new permanent, temporary, inclusive, diverse and high-quality artworks in appropriate locations in the City on public and private land, as required by **draft Policy CV6**.

5. Design

Draft Policy S8

Aviva supports the DNLP’s aim to “*promote innovative, sustainable and inclusive high-quality buildings, streets and spaces*” through design solutions that would “*make effective use of limited land and contribute towards vibrancy, inclusion, wellbeing and a greener, net zero carbon City*”. This would be achieved through a number of policy requirements against the headings of sustainable design, form and layout, experience, and quality and character.

Paragraph 9.1.0 calls for “*world-leading design in all aspects of the built environment*”. This conflicts with the policy wording, and wording in **Paragraph 9.3.0** which requires “*high quality design*” and **draft Policy DE2** which calls for an “*exemplar standard of design, aesthetics, and architectural detail*”. A consistent term should be used throughout the DNLP.

Draft Policy DE2

Aviva queries the requirement in **draft Policy DE2** for “*plant and building services equipment are fully screened from view*”. This would not be possible for neighbouring tall buildings for example, or views from roof terraces.

The policy wording should therefore be amended to read:

“*Plant and building services equipment are fully screened from view **where feasible***”.

Draft Policy DE4

Aviva queries the requirement for “*all tall buildings or major developments to provide free-to-enter, publicly accessible elevated spaces, which may include roof gardens, terraces, public viewing galleries, or other retail or leisure facilities to create attractive destinations for people to enjoy the City’s spectacular skyline and views*”, as set out in **draft Policy DE4**.

Aviva appreciates the benefits of roof terraces and the opportunity they present for additional amenity space, urban greenery and the creation of new viewpoints of the City and the surrounding areas. However, consideration should be given to the requirement for all tall buildings or major developments to provide them.

‘Major development’, (i.e. anything over 1,000 sqm) is a very low benchmark for this policy requirements and creates a conflict whereby it is unlikely that all major developments would be capable of meeting the criteria set out in part 1 of the policy.

There is a risk of oversaturation, and consideration must be had for the requirements for a separate lift core to provide dedicated public access.

6. Heritage and Tall Buildings

Tall buildings form an integral part of the City’s highly recognisable character, with the Square Mile containing some of the capital’s most iconic skyscrapers. A robust tall buildings strategy is essential to maintaining the Square Mile’s World City status and ensuring it remains able to compete globally as a place where businesses seek to locate. Simultaneously, it must effectively balance the potential impacts of developing at height for the area’s rich heritage sensitivities and other potential amenity risks.

Aviva supports in broad terms the strategy set out in the evidence base for the DNLP regarding tall buildings and welcomes the thorough approach and clear assessment criteria detailed in **draft Policy S12**, albeit there are concerns with the proposed policy approach which are discussed in detail below. Primarily, Aviva echoes the emphasis within the DNLP on the value of tall buildings for the City’s World City status, and the recognition that tall buildings play an essential role in meeting the objectively assessed need for office capacity over the lifetime of the DNLP.

A thorough review of the supporting evidence base has been carried out which has informed the wording of **draft strategic Policy S12** and draft policy map C of the DNLP. It is envisaged that most of the office growth of at least 1.2million sqm in the City will be delivered by the City Cluster Key Area of Change (as reflected in the draft spatial strategy). As currently drafted, the policy approach wording are not considered sound.

It is considered that the evidence base is largely sound, however the translation of a complex 3D jelly mould into 2D contours and a restrictive policy wording would limit the City’s ability to deliver fully optimised sites and meet its planned growth.

The starting point for understanding potential massing, particularly within the City Cluster is strategic views of St Paul’s Cathedral, the Tower of London and the Monument. The Fleet Street processional route and views of the Inner Ward of the Tower have informed the creation of the published jelly mould. This creates an incredibly complex 3D shape, with each site needing to be interrogated through detailed townscape testing. When comparing the jelly mould as part of the evidence base against the contours on draft proposals map C, there is a clear methodology issue when combined with the proposed policy wording which seeks to set maximum caps for building heights.

Of most relevance to these representations is the City Cluster tall building area. The contours and **draft strategic policy S12** at present would not allow for the 130 Fenchurch Street site to be fully optimised and maximise its contribution to economic growth in the Square Mile. The evidence base, comprising the Strategic View Impact Assessment, Tall Buildings Topic Paper and Volumetric Testing all form a solid basis for creating a workable tall buildings policy.

Appended to this letter is analysis which has been prepared by Millerhare, setting out the relationship of the emerging proposals for 130 Fenchurch Street, represented as a jelly mould, and how they relate to the

proposed 2D contours and 3D published jelly mould. It is clear that when reading this alongside draft strategic policy S12 that there is a conflict with how the City of London intend for this to be used in planning decisions.

It is noted that the Volumetric Testing which accompanies the evidence base recognises the challenges associated with creating a series of 2D building contours which can be workable within the complex geometry of the City Cluster. Volume 1, Paragraph 1.21-1.23 (optimising outcomes for each site) is clear that there was scope for tall buildings to exceed the height contours subject to detailed townscape and heritage testing.

The contours were created to provide a scenario where a building can be certain to not impact key views, but it is clear that there is significant scope to exceed the contours, particularly on sites to the south of Leadenhall Street, whilst remaining invisible in key views. The policy needs to recognise this potential to ensure it does not preclude projected growth coming forward through a restrictive tall buildings policy.

It is considered that the wording for **draft strategic Policy S12** must be reworded to make the policy workable. This could be achieved through different approaches which we encourage the City of London to explore:-

- Alterations to policy map C to introduce additional contours at 10 metre intervals to make the stepping clearer, or referring to the 3D jelly mould;
- Introducing ranges of heights which could be acceptable within the current 2D contours to take account of the highly sensitive and complex viewing cones (particularly from the Fleet Street Processional Route and kinetic sequence towards St Paul's Cathedral, and static views from the Tower of London and Waterloo Bridge/the South Bank, as outlined in the evidence base);
- Providing a methodology for how the contours can be interpreted in 2D form to give greater clarity to the nuances of these complex views;
- Rewording the draft policy to allow for broad height ranges or parameters which are subject to detailed townscape and heritage testing to ensure that each site can account for the various nuances within these complex, kinetic views.

The policy should also clarify the following:-

- The policy is not a gateway, or, "fail at the first hurdle" policy which is established by case law in relation to policy D9 of the London Plan, which confirms that just because a site is not allocated for tall building development or is above a defined height in local policy, that it cannot be acceptable having regard to its visual, functional or environmental aspects;
- There may be exceptions to the policy which only allocates two areas which tall buildings may be acceptable (such as those which are already taller than 75m AOD, particularly around Liverpool Street/Broadgate);

As a minimum, the following changes should be made to **draft strategic Policy S12**:-

"2. The tall building areas identified on the Policies Map and Figure 14 are areas where tall buildings may be appropriate, subject to the requirements in this and other relevant policies. Existing tall buildings outside of defined areas may be acceptable for tall buildings development, subject to detailed assessments and testing of the functional, environmental and visual impacts.

3. The ~~maximum permissible~~ Tall building heights within the identified tall building areas are depicted as contour rings on Policies Maps C and D and Figure 15. Tall buildings should not generally exceed the height of the relevant contour rings. There may be instances where these can be exceeded through detailed assessment of the visual, functional and environmental impacts. In areas between the contour rings, tall buildings should be designed to successfully mediate between the contour ring heights and should not exceed the next higher contour. Tall buildings should not necessarily be designed to maximise height; instead they should be thoughtfully designed to create built form that contributes positively to the skyline and townscape character, creating a coherent cluster form and a varied and animated skyline, and should have architectural integrity."

At present, the policy as drafted is not sound and requires amendments to ensure that the City's planned growth can be accommodated.

Detailed townscape testing for 130 Fenchurch Street indicates that the maximum building height is closer to 160m AOD than the current 140m AOD contour as proposed on draft policy map C.

Millerhare have produced a jelly mould for the site which indicates the opportunities for massing within the confines of the visibility envelope from the Fleet Street sequence. This is overlaid above the 2D contours and set out below at Figure 1. Further detailed views illustrating this are included in Appendix 1.

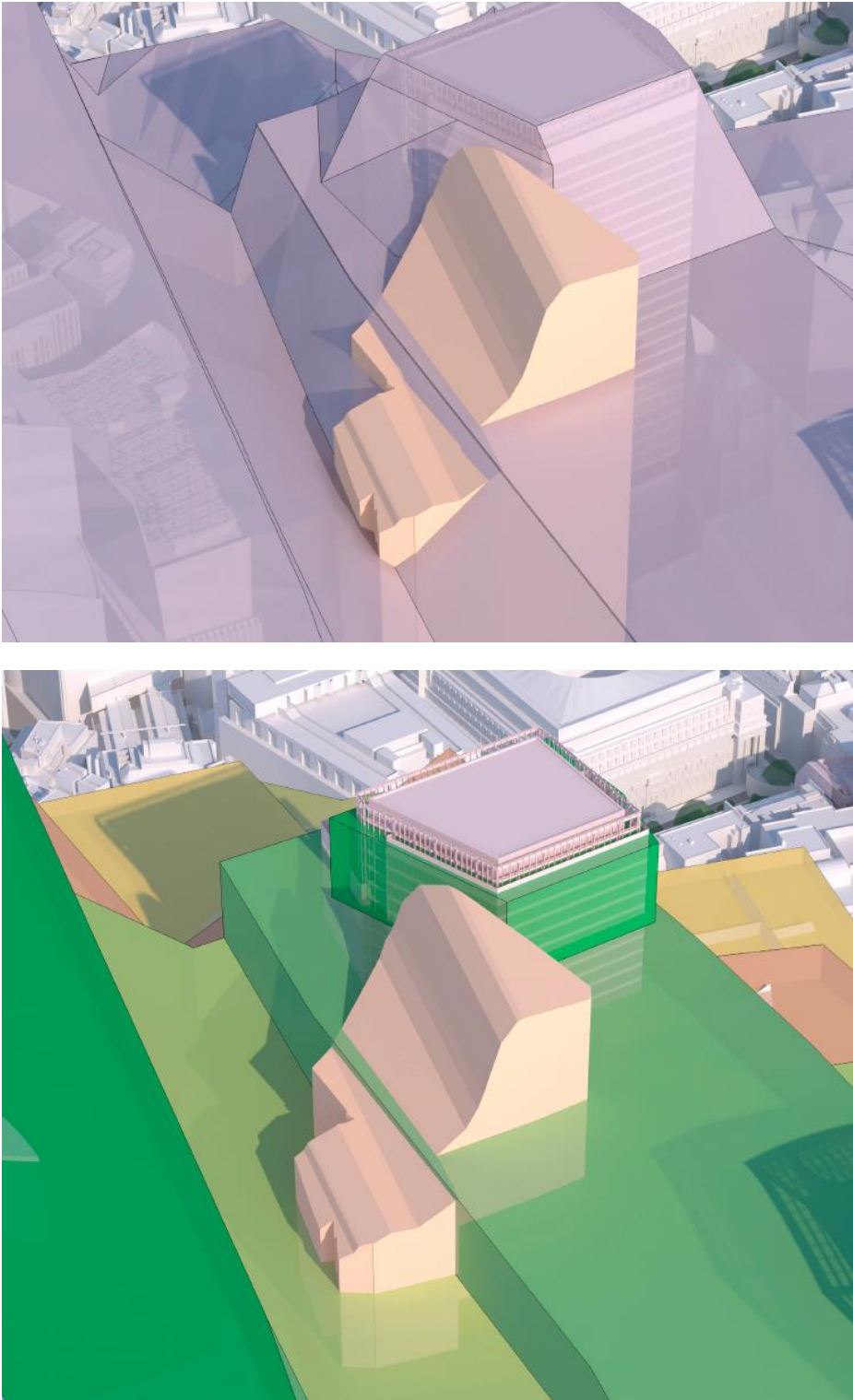


Figure 1 – Extract from Miller Hare Supporting Document

It is clear that an additional contour which recognises the sloping nature of the jelly mould should be introduced on the 2D map.

Wider Policy Commentary

Air Quality

Draft Policy S1 states that a healthy and inclusive environment will be created by expecting developers and development to *“improve local air quality, particularly nitrogen dioxide and particulates PM10 and PM2.5”*. This wording differs from that of **draft Policy HL2** which states that *“all developments must be at least Air Quality Neutral”*, **draft Policy S8** which calls for development that *“delivers improvements in air quality”*, and **Paragraph 9.2.9** which calls for all major developments provide *“an air quality assessment to meet the requirements of the London Plan demonstrating that the development will not result in deterioration in air quality”*.

A consistent target should be used across the DNLP which aligns with that set out in the London Plan (as written in **Paragraph 9.2.9**), to ensure targets for air quality are clear and concise, as well as an acknowledgement that improvements in air quality will not be possible across all developments.

Further, point 6 of **draft Policy HL2** states that *“Developments that include uses that are more vulnerable to air pollution, such as schools, nurseries, medical facilities and residential development, will be refused if the occupants would be exposed to poor air quality.”*

Aviva finds this stance to be overly restrictive, especially without employing specific thresholds to define terms such as ‘poor air quality’. If employing a spatial approach to directing the location of more sensitive uses, the DNLP should make clear a benchmark for baseline air quality with the Local Plan area, and comparable thresholds for the Corporation’s definition of ‘high’ and ‘low’ air quality.

Instead of determining to refuse applications for sensitive uses on this basis, the wording should be amended to positively direct these uses to areas of higher air quality. The policy wording should be amended as follows:

“Developments that include uses that are more vulnerable to air pollution, such as schools, nurseries, medical facilities and residential development, should be directed to areas where air quality is comparatively higher.”

Health Impact Assessments

Draft Policy S1 states that a healthy and inclusive environment will be created by *“requiring Health Impact Assessments (HIAs) of different levels depending on the scale and impact of the proposed development”*. Aviva supports the requirement for HIA’s, however believe the definitions of ‘different levels’ and ‘scale and impact’ need to be defined more clearly and in greater detail.

This point of **draft Policy S1** should read consistently with **draft Policy HL9** which states that *“Major development should submit a rapid Health Impact Assessment (HIA). A full HIA will be required on those developments that are subject to an Environmental Impact Assessment (EIA)”*.

While it can be inferred after reading **draft Policy HL9** that the ‘different levels’ referred to in **draft Policy S1** relate to either a rapid or full HIA, and ‘scale and impact’ relates to either major developments or developments that are subject to an Environmental Impact Assessment, this should be made clear in each standalone policy.

Draft Policy HL9 adds that *“an HIA may also be required for developments considered to have particular health impacts, including those involving sensitive uses such as education, health, leisure or community facilities, publicly accessible open space, hot food take away shops, betting shops and in areas where air pollution and noise issues are particularly prevalent”*.

As set out above, there should be a clearer threshold for the definition of *‘areas where air pollution and noise issues are particularly prevalent’*.

Accessibility

Draft Policy HL1 states that “Buildings, open spaces and streets must meet the highest standards of accessibility and inclusive design”. Aviva supports this target for inclusive buildings and spaces, however, Point 2 of the policy requires the City to be “Convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment”. Further, Point 3 requires the City to be “Responsive to the requirements of all users who visit, work or live in the City, whilst recognising that one solution might not work for all”.

Given the City’s many heritage assets and the subsequent heritage implications that result from their significance, Aviva considers the requirement for ‘no’ disabling barriers to be an unrealistic expectation. When paired with a city-wide shift toward a retro-fit first approach, this will provide further challenges when trying to account for the requirements of ‘all’ of the City’s potential users.

The policy wording should be amended as follows:

2. Convenient and welcoming with ~~no~~ disabling barriers *minimised wherever reasonably possible*, ensuring that everyone can experience independence without undue effort, separation or special treatment

3. *As responsive as reasonably practical* to the requirements of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

Noise

Point 3 of **draft Policy HL3** should be separated into two different policy criteria. It should read as follows:

3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance near development.

4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment

Community Facilities

Draft Policy HL5 states that “existing social and community facilities will be protected in situ” unless one of three policy requirements can be met. Aviva supports the protection of existing social and community facilities in principle, however, query criterion 3 of Point 1, which states that these facilities will be protected unless “It has been demonstrated through active marketing, at reasonable terms for public, social and community floorspace, that there is no demand for the existing facility or another social or community use on the site”.

Aviva believes consideration should be given to other available methods to define demand. While active marketing is one means, the policy should be more flexible and open to alternative methods.

Transport

Aviva supports the DNLP’s aim to maintain and improve the City’s transport infrastructure by minimising road danger and congestion, and reducing vehicle emissions. Specifically, Aviva supports “Not providing any additional on-street car and motorcycle parking” and “Identifying opportunities to use on-street parking reductions and restrictions to discourage private vehicle use” as set out under point 4 of **draft Policy S9**.

Draft Policy VT2 sets out that “Developments must minimise the need for freight trips and seek to work together with adjoining owners and occupiers to manage freight and servicing on an area-wide basis”, however it is unclear how this would work in practice. This policy should also prioritise the use of servicing lifts or joint functioning spaces which can have a public realm function during the day and be used for overnight or out of hours servicing.

Additionally, Aviva supports the clarification that “Development should be designed to provide for on-site servicing bays within buildings, wherever practicable”.

Aviva supports Point 3 of **draft Policy VT3** which states that *“Underutilised public car parks will be prioritised for alternative uses that support the delivery of the Transport Strategy.”*

Aviva supports the aspirations to improve pedestrian permeability and movement, however part 6 of policy AT1 of the DNLP should recognise that in some cases, there may be situations transformative public realm may require some loss of public highway for practical reasons. The policy should be amended as follows:-

“The replacement of a route over which pedestrians have rights with one to which the public have access only with permission will not normally be acceptable, it may be acceptable as part of a larger transformational public realm proposal”.

Aviva query points 2 and 3 of **draft Policy AT3**, which requires that *“all long stay on-site cycle parking must be secure, undercover and preferably enclosed, in accordance with the London Cycle Design Standards”* and *“Developments that include ground floor retail and take-away food outlets should provide appropriate off-street storage for cargo bikes and hand carts”*. This would be difficult to execute for sites that fill the entirety of their red-line area.

Urban Greening Factor (UGF)

Draft Policy OS2 requires that *“Major development proposals will be required to [...] include an Urban Greening Factor (UGF) calculation demonstrating how the development will meet the City’s target UGF score of 0.3 as a minimum”*. Aviva supports the encouragement for urban greening throughout the City, however, note the policy wording does not differentiate between commercial and residential development. Clarification should be provided.

Conclusion

We thank the City of London Corporation for the opportunity to comment and look forward to future opportunities to engage with the DNLP. If you have any queries or would like to discuss anything further, please do contact Iain Buzza and Maddison Driver of Savills or Barnaby Collins and Liam Lawson Jones of DP9.