

**Statement of Common Ground (SoCG) between  
City of London Corporation and Aviva Investors and Obayashi Properties UK Ltd**

**In relation to 20 Gracechurch Street.**

**25 November 2024**

**Chapter 11 Heritage & Tall Buildings**

**1. Purpose of the Statement of Common Ground**

- 1.1. The purpose of this SoCG is to update the local plan Inspector/s and other parties in relation to matters raised within Regulation 20 representations. The topics covered in this SoCG are heritage and tall buildings.
- 1.2. This SoCG has been prepared post submission of the City Plan 2040 on 29 August 2024. It highlights matters where agreement has been reached, and areas where agreement has not yet been reached but will be subject to further discussion at the local plan examination hearings.
- 1.3. This SoCG is in addition to any other matters statements to be produced during the course of the examination by either party.

**2. Parties**

- 2.1. The parties to this SoCG are the City of London Corporation (City Corporation) and Aviva Investors and Obayashi Properties UK Ltd.

**3. Comments received at Regulation 20**

- 3.1. Aviva Investors and Obayashi Properties UK Ltd submitted their response to the Regulation 19 City Plan dated 14 June 2024. Their response made representations in relation to the approach to tall buildings and heritage (Chapter 11), specifically in respect of the site at 20 Gracechurch Street, the City Cluster tall buildings area and the City’s development needs. This SoCG relates to matters in respect of tall buildings and heritage only.
- 3.2. Table 1 below includes the relevant reference number of the comments to which this SoCG relates, both parties agree this is a true record of the main matters subject to this SoCG.

Table 1- Representation references

Comment ID	Chapter	Summary
R0211/C0001	Chapter 11 Heritage & Tall Buildings	There is an existing tall building at the site at 20 Gracechurch Street (above 75m) and there is potential for the site to deliver significant additional office floorspace so the City Cluster tall buildings area should be extended westwards to include the site.

**4. Matters on which parties agree**

- 4.1. Both parties agree that the principle of identifying tall building clusters where tall buildings may be appropriate is correct to meet development requirements.
- 4.2. Both parties acknowledge that 20 Gracechurch Street, being over 75m is an existing tall building (as classified by London Plan Policy D9 and draft City of London Local Plan Policy S12) and is currently outside but immediately adjacent to an identified tall buildings cluster.
- 4.3. Without prejudice to Aviva Investors and Obayashi Properties UK Ltd’s representations that 20 Gracechurch Street should be included within the City Cluster tall buildings area (which they will present evidence on at the local plan examination), both parties agree that 20 Gracechurch Street is outside the identified tall buildings area.
- 4.4. Both parties agree that, on adoption of the City Plan, the Development Plan will be the 2021 London Plan and the City Plan 2040, and the approach to tall buildings is set out in policies within each document, ie Policy D9 of the London Plan and City Plan Policy S12.
- 4.5. Consistent with London Plan Policy D9(B) (1), draft City Plan Policy S12(2) identifies areas where tall buildings may be appropriate.
- 4.6. Both parties agree that London Plan Policy D9(C) and draft City Plan Policy S12(8), (9) and (10) also contain policies which will apply to the assessment of proposals for tall buildings whether or not they are within identified areas where tall buildings may be appropriate such as the City Cluster tall buildings area.
- 4.7. In light of the above, both parties agree that additional wording within the supporting text would be helpful to set out how the redevelopment of 20 Gracechurch Street may also be appropriate.

**5. Agreed proposed changes (if any)**

- 5.1. As set out below.

Paragraph	Proposed change
11.5.2	The City contains many tall buildings, <u>some are located in clusters or as standalone features, and unusually some are also heritage assets</u> . In particular, the eastern part of the City has a concentration of tall buildings including iconic skyscrapers such as the Gherkin, 22 Bishopsgate, and the Leadenhall building. Tall buildings impart the City of London’s World City status to compete globally and to be a place where businesses seek to locate. Strategically planning for tall buildings in clusters can bring economic as well as townscape benefits. Clusters of tall buildings allow for concentration and agglomerations of businesses and related economic activity while they also provide higher densities and contribute towards creating a more defined impact on the overall City skyline. The eastern cluster forms a distinctive skyline with the

	highest density of commercial activity within the City and is required to accommodate a significant proportion of the City's future growth in office floorspace. Capacity modelling demonstrates that the two clusters of tall buildings are required if the City is to meet objectively assessed need for office capacity over the lifetime of this Plan. <u>Taking into account the policies of the plan as a whole, there may be some circumstances where the redevelopment of an existing tall building could contribute towards meeting these needs.</u>
11.5.4	<u>For the purposes of Policy D9 of the London Plan, the Tall building areas identified as being appropriate locations for tall buildings</u> are the City Cluster and Fleet Valley areas. A comprehensive analysis of the character of the City informed the location of these tall building areas. The study found that, given its historic nature, and the prominence in local and wider strategic views, all parts of the Square Mile are sensitive or very sensitive to <u>new</u> tall buildings. The City Cluster and Fleet Valley areas are the only broad areas found to be less sensitive and less constrained relative to other areas. Outside the identified tall building areas, <u>new</u> tall buildings, <u>particularly on sites where there is no tall building currently, would be likely to have</u> significant impacts on heritage assets and on protected views from places within and outside the Square Mile, and could significantly undermine the prevailing townscape and character of the area.
New paragraph 11.5.12 after 11.5.11	<u>On sites that contain a tall building (both within and outside the tall building areas identified in Figure 14), the existence of a tall building is likely to be a material consideration in the determination of development proposals. The retrofit or redevelopment of sites with existing tall buildings outside of the tall building areas may therefore be considered appropriate, where demonstrated that they would meet the requirements of Policy S12 (8), (9) and (10) in relation to their impacts and design, and other relevant development plan policies.</u>

## 6. Matters on which parties disagree

Topic/matter	City of London Corporation	Aviva Investors and Obayashi Properties UK Ltd
Boundaries and form of the City Cluster tall buildings area	Comprehensive analysis of the character of the city has informed both the boundaries of the tall buildings clusters. 20 Gracechurch Street is wrapped to the north, west and south by the largest Conservation	In order to accommodate the additional office floorspace over the Plan period (which Aviva consider is a minimum of 1.9 million sqm) then growth in and around the City Cluster needs to be optimised. This

	<p>Area in the City (Bank Conservation Area) and therefore the extension of the city cluster to the west to include the 20 Gracechurch Street site would not form a logical boundary for the cluster.</p> <p>The Tall Building Volumetric testing (2024) has informed the sculpting of the tall buildings area. The site is located to the west of the identified cluster. The part of the cluster immediately to the east of the site has contours of between 100 and 140m AOD. It would be too simplistic to pull these boundaries westwards. These contours have been influenced by the heritage assets and urban form.</p>	<p>requires flexibility in the definition and application of the contour heights and the extension of the tall building area itself where this can be achieved without compromising the Local Plan's overarching objective to deliver sustainable development.</p> <p>The site at 20 Gracechurch Street presents a clear and obvious opportunity to extend the City Cluster Tall Buildings Area. PLP Architects have prepared a study in consultation with Tavenors Consultancy which demonstrates that the site could deliver a significant quantum of new office floorspace through a redevelopment which would respect each of the key townscape and heritage constraints identified within the evidence base.</p> <p>Further details and explanation are set out within the representations submitted by Aviva Investors and Obayashi Properties UK Ltd (dated 14 June 2024).</p>
<p>Office floorspace requirements in respect to need for tall buildings</p>	<p>The Future of Office Use Study (2023) identifies a need for a minimum of 1.2m sqm net (NIA) of new office floorspace within the square mile up to 2040</p>	<p>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.</p> <p>Further details and explanation are set out within the representations submitted by Aviva Investors and Obayashi</p>

		Properties UK Ltd (dated 14 June 2024).
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Signed on behalf of City of London Corporation:



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