



Planning and Transportation Committee

Date: TUESDAY, 25 FEBRUARY 2014

Time: 11.00am

Venue: LIVERY HALL

Members:

Deputy Michael Welbank, MBE (Chairman)	Gregory Jones QC
Oliver Lodge (Deputy Chairman)	Deputy Henry Jones
Randall Anderson	Deputy Keith Knowles
Alex Bain-Stewart	Alderman Professor Michael Mainelli
David Bradshaw	Paul Martinelli
Deputy John Chapman	Brian Mooney
Dennis Cotgrove	Sylvia Moys
Revd Dr Martin Dudley	Deputy John Owen-Ward
Peter Dunphy	Alderman Dr Andrew Parmley
Sophie Fernandes	Ann Pembroke
John Fletcher	Deputy Henry Pollard
Marianne Fredericks	Chris Punter
Deputy Bill Fraser	Jeremy Simons
Alderman John Garbutt	Tom Sleigh
George Gillon (Chief Commoner)	Graeme Smith
Alderman David Graves	Patrick Streeter
Christopher Hayward	Deputy James Thomson
Michael Hudson	

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Lunch will be served in Guildhall Club at 1PM

John Barradell
Town Clerk and Chief Executive

AGENDA

Part 1 - Public Agenda

1. **APOLOGIES**
2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
3. **MINUTES**
 - a) To confirm the Minutes of the last meeting held on 4 February 2014
For Decision
(Pages 1 - 6)
 - b) To receive the draft minutes of the Streets and Walkways Sub Committee Meeting held on 13 January 2014
For Information
(Pages 7 - 12)
4. **TOWN PLANNING AND DEVELOPMENT APPLICATIONS**

Report of the City Planning Officer relative to development and advertisement applications dealt with under delegated authority.

For Information
(Pages 13 - 22)
5. **REPORTS OF THE CITY PLANNING OFFICER RELATIVE TO PLANNING APPLICATIONS**
 - a) Site Bounded By 19-21 & 22 Billiter Street, 49 Leadenhall Street, 108 & 109-114 - Fenchurch Street, 6-8 & 9-13 Fenchurch Buildings London EC3
To view documents and plans relating to this application click [here](#).
For Decision
(Pages 23 - 134)
 - b) 19-21 & 22 Billiter Street, London EC3 - Listed Building Consent
To view documents and plans relating to this application click [here](#).
For Decision
(Pages 135 - 142)
6. **REPORTS OF THE DIRECTOR OF THE BUILT ENVIRONMENT**
 - a) Adoption and Implementation of the City of London Community Infrastructure Levy
For Decision
(Pages 143 - 162)
 - b) Consultation on the City's Draft Local Flood Risk Management Strategy
For Decision
(Pages 163 - 218)
 - c) Parking Ticket Office Update and Annual Statistics
For Information
(Pages 219 - 226)

- d) Road Danger Reduction Update

For Information
(Pages 227 - 240)

- e) Department of the Built Environment, Business Plan Progress Report for Q3

For Information
(Pages 241 - 252)

7. **UPDATE MANAGEMENT OF PUBLIC LIFTS, ESCALATORS AND THE MILLENNIUM INCLINATOR**

Report of the City Surveyor.

For Information
(Pages 253 - 268)

8. **RESOLUTION FROM THE AUDIT AND RISK MANAGEMENT COMMITTEE**

To receive a resolution from the Audit and Risk Management Committee relative to flooding.

For Decision
(Pages 269 - 270)

9. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

10. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

11. **EXCLUSION OF THE PUBLIC**

MOTION – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

Part 2 - Non-public Agenda

12. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 4 February 2014.

For Decision
(Pages 271 - 272)

13. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

14. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

Any drawings and details of materials submitted for approval will be available for inspection by Members in the Livery Hall from Approximately 9:30 a.m.

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Agenda Item 3a

PLANNING AND TRANSPORTATION COMMITTEE

Tuesday, 4 February 2014

Minutes of the meeting of the Planning and Transportation Committee held at the Guildhall EC2 at 11.00am

Present

Members:

Deputy Michael Welbank (Chairman)	George Gillon (Chief Commoner)
Oliver Lodge (Deputy Chairman)	Michael Hudson
Randall Anderson	Deputy Henry Jones
Alex Bain-Stewart	Paul Martinelli
Deputy John Chapman	Sylvia Moys
Dennis Cotgrove	Deputy John Owen-Ward
Peter Dunphy	Ann Pembroke
John Fletcher	Jeremy Simons
Marianne Fredericks	Tom Sleigh
Deputy Bill Fraser	Patrick Streeter
Alderman John Garbutt	

Officers:

Simon Murrells	- Assistant Town Clerk
Katie Odling	- Town Clerk's Department
Deborah Cluett	- Comptroller and City Solicitor's Department
Philip Everett	- Director of the Built Environment
Peter Rees	- City Planning Officer, Department of the Built Environment
Annie Hampson	- Department of the Built Environment
Paul Beckett	- Department of the Built Environment
Paul Monaghan	- Assistant Director Engineering
Alan Rickwood	- City Police
Alexander Williams	- City Police

1. APOLOGIES

Apologies for absence were received from David Bradshaw, the Reverend Dr Martin Dudley, Sophie Fernandes, Alderman David Graves, Christopher Hayward, Gregory Jones QC, Brian Mooney, Deputy Henry Pollard, Graeme Smith and Deputy James Thomson.

2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA

There were no declarations of interest.

3. MINUTES

RESOLVED – That,

- a) the Minutes of the Planning and Transportation Committee meeting held on 14 January 2014, be approved as a correct record; and

- b) the Minutes of the Streets and Walkways Sub Committee meetings held on 14 October and 18 November 2013, be received.

4. **TOWN PLANNING AND DEVELOPMENT APPLICATIONS**

The Committee received a report of the City Planning Officer relative to development and advertisement applications dealt with under delegated authority since the previous meeting.

5. **REPORTS OF THE CITY PLANNING OFFICER RELATIVE TO PLANNING APPLICATIONS**

5.1 **Emperor House & Roman Wall House 35 - 36 Vine Street & 1- 2 Crutched Friars, London**

Registered Plan No.: 13/00166/FULMAJ

Proposal: Demolition of existing buildings and redevelopment of the site to provide an office (Class B1) and retail (Class A1/A3) building comprising basement, lower ground, ground and ten upper floors, together with associated works.

The City Planning Officer informed the Committee of the following amendments to the report –

Condition 1

The applicants have requested that due to the nature of the development the period for implementation be 5 years rather than 3years.

The development hereby permitted shall be begun before the expiration of five years from the date of this permission.

To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.

Condition 6 – sewer vent condition.

The applicants have requested a slightly more flexible wording so that it can be established whether high level sewer venting would be required in this development.

Unless otherwise agreed in writing by the local planning authority, before any piling or construction of basements is commenced, a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.

To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Core Strategy: CS15.

Condition 17

The following details to be submitted and approved are added to the condition

(I) details of the riser on the south elevation, including details of location, route and level of termination;

Condition 25

A slight amendment to the wording:

Unless otherwise approved by the Local Planning Authority the doors and windows to any bar or restaurant on the Vine Street frontage shall be kept closed other than for the purposes of normal access and egress, or for use in an emergency or for maintenance purposes.

To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Core Strategy: CS15, CS21.

Condition 29

A correction to the condition number –

Fritting must be applied and maintained for the life of the building to the windows at first to fourth floor levels on the elevation facing Vine Street in accordance with details approved under Condition 17 of this planning permission.

In order to prevent overlooking and to protect the amenity of nearby residential properties in accordance with the following policies of the Unitary Development Plan and Core Strategy: HOUS10; CS21.

The City Planning Officer detailed site and surrounding information to Members.

Mr Christopher Murphy and Mr Anthony Corradi spoke against the application. In response to questions from the Committee, Mr Corradi advised that the main attraction to his wine bar which was situated on the left hand side of Vine Street was the vast amount of space which it was surrounded by. In addition, he informed the Committee that a petition campaigning against the development had been signed by a number of residents and interested parties.

During discussion, reference was made to the following –

- The loss of light – Members noted that an impact assessment had been undertaken on daylight and sunlight hours which had demonstrated some loss of light.
- It was noted that the service entrance to Jardin House would not be affected as a result of the proposed development.
- Members were informed that the roof of the proposed development contained horizontal slates which would retain elements of snow and ice and as part of the detailed design, draining would be considered.
- In response to a number of concerns, the City Planning Officer advised that the developer had specifically requested a 5 year period in which to start the development due to its scale and complexity. Some Members considered that 3 years would be more appropriate to speed up the development whereas other Members supported 5 years. A vote was taken and it was agreed that the development should begin before the expiration of 5 years as per the amendment above.
- It was suggested that the use of the Vine Street frontage should be extended to include usage by A4 premises (public houses, wine bars). Members were in agreement that this amendment should be made and noted that a further consultation would need to be undertaken before a decision notice could be issued. If there were issues that arose from the consultation then the City

Planning Officer would report back to the Committee, otherwise a decision notice would be issued.

Vote – 15 in favour, 1 abstention.

RESOLVED – That the Committee be minded to approve planning permission subject to the outcome of a satisfactory consultation to include usage by A4 premises (public houses and wine bars) along the Vine Street frontage and the City Planning Officer either –

- a) be delegated authority to issue a decision notice; or
- b) report back to the Committee with any issues that arise from the consultation.

6. BISHOPSGATE AND TRINITY SQUARE CONSERVATION AREA CHARACTER SUMMARY AND MANAGEMENT STRATEGIES - DRAFT SPD

Consideration was given to a report of the City Planning Officer which sought approval for the draft text of the Bishopsgate and Trinity Square Conservation Area Character Summary and Management Strategies to be issued for informal and formal consultation to allow for their adoption as Supplementary Planning Documents.

A brief discussion took place regarding 'A' Boards and the Director of the Built Environment advised that a Policy was currently being produced and this would come before the Committee in the near future.

RESOLVED – That,

- a) the draft text of the Bishopsgate and Trinity Square Conservation Area Character Summary and Management Strategies, be approved and placed on the website as 'living drafts' prior to formal public consultation in 2014;
- b) the City Planning Officer be authorised to make amendments in response to the public's comments, providing these do not materially change the documents; and
- c) that following informal public consultation the documents be published for formal consultation, prior to adoption as Supplementary Planning Documents.

7. PLANNING APPEAL DECISIONS

A report of the City Planning Officer was received which advised the Committee about the decisions made by the Planning Inspectorate on appeals made against the decisions of the City Corporation during 2013.

8. SCHEME OF DELEGATION

A report of the Town Clerk was considered relative to the Scheme of Delegation and Standing Orders.

RESOLVED – That,

- a) the delegations relating to the Director of the Built Environment as set out in the appendix to this report be approved; and
- b) the proposed amendment to Standing Orders relating to the declaration of operation property assets which are surplus to requirements be noted.

9. PLANNING PROTOCOL

A report of the Comptroller and City Solicitor was considered which related to the review of the Planning Protocol. Members recalled that an update of the Planning Protocol was recommended to the Planning and Transportation Committee at its meeting of 14 January 2014.

At the meeting on 14 January, concern was expressed that in advising on pre-determination, the wording of the Protocol was overly restrictive. Concern was also expressed regarding the procedure in the event of committee refusing an application for planning permission where the City Planning Officer had recommended approval. It was agreed that the Comptroller and City Solicitor review the relevant sections of the draft updated Planning Protocol and submit a revised draft Planning Protocol for approval.

RESOLVED – That the revised draft Planning Protocol be approved and referred to the Policy and Resources Committee.

10. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

'A' Boards – In response to a question, the Comptroller and City Solicitor advised that the responsibility of an accident which had been caused by a 'A' Board would be very much dependent on the circumstance and it was hope that this matter could be addressed within the Policy that was being prepared which would come to this Committee for consideration in the coming months.

11. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

There were no items of urgent business.

12. EXCLUSION OF THE PUBLIC

RESOLVED – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

13. ISSUE REPORT - BRIDGEMASTER'S HOUSE

An issue report of the City Surveyor was considered relative to Bridgemastrer's House.

14. QUESTIONS

There were no questions.

15. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED

There were no items of urgent business.

The meeting closed at 12.45pm

Chairman

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STREETS AND WALKWAYS SUB (PLANNING AND TRANSPORTATION) COMMITTEE

Monday, 13 January 2014

Minutes of the meeting of the Streets and Walkways Sub (Planning and Transportation) Committee held at Guildhall on Monday, 13 January 2014 at 1.45pm

Present

Members:

Jeremy Simons (Chairman)
Marianne Fredericks (Deputy Chairman)
Randall Anderson
Dennis Cotgrove
Brian Harris (Ex-Officio Member)
Michael Hudson
Oliver Lodge
Sylvia Moys
Barbara Newman (Ex-Officio Member)
Deputy John Owen-Ward
Deputy Michael Welbank
Alderman Nick Anstee
Deputy John Tomlinson

In Attendance:

Alderman Nick Anstee
Deputy John Tomlinson
Angela Starling

Officers:

Julie Mayer	- Town Clerk's
Victor Callister	- Department of the Built Environment
Steve Presland	- Department of the Built Environment
Iain Simmons	- Department of the Built Environment
Ian Hughes	- Department of the Built Environment
Patrick Hegarty	- Department of the Built Environment
Norma Collicott	- City of London Police
Alan Rickwood	- City of London Police

1. APOLOGIES FOR ABSENCE

Apologies for absence were received from Alderman Alison Gowman

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

Randall Anderson and Barbara Newman declared a general interest in respect of item 4(f) as they are both residents of the Barbican Estate.

3. **MINUTES**

RESOLVED – that, the minutes of the meeting held on 18 November 2013 be approved.

Matters arising

Cycling in the City - Officers advised that the Mayor's public consultation was underway. The consultation was due to finish on 14th February and a report would be taken to the Planning and Transportation and Policy and Resources Committees at the end of February.

BT Openreach – Officers advised that they had been in contact with BT and invited them onto the Considerate Contractors scheme.

4. **REPORTS OF THE DIRECTOR OF THE BUILT ENVIRONMENT :-**

4.1 **Gateway 4 Detailed Options Appraisal – 8-10 Moorgate Area Improvements**

The Sub Committee considered a report of the Director of the Built Environment in respect of the detailed options appraisal for 8 – 10 Moorgate area. The project sought to raise the carriageway to footway level and introduce seating to create new public space in Tokenhouse Yard and Telegraph Street.

In response to questions, officers advised that signage would be considered at Gateway 5 but it would be kept to a minimum. However, enforceable traffic orders would be made very clear to the public.

RESOLVED – that:

1. Option 1, as set out in the report, be adopted; i.e. the pedestrianisation of the eastern part of the street and a timed closure to vehicles for the remainder of the street.
2. The project progress to the next Gateway.

4.2 **Gateway 3 - Outline Options Appraisal -- Beech Street**

The Sub Committee considered a report of the Director of the Built Environment, which sought to enhance the user experience of Beech Street. Members noted that since Beech Street had now been classified as a covered road, more options would be available.

In response to questions, officers advised that the next report (Gateway 4) would consider issues such as access, the central reservation, escalators and lifts. The report would also form part of the consultation on the Barbican Area Strategy and be reported to the next cycle of the Residents' Consultation Committee and the Barbican Residential Committee. Finally, a ward member for Cripplegate, who was in attendance, advised members that a new consultation protocol was being prepared between Barbican residents and the City.

RESOLVED, that:

1. All three options, as set out in the report be progressed to the next Gateway, subject to a full public consultation.
2. An additional £19,000 be allocated to progress the project to the next Gateway, as set out in the table at Appendix 5 to the report.

4.3 Outcome Report - Paul's Walk Western End

The Sub Committee considered a report of the Director of the Built Environment, which sought to close the Paul's Walk Western End project. The Director of the Built Environment and the Chairman commended Clarisse Tavin for her excellent work on this project, which had included extensive negotiations with Network Rail.

However, members were concerned about the behaviour of cyclists in this area and asked if there were any plans for calming measures. The Police representative advised that cyclists were stopped and ticketed, being encouraged to attend awareness raising courses. The Chairman asked if means to reduce cycling on the Riverside Walk be reported to the next meeting.

RESOLVED, that:

1. The project be closed.
2. The additional staff costs of £2,503 be met from the works and fees underspend on the project.

4.4 Gateway 3 - Outline Options Appraisal Bank By-Pass Walking Routes

The Sub Committee considered a report of the Director of the Built Environment in respect of proposed improvements to north-south lanes in the Bank area that act as 'by-pass' walking routes, avoiding the congested Bank junction.

RESOLVED, that:

1. Option 1, as set out in the report, be adopted.

2. The various sub options related to traffic management be further developed through a detailed traffic analysis, ahead of the next Gateway, to ensure that the requirements of each Lane are taken into account.

4.5 Progress Report – Holborn Circus Area Enhancement

The Sub Committee received a progress report of the Director of the Built Environment in respect of the above project. Members noted that the statue of Prince Albert at Holborn Circus was being cleaned and restored and ten places would be available for members to visit the statue, at a foundry in Poplar, on 30th January 2014. Officers would contact members after the meeting and advise of the arrangements. The statue would be unveiled in early May 2014 and members agreed that the Lord Mayor should be invited to unveil it and that invitations should also be extended to the Mayors for London and Camden. Members commended officers for this project and particularly the quality of their regular bulletins.

4.6 Barbican Seating - Consultation Report

The Committee considered a progress report of the Director of the Built Environment in respect of the above project. In response to questions about Listed Building compliance, officers agreed to check that replacements would be like-for-like. In respect of possible damage to vents, should seating be removed, members noted that the replacement would be immediate. Finally, members noted that the seating for the upper level of the Ben Jonson Highwalk was in abeyance, pending completion of the waterproofing project.

Members noted that all projects have a 'lessons learnt' phase at the end; as part of the Gateway 7 report.

RESOLVED – that, the seating and planters be removed from St Giles Terrace and Ben Jonson Highwalk and relocated to elsewhere in the City, for use by the City community, and seating similar to that present on site be put back before the delivery of the City's improvement project.

4.7 Special Events on the Public Highway for 2014

The Committee considered a joint report of the Director of the Built Environment and the Director of Public relations, outlining the major events planned for 2014.

During the debate and discussion the following items were raised/noted:

- The Children's Parade was always held on a Friday to ensure maximum attendance
- Members were concerned at the large number of events and it was generally agreed that the number should reduce in future years. It was suggested that events finishing early evening in the summer months might start later.

- All sporting events in the City should be non-profit making, with all proceeds to charities.
- Members generally favoured subtle lighting to the bridges, as used during the Olympics. Officers advised that City bye-laws prohibited commercial exploitation of the bridges.

In concluding, the Chairman noted that the same number of events as held last year was being proposed.

Members further noted that a report setting out Event Guidelines providing a framework to consider both new and existing events would come to the Sub Committee in April 2014.

RESOLVED, that :

1. The major events taking place in the City, as detailed in Appendix 1 to the report, be agreed.
2. Progress and planning to date in relation to the Tour de France and Prudential Ride London cycling events be noted.
3. A short-term road closure, on the same basis as 2013, be agreed to allow the Children's Parade event to take place on Friday 27 June 2014.
4. A further report be presented to members in Spring 2014 reviewing the Events Guidelines, including special event lighting for the City's River Bridges and the introduction of an application fee for special events, from April 2014.

5. DECISIONS TAKEN UNDER URGENCY OR DELEGATED AUTHORITY

Members noted the following decisions, which had been taken under urgency provision since the last meeting:

- Aldgate Highway changes
- John Carpenter Street (Gateway 3/4/5) – the Chairman asked if the full report could be circulated to members

6. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE

In response to a question about skateboarding, the Police advised that they frequently moved on skateboarders causing a public nuisance but there were limited judicial remedies. Members were particularly concerned about public safety, anti-social behaviour and damage to street furniture. The Chairman asked whether this behaviour was covered by City Bye-Laws and asked for a report to the next meeting.

7. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

The Assistant Director (Department of the Built Environment) was heard in respect of the Ludgate Hill Crossing Trial. Members noted that the City had been very successful in obtaining £6Million for next year from TFL. However, they had not made any budget allocation for the Fleet Street Corridor scheme.

As a result, the City did not have TfL funding for the proposed crossing trial in Ludgate Hill. The next opportunity for TfL funding would be in the summer of this year, when there might be some TfL bus funding available. The Sub Committee were therefore asked whether they would like to revert to the S.106 funding route for this change.

Subsequent to the meeting, the Assistant Director confirmed that the cost estimates provided for the removal of the trial, should it be unsuccessful.

RESOLVED – that, the Section 106 funding be used.

The meeting ended at 3.40

Chairman

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Agenda Item 4

Committee:	Date:
Planning and Transportation	25 February 2014
Subject:	
Delegated decisions of the City Planning Officer and the Planning Services and Development Director	
Public	

1. Pursuant to the instructions of your Committee, I attach for your information a list detailing development and advertisement applications determined by the City Planning Officer or the Planning Services and Development Director under their delegated powers since my report to the last meeting.
2. Any questions of detail arising from these reports can be sent to plans@cityoflondon.gov.uk

DETAILS OF DECISIONS

Registered Plan Number & Ward	Address	Proposal	Date of Decision
13/01139/FULL Broad Street	4 Copthall Avenue London EC2R 7DA	Change of use of basement from office (Class B1) use to dual use as office (Class B1) and/or physiotherapy clinic (Class D1) use (total floor space 168sq.m).	06.02.2014
13/01206/FULL Broad Street	111 Old Broad Street London EC2N 1AP	Installation of a new shop front window to replace the existing double doors.	06.02.2014
13/01209/ADVT Broad Street	111 Old Broad Street London EC2N 1AP	Installation of three illuminated fascia signs measuring 0.6m high by 2.14m wide at a height above ground of 2.6m.	06.02.2014

13/01029/MDC Bridge And Bridge Without	11 - 19 Monument Street,41 - 45 Fish Street Hill And 1 - 2 Pudding Lane London EC3R 8JU	Details of a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects pursuant to condition 4 of planning permission (application no. 13/00049/FULMAJ) dated 23rd September 2013.	31.01.2014
13/01112/MDC Bishopsgate	5 Broadgate London EC2M 2QS	Details of photovoltaic cells and solar thermal units pursuant to condition 7a (part) of planning permission dated 29 July 2011 (10/00904/FULEIA).	23.01.2014
13/01113/MDC Bishopsgate	5 Broadgate London EC2M	Details of the integration of window cleaning equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level pursuant to condition 7(f) of planning permission dated 29 July 2011 (10/00904/FULEIA).	23.01.2014
13/01144/MDC Bishopsgate	Broadgate Circle & 3 Broadgate London EC2M 2QS	Details of plant and duct work to serve the (A1) (A3) (A4) uses and details of ventilation and air-conditioning for the (A1) (A3) (A4) uses pursuant to conditions 2 (e) and (f) of Planning Permission 12/00431/FULL dated 24th July 2012.	23.01.2014
13/01059/ADVT Bishopsgate	216 Bishopsgate London EC2M 4PT	Installation of (i) One internally illuminated fascia sign (with additional external LED uplighter) measuring 0.80m high by 6.80m wide and 3.93m above ground level; (ii) One internally illuminated projecting sign measuring 0.75m high by 1.00m wide and 4.04m above ground level.	30.01.2014

13/01157/FULL Bishopsgate	176 Bishopsgate London EC2M 4NQ	Change of use of first and second floor from financial and professional services (Class A2) use to cafe (Class A3) use as an extension to the existing cafe (Class A3) use at basement and ground floor levels.	30.01.2014
13/01042/MDC Castle Baynard	12 - 14 New Fetter Lane 43 Fetter Lane London EC4A 1NA	Submission of a Construction Method Statement and details of foundations pursuant to conditions 19 and 23 of Planning Permission 11/00423/FULL dated 18/08/2011.	23.01.2014
13/01149/MDC Castle Baynard	Carmelite House 50 Victoria Embankment London EC4Y 0LS	Details of ground level surfaces, walkway surfaces and external surfaces within the site boundary pursuant to condition 2(n), (o) and (p) of planning permission dated 25.08.2011. (ref. (11/00228/FULL).	23.01.2014
13/01156/LDC Castle Baynard	Carmelite House 50 Victoria Embankment London EC4Y 0LS	Submission of samples and materials, fenestration, ground floor elevations, office entrance, soffits, handrails and balustrades, works of making good to interior pursuant to conditions 2(a), (b), (c), (d), (f) and (K) of 11/00230/LBC dated 25.08.11.	28.01.2014
13/01158/MDC Castle Baynard	Carmelite House 50 Victoria Embankment London EC4Y 0LS	Details of green roof pursuant to condition 16 of planning permission 11/00228/FULL dated 25.08.2011.	28.01.2014
13/00857/FULL Castle Baynard	176 Fleet Street London EC4A 2EN	Formation of a new entrance and associated ramp.	30.01.2014

13/00783/FULL Castle Baynard	New Fetter Lane London EC4	Re-alignment and extension of the existing cycle hire docking station associated with the London Cycle Hire Scheme, containing a maximum of 21 docking points for scheme bicycles plus a terminal to secure and release bicycles and provide registration and payment facilities and way-finding mapping.	06.02.2014
13/01097/NMA Cripplegate	City of London School For Girls St Giles' Terrace Barbican London EC2Y 8BB	A non-material amendment to planning permission 12/01016/FULL dated 7th March 2013, under section 96a of the Town and Country Planning Act 1990 for: (i) alterations to the glazed rooflights; (ii) retention of the access bridges; (iii) alterations to the brick parapet; (iv) alterations to the sliding doors and (v) alterations to the structural support mechanisms.	06.02.2014
13/01195/MDC Cripplegate	City of London School For Girls St Giles' Terrace Barbican London EC2Y 8BB	Submission of samples, colour and finish of railings, relocation of cycle stands, details of landscaping and submission of archaeological details pursuant to conditions 2(a), (b), (d), 4 and 5 of planning permission 12/01016/FULL and conditions 2 (a), (b), (c) of listed building consent 12/01017/LBC dated 07/03/13.	06.02.2014
13/01197/FULL Cripplegate	City of London School For Girls St Giles' Terrace Barbican London EC2	Formation of an emergency escape door, escape ramp and enclosure for mechanical plant in the existing basement level car park in association with the proposed internal works to subdivide the swimming pool and extend the gym.	10.02.2014

13/01174/ADVT Candlewick	70 - 72 King William Street London EC3M 7JJ	Installation of (i) two internally illuminated fascia signs measuring 0.675m (h) x 1.22m (w) at a height of 4.18m above ground, (ii) one internally illuminated fascia sign measuring 0.75m diameter at a height of 4.19m above ground and (iii) one internally illuminated hanging sign measuring 0.6 x 0.6m at a height of 2.9m above ground.	30.01.2014
13/01173/ADVT Candlewick	Phoenix House 18 King William Street London EC4N 7BP	Installation and display of (i) three sets of halo illuminated fascia lettering measuring 0.395m high by 0.845m wide at height of 2.78m above ground and (ii) one internally illuminated projecting sign measuring 0.7m high by 0.7m wide at a height of 2.78m above ground.	04.02.2014
13/00950/FULL Coleman Street	Finsbury Circus House 12-15 Finsbury Circus London EC2M 7EB	Installation of four air condenser units at roof level.	23.01.2014
13/01116/MDC Coleman Street	72 Fore Street London EC2Y 5EJ	Details, samples and particulars of the ground floor finishes, public realm and gates pursuant to condition 6(a) (in part) of planning permission dated 26th June 2009 (Application 07/00092/FULL) amended by planning permission dated 30th March 2012 (Application 11/00969/FULL).	30.01.2014
13/01204/LBC Coleman Street	Moorgate Station Moor Place London EC2	Erection of memorial plaque to the Moorgate Rail disaster of 1975.	31.01.2014

13/00969/MDC Cheap	125 Wood Street London EC2V 7AN	Details of window cleaning equipment and garaging thereof, plant and other excrescences at roof level, details of all ground level services , details of the proposed facade and windows and submission of a Noise Assessment Report pursuant to condition 18, 2 (b), (f), (j), (k), (b) and 18 of planning permission 12/01200/FULL dated 5th June 2013.	30.01.2014
13/01140/FULL Dowgate	76 Cannon Street London EC4N 6AE	Alterations to the office entrance on Cannon Street to include the installation of a new glazed entrance door with a video entry system and replacement of the existing metal canopy with a new backlit fretwork metal canopy.	30.01.2014
13/01176/MDC Dowgate	90 Cannon Street London EC4N 6HL	Details of the height of the ATM controls pursuant to condition 2(a) of planning permission 13/00817/FULL dated 3 October 2013.	30.01.2014
13/01028/LBC Farringdon Within	2 King Edward Street London EC1A 1HQ	Upgrading of Audio/Visual Equipment in King Edward Hall.	23.01.2014
13/01043/NMA Farringdon Within	30 Old Bailey And 60 Ludgate Hill London EC4M 7HS	Non material amendment under S96A of the Town and Country Planning Act 1990 to the proposed office doors, glass canopies and southern roof terrace at 9th floor level.	23.01.2014
13/01008/FULL Farringdon Within	Flat 6 64 West Smithfield London EC1A 9DY	Roof extension to form an additional bedroom and roof terrace.	30.01.2014

13/01072/MDC Farringdon Within	26 Farringdon Street London EC4A 4AB	Details of (i) external duct finish pursuant to condition 2 of planning permission 12/01120/FULL and listed building consent 12/01121/LBC dated 31.01.2013 and (ii) noise assessment report pursuant to condition 4 of planning permission 12/01120/FULL.	30.01.2014
13/01154/ADVT Farringdon Within	60 Holborn Viaduct London EC1A 2FD	Installation and display of: (i) two sets of internally illuminated fascia lettering measuring 2.3 metres wide, 0.2 metres high displayed at a height of 2.4 metres above ground level on the west side of the shop frontage and 2.6 metres above ground level on the east side of the shop frontage; (ii) one set of internally illuminated fascia lettering measuring 1.9 metres wide, 0.4 metres high displayed at a height of 2.5 metres above ground level; (iii) one internally illuminated projecting sign measuring 0.9 metres wide, 0.4 metres high displayed at a height of 2.6 metres above ground level.	06.02.2014
13/01033/FULL Farringdon Without	4 - 7 Lombard Lane London EC4Y 8AD	Erection of a one and two storey roof extension to form two flats (Use Class C3) (166 sq.m).	23.01.2014
13/00886/MDC Farringdon Without	St Bartholomew's Hospital - Giltspur Street, West Smithfield, Little Britain London EC1A	Details of the measures for protecting the trees in the square and details of the pruning of the trees, pursuant to the discharge of condition 2 (m) of planning permission reference 04/00344/FULEIA dated 30th March 2005.	30.01.2014

13/01095/FULL Farringdon Without	Archdeaconry of Hackney, St Andrews Vicarage 5 St Andrew Street London EC4A 3AB	Installation of a weather vane on each existing finial of the church tower (four weather vanes in total).	06.02.2014
13/00958/FULL Langbourn	Asia House 31 - 33 Lime Street London EC3M 7HT	Demolition of existing fourth and part fifth floor levels and creation of a new fourth floor and set back fifth floor and associated roof terrace. Extension within rear lightwell at first to fourth floor levels, new plant enclosure at roof level, alterations to main office entrance, and other associated works.	28.01.2014
13/01015/ADVT Langbourn	20 Gracechurch Street London EC3V 0BG	Installation and display of: 2 internally illuminated projecting signs measuring 0.9m by 0.6m at a height of 3.1m above ground; 1 internally illuminated fascia sign measuring 2.3m(w) by 0.7m(h) at a height of 3.4m above ground; 5 internally illuminated signs displayed behind the glazing.	30.01.2014
13/01091/FULL Portsoken	90 Mansell Street London E1 8AL	Single storey extension to the existing gym and the relocation of three existing air conditioning units.	30.01.2014
13/01014/FULL Tower	Tower View 16 Byward Street London EC2R 5BA	Installation of two handrails to the entrance steps.	30.01.2014
12/01142/LBC Tower	26 Great Tower Street London	Installation of a wrought iron security gate in the alleyway between 26/27 Great Tower Street and 25 Great Tower Street.	06.02.2014

13/01012/FULL Vintry	19 - 20 Garlick Hill And 4 Skinners Lane London EC4V 2AL	Construction of a sub- basement extension for hotel use (Class C1) (255sq.m).	23.01.2014
13/01093/FULL Walbrook	15-22 Cornhill London EC3V 3ND	Change of Use from restaurant (Class A3) use to events space (sui generis) use. [1,455sq.m GIA]	07.02.2014

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Agenda Item 5a

Committee:	Date:
Planning and Transportation	25 February 2014
<p>Subject:</p> <p>Site Bounded By 19-21 & 22 Billiter Street, 49 Leadenhall Street, 108 & 109-114 Fenchurch Street, 6-8 & 9-13 Fenchurch Buildings London EC3</p> <p>Partial demolition and works of refurbishment and reinstatement to 19-21 Billiter Street; demolition of all other buildings on the site; redevelopment to provide a new building comprising two basement levels and ground plus part 10, 14 and 34 storeys plus plant (total height 170m AOD) containing offices (B1) and flexible retail/financial and professional services/cafe and restaurant uses (A1/A2/A3) at ground floor level; food and drink (A3/A4) uses at levels 13 and 14; change of use at ground and first floor of 19-21 Billiter Street to retail/cafe and restaurant/bar use (A1/A3/A4); the provision of hard and soft landscaping; alterations to Fenchurch Buildings and other incidental works. (125,699sq.m GIA).</p>	
Ward: Aldgate	Public For Decision
Registered No: 13/01004/FULEIA	Registered on: 14 October 2013
Conservation Area: No	Listed Building: Grade II
<p><u>Summary</u></p> <p>It is proposed to demolish five existing buildings on this island site and construct one building incorporating a listed building that would be retained and refurbished at 19-21 Billiter Street. The new development would contain offices of 122,015sq.m and retail floorspace of 3,684sq.m.</p> <p>On Leadenhall Street the new building would be ground plus 36 storeys high; 170.4m AOD (155.9m above ground level). The middle section of the building would be ground plus 10 storeys high. The southern end of the building, on Fenchurch Street, would be ground plus 16 storeys high.</p> <p>The scheme includes improvements to the public realm through increasing the width of footways and particularly Fenchurch Buildings.</p> <p>An Environmental Statement accompanies the scheme.</p> <p>The proposal is in substantial compliance with the development plan policies that relate to it and in particular it supports the objective of promoting the City as the leading international financial and business centre.</p> <p>The scheme would provide an employment led mixed use development which would support the economic policies of the London Plan, LDF Core Strategy and UDP.</p> <p>Objections have been raised to the impact on the loss of daylight and sunlight to residential premises, to the effect on the listed building at 19-21 Billiter Street to the potential impact on two nearby churches and to the impact on the trade and future of a public house on Fenchurch Street.</p>	

There would be reductions in sunlight and daylight to some residential premises but the majority of changes would be within the standards in the BRE guidance and many of the actual changes would be small. There would be a noticeable reduction in sunlight to two open spaces.

The applicant and church authorities are in the process of reaching an accord to ensure protection of the churches.

It is considered that it the concerns of the freehold owners of the East India Arms about the impact on their trade do not justify refusal of planning permission and that these can be addressed through the City's normal controls over construction.

The proposals are considered not to have a detrimental impact on the listed building on the site or the setting of listed buildings and Conservation Areas in the vicinity. It is concluded that the proposal overall is acceptable subject to conditions and to a Section 106 agreement being entered into to cover the matters set out in the report.

This report considers applications for planning permission (13/01004/FULEIA) and listed building consent (13/01005/LBC). The following recommendation relates to the planning application and there is a separate recommendation before your Committee relating to an application for listed building consent.

Recommendation

(a) Planning permission be granted for the above proposal in accordance with the details set out in the attached scheduled, subject to:

(i) Planning Obligations and other agreements being entered into as set out in the body of this report, the decision notice not to be issued until such obligations have been executed; and

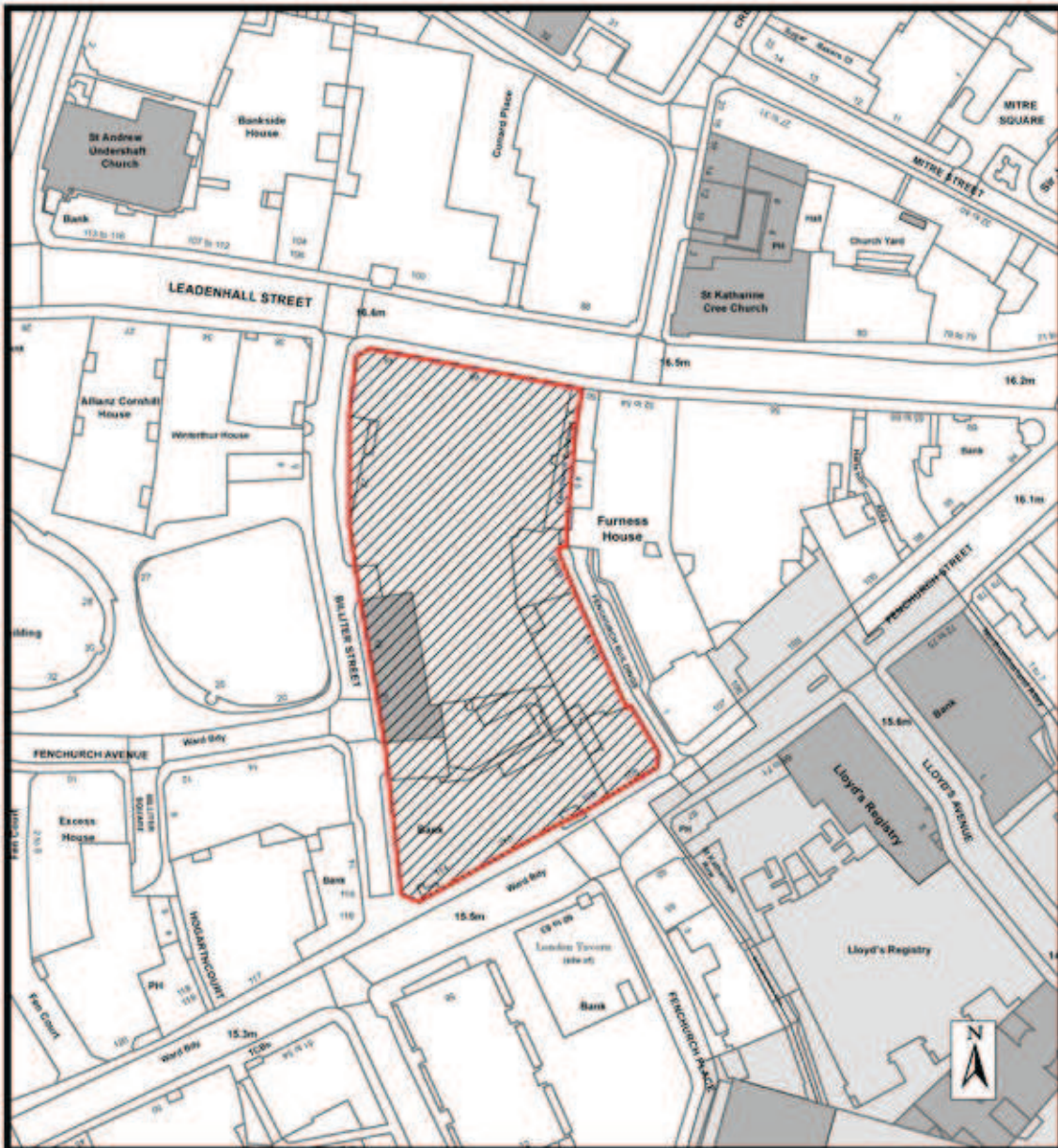
(ii) The Mayor of London be given 14 days to decide whether or not to direct the Council to refuse planning permission (under Article 5(1)(a) of the Town & Country Planning (Mayor of London) Order 2008).

(b) That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 and any necessary agreements under Section 278 of the Highway Act 1980.

(c) That you agree in principle that the area of public highway described in the report may be stopped-up to enable the development to proceed and, upon receipt of the formal application, officers be instructed to proceed with arrangements for advertising and making of a Stopping-up order for that area, under the delegation arrangements approved by the Court of Common Council;

(d) That you agree to accept the area of land proposed to be dedicated as public highway as described in the report.

Site Location Plan



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ADDRESS:
19-21 & 22 Billiter St., 49 Leadenhall St., 108 & 109-114 Fenchurch St., 6-8 & 9-13 Fenchurch Buildings

CASE No.
13/01004/FULEIA

-  SITE LOCATION
-  LISTED BUILDINGS
-  CONSERVATION AREA BOUNDARY



DEPARTMENT OF THE BUILT ENVIRONMENT





Site

1. The site occupies the land bounded by Leadenhall Street, Billiter Street, Fenchurch Street and Fenchurch Buildings. It is occupied by six buildings varying between five and eight storeys in height.
2. 19-21 Billiter Street is listed, grade 2, dates from 1865 and is by the architect Edward Ellis. The building is a classical style office building largely faced in Portland stone with rich detailing of cornices, entablature, pedimented entrances, keystones, columns and decorative carved panels. Despite alterations in the 1930's, the interior is of high quality with substantial surviving original features.
3. The other buildings on the site are as follows. 6-8 Fenchurch Buildings is an early 20th century white glazed brick building. 9-13 Fenchurch Buildings is a building with a high quality white faience facade with modelling and detailing of lion head masks, pilasters, string courses and cornice (Richardson and Gill 1924-27). 108 Fenchurch Street is a red brick and decorative stucco office building dating from 1886. 22 Billiter Street/49 Leadenhall Street is predominantly glazed building constructed in 1972-8. 109-114 Fenchurch Street is a glass and concrete office building constructed in 1972-5.
4. The existing buildings contain offices (B1) of 33,572sq.m (GIA), two shops (A1), a bank (A2) and a restaurant (A3) with a combined area of 1,247sq.m (GIA) and a sports club (D2) of 2,093sq.m.
5. There are listed buildings in the vicinity at St Kathryn Cree and St Andrew Undershaft churches (grade 1), the former tea warehouses in Creechurch Lane (grade 2), Lloyds of London (Grade 1) and Lloyds Registry (grade 2*) and 72-75 Fenchurch Street (grade 2). There are undesignated heritage assets on the site and in the area at 108 Fenchurch Street, 9-13 Fenchurch Buildings, the Fenchurch Buildings frontage to Furness House and 67 Fenchurch Street.
6. Lloyds Avenue Conservation Area is immediately to the south and east of the site; Fenchurch Street Station Conservation Area is to the south of that.
7. The area is predominately in commercial office use, with retail uses on some street frontages. There is residential accommodation in the vicinity at 2-20 Creechurch Lane, 27-31 Mitre Street and above the East India Arms at 67 Fenchurch Street.
8. There are a variety of building heights and styles in the area, including the Willis tower at 51 Lime Street (29 storeys), 56-59 Fenchurch Street, (6 floors on the street frontage with setbacks to 16 floors overall), 60 Fenchurch Street (12 storeys), Plantation Place (6 storeys on the street frontage with setbacks rising to 16 storeys overall).
9. Planning permission was granted in 2012 for a new building on the neighbouring site at 116-120 Fenchurch Street. This permits a 15 storey building comprising an 11 storey base clad with ceramic/vitreous enamelled columns and clear glazing, supporting 4 floors of folded glazing, with a landscaped roof garden. The proposed uses and

floorspace are offices of 38,150sq.m and retail space of 4,857sq.m with 19,636sq.m of plant and ancillary areas. The landscaped roof would be a public garden with dedicated lift access. There would be a cafe kiosk in the garden. A significantly improved public highway fronted by retail units is included through the site at ground level.

10. Planning permissions have been granted for redevelopment with tall buildings at International House, Mitre Square (37,498sq.m, 19 storey, 96.31m AOD) (10/00371/FULMAJ) and at 52-54 Lime Street (59,268sq.m, 38 storey, 206m AOD) (12/00870/FULEIA). Demolition has taken place in preparation for construction of this building.
11. Fenchurch Street and Leadenhall Street are busy local distributor roads. Billiter Street is a restricted access service road with motor cycle parking occupying the full carriageway width at its southern end. The southern part of Fenchurch Buildings is a quiet cul-de-sac which provides vehicle access to a service area at the rear of 54-54 Leadenhall Street. Fenchurch Buildings continues north as a pedestrian alleyway with a narrow entrance under 50 Leadenhall Street.

Proposal

12. Planning permission is sought for the demolition of all the buildings on the site except the listed building at 19-21 Billiter Street and the construction of a single building incorporating this listed building.
13. At the northern end on Leadenhall Street the building would comprise ground plus 36 floors including plant; 170.4m AOD (155.9m above ground level). The central section adjacent to 19-21 Billiter Street would be ground plus 10 storeys high. The southern part of the building on Fenchurch Street would have ground plus 16 storeys including plant. Two full basements are proposed.
14. A double height ground floor would include office entrances on the Leadenhall and Fenchurch Street frontages, linked to an internal space known as the business lounge which is intended to provide security controlled access to the lifts and an amenity for office tenants and visitors. The listed building would provide another entrance to the business lounge via the ground floor retail units.
15. Retail uses (A1-A3) would be provided on the Fenchurch Street frontage and northern part of Fenchurch Buildings. A Food and Drink (A3/A4) use is proposed on the 13 and 14 floors of the southern part of the building where external roof terraces are proposed.
16. There would be retail uses (A1-A4) on the ground floor and mezzanine of the listed building with offices on the two upper floors linked to the main building by bridges.
17. The scheme includes improvements to the public realm primarily through increasing the footway width on Fenchurch Street and Fenchurch Buildings. Additional areas on these and the other frontages would remain private but be publicly accessible spaces.

18. Listed Building Consent is sought for the demolition of existing roof structures and the rear elevation of 19-21 Billiter Street and the construction of a new rear elevation and works of repair, refurbishment and reinstatement of original features.
19. This report deals with the application for planning permission (13/01004/FULEIA) and the application for Listed Building Consent (13/01005/LBC).

Consultations

20. The views of other City of London departments have been taken into account in the preparation of this redevelopment scheme and some detailed matters remain to be dealt with under conditions and the Section 106 agreement.
21. The Mayor of London considers that the application broadly complies with the London Plan but requires further information on various sustainability and transport issues before the application is referred back to him. The applicants have been addressing these points. The Mayor's formal reply encompasses the detailed informal comments in the letters from Transport for London attached to this report.
22. English Heritage has authorised the City to determine the application for listed building consent as it thinks fit.

English Heritage believes that the proposed new development has potential to enhance the significance of the listed building and that the new building's location in the Eastern Cluster and its height relative to other nearby towers means that it would not have a detrimental impact on the strategic views in the LVMF. They are content with the design approach and welcome the improvements to the urban design around the building and to Fenchurch Buildings.

English Heritage states that the proposed tower will add to the impact of the existing and consented Eastern Cluster towers visible above the roof of St Peter ad Vincula in the Tower of London and urges the City to consider the visual harm to the setting of the Tower of London as part of the overall assessment of the proposal.

23. Historic Royal Palaces considers that the proposed building would group appropriately with the rest of the Eastern Cluster in terms of height. HRP regrets that the building would *"eat more (into what is) currently open sky-space in views from the Inner Ward of the Tower over the roof of St Peter ad Vincula"* but they consider that the other already consented schemes visible over the church roof will change this skyline and the additional visual impact would not be great. They do have concerns about, what they see as a "consciously irregular and somewhat harsh architectural style" for the building.
24. The Victorian Society strongly objects on the grounds of harm to the listed building through the impact of the new building on its setting and the demolition of an undesignated heritage asset (108 Fenchurch Street) and the loss of City character caused by widening the northern end of Fenchurch Buildings. They also commented on possible harm to

the listed building through detailed changes to the building but withdrew this element of their objection after assurances about the restoration work. (See letters attached)

25. The London & Middlesex Archaeological Society (LAMAS) has objected strongly on behalf of the Council for British Archaeology. They were concerned about the impact on the fabric and setting of the listed building; the lack of open space being provided on the site; poor spatial planning with little or no thought for the public realm suggesting a different form of development; and that a fuller archaeological investigation was needed than the applicants suggested (See email/letter attached).
26. Tower Hamlets has no comment.
27. London City Airport has no safeguarding objection. An informative is included at their request.
28. The Environment Agency recommends the management of surface water runoff and flood risk. An informative to avoid piling methods posing a pollution risk to controlled waters is included on the schedule.
29. Natural England advises that the proposal is unlikely to affect any statutorily protected sites and refers to its standing advice, which has been considered in the processing of this application.
30. Thames Water has given advice on water supply and waste water issues. They recommend conditions and informatives which are included on the schedule.
31. Agents acting for the churches of St Andrew Undershaft and St Katharine Cree have lodged formal holding objections pending the outcome of discussions between each church and the applicants. The agents consider the development would have a serious impact on each of these Grade 1 listed buildings. Their concerns are set out in the letters attached to this report and referred to under considerations. The agent advises, *"We are now in discussions with the Developer and that we are working to agree a set of Heads of Terms which would be the precursor to a legal agreement between the parties. I am pleased to confirm that we are working together in a spirit of positive collaboration and partnership in this regard and see no reason why the Church's interest will not be properly addressed."*
32. Four residents in flats at 4-8 Creechurch Lane have objected, primarily to the loss of daylight and sunlight, and they all suggest a reduction in the height of the proposal.
33. The tenant of East India Arms at 67 Fenchurch Street raised concerns about the development but has withdrawn the objection following discussions and assurances from the applicant.
34. The brewery freeholder of the East India Arms at 67 Fenchurch Street considers that the application is overdevelopment and that permission *"should be refused until such time as the developer has taken adequate steps to mitigate the impact of the proposal on surrounding business uses and residential tenants"*. They have objected on the

following grounds: noise and vibration during construction; noise disturbance from construction vehicle movements to the site entrance directly opposite the public house; loss of sunlight and daylight, particularly at ground level where outdoor trade is needed to boost trading; potential solar glare; the detrimental impact on the setting of the building as a non-designated heritage asset and the Lloyd's Avenue Conservation Area. They consider *“that the development phase will result in a significant loss of trade which heavily relies on its outdoor trade during summer months to make the business viable ... this could result in the demise of this historic public house as a viable local business and community use.”*

35. Copies of representations are attached to this report.

Policies

36. The development plan consists of the London Plan, the saved policies of the Unitary Development Plan and the Core Strategy. The London Plan, UDP and Core Strategy policies that are most relevant to the consideration of this case are set out in Appendix A to this report.
37. The draft Local Plan was published in December 2013 and is expected to be adopted in late 2014 or early 2015. The draft Local Plan has been subject to public consultation on changes to Core Strategy Policy CS1 and new Development Management policies, including DM1.1. These policies seek to protect existing office accommodation and resist the loss of buildings or sites which are suitable for long-term viable office use. Comments received on this consultation have been considered and amendments to policy made and approved by the Court of Common Council.
38. Although the draft Local Plan does not carry the full weight of an adopted plan, it is considered that the plan should carry significant weight as it is at the final stage of pre-submission consultation, prior to formal consideration at public examination. In accordance with the NPPF and Local Plan Regulations, the draft Plan has been considered by the Court of Common Council as sound planning policy for submission to the Secretary of State.
39. There is relevant City of London and GLA supplementary planning guidance in respect of Planning Obligations, Sustainable Design and Construction, and London Views Management Framework.
40. Government Guidance is contained in the National Planning Policy Framework (NPPF).

Environmental Impact Assessment

41. This application is accompanied by an Environmental Statement (ES). The ES is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This is to ensure that the importance of the predicted effects and the scope for reducing them are properly understood by the public and the competent authority before it makes its decision.

42. The Local Planning Authority must take the Environmental Statement into consideration in reaching its decision as well as comments made by the consultation bodies and any representations from member of the public about environmental issues.

Considerations

43. The Corporation, in determining the planning application has the following main statutory duties to perform:-
- to have regard to the provisions of the development plan, so far as material to the application and to any other material considerations. (Section 70 Town & Country Planning Act 1990);
 - to determine the application in accordance with the development plan unless other material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004);
 - in considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990);
 - to pay special attention to the desirability of preserving or enhancing the character or appearance of any Conservation Area [S 72(1) Planning (Listed Buildings and Conservation Areas) Act 1990].
44. The Environmental Statement is available in the Members' Room, along with the application, drawings and the representations received in respect of the application.
45. There are policies in the Development Plan which support the proposal and others which do not. It is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.
46. The principal issues in considering this application are:
- The extent to which the proposals comply with Government policy advice (NPPF).
 - The extent to which the proposals comply with the relevant policies of the London Plan, Core Strategy and the saved policies of the Unitary Development Plan.
 - The impact of the proposal on designated and non-designated heritage assets.
 - The impact on the nearby buildings and spaces, including daylight/sunlight and amenity.

Economic Development Issues

47. London's status as a world city is founded to a substantial degree on its concentration of international service activities and, most noticeably, by the clustering of financial and business services in the City of London.
48. The importance that is attached to the maintenance and enhancement of the City's role as one of the world's leading financial and business centres is reflected in the policies of the London Plan and Core Strategy, particularly policies 4.2 and CS1.
49. The building would provide high quality flexible office accommodation to meet the demands of the City's major commercial occupiers. The proposed building would provide high quality office accommodation and a 350% increase in office space (net internal area) over that which currently exists on the site. Using the London Plan's assumed density of 1 person per 16sq.m (NIA) the number of office workers in the new building could be 5,100.
50. The proposed office space would offer a range of floor sizes, with large floor plates on the lower levels and a variety of floor sizes on the mid and upper levels which would cater for different office user requirements.
51. This development would support London's business function in accordance with the development plan policies.

Other Uses

52. The site is not within a principal shopping centre but Fenchurch Street is identified as a Retail Link in the Core Strategy 2011 and draft Local Plan.
53. Policy CS20 encourages various retail uses in the Retail Links to meet the 2026 target for increased retail space. Policy Shop 2 of the Unitary Development Plan 2002 seeks the replacement of retail uses in development schemes. Policy Shop 3 seeks, where appropriate, the provision of new retail facilities where existing retail facilities are being replaced on redevelopment.
54. Three retail units (A1-A3) are proposed on each of the Fenchurch Street and Fenchurch Buildings frontages, retail (A1/A3/A4) uses are proposed in the ground and mezzanine floors of 19-22 Billiter Street and a Food and Drink (A3/A4) use is proposed on the 13 and 14 floors with a dedicated entrance on Billiter Street. There would be an overall increase in retail floorspace of 1,437sq.m.
55. The three units on Fenchurch Street would replace an existing A2 unit on Fenchurch Street and be part of the Retail Link. The units Fenchurch Buildings would provide an opportunity to add vibrancy and vitality to this pedestrian route. One of these units would have a frontage on Leadenhall Street and help to draw people into the widened Fenchurch Buildings, where there is sufficient space for external seating if desired.

56. The change of use from offices (B1) to flexible retail (A1/A3/A4) units at 19-21 Billiter Street would provide a public use and access to this listed building.
57. The Food and Drink (A3/A4) use on the 13 and 14 floors would be at the top of the southern part of the building where external roof terraces are provided. This use would be an attractive feature and public benefit, and have an affinity with the public garden and catering use on the roof of the building approved on the neighbouring site at 120 Fenchurch Street.
58. The retail units on Fenchurch Buildings, Billiter Street and the upper floors would be outside of the retail hierarchy but the uses would contribute to the retail targets set out in Core Strategy CS20, would provide additional valuable services to workers, residents and visitors.
59. Core Strategy policy CS19 seeks to protect existing affordable sports facilities and encourages further facilities in major development. DM19.3 of the draft Local Plan states that there are numerous private sports clubs in the City which mostly serve the working population and it will not always be necessary to prevent their change of use due to the fluid nature of the private market. It is not proposed to replace the existing sports club and the loss this use would not be contrary to the Core Strategy policy.

Demolition

60. It is proposed to demolish all of the buildings on site with the exception of the Grade 2 listed 19 – 21 Billiter Street. The various buildings on site date from the 1860's, 1880's, 1920's and the 1970's.
61. The most significant building in terms of architectural value is the listed building at 19-21 Billiter Street which dates from 1865 and is by the architect Edward Ellis. The building is a classical style office building largely faced in Portland stone with rich detailing of cornices, entablature, pedimented entrances, keystones, columns and decorative carved panels. Despite alterations in the 1930's, the interior is of high quality with substantial surviving original features. The scheme involves a comprehensive programme of restoration of the retained elements and the provision of a new rear elevation which is discussed in the relevant section of this report.
62. Of the other buildings on the site, two are considered of architectural and townscape value and to be non-designated heritage assets. Paragraph 135 of the National Planning Policy Framework says that a balanced judgement will be required having regard to scale of any harm or loss and the significance of the heritage asset. It continues by saying that all reasonable steps should be taken to ensure that the new development will proceed after the loss has occurred.
63. 9-13 Fenchurch Buildings is a high quality white faience building by Richardson and Gill (1924-27) with good modelling and detailing of lion head masks, pilasters, string courses and cornice. 108 Fenchurch Street is a red brick and decorative stucco faced building dating from 1886 (W.M Yetts). The building is architecturally interesting with

interplay between red brick pilasters, decorative stuccowork and the bands of windows, and is effective in turning the corner from Fenchurch Street to Fenchurch Buildings.

64. The significance of these two buildings lies in the accomplished architecture and decoration of each building, which contributes interest to the townscape. The loss of these buildings would be regrettable in view of their individual and collective contribution to the townscape but their contribution is not considered sufficient to justify retention when considered against the strategic benefits of a new large office development and the improvement to the width of Fenchurch Buildings which their demolition would permit. Conditions are included requiring contracts to be entered into to construct the new building before any demolition of the designated or non-designated heritage assets is commenced.
65. The other two buildings on the site are 22 Billiter Street/49 Leadenhall Street and 109-114 Fenchurch Street. Both date from the 1970s and are undistinguished with a strong horizontal emphasis and they do not contribute positively to the townscape.

Bulk and Height

66. The proposed scheme comprises a tower on the northern part of the site and lower elements in the central and southern parts of the site. The tower element comprises a double height ground plus 36 storey (including plant) tower rising to a height of 170m AOD. The lower parts step upwards from 53m AOD (ground and 7 storeys) to 89.08m AOD (ground and 16 storeys).
67. The site is located within the Eastern Cluster Policy Area of the Core Strategy and would be on the south east edge of the cluster of existing and consented tall buildings.
68. The Core Strategy identifies the Eastern Cluster as generally an appropriate location for tall buildings. In particular Policy CS7 (3) (Eastern Cluster) seeks:

“To ensure that the Eastern Cluster can accommodate a significant growth in office floorspace and employment, while balancing the accommodation of tall buildings, transport, public realm and security and spread the benefits to the surrounding areas in the City, by :

Delivering tall buildings on appropriate sites that enhance the overall appearance of the cluster on the skyline and the relationship with the space around them at ground level, while adhering to the principles of sustainable design, conservation of heritage assets and their settings and protected views.”

Policy CS14 (Tall Buildings) of the Core Strategy seeks:

“ To allow tall buildings of world class architecture and sustainable design in suitable locations and to ensure that they take full account of the character of their surroundings, enhance the skyline and provide a high quality public realm at ground level, by :

Permitting tall buildings on suitable sites within the City's Eastern Cluster”

69. Verified montages have been submitted which shows the tower in the context of existing and consented tall buildings. From this assessment, the tower would appear as an integral part of the cluster, relating comfortably to existing and consented nearby towers and would enhance the sense of visual compactness of the cluster.
70. The building would be lower than the 30 St Mary Axe tower and the consented 52-54 Lime Street tower and these are lower than 122 Leadenhall Street and the consented Pinnacle tower. The proposed height will consolidate the Eastern Cluster's distinctive profile with buildings gradually increasing upwards in height from the periphery towards the consented Pinnacle scheme.
71. One of the defining factors in the height and massing of the building is the potential impact on views of St Paul's Cathedral from Fleet Street and Ludgate Hill. In order that the tower would not breach the silhouette of the dome, upper drum or peristyle of the Cathedral the north wall of the tower is stepped back at the 26th storey level (127m AOD) so that it is entirely concealed behind the Cathedral. The impact of the proposal on the Ludgate view has been robustly tested through verified modelling and at no point will the tower be visible in the view along Fleet Street and Ludgate Hill. Similar criteria were applied to the consented 52-54 Lime Street tower to the west.
72. The bulk and height of the proposal has also been assessed in terms of its immediate setting. The scale of the tower is substantial and it will be very prominent, particularly in views along Leadenhall Street and westwards from Aldgate. However, it is located adjacent to the Willis Building and the consented tower at 52-54 Lime Street, which collectively define the townscape character of this edge of the Eastern Cluster.
73. The height of the lower Fenchurch Street block is informed by the consented scheme for the adjacent site at 120 Fenchurch Street and the need to step down in scale towards the buildings to the east on Fenchurch Street. The scale of this building is considered acceptable to the townscape context of Fenchurch Street.

London Views Management Framework

74. Policy CS13(1) of the City's Core Strategy seeks to implement the GLA London View Management Framework SPG to manage designated views of strategically important landmarks (St Paul's Cathedral and the Tower of London), river prospects, townscape views and linear views. The site falls outside any of the Protected Vistas but will have an effect on a number of the views identified in the London Views Management Framework. Verified montages accompanied the application to ensure a thorough assessment of the proposal's wider impact.
75. In the views from Waterloo Bridge and Hungerford footbridge, the tower would be within the Eastern Cluster of tall buildings and would assist in consolidating the distinctive silhouette of the Cluster. The proposal

would appear on the southern edge of the Cluster and would not harm the setting of St Paul's Cathedral.

76. In the three City Hall/Queen's Walk views and the Tower Bridge view the proposal would define the eastern edge of the Eastern Cluster appear as an integral part of the cluster and complement the gradual increase in height from east to west. The proposed tower would appear sufficiently detached from the Tower of London so as not to harm its setting and the Outstanding Universal Value of the World Heritage Site.

Setting of the Tower of London World Heritage Site

77. The proposal would have an impact on views and setting of the Tower of London World Heritage Site. The Core Strategy Policy CS12 seeks to Preserve and, where appropriate, seek to enhance the Outstanding Universal Value, architectural and historical significance, authenticity and integrity of the Tower of London World Heritage Site and its local setting.
78. The Tower of London World Heritage Site Management Plan was published by Historic Royal Palaces in June 2007 and the Tower of London Local Setting Study was completed in August 2010 on behalf of the Tower of London World Heritage Site Consultative Committee of which the City is a member. The document identifies key views to and from the Tower, and important approaches to the World Heritage Site.
79. Three of the views identified in the Study are also London Views Management Framework views and are assessed above. Three other relevant views have been assessed and in all of these views the proposed tower would be seen as an integral part of the Eastern Cluster of tall buildings which is a distinctive and accepted townscape feature in the wider setting of the World Heritage Site. The proposed tower would not appear as an incongruous or isolated feature on the skyline.
80. The proposal is therefore not considered to harm the Outstanding Universal Value, special architectural and historic significance, authenticity, integrity and setting of the Tower of London World Heritage Site.

Architectural approach

81. The scheme is designed as a series of rectilinear "slices" with a strong vertical emphasis and "shadow gaps" between each "slice". The use of vertical rectilinear "slices" assists in breaking down the scale of the development and results in pronounced modelling and articulation of the facades. This produces an appropriate contrast with the distinctive appearance of the Lloyds Building, the curved cylindrical form of 30 St Mary Axe, the triangular wedge shaped 122 Leadenhall Street, the concave sculptural qualities of 51 Lime Street and the sharp crystalline form of the consented 52-54 Lime Street scheme. The architectural form would complement and contribute positively to the dynamic and varied qualities of the cluster of tall buildings.

82. A key element of the scheme is the contrast between the tower element and the lower block on Fenchurch Street. The Fenchurch Street block would sit comfortably within the scale of the existing and approved buildings along Fenchurch Street. The Fenchurch Street elevation is broken in to vertical “slices” of varying heights which introduce a sense of rhythm, vertical emphasis and a compact urban grain to Fenchurch Street.
83. The Fenchurch Street block would be of a dark grey metal finish which will give it a separate identity from the lighter stainless steel tower. This approach is welcomed and has the following townscape benefits:
- the darker colour of the Fenchurch Street building would assist in reducing the sense of scale and mass of the development;
 - the development would appear as two related buildings as opposed to a single mass, giving the appearance of a street height building which relates to the scale and grain of Fenchurch Street and a tower with its own separate identity which relates to the Cluster.
 - the darker colour will ensure that the Fenchurch Street building provides a better setting to the listed Billiter Street building than the original proposal where the single design wrapped around the listed building.
84. The design of the ground floor relates satisfactorily with the surrounding streets. Much of the ground floor street frontage will consist of retail units (many are double height) and importantly these are located on corners, enlivening these key parts of the building and townscape. In addition, a significant part of the Fenchurch Buildings passageway will have a retail frontage, which will assist the creation of a vibrant and active public realm.
85. The majority of the ground floor facades would be glazed, affording views into and out of the retail units and office lobbies. The proposed office foyers are generous in scale with double height glazing under projecting bays of the building.
86. The upper storeys of the tower accommodate the plant which is entirely concealed from view and louvres are integrated in to the design of the elevation and roof.
87. Given, the presence of a combination of louvres on the south elevation and vertical metal panels on both the east and west elevations solar glare is highly unlikely to be an issue. Details of the metal cladding will be conditioned to ensure a non-reflective finish.
88. The new entrance to Fenchurch Buildings on Leadenhall Street necessitates the re-facing of the flank wall of No 50 Leadenhall Street to ensure a satisfactory contribution to the character of the area. A brick facade with stone corner quoins is proposed, which relates satisfactorily to the appearance of the Leadenhall Street elevation of the building.

Listed Building - 19-21 Billiter Street

89. Policy CS12 of the City's Core Strategy seeks to safeguard "the City's listed buildings and their settings".
90. The listed building is proposed to be restored in part and altered so that it can be connected to and used in connection with the new building.
91. The works to the exterior of the listed building involve removing later additions to form a roof terrace, retaining an original mansard where it exists on part of the roof, reinstating an original entrance and cleaning and restoring the facade.
92. The building is attached to its neighbours and rear elevation is a series of light wells and a patchwork of brick and rendered areas of unexceptional appearance. It is proposed to give the building a new rear elevation that would face the central atrium of the new building and produce an attractive facade.
93. The proposed rear elevation would be a modern brick facade with punched window openings. The windows are aligned to relate to the existing internal spaces of the listed building and to create a frame for the internal rooms and their decorative elements. The openings diminish in size on upper storeys to reflect the diminishing heights of the upper storeys of the listed building. The simplicity of the brick facade strikes an appropriate balance, giving it restrained appearance befitting a rear elevation and an attractive face onto the new atrium.
94. The applicants have confirmed that original timber doors would be retained or reinstated on the elevations and the original ornamental capping to each chimney would be reconstructed as requested by the Victorian Society and LAMAS.
95. Internally, the scheme involves the restoration of existing decorative elements and the re-instatement of lost features. Some areas of partitioning will be removed, but these elements are not of significant value and the integrity and clarity of the original internal plan form will be retained. A glazed screen is proposed around the central staircase to give fire protection. Although the staircase is high quality, it is a 1930's addition and consequently the glazed screen is acceptable and reinforces the staircase as a later addition. Conditions have been included to control and retain original internal features such as skirtings, cornices and plasterwork as suggested by the Victorian Society.
96. The scale of the proposed new building will have a substantial impact on the setting of the listed building. The tower in particular will be a dominant presence in the background to the listed building. Such a relationship would be an uneasy and contentious one in many places. However the dynamic relationship of imposing tall buildings immediately adjacent to and in the immediate backdrop of older historic buildings is characteristic of the Eastern Cluster. In the current case the contrast of scale between the listed building and the proposed tower is considered not to reduce the architectural or historic interest of the listed building.

97. The darker colour of the lower Fenchurch Street block will ensure that this part of the scheme will have its own separate identity as a street block avoiding the appearance of a single building mass enveloping the listed building, which was a particular concern of the Victorian Society. Within the distinct urban quality of the Eastern Cluster, the proposal is not considered to harm the setting of the listed building.

Setting of other Heritage Assets

98. The proposal will affect the setting of a number of listed buildings and non-designated heritage assets. Those listed buildings nearby and most likely to be affected have been assessed and include the churches of St Katherine Cree and St Andrew Undershaft, The Lloyds Building, 140-144 Leadenhall Street, 147-148 Leadenhall Street, Lloyd's Registry, 72-75 Fenchurch Street and the former tea warehouses in Creechurch Lane and the Sir John Cass Junior School. The non-designated heritage assets immediately adjacent to the site consist of the East India Arms at 67 Fenchurch Street and Furness House frontage to Fenchurch Buildings. The significance of these two buildings lies in their accomplished architecture and townscape contribution.
99. In this part of the City modest and small scaled listed buildings are seen in relation to the City's prominent office buildings. To a greater or lesser degree, all of these buildings will be seen in association with the proposed building and against a backdrop of similar scaled existing and consented schemes.
100. St Katherine Cree is on the northern side of Leadenhall Street and the new tower would be a dominant neighbour but, because of their relative positions, the church would not be seen in a direct relationship with the proposed building and would not cause substantial harm its setting.
101. The new tower could be a striking and dominant element as a backdrop to the church of St Andrew Undershaft in views from Commercial Union Plaza on St Mary Axe and have a considerable impact on the setting of the church. However, the approved 52-54 Lime Street tower would be closer to the church and have a greater effect, and this relationship already exists between the church and 30 St Mary Axe, 122 Leadenhall Street, the St Helen's / Aviva Tower. The building now proposed would not cause substantial harm to this church setting.
102. The Lloyds Building is prominent in the area because of its dynamic design and its height. In views westwards from Aldgate, the Lloyds Building would be concealed by the new building but there are already tall buildings closer to Lloyds at 51 Lime Street, 122 Leadenhall Street and the consented 52-54 Lime Street Tower. The current proposal would not cause further harm to the setting of the Lloyd's Building.
103. There are other listed buildings near to the site, particularly in Fenchurch Street. These are all seen against a backdrop of larger buildings similar scaled existing and consented schemes and the proposed building will not cause substantial harm to the setting of these listed buildings.

104. The non-designated heritage assets impacted are of the East India Arms at 67 Fenchurch Street and the Furness House frontage to Fenchurch Buildings. The East India Arms has ground and three upper floors and is an attractive early-mid 19th century building with brick facades, painted bands and cornice and a curved corner. Furness House ground and five upper floors and is an attractive faience facade with projecting bays and decoration. Both buildings contribute to the townscape of the area. These buildings would be viewed in relation to the 16 storey Fenchurch Street part of the new building and would have a relationship which would be similar to many other situations where new buildings are higher than their existing neighbours. The contribution they make to the townscape of the area would not be reduced by the new building and, consequently, these non-designated heritage assets would not be substantially harmed.

Setting of Conservation Areas

105. Although not in a Conservation Area, the proposal will affect views into and out of a number of Conservation Areas. The impacts of the proposal on these views have been assessed and the settings of the Conservation Areas and designated and undesignated heritage assets within these Conservation Areas are not considered to be harmed.
106. The nearest and most significant of these is the Lloyd's Avenue Conservation Area. From Lloyd's Avenue the upper half of the tower will be visible as a prominent backdrop to the classical stone facades on the west side of the street. However, this view already includes the 122 Leadenhall Street tower and will include the approved towers at 52-54 Lime Street and the Pinnacle. The current proposal would conceal these towers in the view from Lloyd's Avenue.

Public Realm

107. It is proposed that the frontage to Fenchurch Buildings would be set back to create a more generous public realm and attractive through route. Elsewhere, pockets of public realm space are created by setbacks from the building's lines.
108. The existing route along Fenchurch Buildings is somewhat convoluted with buildings cantilevered over the alley and the view is obstructed, which makes it difficult for people unfamiliar with the area to appreciate that this is a continuous route between Fenchurch Street and Leadenhall Street. This is not untypical of the City's alleyways and in itself not a negative character. However the re-modelling offers advantages to justify the alterations. A significant part of the new frontage would be retail, greatly enlivening the route and the alleyway would have a more generous width, allowing external seating. This would be beneficial as a large increase in pedestrians is anticipated in this part of the City as a result of new buildings in the vicinity and the proximity to Fenchurch Street Station.
109. The Victorian Society considers that the new building should be built up to the wall of the five storey building at 50 Leadenhall Street to maintain the street frontage and function of the passageway. There is a large

disparity of scale between the proposal and its neighbour and the existing passage is too narrow for the number of pedestrians likely to use it in future. The proposal provides a good solution, leaving a substantial attractive new route, giving the small building “breathing space” and providing a facade treatment to the exposed flank wall.

Daylight, Sunlight, Overshadowing and Solar Glare

110. The Environmental Statement contains an assessment of the potential impacts on daylight and sunlight to the Sir John Cass Primary School and to six buildings containing residential premises using the Building Research Establishment (BRE) guidelines. The assessment includes the cumulative impact with construction of other permitted schemes, particularly the tower at 52-54 Lime Street.
111. The BRE guidelines have three methods for assessing daylight changes: Vertical Sky Component (VSC) which measures daylight received on the external plane of windows (27% VSC is the ideal target figure); No Sky Line which seeks to ensure that 80% of a room from would have a view of the sky; and Average Daylight Factor (ADF) which considers the daylight within the room and its use (BRE minimum standard = Kitchen - 2%, Living Room - 1.5%, Bedroom - 1%). Where the daylight falls below the relevant standard the guidelines say that if the window or room retains at least 80% of its former value the difference would not be noticeable.
112. Daylight and sunlight to the Sir John Cass Primary School and two of the buildings containing residential premises would comply with at least one of the BRE standards and the development would not have a significant effect on those premises.
113. Daylight to 2 and 10-16 Creechurch Lane, 18-20 Creechurch Lane and 27 Mitre Street would achieve BRE compliance by not exceeding a 20% reduction in the No Sky Line. Sunlight changes to these properties would be insignificant.
114. The residential accommodation over the East India Arms at 67 Fenchurch Street would be most significantly affected by the development. In seven out of nine rooms there would be noticeable reduction in daylight and these rooms would not satisfy any of the BRE daylight criteria. This accommodation would meet the BRE standards with regard to sunlight. The occupier of these premises is aware of the changes to daylight and does not object. The freeholder has mentioned this change in relation to the loss of outdoor trade.
115. All but one window at 29-31 Mitre Street would meet one or more of the BRE daylight standards. The remaining window would have a 20.80% reduction, which is just above the 20% which the BRE say would make this change noticeable. There would be reductions to the hours of sunlight received at this building but the hours would remain greater than the BRE minimum to all but four windows to habitable rooms. Two of these would involve a noticeable loss (i.e. greater than 20%) but this is to bedrooms. The BRE guidance says that sunlight to bedrooms and

kitchens is less important than to living rooms. There has been no objection to these changes.

116. At 4-8 Creechurch Lane there are windows serving 16 habitable rooms. All the rooms would have some reduction in daylight. In ten rooms the reduction would not cause the daylight to fall below the ADF minimum, in five other rooms the reduction in ADF would be less than 20% and in the one other room the reduction would be 20.58%, 20% being the point at which a reduction becomes noticeable.
117. Sunlight at 4-8 Creechurch Lane would be reduced to below the BRE standard at ten windows serving seven rooms. However, in three of these rooms there are other unaffected windows which leave the rooms with sunlight above the minimum. The other seven rooms would have a noticeable reduction in sunlight hours set out in the BRE guidance.
118. Objections to loss of daylight and sunlight have been received from the occupiers of four of the flats at 4-8 Creechurch Lane. The daylight to all four of these flats would remain above the minimum ADF value or the reduction would be below the level that would make it noticeable. Sunlight would be reduced to below the minimum number of hours and by a noticeable amount in one of these flats; the other three flats would retain sunlight hours above the minimum.
119. The BRE guidelines were not designed for use in a dense urban setting and the document states that the guidelines should be interpreted flexibly. It goes on to say, *"In special circumstances the developer or planning authority may wish to use different target values. For example, in a historic city centre with modern high rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings."* In this case there would be reductions in sunlight and daylight but the majority of changes would be within the standards in the BRE guidance and many of the actual changes would be small.
120. The applicants have provided the residents with additional information to illustrate visually that the effect of this development would not cause a material change to daylight and sunlight levels received within 4-8 Creechurch Lane with the previously approved schemes in place. This does not change the technical data already submitted.
121. Nine amenity spaces have been assessed for overshadowing. Seven of the nine would achieve the BRE guideline criteria by receiving at least two hours of direct sunlight over 50% of the area on 21st March or experiencing less than a 20% change in light. Two spaces would not meet the BRE guideline; the Aviva tower plaza and the Old Tea Warehouse courtyard at 4 - 16 Creechurch Lane.
122. Sunlight to the Aviva tower plaza currently meets the guideline of least two hours of direct sunlight over 50% of the area on 21st March. The tower approved at 53-54 Leadenhall Street will reduce of the area receiving two hours of direct sunlight on 21 March from 66.4% to 5.4%.
123. The current proposal would cause a further reduction such that no part of the plaza would receive two hours of direct sunlight on that date.

However, the applicants' specialist consultants advise that approximately one third of the Aviva tower plaza would continue to receive approximately 1.5 hours direct sunlight on 21st March with the 52-54 Lime Street tower in place. At other times of year there would be different amounts on sunlight to this space and, given the urban context, this is considered to be an acceptable impact.

124. The Old Tea Warehouse courtyard can only receive two hours of direct sunlight to 5.4% of its area at present and this would be reduced to 3.6% by the development, a 33% change. This change is disproportionately reflected in percentage terms given the low existing level of direct sunlight and the real impact is considered to be minor.
125. The potential for solar glare to affect drivers in surrounding streets has been assessed as being of minor significance and that use of a sun visor by the driver would mitigate any short term inconvenience on the occasions where there is glare.

Sustainability & Energy

126. The building design incorporates energy efficiency measures such as an insulated and air tight facade with solar shading and energy efficient services. A site wide combined heat and power system to meet the building's base load heating and hot water demand would be included.
127. The overall carbon dioxide emissions savings are stated as 42% and would achieve the current London Plan target of 40%. Further details of the energy strategy are requested by condition to ensure that the London Plan target is achieved.
128. Measures to improve sustainability and climate change adaptation of the development include using recycled materials, responsible sourcing of materials and the incorporation of water saving fittings and grey water use. A sustainable drainage strategy is proposed with rainwater drainage from the roofs and terraces into storage tanks at basement level, and permeable paving to external spaces.
129. The opportunities for biodiversity and urban greening are limited and a condition is included requesting an assessment and details for soft landscaping, green roofs and other measures to improve biodiversity such as bird boxes.
130. A BREEAM pre-assessment demonstrates that the development would achieve an "excellent" rating and additional credits have been identified to improve the overall score.

Wind

131. The likely significant impacts on wind conditions have been assessed in relation to the comfort and safety of pedestrians within and around the development. Current conditions were found to be relatively calm and acceptable for the uses of the area.
132. Wind tunnel tests have demonstrated that some small scale mitigation is needed on the northwest corner of the site. The mitigation measures take the form of a porous screen and two trees on open land within the

site boundary. With this mitigation in place the wind conditions were shown to be acceptable for the intended uses on the site. Wind conditions on the streets around the site would, in places, be slightly worse than exist at present but overall, the development was not found to have a significant effect off-site, and wind conditions would continue to be suitable for the uses in the area.

133. The cumulative impact of other approved development has been assessed. Construction of the tower at 52-54 Leadenhall Street would improve conditions at this site because, with other high buildings to the east, a cluster would be formed providing mutual shelter and breaking up wind patterns.

Transport, Servicing & Parking

134. The site is very well located for public transport links with Fenchurch Street Station approximately 40m to the south and London Bridge, Cannon Street, Liverpool Street, Bank, Monument and Aldgate stations all within walking distance and bus routes on Leadenhall Street and Fenchurch Street.
135. The Transport Assessment with the application considers the current proposal and compares this with the existing situation. Trip generation assessment estimates that 2,643 net additional person trips would occur during the AM peak period. The distribution of these trips over pedestrian, cycle and public transport networks indicates that the proposed development would have a minor impact on the operation of the local transport network.
136. Bank station is congested at peak times but the impact of the additional demands created by this development would be a small element in the overall usage of the station and the effects are likely to be minimal. London Underground has proposals for congestion relief at Bank station.
137. High peak time pedestrian flows are experienced on the periphery of the site. In particular, the flows along Fenchurch Street are significant, creating very congested footways. The City has identified Fenchurch Street as in need of improvement to deal with this situation.
138. On Fenchurch Street the foremost part of the ground floor would be set back. This would result in an increase in the clear footway width of between 3.8m and 5.2m, compared with the existing width of between 2.8m and 4.0m. The shape of the development would result in irregular setbacks on the Fenchurch Street, Billiter Street and Leadenhall Street frontages. These areas would be available for public use but the clear width on Billiter Street and Leadenhall Street would be restricted to its existing width at the points where the building steps forward.
139. Fenchurch Buildings would be widened to improve this pedestrian route at its northern end where it is particularly narrow. This widening and the inclusion of retail uses would encourage this alleyway to be used by greater numbers of pedestrians.

140. The southern end of Fenchurch Buildings is proposed to be widened to provide space for vehicles to access the building and this would be dedicated as public highway. It is recommended that you agree in principle to this area of land to be dedicated as public highway. The applicant does not intend to dedicate the remainder of the sets backs as public highway but proposes that they are all included as publically accessible space under the terms of the Section 106 agreement.
141. There is a small triangle of land towards the northern end of Billiter Street which provides access to one of the existing buildings. This has become public highway, having been open for unrestricted public use for more than 20 years. This area would need to be stopped up as it would be occupied by parts of the new building and by the wind mitigation features. The loss of this area would not affect pedestrian access to the new building or the use of Billiter Street. It is recommended that you agree in principle that this area of public highway may be stopped-up to enable the development to proceed.
142. Servicing provision is made at basement level with three lifts capable of taking lorries to provide access. It is estimated that the development would generate 251 service vehicle trips on a typical day, with the peak or 29 vehicles between 9.00 and 10.00. The entrance to the lifts would be on Fenchurch Buildings, where the road would be increased in width to accommodate manoeuvring and waiting. This would be adequate for the purpose and would provide additional space for pedestrian movement.
143. The development is proposed to be car free, except for two disabled users bays located in the basement servicing area. This is in accordance with policies to encourage car free development. As no general car parking is provided there is no policy requirement for motor cycle parking but 18 spaces are included at basement level.
144. 1,069 bicycle parking spaces are proposed for office users. These are located in the basement and would be accessed by dedicated lifts and stairs access from the Billiter Street frontage and Leadenhall Street entrance. Changing, shower and locker facilities are included. The number of spaces exceeds the new standard (1/125) proposed in the draft Local Plan. 12 spaces are provided at street level in Fenchurch Buildings for visitors to the building, including the retail units.
145. Hours of servicing are proposed to be restricted to avoid night time disturbance, particularly to the residents at 67 Fenchurch Street.
146. A Servicing Management Plan will be required in order to rationalise servicing and security checking and a Travel Plan will be required to improve the sustainability of the development.
147. The proposed development would incorporate counter terrorism measures within the building facades and consequently would not require the provision of any security measures in the public realm or highway.
148. The development would achieve a good level of inclusive design with step free circulation routes and level entrances. As there is a significant

difference between street levels on the north and south ends of the site the ground floor would include sloped foyers to take up the difference.

149. The listed building has a number of steps at its main entrance which would need to remain. Wheelchair access would be provided from the central atrium and via a platform lift in a new foyer on the south side of the building.

Archaeology

150. The site is in an area of important archaeological potential, located within the Roman and medieval city walls, close to the gate at Aldgate. There is potential for remains of all periods from Roman to post-medieval to survive on the site. There has been archaeological recording on parts of the site prior to previous development and in the immediate area. Recorded remains from the Roman period include burials, domestic occupation, a road linking Aldgate to the Forum and structural remains. Medieval and post medieval remains recorded include structural walls and occupation, and evidence for bell making.
151. The potential for archaeological survival would vary depending on the extent of single and double basements on the site and areas where archaeological excavation has previously been carried out. Archaeological potential is highest in areas where there is an existing single basement level. The proposed development would have an impact on archaeological remains in the area of the proposed double basement, new piled foundations and any temporary enabling works.
152. Conditions are recommended to cover archaeological evaluation to provide additional information on the character, nature and date of surviving archaeological remains. The level of investigation required will deal with the archaeological concerns expressed by LAMAS. The results of the evaluation would be used to design an appropriate mitigation strategy in order to fully record and excavate remains that would be affected by the proposals.

Mayor of London and Transport for London

153. The applicants have been in consultation with the GLA and TfL to address the points raised in the Mayor's letter. These matters will be clarified before the application is referred to the Mayor again. Amongst the matters under review is the scope and funding for Cycle Hire docking stations at or near the site and the need for funding for bus infrastructure and the Bank Station upgrade as a consequence of this development.

Neighbour Representations

154. The concerns of residents at 4-8 Creechurch Lane are covered previously in this report. Although there would be reductions in sunlight and daylight the majority of changes would be within the standards in the BRE guidance and many of the actual changes would be small.
155. Agents acting for the churches of St Andrew Undershaft and St Katharine Cree lodged formal holding objections pending the outcome of discussions between each church and the applicants. The agents

have confirmed that they are working together in a spirit of positive collaboration and partnership in this regard and see no reason why the Church's interest will not be properly addressed.

156. The representations made by agents for the brewery which owns the freehold of the East India Arms relate primarily to the potential impact of the development on the business, particularly in the summer months when customers take their drinks outside. Their concerns may be summarised as the effect on trade caused noise and vibration from construction work over a protracted period of time; noise during construction from vehicles using a construction site access opposite the public house; a possible reduction in daylight and sunlight to the outdoor area where customers gather; and possible solar glare and light pollution impacts. They also remark on the impact on the setting of the East India Arms and Lloyds Avenue Conservation Area, which is considered earlier in this report.
157. The East India Arms is a small public house with no external area but customers use a wide area of public highway on the corner of St Katherine's Row. The pub has a highways license for chairs and two tables in this location.
158. It is not uncommon for neighbouring business premises to be affected during construction works. This relationship between this small public house and the potential development site is not unique; the Bloomberg site has a similar small neighbouring pub where customers are continuing to use the public highway in Queen Street during construction work.
159. Noise and vibration from construction sites is controlled by the Director of Markets and Consumer Protection and conditions will be included on any planning permission requiring compliance with schemes to protect nearby residents and commercial occupiers from noise, dust and other environmental effects during demolition and construction. Similarly, a construction logistics plan will be required to mitigate the impact of construction traffic. The effect on the business at the East India Arms would be considered in monitoring and enforcing these operational plans but they would not prevent all disturbance.
160. The sunlight study submitted in support of the application demonstrates that even without the development taking place no part of the public highway used by customers of the East India Arms would receive two hours sunlight on 21 March (the BRE Guidance minimum standard). This is because it is a small area with buildings to its East, South and West. However, there will be sunlight to this area for various periods and at other times of year but the BRE Guidance would not be breached by the proposed development.
161. The public house lies to the east of the southern end of the proposed building and any sunlight from the East, South and Southwest would be unimpeded by the proposed development. It is possible that some sunlight may at present be received late in the day from the West and this could be affected by the development but the study does not cover

this. However, the period of any such loss would be relatively limited as sunlight from other directions would be unaffected.

162. The residential accommodation at the East India Arms would be affected by a significant and noticeable reduction in daylight and by the noise and vibration impacts referred to above. The applicants have agreed to provide secondary glazing to reduce noise and would monitor vibration. As a consequence, the tenant of the pub who occupies the residential accommodation has withdrawn his objection.
163. It is considered that if the concerns of the brewery can be addressed through the City's normal controls over construction and the objection would not justify the refusal of planning permission.

Planning Obligations

164. Under Section 106 of the Town & Country Planning Act 1990 an agreement or planning obligation can be made between parties, usually the developer and the local authority, or a unilateral undertaking can be submitted by a prospective developer:
- restricting the development or use of land in any specified way;
 - requiring specified operations or activities to be carried out in, on or under or over the land;
 - requiring the land to be used in any specified way; or
 - requiring a sum or sums to be paid to the authority on a specified date or dates or periodically.
165. Planning obligation arrangements were modified by the Community Infrastructure Levy Regulations 2010 ('the CIL Regulations'). The Regulations introduce statutory restrictions on the use of planning obligations to clarify their proper purpose, and make provision for planning obligations to work alongside any Community Infrastructure Levy ('CIL') arrangements which local planning authorities may elect to adopt.
166. Regulation 122 states that it is unlawful for a planning obligation to constitute a reason to grant planning permission when determining a planning application if the obligation does not meet all the following tests:
- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development
167. The National Planning Policy Framework (March 2012) stated that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. It repeated the tests set out above and then stated that where planning obligations are being sought or revised, local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled. (NPPF paragraphs 203-206).

Mayoral Community Infrastructure Levy (CIL)

168. On 1st April 2012 the Mayor of London introduced a statutory charge, the Mayoral Community Infrastructure Levy (CIL), in accordance with London Plan Policy 8.3. The Mayoral CIL is paid by developers to help fund strategically important infrastructure, initially focussing on Crossrail. The Mayor has set a charge of £50 per sq.m and this applies to all development over 100sq.m (GIA) except social housing, education related development, health related development and development for charities for charitable purposes.

Mayoral Planning Obligations

169. Since April 2010 the Mayor of London has sought contributions towards the cost of funding Crossrail through the negotiation of planning obligations in accordance with London Plan Policy 6.5. Mayoral planning obligations are payable by developers according to an indicative level of charges for specific uses set out in the Mayoral SPG (April 2013): offices (£140 per sq.m net gain in GIA floorspace), retail (£90) and hotels (£61) provided there is a net gain of 500sq.m.
170. The Mayor of London has stated in his Mayoral CIL Charging Schedule (April 2012) that he will not 'double charge' developments that are liable for both Mayoral CIL and Mayoral planning obligations payments for Crossrail. His approach is to treat any Mayoral CIL payment as a credit towards any Mayor planning obligation liability. Therefore the Mayoral planning obligation liability can be reduced by the Mayoral CIL.
171. At the time of preparing this report the Mayoral CIL has been calculated to be £4,439,350. The full Mayoral planning obligation has been calculated to be £12,601,350 but this would be reduced to £8,162,000 after deduction of the Mayoral CIL. The full Mayoral planning obligation is also subject to a 10% discount if the development is commenced before 31st March 2013. It should be noted that these figures may be subject to change should there be a variation in the CIL liability at the point of payment and should therefore only be taken as indicative figures at this point.
172. These contributions towards the funding of Crossrail will be collected by the City Corporation. Under the CIL regulations the City Corporation is able to retain 4% of the Mayoral CIL income as an administration fee; the remainder will be forwarded to the Mayor of London. The whole of the Mayoral planning obligation income received will be forwarded to the Mayor. However, the developer will also be liable to pay an additional £3,500 Mayoral planning obligation administration and monitoring charge to the City Corporation. The total contributions due in accordance with the Mayoral CIL and Mayoral planning obligation policies are summarised below.

Liability in accordance with the Mayor of London's policies

Liability in accordance with the Mayor of London's policies	Contribution £	Forwarded to the Mayor	Retained by City Corporation
Mayoral Community Infrastructure Levy payable	4,439,350	4,261,776	177,574
Mayoral planning obligation net liability*	8,162,000	8,162,000	Nil
Mayoral planning obligation administration and monitoring charge	3,500	Nil	3,500
Total liability in accordance with the Mayor of London's policies	12,604,850		181,074

*Net liability is on the basis of the CIL charge remaining as reported and could be subject to variation.

City of London's Planning Obligations SPG policy

173. On 8th June 2004 the City's Supplementary Planning Guidance on Planning Obligations was adopted. This policy seeks a contribution of £70sq.m from developments over 10,000sq.m provided that there is also an increase of 2,000sq.m.
174. In this case the proposed net increase would be 94,342sq.m. On the basis of the figure indicated in the Supplementary Planning Guidance, the planning obligation figure would be £6,603,940. It is the City's practice that all financial contributions should be index-linked with reference to the appropriate index from the date of the Committee resolution.
175. The applicant has agreed a breakdown which accords with the Supplementary Planning Guidance as follows:

Category	Contribution £	Percentage share %
Total Contribution under City's SPG	6,603,940	
Allowance for Monitoring of Agreement by City (1%)	66,039	
Balance available for allocation	6,537,901	100
Proposed allocations:		
Local Community and Environment	3,268,951	50
Affordable Housing	1,961,370	30
Transportation	980,685	15
Local Training and Skills	326,895	5
Total allocation under City's SPG	6,537,901	100

176. I have set out below the details that I am recommending concerning the planning obligations. All of the proposals are considered to be necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the above tests contained in the CIL Regulations and in government policy. I would also request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations as necessary.

Local Community and Environmental Improvements

177. Development of the scale and intensity of the proposals will have a range of impacts in the vicinity of the site both in terms of the demolition and construction phase, and in terms of the operational phase, as referred to in this report. The contribution for Local Community Facilities and the Environment will be used to help mitigate the impact of the development by providing facilities and opportunities which may include but are not limited to education, health & welfare, church works and for the benefit of other voluntary organisations, arts & culture, leisure and recreation, childcare provision, street scene and air quality improvements.
178. The City has identified a number of matters required to mitigate the impact of the development and which meet the planning tests and these are set out below. However, other matters requiring mitigation for the benefit of the local community are still yet to be fully scoped and it is proposed that the Local Community Facilities and Environment Contribution will be used to help mitigate such impacts also.
179. It has been proposed that the contribution be put towards the delivery of the Fenchurch & Monument Area Enhancement Strategy, adopted in April 2013.

180. The Strategy identifies that the footways, carriageways and open spaces in the Strategy area, particularly Fenchurch/Leadenhall Streets, are already under-capacity and with the significant increases in people expected within and moving through the area over the coming years due to new developments, these issues are expected to be further exacerbated. The Transport Assessment for the 40 Leadenhall Street development refers to the Area Enhancement Strategy and confirms the existing public realm capacity issues.
181. The Strategy identifies the Fenchurch Street project as the highest priority public realm and transportation project within the area and therefore it is proposed to direct the majority of funding to this project. The Fenchurch Street project was initiated by the City in February 2013 and aims to address the public realm and transportation issues along Fenchurch Street, which the development fronts, aiming to rationalise the carriageway, increase pedestrian capacity and improve road safety. The project is expected to cost between £3m - £5m which will be met from local S106/CIL.
182. Medium priority projects within the Strategy that would also offset the impacts of the new development include the Leadenhall Street project, which will adopt a similar approach to the Fenchurch Street project along Leadenhall Street.
183. The Local Community Facilities and Environmental Improvement Works contribution would be limited to the Fenchurch & Monument Area Enhancement Strategy with first consideration be given to the Fenchurch Street project.
184. Other matters requiring mitigation for the benefit of the local community are still yet to be fully scoped and it is proposed that the Local Community Facilities and Environment Contribution will be used to help mitigate such impacts also. Agents for the churches of St. Katharine Cree and St. Andrew Undershaft have requested sums for improvements. These matters are being discussed with the churches.
185. The applicant will be required to pay ten per cent of this contribution, for feasibility and design studies, upon demolition and the balance would be payable on or before the implementation of the planning permission.

Affordable Housing

186. The Affordable Housing contribution will be used for the purpose of off-site provision of affordable housing in suitable locations in or near to the City of London in accordance with the London Plan. The applicant will be required to pay this contribution on or before the implementation of the planning permission.

Transport Improvements

187. The proposed development will generate additional demands for movement in the form of new walk, cycle, public transport, taxi and servicing trips. Although these movements may have a destination at the development, they will have an origin elsewhere, probably outside

the City. As a result, the impacts of these additional movements will be felt throughout the City, not just in the area immediately surrounding the development.

188. It is therefore proposed that the Transport Contribution should go towards projects in the emerging Traffic Management Programme. The Traffic Management Programme is an emerging series of projects that seek to actively improve the functionality of City Streets in order to help them to accommodate growth in movement. This Programme has been set out in the City's adopted Local Implementation Plan (2011).
189. As the development lies close to the borders of three of the City's strategy areas (Aldgate & Tower, Fenchurch & Monument and the Eastern City Cluster), it is considered that preference would be given to transport projects that lie within the areas bounded by these Strategies.
190. TfL are seeking pooled contributions from development in the locality towards the upgrade of Bank Station. A contribution of £1,263,638 is sought in this instance. A further contribution of £374,000 is sought for the provision of an additional 50-60 Cycle Hire docking points in the area. TfL propose that some initial feasibility is undertaken between TfL and the developer to determine if private land can be made available. The applicants have asked TfL to provide information to justify these sums and this will be resolved before the application is referred back to the Mayor.
191. The developer would be required to submit interim and full Travel Plans prior to occupation and six months after occupation respectively. The obligations in relation to this shall apply for the life of the building.

Local Training, Skills and Job Brokerage

192. The Local Training, Skills and Job Brokerage contribution will be applied to the provision of training and skills initiatives, including job brokerage, in the City or City fringes. The Developer will be required to pay this contribution on or before the implementation of planning permission.

Public Realm Access

193. The proposal includes publically accessible space on the site. The balance of public and private access rights will be secured through the section 106 covenants subject to a detailed regime for public access to be only prevented or temporarily restricted or limited to enable cleansing, maintenance and security. The details of this regime are yet to be finalised and negotiations with the developer are in progress.

Highway Reparation and other Highways obligations

194. The cost of any reparation works required as a result of the development will be the responsibility of the Developer.
195. If required, prior to implementation and based on the City's standard draft, the developer will be obligated to enter into an agreement under Section 278 of the Highways Act 1980 to meet the cost of highway

works that are necessary to meet the burden placed on the highway network by the development.

Utility Connections

196. The development will require connection to a range of utility infrastructure. Early engagement by the applicant about utilities infrastructure provision will allow for proper co-ordination and planning of all works required to install the utility infrastructure, particularly under public highway, so as to minimise disruption to highway users. A s106 covenant will therefore require the submission of draft and final programmes for ordering and completing service connections from utility providers in order that the City's comments can be taken into account, and will require that all connections are carried out in accordance with the programme.
197. Details of the utility connection requirements of the Development including all proposed service connections, communal entry chambers, the proposed service provider and the anticipated volume of units required for the Development will also be required.

Delivery and Servicing Management Plan

198. The developer would be required to submit for approval a Delivery and Servicing Management Plan prior to occupation. In the event of any breach of the Management Plan, the developer will be required to resubmit a revised document, and should the developer default on this requirement, the City will be given the ability to provide a replacement plan. The operation of the Delivery and Servicing Management Plan will be subject to an annual review.

Local Training, Skills and Job Brokerage Strategy (Construction)

199. The applicant will be required to submit for approval details of the Local Training, Skills and Job Brokerage Strategy (Construction) in line with the aims of the City Corporation's Employment Charter for Construction. This Charter aims to maximise job opportunities in the City for residents of the City fringes and offer employment and training opportunities to local people wishing to begin a career in construction. The Strategy will be submitted in two stages: one to be submitted prior to the First Preparatory Operation Date in respect of the Preparatory Operations; the second to be submitted prior to Implementation in respect of the Main Contract Works Package.
200. The Economic Development Office is able to introduce the Developer or its Contractor and Sub-Contractors to local training providers and brokerage agencies to discuss their site-specific skills needs and to identify suitable local people to fill opportunities on site. The Developer is encouraged to liaise with the Economic Development Office at the earliest stage in the development process in order that the strategy can be submitted prior to commencement.

Television Reception Surveys

201. The Developer has provided the First Interference Survey for the City Corporation. As soon as reasonably practicable following completion

the Company shall undertake the Second Interference Survey and shall submit the results to the City. If significant deterioration in TV and radio reception is identified, the Developer will be required to undertake appropriate mitigation measures.

Local Procurement

202. The developer has agreed to submit for approval a Local Procurement Strategy prior to commencement of demolition. The Local Procurement Strategy shall include details of: initiatives to identify local procurement opportunities relating to the construction of the development; initiatives to reach a 10% target for local procurement, from small to medium sized enterprises in the City and City fringes; the timings and arrangements for the implementation of such initiatives; and suitable mechanisms for the monitoring of the effectiveness of such initiatives e.g. a local procurement tracker can be used to capture this information.
203. The developer will be required at the 6 month stage, or half way through the project (whichever is earliest), to report to the City of London Corporation's Economic Development Office on their performance against the 10% local procurement target.
204. The Economic Development Officer is able to provide information and guidance to the Developer its Contractor and Sub-Contractors. The Developer is encouraged to liaise with the Economic Development Officer at the earliest stage in the development process in order that the strategy can be submitted prior to implementation

Carbon Reduction Targets

205. The London Plan sets a target for major developments to achieve an overall carbon dioxide emission reduction of 40% in 2013-2016, through the use of on-site renewable energy generation. The development is expected to achieve an overall reduction of 1080 tonnes of carbon per year in regulated emissions compared to a 2010 building regulations compliant building equivalent to an overall saving of 40%. This would comply with London Plan policy 5.2.
206. A detailed assessment will be required by condition to confirm that this can be achieved. If this target is not met on site the applicant will be required to meet the shortfall through cash in lieu contribution. The contribution will be secured through the section 106 agreement.

Monitoring and Administrative Costs

207. A 10 year repayment period would be required where by any unallocated sums would be returned to the developer 10 years after practical completion of the development.
208. The applicant will pay the City of London's legal costs incurred in the negotiation and execution of the legal agreement and the City Planning Officer's administration costs in respect of the same. 1% of the total contribution (secured under the City's SPG) will be allocated to the monitoring of the agreement.

209. Separate additional administration and monitoring fees will be applied in relation to the Crossrail Contribution.

Conclusion

210. The proposal supports the strategic objective of the Corporation to promote the City as the leading international financial and business centre. It would provide an employment led mixed use development which supports the economic policies of the London Plan and LDF Core Strategy and would provide an increase in high quality floor space.
211. The proposal is in substantial compliance with the development plan policies that relate to it and in particular it supports the objective of promoting the City as the leading international financial and business centre.
212. Objections have been raised to the impact on the loss of daylight and sunlight to some residential premises, to the effect on the listed building at 19-21 Billiter Street and to potential impacts on two nearby churches.
213. There would be reductions in sunlight and daylight to some residential premises but the majority of changes would be within the standards in the BRE guidance and many of the actual changes would be small. There would be a noticeable reduction in sunlight to two open spaces.
214. The applicant and church authorities are in the process of reaching an accord to ensure protection of the churches.
215. It is considered that if the concerns of the freehold owners of the East India Arms about the impact on their trade do not justify refusal of planning permission and that these can be addressed through the City's normal controls over construction.
216. The proposals are considered not to have a detrimental impact on the listed building on the site or the setting of other listed buildings, Conservation Areas and non-designated heritage assets in the vicinity.
217. It is concluded that the proposal overall is acceptable subject to conditions and to a Section 106 agreement being entered into to cover the matters set out in the report.

Background Papers

Internal

Memo 14/11/13 Environmental Health Officer
Letters 13/01/13 & 04/02/14 Access Adviser to DP9
Memo 17/01/14 Waste & Amenity Planning Manager

External

Letters 29/10/13 (x2), 07/18/13, 03/02/14 English Heritage
Letter 03/12/13 GLA
Letters 04/12/13 & 22/01/14 TfL
Letter 15/11/13 Tower Hamlets
Email 25/10/13 Environment Agency
Letter 11/11/13 Natural England
Email 08/11/13 Thames Water
Emails 07/11/13 & 04/02/14 Yarema Ronish
Email 07/11/13 Jonathan Whitby
Letter 11/11/13 Yvonne Courtney
Email 11/11/13 David Rees
Letter 05/12/13 Wilson Stephen for St Andrew Undershaft Church
Letter 05/12/13 Wilson Stephen for St Katharine Cree Church
Email 11/02/14 Wilson Stephen
Letter 28/10/13 and email 03/12/13 Robert Benson
Letter 31/01/14 Milliken & Company
Email 08/01/14 London City Airport
Letter 20/11/13, Email 07/02/14 The Victorian Society
Email 08/01/14 Anna McPherson/HRP
Emails 04/12/13 and 08/01/14 and attachment LAMAS
Letters 18/12/13, 15/01/14, 05/02/14, 11/02/14 DP9
Letter 22/11/13 and Appendix GIA TO DP9
Letter 09/12/14 and Appendix GIA TO DP9
Email 16/01/14 GIA
Planning Statement September 2013 DP9
Design & Access Statement September 2013 Make & David Bonnett
Statement of Community Involvement September 2013 Your Shout

Statement of Community Involvement Addendum December 2013 Your
Shout

Environmental Statement September 2013 comprising Non-Technical
Summary and Volumes , Volume 2, Volume 3 Appendices Parts One and Two

Significance of the Designated Asset report September 2013 Make
Architects & Francis Golding

Sustainability Statement and BREEAM Strategy September 2013 WSP
Group

Energy Statement September 2013 WSP Group

Transport Assessment September 2013 Arup

Drawings 226326-00-SU-03 Rev A; 226326-00-007 Rev C, 008 Rev H, 009
Rev H, 010 Rev H Arup

Sesame Access Systems Ltd brochure

Appendix A

London Plan Policies

The London Plan policies which are most relevant to this application are set out below:

Policy 2.10 Enhance and promote the unique international, national and London wide roles of the Central Activities Zone (CAZ) and as a strategically important, globally-oriented financial and business services centre.

Policy 2.11 Ensure that developments proposals to increase office floorspace within CAZ include a mix of uses including housing, unless such a mix would demonstrably conflict with other policies in the plan.

Policy 4.1 Promote and enable the continued development of a strong, sustainable and increasingly diverse economy;

Support the distinctive and crucial contribution to London's economic success made by central London and its specialist clusters of economic activity;

Promote London as a suitable location for European and other international agencies and businesses.

Policy 4.2 Support the management and mixed use development and redevelopment of office provision to improve London's competitiveness and to address the wider objectives of this Plan, including enhancing its varied attractions for businesses of different types and sizes.

Policy 4.3 Within the Central Activities Zone increases in office floorspace should provide for a mix of uses including housing, unless such a mix would demonstrably conflict with other policies in this plan.

Policy 4.8 Support a successful, competitive and diverse retail sector which promotes sustainable access to the goods and services that Londoners need and the broader objectives of the spatial structure of this Plan, especially town centres.

Policy 5.2 Development proposals should make the fullest contribution to minimising carbon dioxide emissions.

Policy 5.3 Development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation. Major development proposals should meet the minimum standards outlined in supplementary planning guidance.

Policy 5.6 Development proposals should evaluate the feasibility of Combined Heat and Power (CHP) systems, and where a new CHP system is appropriate also examine opportunities to extend the system beyond the site boundary to adjacent sites.

Policy 5.7 Major development proposals should provide a reduction in carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.

Policy 5.9 Reduce the impact of the urban heat island effect in London and encourage the design of places and spaces to avoid overheating and excessive heat generation, and to reduce overheating due to the impacts of climate change and the urban heat island effect on an area wide basis.

Policy 5.10 Promote and support urban greening, such as new planting in the public realm (including streets, squares and plazas) and multifunctional green infrastructure, to contribute to the adaptation to, and reduction of, the effects of climate change.

Policy 5.11 Major development proposals should be designed to include roof, wall and site planting, especially green roofs and walls where feasible.

Policy 5.12 Development proposals must comply with the flood risk assessment and management requirements set out in PPS25 and address flood resilient design and emergency planning; development adjacent to flood defences will be required to protect the integrity of existing flood defences and wherever possible be set back from those defences to allow their management, maintenance and upgrading to be undertaken in a sustainable and cost effective way.

Policy 5.13 Development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so.

Policy 6.1 The Mayor will work with all relevant partners to encourage the closer integration of transport and development.

Policy 6.3 Development proposals should ensure that impacts on transport capacity and the transport network are fully assessed.

Policy 6.5 Contributions will be sought from developments likely to add to, or create, congestion on London's rail network that Crossrail is intended to mitigate.

Policy 6.9 Developments should provide secure, integrated and accessible cycle parking facilities and provide on-site changing facilities and showers for cyclists, facilitate the Cycle Super Highways and facilitate the central London cycle hire scheme.

Policy 6.13 The maximum standards set out in Table 6.2 should be applied to planning applications. Developments must:

ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles

provide parking for disabled people in line with Table 6.2

meet the minimum cycle parking standards set out in Table 6.3

provide for the needs of businesses for delivery and servicing.

Policy 7.2 All new development in London to achieve the highest standards of accessible and inclusive design.

Policy 7.3 Creation of safe, secure and appropriately accessible environments.

Policy 7.4 Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

Policy 7.5 London's public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces.

Policy 7.6 Buildings and structures should:

- a be of the highest architectural quality
- b be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm
- c comprise details and materials that complement, not necessarily replicate, the local architectural character
- d not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings
- e incorporate best practice in resource management and climate change mitigation and adaptation
- f provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces
- g be adaptable to different activities and land uses, particularly at ground level
- h meet the principles of inclusive design
- i optimise the potential of sites.

Policy 7.7 Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations. Tall and large buildings should not have an unacceptably harmful impact on their surroundings. Applications for tall or large buildings should include an urban design analysis that demonstrates the proposal is part of a strategy that will meet the criteria set out in this policy.

Policy 7.8 Development should identify, value, conserve, restore, re-use and incorporate heritage assets, conserve the significance of heritage assets and their settings and make provision for the protection of archaeological resources, landscapes and significant memorials.

Policy 7.10 Development in World Heritage Sites and their settings, including any buffer zones, should conserve, promote, make sustainable use of and enhance their authenticity, integrity and significance and Outstanding Universal Value.

Policy 7.12 New development should not harm and where possible should make a positive contribution to the characteristics and composition of the strategic views and their landmark elements identified in the London View Management Framework. It should also, where possible, preserve viewers' ability to recognise and to appreciate Strategically Important Landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated Viewing Places.

Policy 7.13 Development proposals should contribute to the minimisation of potential physical risks, including those arising as a result of fire, flood and related hazards.

Policy 7.14 Implement Air Quality and Transport strategies to achieve reductions in pollutant emissions and minimise public exposure to pollution.

Policy 7.15 Minimise existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals and separate new noise sensitive development from major noise sources.

Policy 7.19 Development proposals should, wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity.

Unitary Development Plan and Core Strategy Policies

CS1 Provide additional offices

To ensure the City of London provides additional office development of the highest quality to meet demand from long term employment growth and strengthen the beneficial cluster of activities found in and near the City that contribute to London's role as the world's leading international financial and business centre.

CS2 Facilitate utilities infrastructure

To co-ordinate and facilitate infrastructure planning and delivery to ensure that the functioning and growth of the City's business, resident, student and visitor communities is not limited by provision of utilities and telecommunications infrastructure.

CS3 Ensure security from crime/terrorism

To ensure that the City is secure from crime, disorder and terrorism, has safety systems of transport and is designed and managed to satisfactorily accommodate large numbers of people, thereby increasing public and corporate confidence in the City's role as the world's leading international financial and business centre.

CS4 Seek planning contributions

To manage the impact of development, seeking appropriate contributions having regard to the impact of the contributions on the viability of development.

CS7 Meet challenges of Eastern Cluster

To ensure that the Eastern Cluster can accommodate a significant growth in office floorspace and employment, while balancing the accommodation of tall buildings, transport, public realm and security and spread the benefits to the surrounding areas of the City.

CS10 Promote high quality environment

To promote a high standard and sustainable design of buildings, streets and spaces, having regard to their surroundings and the character of the City and creating an inclusive and attractive environment.

CS12 Conserve or enhance heritage assets

To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors.

CS13 Protect/enhance significant views

To protect and enhance significant City and London views of important buildings, townscape and skylines, making a substantial contribution to protecting the overall heritage of the City's landmarks.

CS14 Tall buildings in suitable places

To allow tall buildings of world class architecture and sustainable design in suitable locations and to ensure that they take full account of the character of their surroundings, enhance the skyline and provide a high quality public realm at ground level.

CS15 Creation of sustainable development

To enable City businesses and residents to make sustainable choices in their daily activities creating a more sustainable City, adapted to the changing climate.

CS16 Improving transport and travel

To build on the City's strategic central London position and good transport infrastructure to further improve the sustainability and efficiency of travel in, to, from and through the City.

CS17 Minimising and managing waste

To support City businesses, residents and visitors in making sustainable choices regarding the minimisation, transport and management of their waste, capitalising on the City's riverside location for sustainable waste transfer and eliminating reliance on landfill for municipal solid waste (MSW).

CS18 Minimise flood risk

To ensure that the City remains at low risk from all types of flooding.

CS19 Improve open space and biodiversity

To encourage healthy lifestyles for all the City's communities through improved access to open space and facilities, increasing the amount and quality of open spaces and green infrastructure, while enhancing biodiversity.

CS20 Improve retail facilities

To improve the quantity and quality of retailing and the retail environment, promoting the development of the five Principal Shopping Centres and the linkages between them.

CS21 Protect and provide housing

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near existing residential communities, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

ARC1 Archaeology - evaluation and impact

To require planning applications which involve excavation or groundworks on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site including the impact of the proposed development.

ARC2 To preserve archaeological remains

To require development proposals to preserve in situ, protect and safeguard important ancient monuments and important archaeological remains and their settings, and where appropriate, to require the permanent public display and/or interpretation of the monument or remains.

ARC3 Recording of archaeological remains

To ensure the proper investigation, recording of sites, and publication of the results, by an approved organisation as an integral part of a development programme where a development incorporates archaeological remains or where it is considered that preservation in situ is not appropriate.

HOUS10 Respect residential privacy, etc

To require where practicable that the privacy, outlook and daylighting levels of residential accommodation is respected by the form of adjacent development.

ENV10 Protect and encourage public art

To protect existing works of art and to seek the provision of additional works of art which enhance the City townscape.

ENV35 To protect daylight and sunlight

To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to levels which would be contrary to the Building Research Establishment's guidelines.

ENV6 Design of alterations to buildings

To ensure that all alterations or extensions to an existing building take account of its scale, proportions, architectural character, materials and setting.

ENV28 Design of building services

To ensure that building services are satisfactorily integrated into the architectural design of the building (with particular reference to its roof profile) and to resist installations which would adversely affect the character, appearance or amenities of the buildings or area concerned.

SHOP2 Seek replacement of retail uses

To seek the replacement of retail uses in development schemes and to ensure that such replacements are primarily at the pedestrian level.

SHOP3 Seek increased retail facilities

To seek, where appropriate, the provision of new or increased retail facilities, particularly where:

- i. existing retail shop facilities are being replaced on redevelopment in accordance with policy SHOP 2;
- ii. the site is in or close to a shopping centre;
- iii. the site is close to a public transport interchange;
- iv. there is a riverside frontage.

UTIL6 Provision for waste collection

To require adequate provision within all developments for the storage, presentation for collection, and removal of waste, unless exceptional circumstances make it impractical; to encourage provision to allow for the separate storage of recyclable waste where appropriate.

TRANS15 Seek off-street servicing

To seek, where appropriate, the provision of off-street servicing facilities in such a way as:

- i. to ensure that the location and design of vehicular access and servicing arrangements minimise the adverse effects on the adjoining highway and pay due regard to the environment and the convenience and safety of pedestrians;

ii. to ensure that vehicular servicing and servicing access is avoided on or onto Tier 1-3 roads, except where a practical alternative cannot be provided; and

iii. to enable vehicles to enter and leave premises in a forward direction.

TRANS18 Resist non-residential parking

To resist the provision of private non-residential parking in excess of the current planning standards.

TRANS21 Seek parking for disabled people

To seek the provision and improvement of parking arrangements for disabled people.

TRANS22 Require cycle parking

To provide cycle parking facilities by:

i. requiring the provision of private parking space for cycles in development schemes;

ii. maintaining an adequate overall number of spaces for cycles in public off-street car parks; and

iii. providing an adequate supply of cycle parking facilities on-street.

TRANS23 Require parking for motorcycles

To provide parking facilities for motorcycles by:

i. requiring the provision of private parking spaces for motorcycles in development schemes;

ii. maintaining an adequate overall number of spaces for motorcycles in public off-street car parks and;

iii. seeking to maintain on-street motorcycle parking at current levels, pending the approval of the Local Implementation Plan.

SCHEDULE

APPLICATION: 13/01004/FULEIA

Site Bounded By 19-21 & 22 Billiter Street, 49 Leadenhall Street, 108 & 109-114 Fenchurch Street, 6-8 & 9-13 Fenchurch Buildings

Partial demolition and works of refurbishment and reinstatement to 19-21 Billiter Street; demolition of all other buildings on the site; redevelopment to provide a new building comprising two basement levels and ground plus part 10, 14 and 34 storeys plus plant (total height 170m AOD) containing offices (B1) and flexible retail/financial and professional services/cafe and restaurant uses (A1/A2/A3) at ground floor level; food and drink (A3/A4) uses at levels 13 and 14; change of use at ground and first floor of 19-21 Billiter Street to retail/cafe and restaurant/bar use (A1/A3/A4); the provision of hard and soft landscaping; alterations to Fenchurch Buildings and other incidental works. (125,699sq.m GIA).

CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of five years from the date of this permission.
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2 Before any works including demolition are begun a survey of the perimeter of the existing site shall be carried out and submitted to the LPA showing the existing Ordnance Datum levels of the adjoining streets and open spaces.
REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Unitary Development Plan 2002: ENV8, CS10, CS16.
- 3 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site identifying efficiency and sustainability measures to be undertaken during site deconstruction of the existing buildings has been submitted to and approved in writing by the Local Planning Authority (in consultation with Transport for London). The development shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority (in consultation with Transport for London).
REASON: To ensure that deconstruction works do not have an adverse impact on the transport network in accordance with London Plan Policy 6.14.

- 4 A scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects shall be submitted to and approved in writing by the Local Planning Authority prior to any demolition taking place on the site. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme
REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policy of the Core Strategy: CS15.
- 5 Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site identifying efficiency and sustainability measures to be undertaken during site construction of the development has been submitted to and approved in writing by the Local Planning Authority (in consultation with Transport for London). The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority (in consultation with Transport for London).
REASON: To ensure that construction works do not have an adverse impact on the transport network in accordance with London Plan Policy 6.14.
- 6 Construction works shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the development process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme.
REASON: To protect the amenities of nearby residents and commercial occupiers in accordance with the following policy of the Core Strategy: CS15.
- 7 No part of the buildings at 108 Fenchurch Street and 9-13 Fenchurch Buildings shall be demolished (unless otherwise permitted by the Local Planning Authority in the circumstances identified in this condition)

before a contract or series of contracts for the carrying out of substantial works of redevelopment have been made and planning permission has been granted for the development for which the contracts provide. Such contracts shall include the construction of all foundations, above ground framework and floor structures. Works of demolition may be permitted prior to the completion of the contract(s) if the Local Planning Authority is satisfied that the site is required for archaeological investigation and the developer has submitted evidence to show that development will proceed upon completion of the investigation.

REASON: To ensure these non-designated heritage assets are not demolished unless necessary for the purposes of an approved development scheme in accordance with the requirements of paragraph 136 of the National Planning and Policy Framework.

- 8 No development shall take place until the detailed design of all wind mitigation measures has been submitted to and approved in writing by the Local Planning Authority. These details shall include the size and appearance of any features, the size and appearance of any planting containers, trees species, planting medium and irrigation systems. No part of the building shall be occupied until the approved wind mitigation measures have been implemented unless the Local Planning Authority agrees otherwise in writing. The said wind mitigation measures shall be retained in place for the life of the building unless otherwise agreed by the Local Planning Authority.
REASON: In order to ensure that the proposed development does not have a detrimental impact on the amenities of the area in accordance with the following policies of the Core Strategy: CS10, CS14.
- 9 Before any construction works are begun details must be submitted to and approved in writing by the local planning authority indicating the proposed finished floor levels at basement and ground floor levels in relation to the existing highway levels. The development shall be carried out in accordance with the approved site survey unless otherwise agreed in writing by the local planning authority.
REASON: To ensure compliance with building lines and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Unitary Development Plan 2002: ENV8, CS10, CS16.
- 10 Archaeological evaluation shall be carried out in order to compile archaeological records in accordance with a timetable and scheme of such archaeological work submitted to and approved in writing by the Local Planning Authority before any commencement of archaeological evaluation work.
REASON: To ensure that an opportunity is provided for the archaeology of the site to be considered and recorded in accordance with the following policy of the Unitary Development Plan 2002: ARC 1.
- 11 No works except demolition to basement slab level shall take place until the developer has secured the implementation of a programme of

archaeological work to be carried out in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.

REASON: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are understood to exist in accordance with the following policies of the Unitary Development Plan: ARC2, ARC3

- 12 No works except demolition to basement slab level shall take place before details of the foundations and piling configuration, to include a detailed design and method statement, have been submitted to and approved in writing by the Local Planning Authority, such details to show the preservation of surviving archaeological remains which are to remain in situ.

REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policies of the Unitary Development Plan: ARC2, ARC3.

- 13 The development shall incorporate such measures as are necessary within the site to resist structural damage arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun.
- REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Core Strategy: CS3.

- 14 Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.
- REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policies of the Core Strategy: CS15.

- 15 No impact piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning

authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

REASON: The proposed works will be in close proximity to underground water utility infrastructure and piling has the potential to impact on local underground water utility infrastructure.

(The applicant is advised to contact Thames Water Developer Services on 0845 850 2777 to discuss the details of the piling method statement.)

- 16 Construction works shall not be commenced until impact studies of the existing water supply infrastructure have been submitted to and approved in writing by the local planning authority in consultation with Thames Water. The studies shall determine the magnitude of any new additional capacity required in the system and a suitable connection point.

REASON: To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand.

- 17 Before any construction works hereby permitted are begun an energy statement shall be submitted to and approved in writing by the local planning authority. The energy statement shall be based on the detailed design of the proposed development and provide further details of the energy efficiency design and efficient energy supply including carbon emissions savings calculations. The measures identified as being incorporated into the development and approved under this condition shall be incorporated into the development and maintained for the life of the development.

REASON: To minimise carbon emissions and provide a sustainable development in accordance with the following policy of the Core Strategy CS15.

- 18 Before any construction works hereby permitted are begun a detailed assessment of the potential for urban greening on ground and upper levels and vertical planes and for improvements to biodiversity on site shall be submitted to and approved in writing by the local planning authority. This assessment should include details of type, position and size of any proposed measures which shall be implemented and maintained as approved for the life of the development.

REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Core Strategy: CS10, CS15, CS18, CS19.

- 19 Before any construction works hereby permitted are begun details of rainwater harvesting and grey water recycling systems shall be submitted to and approved in writing by the local planning authority.

REASON: To improve sustainability and reduce flood risk by reducing potable water demands and water run-off rates in accordance with the following policies of the Core Strategy CS15 and CS18

- 20 A post construction BREEAM assessment demonstrating that a target rating of 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted as soon as practicable after practical completion.
REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Core Strategy CS15.
- 21 Before any works thereby affected are begun details of the Billiter Street and Fenchurch Buildings elevations showing a clear demarcation between the lower street block and the tower shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details.
REASON: To ensure that the new building provides an appropriate setting for and relationship with the listed building at 19-21 Billiter Street in accordance with the following policies of the Core Strategy: CS10, CS12.
- 22 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) particulars and samples of the materials to be used on all external faces of the building including external ground and upper level surfaces;
 - (b) details of the proposed new facades including typical details of the fenestration and entrances;
 - (c) details of ground floor elevations and office entrances;
 - (d) details of a typical bay of the development;
 - (e) details of all alterations to the facade of the retained building;
 - (f) details of soffits, hand rails and balustrades;
 - (g) details of the vehicle entrance and gates thereto;
 - (h) details of the size and design of the platform lift providing wheelchair access to 19-21 Billiter Street;
 - (j) details of junctions with adjoining premises and the retained building;
 - (k) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level
 - (l) details of ventilation and air-conditioning for the retail and food and drink uses;
 - (m) details of the purpose, location and design of all external louvers;
 - (n) details of external surfaces within the site boundary including hard and soft landscaping;
 - (p) details of suitable provision for bird nesting boxes.
- REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a

satisfactory external appearance in accordance with the following policies of the Unitary Development Plan and Core Strategy: CS10, CS12, CS13, CS14 ENV28, ENV29.

- 23 The development shall be designed to allow for the retro-fit of heat exchanger rooms to connect into a district heating network if this becomes available during the lifetime of the development.
REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policy of the Core Strategy: CS15.
- 24 Prior to the occupation of any part of the building all exposed flank or party walls must be faced or treated in accordance with details to be approved by the Local Planning Authority in writing before any such works are commenced and all development pursuant to this permission shall be carried out in accordance with the approved details.
REASON: In the interests of visual amenity in accordance with the following policies of the Unitary Development Plan and Core Strategy: ENV 6, CS10.
- 25 The threshold of all vehicular access points shall be at the same level as the rear of the adjoining footway.
REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Unitary Development Plan and Core Strategy: TRANS 15, ENV 8, CS10, CS16.
- 26 Prior to the occupation of any part of the building, the land between the existing building lines and the face of the proposed new building shall be brought up to street level, paved and drained in accordance with details to be submitted to and approved in writing by the Local Planning Authority and shall not be fenced or otherwise enclosed or obstructed.
REASON: To ensure compliance with building lines and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Unitary Development Plan and Core Strategy: ENV 8, CS10, CS16.
- 27 No doors or gates shall open over the public highway.
REASON: In the interests of public safety
- 28 Provision shall be made for disabled people to obtain access to the offices and, except in the case of 19-21 Billiter Street, to each retail unit via their respective principal entrances without the need to negotiate steps and shall be maintained for the life of the building.
REASON: To ensure that disabled people are able to use the building in accordance with the following policy of the Core Strategy: CS10.
- 29 Unless otherwise approved in writing by the local planning authority the generator exhaust pipework must terminate no lower than one metre above the highest roof level of the development.

REASON: To improve or maintain local air quality, particularly nitrogen dioxide and particulates PM10 in accordance with the City of London Air Quality Strategy 2011 and the following policy of the Core Strategy: CS15.

- 30 Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.
REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Core Strategy: CS15.
- 31 Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the Class A use. The details approved must be implemented before the Class A use takes place
REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Core Strategy: CS15, CS21.
- 32 Before any works thereby affected are begun, a scheme in the form of an acoustic report compiled by a qualified specialist shall be submitted to and approved in writing by the Local Planning Authority specifying the materials and constructional methods to be used demonstrating that there is adequate sound proofing to both airborne and structure borne noise transmission between the Class A use and the surrounding offices in the building. The development pursuant to this permission shall be carried out in accordance with the approved scheme and so maintained thereafter.
REASON: To protect the amenities of commercial occupiers in the building in accordance with the following policy of the Core Strategy: CS15.
- 33 (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the nearest window or facade of the nearest premises.
The measurements and assessments shall be made in accordance with B.S. 4142. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation. Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.

(b) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.
REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Core Strategy: CS15, CS21.

- 34 There must be no building, roof structures or plant above the top storey of each part of the development except as may be approved in writing by the Local Planning Authority.
REASON: To ensure protection of the view of St Paul's Cathedral and to ensure a satisfactory external appearance in accordance with the following policies of the Core Strategy: CS10, CS12, CS13.
- 35 No part of the site or building shall be used for the parking of motor vehicles unless specifically approved for that purpose in writing by the Local Planning Authority.
REASON: To protect the visual amenities of the area and reduce commuting by car in accordance with the following policies of the Unitary Development Plan and Core Strategy: ENV 8, TRANS 17, TRANS 18, TRANS 20, CS16.
- 36 A clear unobstructed minimum headroom of 5m must be maintained for the life of the building in the refuse skip loading area as shown on the approved drawings.
REASON: To ensure satisfactory servicing facilities in accordance with the following policies of the Unitary Development Plan: TRANS15, UTIL6.
- 37 Except as may be approved in writing by the Local Planning Authority the loading and unloading areas must remain ancillary to the use of the building and shall be available at all times for that purpose for the occupiers thereof and visitors thereto.
REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Unitary Development Plan: TRANS15.
- 38 Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of one pedal cycle per 150sq.m of floorspace. The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.
REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the standard set out in the London Plan.

- 39 Changing facilities and showers shall be provided adjacent to the bicycle parking areas and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.
REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Unitary Development Plan: TRANS22.
- 40 No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.
REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Core Strategy: CS15, CS16, CS21.
- 41 Details of a Servicing Management Plan demonstrating the arrangements for control of the arrival and departure of vehicles servicing the premises shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development hereby permitted. The building facilities shall thereafter be operated in accordance with the approved Servicing Management Plan (or any amended Servicing Management Plan that may be approved from time to time by the Local Planning Authority) for the life of the building.
REASON: To ensure that the development does not have an adverse impact on the free flow of traffic in surrounding streets in accordance with the following policies of the Unitary Development Plan and Core Strategy: TRANS15, CS16.
- 42 The two car parking spaces shown on the approved drawings for disabled users shall be wide enough to enable them to be used by people with disabilities and the spaces shall be marked out accordingly. These spaces shall be provided and maintained throughout the life of the building for use solely by people who are disabled.
REASON: To ensure provision of suitable parking for people with disabilities in accordance with policy TRANS 21 of the Unitary Development Plan 2002 and that private car parking is not provided without motorcycle parking also being provided in accordance with policies TRANS 18 and TRANS 23.
- 43 Electric vehicle recharging facilities shall be provided for vehicles using the servicing area and the disabled parking bays.
REASON: To facilitate the use of electrically powered vehicles and address carbon reduction and air pollution issues in accordance with the following policy of the Core Strategy: CS15.

- 44 The A1/A3/A4 uses hereby permitted shall not be open to customers between the hours of 23:30 on one day and 07:00 on the following day. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Core Strategy: CS15, CS21.
- 45 No live or recorded music that can be heard outside the premises shall be played. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Core Strategy: CS15, CS21.
- 46 At all times when not being used for cleaning or maintenance the window cleaning gantries, cradles and other similar equipment shall be garaged within the enclosure(s) shown on the approved drawings. REASON: To ensure a satisfactory external appearance in accordance with the following policies of the Core Strategy: CS10, CS12, CS13, CS14.
- 47 The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission: drawings numbered PA1000, 1198, 1199, 1200, 1210, 1300, 1301, 1399, 1400, 1401, 1402, 1403, 1404, 1405, 1410, 1420, 1421, 1500, 1549, 1550, 1551, 1552, 1553, 1554, 1555, 1997/01, 1998/03, 1999/02, 2000/01, 2000M/01, 2001/01, 2002/01, 2002/01, 2003/01, 2004/01, 2005/01, 2006/01, 2007/01, 2008/02, 2009/02, 2010/02, 2011/01, 2012/01, 2013/01, 2014/01, 2015/01, 2016, 2017, 2018, 2019, 2020, 2012, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2200, 2201, 2300, 2301/02, 2302/01, 2303/01, 2400/01, 2401/01, 2402/01, 2403/01, 2499, 2500/01, 2502/01, 2502/01, 2503/01, 2504/01, 2505/01, 2510/01, 2520/01, 2521/01, 2600, 2601, 2602, 2603, 2604, 2610, 2611, 2612, 2613/02, 2614, 2615. REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

INFORMATIVES

- 1 In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:
detailed advice in the form of statutory policies in the Core Strategy/ Unitary Development Plan, Supplementary Planning documents, and other written guidance has been made available;

a full pre application advice service has been offered;
where appropriate the City has been available to provide guidance on
how outstanding planning concerns may be addressed.

- 2 The correct street number or number and name must be displayed prominently on the premises in accordance with regulations made under Section 12 of the London Building Acts (Amendment) Act 1939. Names and numbers must be agreed with the Department of the Built Environment prior to their use including use for marketing.
- 3 This permission must in no way be deemed to prejudice any rights of light which may be enjoyed by the adjoining owners or occupiers under Common Law.
- 4 London City Airport advises that for air safety reasons, in the event that cranes or other construction equipment are required at a higher elevation than the top of the proposed building their use must be the subject of a separate consultation with the airport authority.
- 5 Improvement or other works to the public highway shown on the submitted drawings require separate approval from the local highway authority and the planning permission hereby granted does not authorise these works.
- 6 The Department of the Built Environment (Highways and Streetworks Team) must be consulted on the following matters which require specific approval:
 - (a) Hoardings, scaffolding and their respective licences, temporary road closures and any other activity on the public highway in connection with the proposed building works. In this regard the City of London Corporation operates the Considerate Contractors Scheme.
 - (b) The incorporation of street lighting and/or walkway lighting into the new development. Section 53 of the City of London (Various Powers) Act 1900 allows the City to affix to the exterior of any building fronting any street within the City brackets, wires, pipes and apparatus as may be necessary or convenient for the public lighting of streets within the City.
 - (c) Connections to the local sewerage and surface water system.
 - (d) Carriageway crossovers.
 - (e) Means of escape and constructional details under the Building Regulations and London Building Acts (District Surveyor).
 - (f) The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window cill, rainwater pipe, oil fuel inlet pipe or

box, carriageway entrance, or any other projection beneath, over or into any public way (including any cleaning equipment overhanging any public footway or carriageway). You are advised that highway projection licenses do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the land owner. In such cases please also contact the Corporate Property Officer, City Surveyor's Department.

- 7 The Director of Markets and Consumer Protection (Environmental Health Team) advises that:

Air Quality

(a)

Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.

Boilers and CHP plant

(b)

The City is an Air Quality Management Area with high levels of nitrogen dioxide. All gas boilers should therefore meet a dry NO_x emission rate of <40mg/kWh in accordance with the City of London Air Quality Strategy 2011.

(c)

All gas Combined Heat and Power plant should be low NO_x technology as detailed in the City of London Guidance for controlling emissions from CHP plant and in accordance with the City of London Air Quality Strategy 2011.

(d)

When considering how to achieve, or work towards the achievement of, the renewable energy targets, the Markets and Consumer Protection Department would prefer developers not to consider installing a biomass burner as the City is an Air Quality Management Area for fine particles and nitrogen dioxide. Research indicates that the widespread use of these appliances has the potential to increase particulate levels in London to an unacceptable level. Until the Markets and Consumer Protection Department is satisfied that these appliances can be installed without causing a detriment to the local air quality they are

discouraging their use. Biomass CHP may be acceptable providing sufficient abatement is fitted to the plant to reduce emissions to air.

(e)

Developers are encouraged to install non-combustion renewable technology to work towards energy security and carbon reduction targets in preference to combustion based technology.

(f)

Wet cooling towers are recommended rather than dry systems due to the energy efficiency of wet systems.

Standby Generators

(g)

There is a potential for standby generators to give out dark smoke on start-up and to cause noise nuisance. Guidance is available from the Department of Markets and Consumer Protection which state:

1. Routine testing should normally be carried out at a time when minimum inconvenience is caused to others. Generally this should be between 09.00 and 14.00 hours on a Saturday.
2. The generator should be located on suitable anti-vibration mountings to prevent the transmission of noise or vibration through the structure to other parts of the building.

Food and Catering

(h)

Further information should be provided regarding the internal layout of the proposed food/catering units showing proposals for staff/customer toilet facilities, ventilation arrangements and layout of kitchen areas.

(i)

If cooking is to be proposed within the food/catering units a satisfactory system of ventilation will be required. This must satisfy the following conditions:

Adequate access to ventilation fans, equipment and ductwork should be provided to permit routine cleaning and maintenance;

The flue should terminate at roof level in a location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. It cannot be assumed that ductwork will be permitted on the exterior of the building;

Additional methods of odour control may also be required. These must be submitted to the Markets and Consumer Protection Department for comment prior to installation;

Ventilation systems for extracting and dispersing any emissions and cooking smells to the external air must be discharged at roof level and designed, installed, operated and maintained in accordance with manufacturer's specification in order to prevent such smells and emissions adversely affecting neighbours.

(j)

Any building proposal that will include catering facilities will be required to be constructed with adequate grease traps to the satisfaction of the Sewerage Undertaker, Thames Water Utilities Ltd, or their contractors.

8 Thames Water advice

Thames Water requests that the developer should incorporate protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.

Surface Water Drainage - It is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777.

A Trade Effluent Consent will be required for any effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. Applications should be made to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol/oil interceptors could result in oil-polluted discharges entering local watercourses.

Water Comments

There are large water mains adjacent to the proposed development. Thames Water will not allow any building within 5 metres of them and will require 24 hours access for maintenance purposes. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0845 850 2777 for further information.

Supplementary Comments

Our preferred option would be for all surface water to be disposed of on-site using SUDs as per policy 5.13 of the London plan.

The developer will need to contact Thames Water to discuss the connection point to supply this property. There are a number of mains around this site which may or may not affect the water capacity requirements for this development. Please contact Developer Services on 0845 850 2777 to discuss this further.

9 The Environment Agency advice:

Developers should ensure that any proposed piling methods do not pose a pollution risk to controlled waters. Piling to facilitate building foundations or the installation of ground source heat pumps has the potential to create a pathway between contaminated shallow soils and deeper geological formations and aquifers. Deep piling can also result in physical disturbance of aquifers.

If piling is proposed, a Piling Risk Assessment will be required to demonstrate that the chosen piling method does not increase the risk of near-surface pollutants migrating into deeper geological formations and aquifers. A Hydrogeological Risk Assessment of physical disturbance to the aquifer should also be undertaken and if unacceptable risks are identified, appropriate mitigation measures must be provided.

We recommend that developers follow the risk management framework provided in our guidance for 'Piling into Contaminated Sites' and also refer to the document: "Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention".

Stothard, David

Subject: 40 Leadenhall Street

From: Julie Limage **On Behalf Of** Bob Wilson

Sent: 11 February 2014 09:46

To: Stothard, David

Subject: J5451 - 40 Leadenhall Street

Dear David

Further to our telephone conversation earlier this morning, I confirm that we are now in discussions with the Developer and that we are working to agree a set of Heads of Terms which would be the precursor to a legal agreement between the parties. I am pleased to confirm that we are working together in a spirit of positive collaboration and partnership in this regard and see no reason why the Church's interest will not be properly addressed. It is hoped that the legal agreement will be in place quite quickly: if your committee meeting date is 25 February 2014 it is unlikely to be before then, although we may have agreed heads of terms at that point. I will keep you informed.

Kind regards

Bob

M: Wilson Stephen Associates

2-3 Hind Court, London EC4A 3DL

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Hassall, Pam

From: Kathy Clark (The Victorian Society) <kathy@victoriansociety.org.uk>
Sent: 07 February 2014 15:45
To: PLN - Comments
Subject: (Replacement for last email) RE: FAO D Stothard, RE 13/01005/LBC & 13/01004/FULEIA
Attachments: Feb 2013 resend, 2013-11-003 London, 19-21 and 22 Billiter Street.pdf

Dear Mr Stothard



Your ref: 13/01005/LBC and 13/01004/FULEIA
Our ref: 2013/11/003

RE: 19-21 and 22 Billiter Street, London (former: grade II, 1865); conversion, partial rebuilding, and redevelopment of remainder of block.

Thank you for consulting the Victorian Society on alterations to the development proposal above. As the principle of the scheme, the extent of demolition and the overall new design is unchanged, our objection, as in the Society's letter of 20 November 2013, still stands. We do welcome the changes to the treatment of the listed building itself that have been made in response to our original comments. I have attached our original letter for reference. The remainder of the comments, which do not relate to the chimneys, doors and interior of the listed building, are unchanged.

Yours sincerely,

Kathy Clark

ACKNOWLEDGED



GREATER LONDON AUTHORITY
Development, Enterprise and Environment



Mr. David Stothard
City of London Corporation
PO Box 270
Guildhall
LONDON EC2P 2EJ

Our ref: D&P/3175/01
Your ref: 13/01004/FULEIA
Date: 3 December 2013



Dear Sir,

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

Site bounded by 19-21 & 22 Billiter Street, 49 Leadenhall Street, 108 & 109-114 Fenchurch Street, 6-8 & 9-13 Fenchurch Buildings, London, EC3

I refer to the copy of the above planning application, which was received from you on 28 October 2013. On 3 December 2013 Sir Edward Lister, Deputy Mayor and Chief of Staff, acting under delegated authority, considered a report on this proposal, reference D&P/3175/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that the application broadly complies with the London Plan, but that the issues set out in paragraph 47 of the report should be addressed before the scheme is referred back to the Mayor at Stage 2. 63

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is James Forrest, e-mail JamesForrest@tfl.gov.uk, telephone 020 3054 7090.

Yours sincerely,


Colin Wilson
Senior Manager – Development & Projects

Conclusion *of report*

63 London Plan policies on the **principle of development (offices, mix of uses), urban design, heritage, tall building and views, inclusive access, sustainable development and transport** are relevant to this application. The application complies with the majority of these policies and is strongly supported but further information is needed in order to fully comply with the London Plan. The potential remedies to issues of non-compliance are set out below:

- **Principle of development:** The principle of an uplift in office and retail floorspace on the site, and the mix of uses is strongly supported in this location within the City and the Central Activities Zone.
- **Urban design, heritage, tall buildings, views:** Officers support the design, massing and height of the building, including the ground floor interactions, public realm improvements and the manner in which the listed building has been retained and incorporated into the development. Officers are satisfied that a tall building is acceptable in this location of the City adding to the existing eastern cluster, and are satisfied that the development will have an acceptable impact on views.
- **Inclusive access:** Overall the scheme responds well to the principles of inclusive design. Whilst there are a number of access challenges associated with refurbishment of 19-21 Billiter Street, it is acknowledged that the need to conserve the listed building provides a constraint to doing so. The applicant has demonstrated that all reasonable steps have been taken to ensure inclusive access across the development.
- **Sustainable development:** The applicant has broadly followed the energy hierarchy to reduce carbon dioxide (CO₂) emissions. An overall reduction of 1080 tonnes of CO₂ per year in regulated emissions compared to a 2010 Building Regulations compliant development is expected, equivalent to an overall saving of 40%. This complies with Policy 5.2 of the London Plan. However, further evidence/information is required in order to verify this including; BRUKL sheets showing efficiency features only; the sizing of the CHP system; further detail on the operation of the site heat network, energy centre and connection routes; and future proofing evidence for connection to a district heating system.
- **Transport:** TfL require further clarification and confirmation from the applicant as follows; demonstration that the blue badge provision is sufficient to meet demand and that each bay will have access to EVCP's; clarification on whether the TA includes new retail trips; comparison required between the presented mode share of DLR trips and local Census ward data; mitigate the likely additional stress on the cycle hire network; assessment of local buses and bus stops on Leadenhall Street; revisions to travel plan; DSP and CLP to be secured by condition. Financial contributions are sought towards; improved pedestrian and cycling facilities; works to mitigate overcrowding and improve accessibility at Bank;



ENGLISH HERITAGE
LONDON OFFICE

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119953

Mr David Stothard
Corporation of London
Department of Planning & Transportation
PO Box 270
Guildhall
LONDON
EC2P 2EJ

Direct Dial: 020 7973 3774
Direct Fax: 020 7973 3792

Our ref: L00289250

29 October 2013

Dear Mr Stothard

**Notifications under Circular 01/2001, Circular 08/2009 &
T&CP (Development Management Procedure) Order 2010**

**Authorisation to Determine an Application for Listed Building Consent as Seen
Fit**

**19 - 21 AND 22 BILLITER STREET, LONDON, EC3
Application No 13/01005/LBC**

<i>Applicant:</i>	Vanquish Properties (UK) Limited Partnership
<i>Grade of building(s):</i>	II
<i>Proposed works:</i>	Demolition of the rear elevation and rooftop structures; works of repair, refurbishment and reinstatement throughout the building in conjunction with the change of use of the ground and first floor to retail/cafe and restaurant/bar use and the building's integration into the redevelopment of the surrounding site.
<i>Drawing numbers:</i>	As approved.

<i>Date of application:</i>	11 October 2013
<i>Date of referral by Council:</i>	22 October 2013
<i>Date received by English Heritage:</i>	28 October 2013
<i>Date referred to CLG:</i>	29 October 2013



You are hereby authorised to determine the application for listed building consent referred to above as you think fit. In so doing English Heritage would stress that it is not expressing any views on the merits of the proposals which are the subject of the application.



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LONDON OFFICE

Yours sincerely

Michael Dunn

Principal Inspector of Historic Buildings and Areas

E-mail: michael.dunn@english-heritage.org.uk

NB: This authorisation is not valid unless it has been appropriately endorsed by the Secretary of State.

The Secretary of State has considered the information given above and does not intend to require the application concerned to be referred to him.

Signed

Date 31/10/13

National Planning Casework Unit



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ENGLISH HERITAGE
LONDON OFFICE

Mr David Stothard
Corporation of London
Department of Planning & Transportation
PO Box 270
Guildhall
LONDON
EC2P 2EJ

FILE	119918
NO	
C	
TR	011 V 2013

Direct Dial: 020 7973 3774
Direct Fax: 020 7973 3792

Our ref: P00289190

29 October 2013

Dear Mr Stothard

**SITE BOUNDED BY 19-21 & 22 BILLITER BUILDINGS, 49 LEADENHALL STREET,
108 & 109-114 FENCHURCH STREET, 6-8 & 9-13 FENCHURCH BUILDINGS
LONDON EC3**

Thank you for formally consulting us the submitted proposals for development at the above site. We previously met with the applicants and their design team, and provided detailed comments about the scheme in a letter dated 7 August 2013. I enclose a copy of that letter for your reference.

As the submitted proposals do not differ substantially from those that we provided pre-application advice on, our position as set out in the 7 August letter remains valid.

Please do not hesitate to contact me should you have any further queries.

Yours sincerely

Michael Dunn
Principal Inspector of Historic Buildings and Areas
E-mail: michael.dunn@english-heritage.org.uk



	<p>1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST Telephone 020 7973 3000 Facsimile 020 7973 3001 www.english-heritage.org.uk</p>	
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ENGLISH HERITAGE
LONDON OFFICE

Mr Jonathan Smith
DP9
100 Pall Mall
London
SW1Y 5NQ

Direct Dial: 020 7973 3774
Direct Fax: 020 7973 3792

Our ref: PA00172874

7 August 2013

Dear Mr Smith

Request for Pre-application Advice

LEADENHALL TRIANGLE, 60 LEADENHALL STREET, LONDON

Thank you for consulting English Heritage on pre-application proposals for the Leadenhall Triangle site in the City of London. We have considered the proposals and can set out our position as follows.

The proposals are for a new building to replace most of the existing buildings on the site between Billiter Street, Leadenhall Street, Fenchurch Street and Fenchurch Buildings. The grade II listed building at Nos. 20-21 Billiter Street will be retained and incorporated into the proposed scheme. The site is not within a conservation area, and is currently occupied by buildings that are, for the most part, of no architectural interest (apart from the aforementioned listed building). In this regard, we support the principle of re-developing the site.

English Heritage believes that tall buildings can make a positive contribution to London when they are situated in the right place and are excellent works of architecture. A key component of ensuring successful tall buildings that enhance the overall townscape is the plan-led approach, where local authorities identify appropriate locations for tall buildings in the local development frameworks (EH/CABE Guidance on Tall Buildings 2007).

The City of London has identified the Eastern Cluster as a part of the City that can, in principle, accommodate tall buildings, and has set that out as policy guidance in their current Development Framework. English Heritage acknowledges that the Eastern Cluster is, in principle, an appropriate area for tall buildings in the City, and that therefore the proposed location for the current scheme within the cluster accords with policy. Its location within the Eastern Cluster and its height relative to existing and consented nearby towers means that, in our view, it does not have a detrimental impact on the Mayor's strategic views set out in the London View Management



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English Heritage will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.

LONDON OFFICE

Framework. We are also content with the design approach, and welcome the improvements to the urban design around the new building and the improvements to the narrow passage at Fenchurch Buildings.

However, by virtue of their size and prominence, tall buildings have a wide reaching impact on the environment, and even an appropriate location and design cannot mitigate every impact. In this case, the proposed tower will add to the impact of the existing and consented Eastern Cluster towers visible above the roofline of the Chapel Royal of St Peter ad Vincula within the Tower of London. We would urge the City of London to consider this visual harm to the setting of the Tower of London as part of their overall assessment of the proposals.

In terms of those aspects of the proposals that affect the grade II listed building at Nos. 20-21 Billiter Street (Edward Ellis, 1865), English Heritage is supportive of the design approach, and we believe that the proposals have great potential enhance the significance of the listed building. This is a heritage benefit that would weigh in favour of the overall proposals.

We look forward to the submission of the proposals, but if you have any queries in the meantime, please do not hesitate to contact me.

Yours sincerely

Michael Dunn

Principal Inspector of Historic Buildings and Areas

E-mail: michael.dunn@english-heritage.org.uk

cc: Gwyn Richards, City of London Corporation



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Our ref: 13/2767
Your ref: 13/01004/FULEIA

David Stothard
-By email only-

Transport for London
Group Planning

Windsor House
42 – 50 Victoria Street
London SW1H 0TL

Phone 020 7222 5600
Fax 020 7126 4275
www.tfl.gov.uk

22nd January 2014

Dear David

40, Leadenhall Street - TfL's follow up comments

The following comments represent the views of Transport for London officers and are made on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. These comments also do not necessarily represent the views of the Greater London Authority.

I am writing in response to ARUP's correspondence dated 18th December 2013 which was prepared to address the comments raised within my initial comments sent to the City of London dated 4th December 2013.

Car parking

It is accepted that the provision of additional on site Blue Badge provision is restricted by the size constraints of the proposed servicing area. Furthermore the applicant has considered that there is sufficient provision within the local area to cater for any potential Blue Badge parking demand. It is requested that the provision of an electric vehicle charging point is secured either through a revised drawing or by condition.

Impact assessment

It is accepted that the retail element of the scheme will not generate any new trips on the local transport or highway network. The applicant has clarified that DLR trips have been classified as London Underground trips for the purpose of the impact assessment.

Cycle Hire

The applicant has requested further assessment to support TfL's request for additional Cycle Hire provision at this location. The applicant has highlighted

MAYOR OF LONDON



VAT number 756 2770 08

that the site already benefits from access to the Cycle Hire scheme and this is recognised. However notwithstanding this, the following provides a context of how Cycle Hire operates within the local vicinity.

There are 6 docking stations within approximately 600m of the proposed development. Wormwood Street to the north and Crosswall Street to the south east are already within the top 5% most used stations in the whole of the scheme, ranking 10th and 19th respectively, out of circa 700 stations. These stations are shortly followed by Great Tower Street and the Bank of England Museum which are within the top 10% most used. The other 2 stations are within the top 40% most used.

Due to the relatively small size of these docking stations they suffer from the impact of the high flows of cyclists to and from the area at morning and evening peaks and some can be found empty well above the scheme average at more than 20% unavailability of bikes. Furthermore the stations mentioned above are more likely than others in the scheme to be full, with Jewry Street being the most likely to be full in The City of London.

TfL try to counter the impacts of tidal flows by redistributing the bikes around the scheme during inter-peak period of the day and over night, however this means that many of the stations close to Leadenhall Street require many more intervention visits than the scheme average. The Bank of England Museum manages a mere 52 hires per redistribution visit, well below the scheme average of 168.

The above information demonstrates that capacity for Cycle Hire in this area is at it's peak and any changes to the land usage will have a direct impact on Cycle Hire, especially redistribution efforts. Cycle Hire is immensely popular within the City of London, accounting for many journeys to and from major network rail and TfL transport hubs including Waterloo, King's Cross and Liverpool Street.

In accordance with London Plan policy 6.9 'Cycling' and based on the uplift of floorspace and lack of current Cycle Hire capacity in the area it is deemed appropriate to request an additional 50-60 docking points in the area. It is suggested that some initial feasibility is undertaken between TfL and the developer to determine if private land can be made available.

Buses

It is understood that additional information will be provided to establish the forecast demand on the local bus network. Once this has been provided TfL can confirm whether additional capacity upgrades would be required. It is accepted that due to space constraints additional bus stop infrastructure would be difficult to implement at this location. Notwithstanding this, it is requested that applicant reviews the kerb heights of the two nearest bus stops to ensure that they are of sufficient height (125mm) to accommodate bus ramps.

Bank station

London Plan policy 6.1 'Strategic Approach' aims to encourage the closer integration of transport and development by seeking to improve the capacity and accessibility of public transport, improve interchanging facilities and by securing step free access where this is appropriate and practical. Furthermore, London Plan policy 6.4 'Enhancing London's Transport Connectivity' states that the Mayor aims to increase public transport capacity by completing upgrades to the London Underground network to support future development. The cumulative impact of the growth of development within the City of London means Bank station suffers from significant congestion. Although works are being progressed to mitigate overcrowding and implement step free access, these remain partially funded and therefore TfL are seeking pooled contributions from development in the locality towards these works and to date, a total of £3.25 million of section 106 funds has been secured.

Crossrail

The applicant has calculated the Crossrail liability however it is requested that the existing and proposed GIA floorspace is provided to TfL to ensure that the Crossrail contribution has been calculated correctly. The figures that have been provided to date are GEA.

Freight, servicing and construction

It is welcomed that the applicant intends for the DSP and CLP to be secured by condition and it is requested that with consideration to the nearby strategic road network these are discharged in consultation with TfL.

Travel Plan

Once a revised travel plan has been provided TfL will re-assess the plan using ATTrBuTE and confirm its acceptability.

I trust that the above provides you with a better understanding of TfL's current position on the document. Additional correspondence will be provided by TfL once in receipt of additional impact assessment work and a revised travel plan. Please do not hesitate to contact me if you have any questions or need clarification on any of the points raised.

Yours sincerely

James Forrest
Planner – TfL Borough Planning
Email JamesForrest@tfl.gov.uk
Direct Line: 020 3054 7090

Copy to:



Our ref: 13/2767
Your ref: 13/01004/FULEIA

David Stothard
-By email only-

Transport for London
Group Planning

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4th December 2013

Dear David

40, Leadenhall Street - TfL's initial comments

The following comments represent the views of Transport for London officers and are made on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. These comments also do not necessarily represent the views of the Greater London Authority.

Site context

The site is bounded by Leadenhall Street to the north, Fenchurch Street to the south and Billiter Street to the west. Fenchurch Buildings, a north-south cul-de-sac at the eastern edge of the site, is a pedestrian only route between Leadenhall Street and 6-8 Fenchurch Buildings. A cluster of other predominately office buildings surrounds the site.

The nearest section of the Transport for London Road Network (TLRN) is Gracechurch, 350m to the west of the site. Leadenhall Street, forms part of the Strategic Road Network (SRN).

The site is well served by buses with a total of 20 bus routes available within 400m of the site. The nearest bus stops are located on Fenchurch Street, 6m from the site.

There are eight London Underground lines accessible within 960m walking distance of the site (Central, Northern, Circle, Hammersmith & City, Metropolitan, District and the Waterloo & City). The nearest station is Aldgate (Metropolitan, Circle and Hammersmith & City), located approximately 260m away to the east.

Bank Station

Bank station suffers from significant congestion and works seek to mitigate overcrowding on the Northern and Waterloo & City lines are being progressed including increasing station capacity and providing step free access. Subsequently congestion, queuing and the risk of station closures will be reduced, step-free access will benefit mobility-impaired passengers, new signage and information will be provided and fire and evacuation protection will be provided. These works are not fully funded and with account to the significant uplift of London Underground trips and the assumed uplift in DLR trips TfL is seeking a contribution towards these works in accordance with London Plan policy 6.1 'Strategic Approach' and 6.4 'Enhancing London's Transport Connectivity'.

CIL

In accordance with London Plan policy 8.3, *Community Infrastructure Levy*, the Mayor agreed to commence CIL charging for developments permitted on or after 1 April 2012. It is noted that the proposed development is within the City of London, where the Mayoral charge is £50 per square metre Gross Internal Area (GIA). The levy will raise £300 million towards the delivery of Crossrail. Further details can be found at: <http://www.london.gov.uk/publication/mayoral-community-infrastructure-levy>.

Crossrail

The mechanism for contributions to be made payable towards Crossrail has been set out in the Mayor's Supplementary Planning Guidance (SPG) '*Use of planning obligations in the funding of Crossrail and the Mayoral Community Infrastructure Levy*' (April 2013) and London Plan policies 6.5 and 8.3. The SPG states that contributions should be sought in respect of uplift in floorspace for B1 office, hotel and retail uses (with an uplift of at least 500sqm). To calculate the net increase in chargeable floorspace, account will only be taken of any building in lawful use for a continuous period of six months within the twelve months before planning permission is granted. The applicant has calculated the Crossrail liability however it is requested that the existing and proposed GIA floorspace is provided to TfL to ensure that the Crossrail contribution has been calculated correctly.

The Mayor's CIL charge will be treated as a credit towards the Section 106 liability and therefore the CIL will be payable plus a 'top up' so that in combination the two payments make up the amount payable under the obligations policy. As the CIL charge will not be confirmed until development is about to commence, the Section 106 agreement will need to be worded so that if the Section 106 contribution based on the assumed CIL proves incorrect the contribution is adjusted accordingly (assuming it is still more than the CIL).

Freight, servicing and construction

peak flow from the Waterloo area which requires redistribution to move cycles away from the area during and after the AM peak and bring cycles during the PM peak. This is at significant cost to TfL. This development would place even greater stress on the network as it is likely to add to the existing tidal flow of cyclists from nearby transport hubs. Subsequently and in accordance with London Plan policy 6.9, TfL requests that additional capacity is provided and further discussion on this matter is welcomed.

Buses

The site is served directly by two main bus routes, route 25 and route 40 that run along Leadenhall and Fenchurch Street. The net increase in trips generated in the AM peak hour is 246 in total inbound, which equates to 3.5 full buses of passengers.

In order to assess the impact of these trips on the bus network, forecast demand should be predicted by using census data/comparable sites, providing the number of trips for the entire day and the peak hour by direction. This should include origin and destination projections for new travellers to and from the development. The applicant should use this to allocate trips to specific corridors as appropriate. Upon receipt of this data, TfL will consider the impact on network capacity and may request a contribution to mitigate the impact of additional demand where necessary in line with London Plan policy 6.7 *'Better streets and surface transport'*.

To promote inclusive access for all users of the proposed development, the applicant should undertake an assessment of the pair of bus stops located on Leadenhall Street and identify a schedule of works required to improve them in line with TfL's *'Accessible Bus Stop Design Guidance'*: http://www.tfl.gov.uk/assets/downloads/businessandpartners/accessible_bus_stop_design_guidance.pdf. Upon TfL's receipt of the audit, a capped contribution of up to £10,000 per bus stop maybe requested to ensure full compliance with accessibility guidelines.

Walking and cycling

TfL have undertaken a review of the cycling and pedestrian facilities on the A10 Bishopsgate junction with Leadenhall Street and Cornhill and consequently a schedule of works has been identified to improve pedestrian and cyclist safety, priority and accessibility. With considerations to the significant uplift of walking and cycling trips expected from the proposed development, a contribution towards the delivery of these improvements is requested in line with London Plan policy 6.9 *'Cycling'* and 6.10 *'Walking'*. Furthermore, a Pedestrian Environment Review System (PERS) audit has been submitted which is welcomed. It is recommended a contribution is sought towards implemented the included recommendations.

The Docklands Light Railway (DLR) is available from both Tower Gateway (400m away) and Bank (850m away) and provides services onwards towards Lewisham, Woolwich Arsenal and Beckton.

In addition, there are three Network Rail stations providing suburban and national rail services accessible from the site (Cannon Street, Liverpool Street and Fenchurch street). From 2018, Crossrail services will also be available from Liverpool Street station. The site has been estimated to have an excellent Public Transport Accessibility Level (PTAL) of 6b, on a scale of 1-6 where 6 is most accessible.

This location is also served by the Mayor's Cycle Hire Scheme. A total of five docking stations are located within 300m of the site. The closest is located on Jewry Street.

Car parking

The development is proposed to be car free, except for two Blue Badge bays located within the servicing area. Before TfL can consider this appropriate the applicant should provide expected levels of demand. Furthermore, the design should be amended to allow for a 1.2m wide buffer zone between the spaces and an Electrical Vehicle Charging Point.

Cycle parking

In terms of cycle parking, 920 spaces are proposed for the office uses located within the basement. Furthermore, showering and changing facilities are available to staff. For retail uses and visitors to the proposed development, it is proposed to provide 12 cycle parking spaces within the new area of public realm at the south-east corner of the Site. For retail employees, one space will be provided within the vicinity of each retail unit of the proposed development. TfL considers this provision to be in conformity with both London Plan standards and policy 6.9.

Impact assessment

A multi-modal impact assessment has been provided which is welcomed. Notwithstanding this, there were no retail trips included in the assessment. The applicant should therefore confirm whether an assumption has been made that no new trips would be generated by this use. To ensure a robust assessment it is requested that a sensitivity test is undertaken comparing the mode share to local Census data. This particularly relevant as no DLR trips have been included within the impact assessment.

Cycle Hire

This area of the City of London between Fenchurch Street, Liverpool Street and Bank is extremely highly stressed from an operational perspective and Cycle Hire provision is low compared to demand. TfL experience significant

It is proposed that servicing for all land uses within the proposed development be undertaken from a dedicated service yard located in the basement, which will allow access to the loading bays. TfL has reviewed the provided swept path analysis and it is considered these arrangements are satisfactory subject to a delivery and servicing plan (DSP) secured by condition and submitted to City of London Council for approval in consultation with TfL, prior to occupation.

To ensure full compliance with London Plan policy 6.14 a construction and logistics plan (CLP) will also be required. The CLP should be a standalone document that enables construction impacts to be managed, minimising impact on the highway network and transport system. This will need to be secured by condition and approved by City of London Council for approval in consultation with TfL prior to the commencement of any construction.

Travel Planning

TfL welcomes the submission of a Travel Plan, which aims to promote sustainable travel to and from the site. The plan has failed the ATTrBuTE assessment used by TfL to assess the content and requires further work to comply with London Plan policy 6.3. This should include a baseline modal split. For TfL's guidance on travel planning for new developments, please visit: http://www.lscp.org.uk/newwaytoplan/travelplan_guidance.html. The Travel Plan and all agreed measures therein should be secured, enforced, monitored and reviewed as part of the S106 agreement.

Summary

Additional impact information is required before a definitive decision on the scope of mitigation can be finalised however TfL have identified several strategic transport priorities in the local area. Further discussion on this matter is therefore required. Finally, a DSP and CLP will both need to be secured by condition with the Travel Plan included in the Section 106 agreement.

I trust that the above provides you with a better understanding of TfL's current position on the document. Please do not hesitate to contact me if you have any questions or need clarification on any of the points raised.

Yours sincerely

James Forrest
Planner – TfL Borough Planning
Email JamesForrest@tfl.gov.uk
Direct Line: 020 3054 7090

Copy to:

Natalie Gentry – GLA

Begum, Shupi

From: DBE - PLN Support
Subject: FW: 60 Leadenhall Street/19-1 Billiter Street, EC3
Importance: High

From: Anna McPherson [<mailto:amcpherson@dmpartnership.com>]
Sent: 08 January 2014 12:06
To: Stothard, David
Cc: 'Tracy Simmons'; 'Paul Drury'; 'Jonathan Smith'
Subject: RE: 60 Leadenhall Street/19-1 Billiter Street, EC3
Importance: High

Dear David

My apologies. I'm afraid the formal notification of this application somehow slipped through the net!

Since the proposal remains as I saw it at the end of August 2013, I think HRP can add little to the comment below. Whilst accepting that the location and height of the development complies with the City's adopted policy for the Eastern Cluster, we do have concerns about its, in our view, "consciously irregular and somewhat harsh architectural style", which results in a perhaps unnecessarily angular silhouette.

I am copying this to Jonathan Smith, DP9, for information.

Kind regards

Anna McPherson
for Historic Royal Palaces

Anna McPherson DipArch RIBA IHBC FRSA
Partner
Drury McPherson Partnership
114 Shacklegate Lane
Teddington
TW11 8SH
tel: 020 8977 8980
fax: 020 8977 8990

www.dmpartnership.com

From: Anna McPherson [<mailto:amcpherson@dmpartnership.com>]
Sent: 11 September 2013 11:42
To: 'Jonathan Smith'
Cc: Stothard, David; Richards, Gwyn; 'John Barnes'; 'Tracy Simmons'; pdrury@dmpartnership.com;
paulscott@makearchitects.com

Subject: RE: 60 Leadenhall Street/19-1 Billiter Street (Leadenhall triangle), EC3

Dear Jonathan

Thank you for consulting Historic Royal Palaces about this proposed development and for arranging the presentation by Make at your offices on 23 August 2013. Thank you also for this set of helpful views, which show the existing situation



and as proposed views of the proposals (both without and with other consented, but not yet built, schemes). Make have since provided a copy of Paul's presentation, as you are aware.

We note that the Leadenhall Triangle site lies within the Eastern Cluster area of tall buildings as identified in the City's adopted Core Strategy 2011 (Figure 7, Policy CS7). Policy CS7 states that the City will seek to ensure that the Eastern Cluster can accommodate a significant growth in office floor-space by, amongst other things, "*Delivering tall buildings on appropriate sites that enhance the overall appearance of the cluster on the skyline and the relationship with the space around them at ground level...*". The proposed development has been designed with its taller part towards the consented "Pinnacle" scheme (intended to be the tallest building in the Cluster), and a lower block on the south-eastern portion of the site, the two blocks 'book-ending' the existing listed building. The development conforms with the City's adopted planning policy framework, while presenting its lower flank to the Tower of London World Heritage Site.

Given existing and already consented schemes in the Eastern Cluster (although it must be a matter of debate whether the Pinnacle will be built in its consented form), we agree that the proposed Leadenhall Triangle development would group appropriately with the rest of the Eastern Cluster in terms of its height, despite (in our view) its consciously irregular and somewhat harsh architectural style. Inevitably, it will 'eat' more currently open sky-space in views from the Inner Ward of the Tower, particularly in the Millerhale views 2179_5015 version 130730 (over the roof of St Peter ad Vincula) and 2179_3015 version 130730 (looking north-west from in front of the White Tower), which is regrettable. But the other already consented schemes will change the skyline in any case, so the additional visual impact of the Leadenhall Triangle development would not be great. The same is true in the view of the Tower from Tower Bridge.

I am copying this to the City of London Corporation, for information.

Kind regards

Anna McPherson
For Historic Royal Palaces

Anna McPherson DipArch RIBA IHBC FRSA
Partner
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www.dmpartnership.com

ACKNOWLEDGED

Kathy Clark
Conservation Adviser
Direct line 020 8747 5894
kathy@victoriansociety.org.uk

THE VICTORIAN SOCIETY
The champion for Victorian and Edwardian architecture

David Stothard
Department of the Built Environment
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

21 NOV 2013

Your reference: 13/01005/LBC and
13/01004/FULEIA

Our reference: 2013/11/003

20 November 2013

PLNComments@cityoflondon.gov.uk

Dear Mr Stothard

RE: 19-21 and 22 Billiter Street, London (former: grade II, 1865); conversion, partial rebuilding, and redevelopment of remainder of block.

Thank you for consulting the Victorian Society on this application. The application was considered by the Society's Southern Building Committee at their last meeting, and I write now to convey their views. We **strongly object** to this application, on the grounds of harm to a listed building through destruction of its setting, and demolition of an undesignated heritage asset.

19-21 Billiter Street is a handsome four storey, mid-Victorian commercial building in Portland stone, with some well-executed 1930s alterations to the central entrance and interior. It has lively carved Baroque details between striking, polychromatic end bays, with a strongly pedimented entrance (one now blocked up) at the bottom of each. It retains some good interior features, including ornamental plasterwork.

The immediate context of the listed building at present is mid-height, six to nine storey buildings, with individual horizontal massing on a moderate scale. The new development proposed for the site is a cluster of adjoined towers, with the bulk of the site footprint to be built up to between 25 and 38 storeys. The entire complex would be on an excessive scale; in many views, the listed building would be backed closely by a glass structure more than five times its height. At ground level, this would comprise elevations of expanses of glass, with staggered elements doing little to dispel the sense of a rather monolithic structure. This is not necessarily objectionable in itself, but in the context of the City of London, and as what will essentially be an enclosure as well as a backdrop for a listed building, this would be extremely harmful. The setting of the Billiter Street warehouse would essentially be destroyed by this development.

108 Fenchurch Street is proposed for demolition as part of this development. This building is a well-articulated red-brick commercial building of the late nineteenth century, which although altered at ground floor level is in good condition at the upper levels. It contributes very positively both to the streetscape and to the setting of the



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conservation area immediately to the south east, and should be considered a non-designated heritage asset. It should be retained and incorporated into any development of the site.

The urban grain of the area in general would be irrevocably and negatively altered by this development. The corner of the Lloyds Avenue conservation area is immediately adjacent to the site, and is characterised by "buildings of consistently high architectural quality, mainly Edwardian in origin, with a high level of conformity in terms of scale, design and street plan" (Lloyds Avenue conservation area appraisal, p.9) including, extremely close to the site, T E Colcutt's grade II* Lloyds Registry. The new development would have a negative impact on the setting of the conservation area, through its excessive scale and massing.

Of lesser concern, but still at risk of causing harm, is the proposed treatment of the listed building itself. We support the reopening of the south door to the street façade. However, the use of glazed doors rather than timber for both the north and south entrances is inappropriate and weakens the façade. The treatment of the interior risks sanitising the listed building to too great an extent; although an intention is stated to reinstate concealed internal features "wherever possible", the visualisations of the scheme suggest rather a stripped back, clean interior is the intention. The quality of a lot of these internal features, as shown on the accompanying photographs, is really quite high. As well as the ornamental plasterwork, cornices and skirting mentioned, photograph number 5 in section 5.5 of the design and access statement appears to show some marble wall lining, which is not mentioned. These internal features should be investigated in more detail, and where original or early alterations, they should be retained and restored in full.

The plan for the north east corner of the site would leave a larger gap beside the current passage through the adjacent building on Leadenhall Street, currently the only northern entry point to Fenchurch Buildings. This narrow passage is an example of something distinctive to the City of London. The City is characterised by its contrast of narrow, sometimes almost concealed walkways with wider thoroughfares; this adds to the sense of density and reflects the medieval street patterns and development of the area. Adding a wider pedestrian access next to this passage would make it nonsensical, and remove a characteristic way for pedestrians to move about and experience the City.

We would advise that the application is **refused**. However, if your authority is minded to approve the application, alterations should be made and/or conditions applied which would reduce the harm caused by the development. First, the timber doors should be retained or reinstated in the north and south elevations of the listed building on Billiter Street. As originally built (as shown in original drawings) the building had ornamental capping to each chimney, which would be particularly visible on an opened up roof terrace and with overlooking structures; these should be reconstructed. Although it is stated that the remaining skirting, cornices, and other plasterwork will be retained *where possible*, this should be controlled strictly by conditions, to ensure all original features are retained and repaired. Finally, the northern Leadenhall Street elevation should be built up to meet the adjacent building to the east, to preserve the continuous line of buildings and the function of the northern passageway to Fenchurch Buildings.

Yours sincerely

Kathy Clark
Conservation Adviser



For the attention of David Stodhard

This application had been considered at the last meeting but, because of the complexity and scale of the development, it had been agreed to consider it again in more detail - after the Chairman had visited the site. Photographs from that visit had been circulated and were tabled.

The Chairman reported that he had contacted the LAMAS Archaeology Committee and that Rob Whytehead had confirmed that the concerns raised about the level of investigations proposed by the Applicants were well founded. A fuller archaeological investigation was therefore required (see previous comments).

It was further noted that the Victorian Society had now objected to the Application on the grounds of loss of fabric and destruction of the setting of the Listed Building. The Committee agreed that this objection reflected the views previously expressed (and further detailed below) and should be supported.

The Committee was also concerned about the lack of good spatial planning in the City. What was termed "greedy developer syndrome" led to building proposals right up to the St Paul's safeguarding heights and more or less up to the back of pavement around the site, with little or no thought for public realm.

The Committee felt that a possible solution for this site would be a north tower block (on Leadenhall Street), a lower south tower (on Fenchurch Street), and the Listed Building and a new building of the same sort of scale facing each other across a tree lined and landscaped public open space in the centre of the site.

The one block solution engulfing and enveloping the Listed Building is simply not good enough. Comparisons were made with the Aviva (formerly CU) tower which with the P+O block had formed a carefully considered group around a public plaza, eroded first by the spaces around the "Gherkin" and now by the "Cheesegrater".

In conclusion the Committee had strong objections in both Conservation and Urban Design terms, and felt there was a need for greater scrutiny of high buildings in the City - with its network of mediaeval streets, alleys and historic buildings. This is a much more complex problem than that faced by most World Cities which had gridiron plans.

Vicki Fox (Hon. Secretary)
LAMAS - Historic Buildings & Conservation Committee

Ball, Matthew

From: PLN - Comments
Subject: FW: 13/01005/LBC - 19=21 & 22 Billiter Street
Attachments: LAMAS e-mail heading.png

09 DEC 2013

From: Vicki Fox [REDACTED]
Sent: 04 December 2013 17:22
To: PlanningQueue
Cc: [REDACTED]
Subject: Ref: 13/01005/LBC - 19=21 & 22 Billiter Street, London EC3 2RY

For the attention of David Stothard

This Committee acts on behalf of the Council for British Archaeology in respect of Listed Buildings & Applications within the Greater London area. The Committee discussed the above case at its meeting on Tuesday, 26 November 2013 and made the following observations:

The Committee viewed this scheme as gross over-development with a complete loss of scale and objected for the following reasons:

- (a) The decision to build "one building" over the whole plot rather than the options of a north and south building with space/piazza between resulted in a monolithic block with no access or public space.
- (b) Due to the slab-like architecture that - despite the Rockefeller Center comparisons - lacks public generosity and scale which would also be detrimental at street level. There would be serious harm to the character and appearance of the Fenchurch Station Conservation Area.
- (c) The impact on the fabric of the listed Building - the rear wall of which would be demolished - and the impact on the setting of the listed building would also be highly detrimental
- (d) An EIA archaeological assessment had been undertaken which appeared to minimise the need for excavation. This was questioned given the scale of the redevelopment and it was felt that a more onerous Archaeological condition should be imposed.

It was agreed that the Chair, Jon Finney, would consult the LAMAS Archaeology Committee on point (d).

Because of the complexities of the impact of the building at micro and macro scale it was agreed the Committee would consider this in further detail at its December meeting (Tuesday, 17 December 2013), following a site visit.

Vicki Fox (Hon. Secretary)
LAMAS - Historic Buildings & Conservation Committee

Mr D Stothard
City of London
Department of the Built Environment
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Guildhall
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EC2P 2EJ

Development & Renewal
London Borough of Tower Hamlets,
2nd Floor,
Town Hall,
Mulberry Place,
5 Clove Crescent,
London,
E14 2BG

www.towerhamlets.gov.uk

Enquiries to: Sophie Hall-Thompson
Tel: 020 7364 0885
Fax: 020 7364 5415
My ref: PA/13/02574
Your ref: 13/01004/FULEIA
Date: 15th November 2013

221
120133

Dear Mr Stothard,

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

Location: Site bounded by 19-21 & 22 Billiter Street, 49 Leadenhall Street, 108 & 109-114 Fenchurch Street, 6-8 & 9-13 Fenchurch Buildings, London, EC3.

Proposal: Partial demolition and works or refurbishment and reinstatement of 19-21 Billiter Street; demolition of all other buildings on the site; redevelopment to provide a new building comprising two basement levels and ground plus part 10, 14 and 34 storeys plus plant (total height 170m AOD), containing offices (B1) and flexible retail/financial and professional services/café and restaurant uses (A1/A2/A3 at ground floor level; change of use at ground and first floor of 19-21 Billiter Street to retail/café and restaurant/bar use (A1/A3/A4); the provision of hard and soft landscaping; alterations to Fenchurch Buildings and other incidental works. (125,977sq.m GIA)

Received: 28/10/2013

Observations:

The London Borough of Tower Hamlets have no comment.

Should you have any further queries in relation to this matter, please contact the officer named at the top of this letter.

Yours sincerely,

Jerry Bell
Applications Team Leader

\$

Ball, Matthew

From: DBE - PLN Support
Subject: FW: 40 Leadenhall Street

From: Emma Worby [<mailto:Emma.Worby@londoncityairport.com>]
Sent: 08 January 2014 11:18
To: Stothard, David
Subject: RE: 40 Leadenhall Street

ACKNOWLEDGED

Thanks David.

After reviewing the documents, we have **no safeguarding objection** to the proposed development 13/01004/FULEIA. However I would like to make the following comments from a safety perspective:

- In the event that crange or construction equipment is required at a higher elevation than that of the proposed development, then their use must be subject to separate consultation with the airport.

Many thanks

Emma

Emma Worby
CSR Executive

Phone: 0203 203 2523

Mobile: 0784 186 5334

Email: Emma.Worby@londoncityairport.com

Website: www.londoncityairport.com


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0 9 NOV 2013

Ball, Matthew

From: Pln - CC - Development Dc
Subject: FW: 3rd Party Planning Application - 13/01004/FULEIA COL:01716544

-----Original Message-----

From: BCTAdmin@thameswater.co.uk [mailto:BCTAdmin@thameswater.co.uk]
Sent: 08 November 2013 16:30
To: PlanningQueue
Subject: 3rd Party Planning Application - 13/01004/FULEIA

Corporation of London
Our DTS Ref: 36601
Department of Planning & Transportation
Your Ref: 13/01004/FULEIA
PO. Box 270
Guildhall
London
EC2P 2EJ

ACKNOWLEDGED

8 November 2013

Dear Sir/Madam

Re: SITE BOUNDED BY 19-21 & 22 BILLITER STREET, 49 LEADENHALL STREET,
108 & 109-114 FENCHURCH ST, LONDON, , EC3M 5HT

Waste Comments

Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.

Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc, may be required before the Company can give its consent.

Applications should be made at
<http://www.thameswater.co.uk/business/9993.htm> or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.



Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

Thames Water recommends the installation of a properly maintained fat trap on all catering establishments. We further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses.

Water Comments

The existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development. Thames Water therefore recommend the following condition be imposed: Development should not be commenced until: Impact studies of the existing water supply infrastructure have been submitted to, and approved in writing by, the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point. Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand.

No impact piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0845 850 2777 to discuss the details of the piling method statement.

Thames Water recommend the following informative be attached to any planning permission: There are large water mains adjacent to the proposed development. Thames Water will not allow any building within 5 metres of them and will require 24 hours access for maintenance purposes. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0845 850 2777 for further information.

Supplementary Comments

Our preferred option would be for all surface water to be disposed of on site using SUDs as per policy 5.13 of the London plan.

The developer will need to contact Thames Water to discuss the connection point to supply this property. There are a number of mains around this site which may or may not affect the water capacity requirements for this development. Please contact Developer Services on 0845 850 2777 to discuss this further.

Yours faithfully
Development Planning Department

ACKNOWLEDGED

25 OCT 2013

Ball, Matthew

From: PLN - Comments
Subject: FW: Environment Agency Consultation

25 OCT 2013

From: planning, North London [mailto:northlondonplanning@environment-agency.gov.uk]
Sent: 25 October 2013 11:26
To: PLN - Comments
Subject: RE: Environment Agency Consultation

Dear David,

Planning Application Reference: 13/01004/FULEIA



Thank you for your below email.

We have assessed this application and identified flood risk as the only constraint at this site. This site is in Flood Zone 1 and is under a hectare and therefore falls under cell F5 of our Flood Risk Standing Advice (FRSA) Flood Risk Standing Advice.

The main flood risk issue at this site is the management of surface water run-off and ensuring that drainage from the development does not increase flood risk either on-site or elsewhere.

We recommend the surface water management good practice advice in cell F5 is used to ensure sustainable surface water management is achieved as part of the development.

Surface water runoff rates and volumes from the site must be managed in accordance with the London Plan (July 2011) - which sets higher standards than the NPPF for the control of surface water run-off. Policy 5.13 - Sustainable drainage (page 155) of the London Plan states that "development should utilise sustainable urban drainage systems (SuDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible" in line with the drainage hierarchy.

If you have identified drainage problems at this site through your Strategic Flood Risk Assessment or Surface Water Management Plan, you may want to request a formal Flood Risk Assessment from the applicant in line with Flood Risk Assessment Guidance Note 1.

In addition, due to the height of the proposed development, we offer the following informative:

Developers should ensure that any proposed piling methods do not pose a pollution risk to controlled waters. Piling to facilitate building foundations or the installation of ground source heat pumps has the potential to create a pathway between contaminated shallow soils and deeper geological formations and aquifers. Deep piling can also result in physical disturbance of aquifers.

If piling is proposed, a Piling Risk Assessment will be required to demonstrate that the chosen piling method does not increase the risk of near-surface pollutants migrating into deeper geological formations and aquifers. A Hydrogeological Risk Assessment of physical disturbance to the aquifer should also be undertaken and if unacceptable risks are identified, appropriate mitigation measures must be provided.

We recommend that developers follow the risk management framework provided in our guidance for 'Piling into Contaminated Sites' and also refer to the document: 'Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention'

If you have any questions please contact me on 0203 263 8105 or email me at northlondonplanning@environment-agency.gov.uk

Kind regards

Michael Devanny

Date: 11 November 2013
Our ref: 103244
Your ref: 13/01004/FULEIA



David Stothard
City Of London
PO Box 270
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EC2P 2EJ

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
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Cheshire
CW1 6GJ

BY EMAIL ONLY

T 0300 060 3900

Dear Mr Stothard

Planning consultation: Partial demolition and works of refurbishment and reinstatement to 19-21 Billiter Street, demolition of all other buildings on the site, redevelopment to provide a new building comprising two basement levels and ground plus part 10, 13 and 34 storeys plus plant (total height 170m AOD), containing offices (B1) and flexible retail/financial and professional services/cafe and restaurant used (A1/A2/A3) at ground floor level, change of use at ground and first floor of 19-21 Billiter Street to retail/cafe and restaurant/bar use (A1/A3/A4), the provision of hard and soft landscaping, alterations to Fenchurch Buildings and other incidental works (125,977sq.m GIA)
Location: Site bounded by 19-21 & 22 Billiter Street, 49 Leadenhall Street, 108 & 109-114 Fenchurch Street, 6-8 & 9-13 Fenchurch Buildings, London EC3

Thank you for your consultation on the above dated 22 October 2013 and received by Natural England on 31 October 2013.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The Wildlife and Countryside Act 1981 (as amended)
The Conservation of Habitats and Species Regulations 2010 (as amended)

Natural England's comments in relation to this application are provided in the following sections.

Statutory nature conservation sites – no objection

Based upon the information provided, Natural England advises the Council that the proposal is unlikely to affect any statutorily protected sites or landscapes.

Protected species

We have not assessed this application and associated documents for impacts on protected species.

Natural England has published Standing Advice on protected species. The Standing Advice includes a habitat decision tree which provides advice to planners on deciding if there is a 'reasonable likelihood' of protected species being present. It also provides detailed advice on the protected species most often affected by development, including flow charts for individual species to enable an assessment to be made of a protected species survey and mitigation strategy.

You should apply our Standing Advice to this application as it is a material consideration in the

determination of applications in the same way as any individual response received from Natural England following consultation.

The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected Species (EPS) that the proposed development is unlikely to affect the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence may be granted.

If you have any specific questions on aspects that are not covered by our Standing Advice for European Protected Species or have difficulty in applying it to this application please contact us at with details at consultations@naturalengland.org.uk.

Local sites

If the proposal site is on or adjacent to a local site, e.g. Local Wildlife Site, Regionally Important Geological/Geomorphological Site (RIGS) or Local Nature Reserve (LNR) the authority should ensure it has sufficient information to fully understand the impact of the proposal on the local site before it determines the application.

Biodiversity enhancements

This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the National Planning Policy Framework. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that *'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'*. Section 40(3) of the same Act also states that *'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'*.

Landscape enhancements

This application may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green space provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider new development and ensure that it makes a positive contribution in terms of design, form and location, to the character and functions of the landscape and avoids any unacceptable impacts.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Dawn Presutti
Customer Service Consultation Team

WILSON STEPHEN

ASSOCIATES

D Stothard Esq
Assistant Director (Development Management East)
City of London
P O Box 270
Guildhall
London
EC2P 2EJ

5 December 2013
J5463

By email & post

Dear Mr Stothard

St. Andrew Undershaft and 40 Leadenhall Street, Planning Ref 13/01004/FULEIA

I confirm that we have been appointed to assist the Church in relation to neighbourly matters and other concerns pursuant to the application by Henderson Global Investors concerning the redevelopment of 40 Leadenhall Street.

To date, the Church has not had any formal consultation with the applicant although is broadly aware of the scheme via the general public consultation events. We are hoping that the applicant will consult with us further but until such time, and depending on the nature of such consultations, we are authorised to lodge our formal holding objection to the scheme which may have a serious impact on the Grade I Listed church building.

The initial concerns relate to:

- The proposals result in significant harm to the setting of this Heritage asset.
- There are significant implications for loss of light and for reflected light nuisance.
- There are material concerns in relation to wind speeds in vicinity of the church.
- There are no provisions in place to safeguard the Heritage building from vibration associated with demolition, rebuilding and construction traffic. There are also numerous sensitive monuments to be protected.
- There are no provisions to ensure that the Church activities can be protected. Unlike other neighbourly properties, the Heritage asset does not have the benefit of double glazing or other modern features which help control noise nuisance and as such the community function may be significantly impaired.

Cont'd/.....

PROJECT MANAGERS & CHARTERED SURVEYORS

2 - 3 Hind Court, London, EC4A 3DL

e: info@ws-a.co.uk w: www.ws-a.co.uk f: 020 7583 9197 t: 020 7583 7799

Robert Wilson Associates Limited trading as Wilson Stephen Associates

Registration England and Wales No. 5628242. Registered Office: 73/75 Mortimer Street, London, W1W 7SQ.

Director: A R Wilson MSc DipBldgCons DipProjMan FRICS FRSA - Director and Company Secretary: R M Wilson BSc



/....2

D Stothard Esq
5 December 2013

- There are no provisions to ensure the church building and fittings are not harmed by dust relating to the development. The pipe organ is particularly sensitive in this regard.
- The proposed development will place additional stress on the public realm space which might also in turn impact the church building and its use.

We have requested a formal briefing in relation to the proposed development and would wish to reserve the ability to amplify any of the above concerns or indeed to raise new issues which might arise from a better understanding of the proposals.

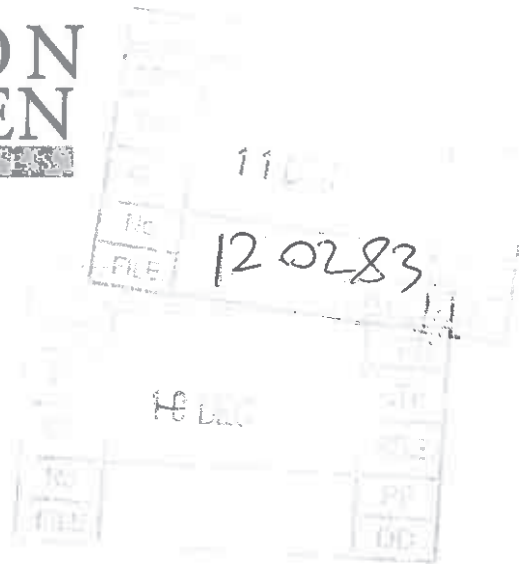
Yours sincerely,



Bob Wilson

cc. Tom Swatman, St. Andrew Undershaft
Martin Sargeant, Archdeaconry of London
Tim Fogarty, RPC

D Stothard Esq
Assistant Director (Development Management East)
City of London
P O Box 270
Guildhall
London
EC2P 2EJ



5 December 2013
J5451

By email & post

Dear Mr Stothard

St. Katharine Cree Church and 40 Leadenhall Street, Planning Ref 13/01004/FULEIA

I confirm that we have been appointed to assist the Church in relation to neighbourly matters and other concerns pursuant to the application by Henderson Global Investors concerning the redevelopment of 40 Leadenhall Street.

To date, the Church has not had any formal consultation with the applicant although is broadly aware of the scheme via the general public consultation events. We are hoping that the applicant will consult with us further but until such time, and depending on the nature of such consultations, we are authorised to lodge our formal holding objection to the scheme which may have a serious impact on the Grade I Listed church building.

The initial concerns relate to:

- The proposals result in significant harm to the setting of this Heritage asset.
- There are significant implications for loss of light and for reflected light nuisance.
- There are material concerns in relation to wind speeds in vicinity of the church.
- There are no provisions in place to safeguard the Heritage building from vibration associated with demolition, rebuilding and construction traffic. There are also numerous sensitive monuments to be protected.
- There are no provisions to ensure that the Church activities can be protected. Unlike other neighbourly properties, the Heritage asset does not have the benefit of double glazing or other modern features which help control noise nuisance and as such the community function may be significantly impaired.
- There are no provisions to ensure the church building and fittings are not harmed by dust relating to the development. The pipe organ is particularly sensitive in this regard.

PROJECT MANAGERS & CHARTERED SURVEYORS
2 - 3 Hind Court, London, EC4A 3DL

e: info@ws-a.co.uk w: www.ws-a.co.uk f: 020 7583 9197 t: 020 7583 7799

Robert Wilson Associates Limited trading as Wilson Stephen Associates

Registration England and Wales No. 5628242. Registered Office: 73/75 Mortimer Street, London, W1W 7SQ.

Director: A R Wilson MSc DipBldgCons DipProjMan FRICS FRSA - Director and Company Secretary: R M Wilson BSc



- The proposed development will place additional stress on the public realm space which might also in turn impact the church building and its use.

We have requested a formal briefing in relation to the proposed development and would wish to reserve the ability to amplify any of the above concerns or indeed to raise new issues which might arise from a better understanding of the proposals.

Yours sincerely



~~Bob Wilson~~

cc. Phil Manning, St. Katharine Cree
Martin Sargeant, Archdeaconry of London
Tim Fogarty, RPC

YVONNE COURTNEY
FLAT 8, 4-8 CREECHURCH LANE
LONDON EC3A 5AY

David Stothard
PO Box 270
Guildhall
London EC2P 2EJ

11 November 2013



ACKNOWLEDGED

Dear Mr Stothard,

Planning Application 13/01004/FULLER: Site Bounded by 19-21 & 22 Billiter Street, 49 Leadenhall Street, 108 & 109-114 Fenchurch Street, 6-8 & 9-13 Fenchurch Buildings

As an owner-occupier of an apartment in Creechurch Lane, I feel very privileged to live amongst such a rich tapestry of fine buildings, spanning several centuries... the care that the City of London Corporation puts into the area, and in particular the public realm makes living here a total joy.

Not to be one of those 'NIMBY' residents that wishes to halt 'progress', I did view with some dismay and therefore object to this particular planning application, for these key reasons:

- 1) The proposed building would significantly impair daylight and sunlight to most of the habitable rooms in our building. When I attended the exhibition by Henderson Global Investors/Make Architects at St Katherine Cree church - I brought up the '4 remaining rooms to be discussed further' (which according to their report "fail to satisfy any BRE daylighting criteria") and when I explained that our living rooms face the development their faces visibly fell.
- 2) I'm no expert (which you would surely need to be to wade through the mountains of documents in such a short consultation period) - however the couched language implies to me that the applicant has deliberately understated the significance of the impacts.
- 3) I am constantly bowled over by the assistance I receive from the City of London Corporation for aspects such as noise pollution, health services, parking issues, etc. However regarding daylight/sunlight issues - the consultation process does not seem to have met the objectives of the City of London Statement of Community Involvement. Not only is the information of a

highly technical nature and buried in a lengthy report (chapter 13)... a plan showing windows/room numbers was not included, making it impossible for residents to link the tables data to specific flats. In a nutshell, the Community Consultation made absolutely no attempt to engage with residents on daylight and sunlight issues.

Our building, at 4-8 Creechurch Lane, is an L shaped building featuring eight one-bedroom flats over four floors. The applicant has identified 16 habitable rooms facing the development site which will be affected by the proposals - namely our living rooms, which will suffer a decrease in illuminated area by 15-25%.

In the even numbered flats (which includes my apartment, no 8l) - the applicant acknowledges that all the main rooms (living room, kitchen and bedroom) face the development site. In my neighbours odd numbered flats, the living room, which also face the development site, is the only room which receives sunlight.

While I support of the 'Gotham City' scheme replacing what is currently occupying the site - given that our properties in 4-8 Creechurch Lane will be directly and adversely affected by the proposals - I am simply requesting some consideration to the height of the proposed development. Expanding from the current eight floors to 36 is perhaps excessive and unnecessary, and with a sensible reduction, would address our rights to light by bringing the levels of daylight/sunlight within the accepted criteria.

As I write this on a particularly dark November afternoon... I do hope you can take these valid concerns on board... and will nevertheless be grateful for your considered action at a later date.

Yours sincerely,

Yvonne Courtney

Jonathan Whitby
Flat 1
4-8 Creechurch Lane
London EC3A 5AY

7 November 2013

David Stothard
PO Box 270
Guildhall
London EC2P 2EJ



ACKNOWLEDGED

Dear Mr Stothard,

Planning Application 13/01004/FULLEIA: Site Bounded by 19-21 & 22 Billiter Street, 49 Leadenhall Street, 108 & 109-114 Fenchurch Street, 6-8 & 9-13 Fenchurch Buildings

I am an owner-occupier of a flat in 4-8 Creechurch Lane. I along with other residents of the building object on the following basis

1. Based on the applicant's calculations, the proposed building would significantly impair daylight and sunlight to most of the habitable rooms in our building. Most of the rooms would suffer breaches to multiple BRE criteria.
2. The applicant has understated the significance of the impacts by attaching only "minimal significance" to threshold breaches of BRE criteria. This subverts the purpose of the BRE thresholds which are intended to identify unacceptable diminution in amenity.
3. It is very difficult for residents to appreciate the extent of the impact on their amenity within the 21 day consultation period. In relation to daylight and sunlight issues, the consultation process has not met the objectives of the City of London Statement of Community Involvement:
 - a. The information is of a highly technical nature and is buried in Chapter 13 of a lengthy report.
 - b. The applicant has not included a key plan or elevation showing windows and room numbers, thus is impossible for residents to relate the data in the tables to specific flats.
 - c. The applicant's Community Consultation made no attempt to engage with residents on daylight and sunlight issues.

Criteria

The applicant sets out the Daylight and Sunlight BRE Criteria in Table 13.1 of the EIA, reproduced below:

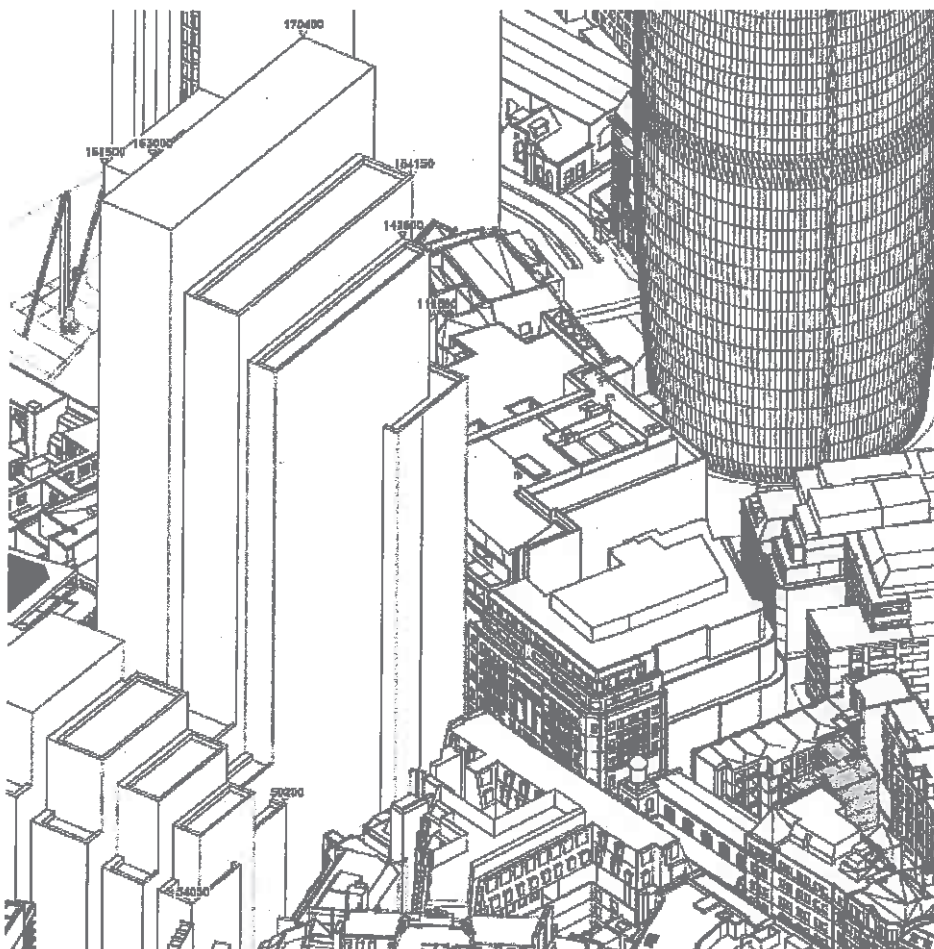
Issue	BRE Criteria
VSC	A window may be adversely affected if its VSC measured is less than 27% and is less than 0.8 times its former value.
NSL	A room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area.
ADF	A room may be adversely affected if the ADF is less than 1% for a bedroom, 1.5% for a living room or 2% for a kitchen.

APSH	A window may be adversely affected if a point at the centre of the window received for the whole year, less than 25% of the APSH including at least 5% of the APSH during the winter months (21 September - 21 March) and less than 0.8 times its former sunlight hours during either period, and (for existing neighbouring buildings), if there is a reduction in total APSH which is greater than 4%.
------	--

The applicant sets out a scale of significance for BRE criteria in Tables 13.2 to 13.4, however these do not originate in the BRE document and are simply proposed by the applicant. The applicant's scale of attaches only "minimal significance" to threshold breaches of BRE criteria. However the BRE documents expressly identify these thresholds as corresponding to significant diminution of amenity.

Impacts

4-8 Creechurch Lane is an L shaped building containing eight one bedroom flats over four upper storeys. The applicant has identified 16 habitable rooms which face the development site and will be affected by the proposals.



Except from applicant's drawing 6287/153 in EIA Appendix 13.1 (4-8 Creechurch Lane highlighted)

In the even numbered flats (which the applicant identifies as 4 & 6 Creechurch Lane), all the main rooms (living room, kitchen and bedroom) face the development site. In the odd numbered flats only the living room faces the development site, being the only room which receives sunlight, as the other rooms face north into a narrow lightwell.

Of the 16 rooms identified by the applicant (4 x living room, kitchen and bedroom to odd numbered flats + 4 x living room to even numbered flats), each will be adversely affected by the proposed development. According to the EIA, Table 13.7:

- None of these rooms will be able to satisfy the VSC criteria
- Only 11 of these rooms will satisfy NSL criteria
- Of the 5 remaining rooms, only one will satisfying ADF criteria.
- Four of these rooms fail to satisfy any BRE daylighting criteria.

In addition, according to the applicant's calculations:

In the even numbered flats:

- Each of the rooms will suffer a diminution of ADF of 10-20%
- In two of the flats the living rooms and kitchens daylight will be diminished below ADF thresholds
- The living rooms will suffer a decrease in illuminated area of 15-25%. The kitchens will suffer a decrease in illuminated area of 31-36%.
- The applicant has not presented sunlighting calculations for the bedrooms to these flats, probably because these rooms receive less than 2 hours of sunlight on March 21.

In the odd numbered flats:

- The living rooms will suffer an ADF diminution of 6-12%, and only two of these rooms will satisfy ADF criteria.
- None of the living rooms will satisfy sunlighting criteria. These are the only rooms in the flats which currently receive sunlight.

Conclusion

As can be seen from the points made above, each of the flats in 4-8 Creechurch Lane will be directly and adversely affected by the proposals. It is therefore incorrect for the applicant to conclude at para 13.136 of the EIA:

"Of the 16 rooms, 12 will meet or exceed one or more of the daylight assessments (VSC, NSL and ADF) and thus the impacts to these rooms are considered to be insignificant."

Thus the height of the proposed development should be reduced to bring the retained levels of daylight and sunlight to 4-8 Creechurch Lane within the BRE criteria. The same applies to 67 Fenchurch Street where daylight and sunlight is also adversely affected by the proposals.

Yours sincerely,

Jonathan Whitby

Yarema Ronish
Flat 5
4-8 Creechurch Lane
London EC3A 5AY

7 November 2013

David Stothard
PO Box 270
Guildhall
London EC2P 2EJ

Dear Mr Stothard,

Planning Application 13/01004/FULLEIA: Site Bounded by 19-21 & 22 Billiter Street, 49 Leadenhall Street, 108 & 109-114 Fenchurch Street, 6-8 & 9-13 Fenchurch Buildings

I am an owner-occupier of a flat in 4-8 Creechurch Lane. I object to this planning application for the following reasons:

1. Based on the applicant's calculations, the proposed building would significantly impair daylight and sunlight to most of the habitable rooms in our building. Most of the rooms would suffer breaches to multiple BRE criteria.
2. The applicant has understated the significance of the impacts by attaching only "minimal significance" to threshold breaches of BRE criteria. This subverts the purpose of the BRE thresholds which are intended to identify unacceptable diminution in amenity.
3. It is very difficult for residents to appreciate the extent of the impact on their amenity within the 21 day consultation period. In relation to daylight and sunlight issues, the consultation process has not met the objectives of the City of London Statement of Community Involvement:
 - a. The information is of a highly technical nature and is buried in Chapter 13 of a lengthy report.
 - b. The applicant has not included a key plan or elevation showing windows and room numbers, thus is impossible for residents to relate the data in the tables to specific flats.
 - c. The applicant's Community Consultation made no attempt to engage with residents on daylight and sunlight issues.

Criteria

The applicant sets out the Daylight and Sunlight BRE Criteria in Table 13.1 of the EIA, reproduced below:

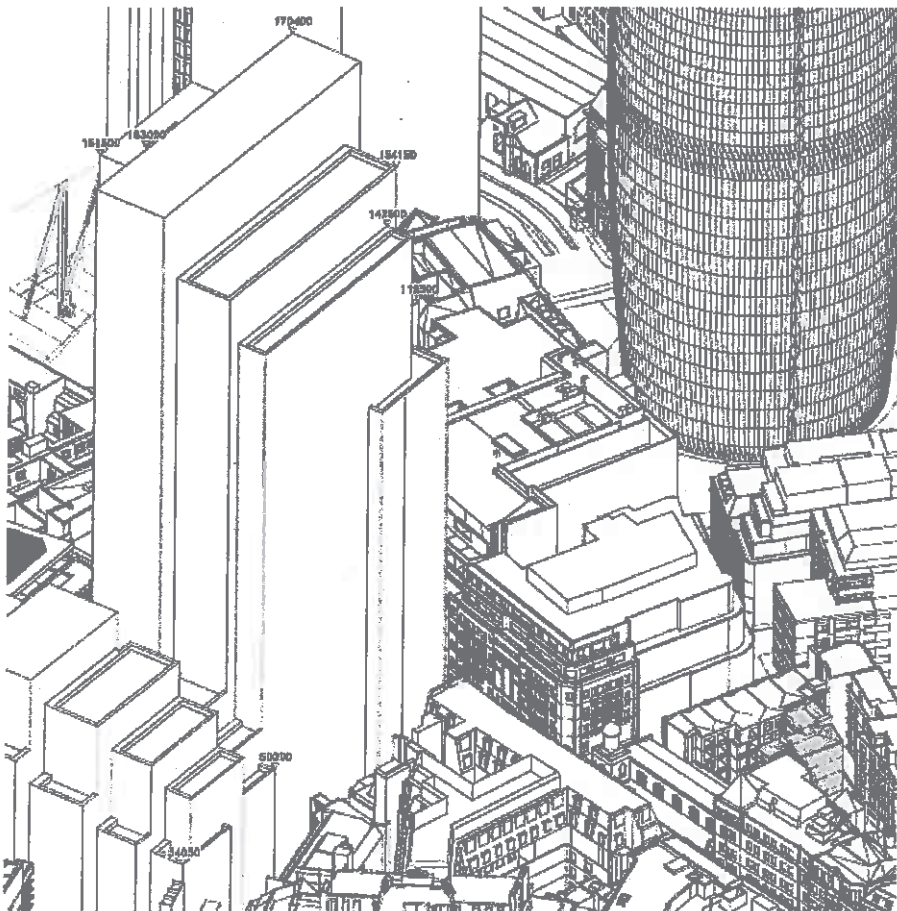
Issue	BRE Criteria
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NSL	A room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area.
ADF	A room may be adversely affected if the ADF is less than 1% for a bedroom, 1.5% for a living room or 2% for a kitchen.

APSH	A window may be adversely affected if a point at the centre of the window received for the whole year, less than 25% of the APSH including at least 5% of the APSH during the winter months (21 September - 21 March) and less than 0.8 times its former sunlight hours during either period, and (for existing neighbouring buildings), if there is a reduction in total APSH which is greater than 4%.
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The applicant sets out a scale of significance for BRE criteria in Tables 13.2 to 13.4, however these do not originate in the BRE document and are simply proposed by the applicant. The applicant's scale of attaches only "minimal significance" to threshold breaches of BRE criteria. However the BRE documents expressly identify these thresholds as corresponding to significant diminution of amenity.

Impacts

4-8 Creechurch Lane is an L shaped building containing eight one bedroom flats over four upper storeys. The applicant has identified 16 habitable rooms which face the development site and will be affected by the proposals.



Except from applicant's drawing 6287/153 in EIA Appendix 13.1 (4-8 Creechurch Lane highlighted)

In the even numbered flats (which the applicant identifies as 4 & 6 Creechurch Lane), all the main rooms (living room, kitchen and bedroom) face the development site. In the odd numbered flats only the living room faces the development site, being the only room which receives sunlight, as the other rooms face north into a narrow lightwell.

Of the 16 rooms identified by the applicant (4 x living room, kitchen and bedroom to odd numbered flats + 4 x living room to even numbered flats), each will be adversely affected by the proposed development. According to the EIA, Table 13.7:

- None of these rooms will be able to satisfy the VSC criteria
- Only 11 of these rooms will satisfy NSL criteria
- Of the 5 remaining rooms, only one will satisfying ADF criteria.
- Four of these rooms fail to satisfy any BRE daylighting criteria.

In addition, according to the applicant's calculations:

In the even numbered flats:

- Each of the rooms will suffer a diminution of ADF of 10-20%
- In two of the flats the living rooms and kitchens daylight will be diminished below ADF thresholds
- The living rooms will suffer a decrease in illuminated area of 15-25%. The kitchens will suffer a decrease in illuminated area of 31-36%.
- The applicant has not presented sunlighting calculations for the bedrooms to these flats, probably because these rooms receive less than 2 hours of sunlight on March 21.

In the odd numbered flats:

- The living rooms will suffer an ADF diminution of 6-12%, and only two of these rooms will satisfy ADF criteria.
- None of the living rooms will satisfy sunlighting criteria. These are the only rooms in the flats which currently receive sunlight.

Conclusion

As can be seen from the points made above, each of the flats in 4-8 Creechurch Lane will be directly and adversely affected by the proposals. It is therefore incorrect for the applicant to conclude at para 13.136 of the EIA:

"Of the 16 rooms, 12 will meet or exceed one or more of the daylight assessments (VSC, NSL and ADF) and thus the impacts to these rooms are considered to be insignificant."

Thus the height of the proposed development should be reduced to bring the retained levels of daylight and sunlight to 4-8 Creechurch Lane within the BRE criteria. The same applies to 67 Fenchurch Street where daylight and sunlight is also adversely affected by the proposals.

Yours sincerely,

Yarema Ronish

ACKNOWLEDGED

Ball, Matthew

From: PLN - Comments
Subject: FW: Planning Application 13/01004/FULLEIA: Site Bounded by 19-21 & 22 Billiter Street, 49 Leadenhall Street, 108 & 109-114 Fenchurch Street, 6-8 & 9-13 Fenchurch Buildings

From: David Rees

Sent: 11 November 2013 12:59

To: PLN - Comments

Subject: Planning Application 13/01004/FULLEIA: Site Bounded by 19-21 & 22 Billiter Street, 49 Leadenhall Street, 108 & 109-114 Fenchurch Street, 6-8 & 9-13 Fenchurch Buildings

11 NOV 2013

David Rees
Flat 7,
4-8 Creechurch Lane,
London. EC3A 5AY

11th November, 2013

Dear Sir/Madam,

I am an owner-occupier of a flat in 4-8 Creechurch Lane. I object to this planning application for the following reasons:

1. Based on the applicant's calculations, the proposed building would significantly impair daylight and sunlight to most of the habitable rooms in our building. Most of the rooms would suffer breaches to multiple BRE criteria.
2. The applicant has understated the significance of the impacts by attaching only "minimal significance" to threshold breaches of BRE criteria. This subverts the purpose of the BRE thresholds which are intended to identify unacceptable diminution in amenity.
3. It is very difficult for residents to appreciate the extent of the impact on their amenity within the 21 day consultation period. In relation to daylight and sunlight issues, the consultation process has not met the objectives of the City of London Statement of Community Involvement:
 - a. The information is of a highly technical nature and is buried in Chapter 13 of a lengthy report.
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 - c. The applicant's Community Consultation made no attempt to engage with residents on daylight and sunlight issues.

Criteria

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Issue	BRE Criteria
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	beyond 0.8 times its existing area.
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The applicant sets out a scale of significance for BRE criteria in Tables 13.2 to 13.4, however these do not originate in the BRE document and are simply proposed by the applicant. The applicant's scale of attaches only "minimal significance" to threshold breaches of BRE criteria. However the BRE documents expressly identify these thresholds as corresponding to significant diminution of amenity.

Impacts

4-8 Creechurch Lane is an L shaped building containing eight one bedroom flats over four upper storeys. The applicant has identified 16 habitable rooms which face the development site and will be affected by the proposals.

In the even numbered flats (which the applicant identifies as 4 & 6 Creechurch Lane), all the main rooms (living room, kitchen and bedroom) face the development site. In the odd numbered flats only the living room faces the development site, being the only room which receives sunlight, as the other rooms face north into a narrow lightwell.

Of the 16 rooms identified by the applicant (4 x living room, kitchen and bedroom to odd numbered flats + 4 x living room to even numbered flats), each will be adversely affected by the proposed development. According to the EIA, Table 13.7:

- None of these rooms will be able to satisfy the VSC criteria
- Only 11 of these rooms will satisfy NSL criteria
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- Four of these rooms fail to satisfy any BRE daylighting criteria.

In addition, according to the applicant's calculations:

In the even numbered flats:

- Each of the rooms will suffer a diminution of ADF of 10-20%
- In two of the flats the living rooms and kitchens daylight will be diminished below ADF thresholds
- The living rooms will suffer a decrease in illuminated area of 15-25%. The kitchens will suffer a decrease in illuminated area of 31-36%.
- The applicant has not presented sunlighting calculations for the bedrooms to these flats, probably because these rooms receive less than 2 hours of sunlight on March 21.

In the odd numbered flats:

- The living rooms will suffer an ADF diminution of 6-12%, and only two of these rooms will satisfy ADF criteria.
- None of the living rooms will satisfy sunlighting criteria. These are the only rooms in the flats which currently receive sunlight.

Conclusion

As can be seen from the points made above, each of the flats in 4-8 Creechurch Lane will be directly and adversely affected by the proposals. It is therefore incorrect for the applicant to conclude at para 13.136 of the EIA:

"Of the 16 rooms, 12 will meet or exceed one or more of the daylight assessments (VSC, NSL and ADF) and thus the impacts to these rooms are considered to be insignificant."

Thus the height of the proposed development should be reduced to bring the retained levels of daylight and sunlight to 4-8 Creechurch Lane within the BRE criteria. The same applies to 67 Fenchurch Street where daylight and sunlight is also adversely affected by the proposals.

Yours faithfully,

David Rees

MILLIKEN & COMPANY
CHARTERED SURVEYORS & CHARTERED TOWN PLANNERS

(Email copy/ Top copy in post)

31st January, 2014

Planning Department
City of London Corporation
Guildhall
PO Box 270
London EC2P 2EJ

ACKNOWLEDGED

F.A.O: Ms S Williams – Planning Case Officer

Dear Sirs / Madam,

RE: 13/01004/FULEIA – Proposed Redevelopment at 40 Leadenhall Street, London EC3

OBJECTION on behalf of Shepherd Neame Ltd (Freeholders of the East India Arms PH, 67 Fenchurch Street, EC3)

We are formally instructed by Shepherd Neame Ltd to submit a planning objection in respect of proposals to develop a 10, 14 & 34 storey B1 office building / ground floor commercial use on land bounded by Billiter Street; Leadenhall Street; Fenchurch Street; and Fenchurch Buildings. We can confirm that Shepherd Neame's Public House (including residential tenant above) is located directly opposite the site (a distance of 10 meters) on the south side of Fenchurch Street (opposite the proposed main site works access point).

We can confirm that the developers did approach Shepherd Neame's tenant as part of a preparing a Statement of Community Involvement in which an offer was made by the developers (Henderson's) to double glaze the manager's accommodation in order to mitigate against future 'noise and nuisance' issues arising from the redevelopment of the site over a period of 265 weeks (circa 5 years). A subsequent meeting took place between Shepherd Neame's Head of Property Services (Mr M Godden) and Mr G Harrison (Henderson's) and other parties to review this proposal and also for Shepherd Neame to gain a better understanding of the likely impact of the development on the continued operation of the Public House during the development phase. This meeting was followed up by an email to Mr G Harrison to which no reply has been received. It is Shepherd Neame's strong contention that the development phase will result in a significant loss of trade to its business which heavily relies on its outdoor trade during the summer months to make the business viable. Once customers are lost, experience has shown that it is very difficult to recapture this trade. There is a real danger therefore that a protracted development phase over many years could result in the demise of this existing historic Public House as a viable local business and community use.



In support of Shepherd Neame's objection to the proposals, it would like to bring to the Planning Officers attention the following material considerations associated with the Planning Application / Environmental Impact Assessment.

(i) EIA – Socio-Economic Impact

It is evident that Shepherd Neame's property is specifically identified in the EIA as a 'Potentially Sensitive Receptor' (SR); namely, an 'Existing business surrounding the site' and 'Existing residents within the area surrounding the site' (Para 3.17; Table 3.3). Importantly, however, it is also evident from the Socio-Economic section of the EIA (Section 7.0) that whilst the socio-economic impact of the proposals is considered in terms of existing site uses and the wider area, no specific consideration is given as to the impact of the proposals on Sensitive Receptors surrounding the site (as identified in Table 3.3). Given the protracted nature of the development phase over 5 years, it is considered that this is a 'fundamental' weakness of the EIA and one which needs to be addressed in order to assess to the impact of the proposals during the construction phase on the local business community. A failure to take into local business interests during the construction phase of a large project as part of an EIA's socio-economic impact assessment is a matter of concern cited by a number of professionals in recent learned papers on this issue (*'Glasson' – Socio-Economic Impacts: The Poor Relation in British Environmental Impact Assessments, 2007*)

(ii) Noise & Vibration Issues

It is noted from the EIA (Section 8) dealing with Noise and Vibration issues that the East India Arms PH is 1 of 2 properties specifically identified by the developers as potentially subject to 'Significant Noise Impacts During the Works'. It is also noted from Table 8.11 'Summary of Predicted Noise Levels During the Works' and 'Table 8.12: Significance of Noise Impacts During the Works' that the Public House would be subject to:

'Substantial, adverse' impact during the construction phase (35 weeks @ 91dB(A);
'Substantial, adverse' impact during the earth moving phase (4 weeks @ 81dB(A);
'Substantial, adverse' impact during the piling phase (85 weeks @ 83dB(A);
'Substantial, adverse' impact during the concreting phase (82dB(A); and
'Substantial, adverse' impact during the external paving phase (80dB(A).

(NB: The developers state at Para 8.70 that sometimes a greater noise level or degree of perceptible vibration maybe acceptable if the overall construction time, and therefore, length of disruption is reduced).

In addition, it is noted that the East India Arms PH is 1 of 2 properties cited by the developers as potentially subject to 'adverse (vibration) impacts' of 'moderate significance' during the construction phase in relation to 'human perception' and possible 'building damage'.

Whilst noting the proposed preparation of a 'Site-specific Environmental Management Plan' (EMP) for the site (Para 8.69) and the various mitigation measures put forward by the developers to control the impact of noise and vibration on properties surrounding the site, none of these measures would adequately compensate

Shepherd Neame for the potential impact of the proposals during the construction phase on its business trade (particularly during the Summer Months) and on the living conditions of its tenant over a period of 5 years.

(iii) Construction Traffic

It is noted that the East India Arms PH is 1 of 2 properties specifically identified in the EIA (Para 8.57) which would experience additional noise disturbance from construction vehicle movements (An average of 35 vehicles per day / 90 vehicles per day during extraction and concrete pouring periods). The EIA states that these impacts would be 'short term adverse'. In view of the fact that the proposed site entrance would be directly opposite the Public House (a distance of 10 meters), it is considered that the forecast levels of construction traffic would have a significant detrimental impact on Shepherd Neame's outdoor trade during the Summer Months. It is not considered that controlled hours of operation would mitigate this potential adverse impact.

(iv) Loss of Daylight & Sunlight / Solar Glare

It is evident that the existing site 7 storey office building fronting Fenchurch Street is set back from the main road pavement frontage at its upper 2 floors to enable increased day and sunlight to reach properties on the south side of Fenchurch Street, including the East India Arms. It is evident that from the EIA that the proposals for a replacement 10 & 14 storey development on the Fenchurch Street frontage (with a taller 34 storey building to the rear) would have a significant impact on existing poor levels of sun and daylight to existing properties on the south side of Fenchurch Street, particularly at ground level where Shepherd Neame is dependant on its outdoor trade during the summer months to boost trade levels.

The EIA does not provide any specific information on the extent to which sun and daylight levels would be reduced in respect of day and sunlight conditions on the south side of Fenchurch Street, but does state that 11% of surrounding residential properties would be subject to a 'significant loss of sun and daylight as a result of the completed development'. Shepherd Neame is seeking verification from the developers whether its property falls into this category and, as such, its existing residential tenant and commercial operation would be adversely affected.

It is evident that the East India Arms would be within 10 meters of a new tall glass and steel fronted structure. The EIA states that the proposals would not give rise to any 'significant effects in terms of solar glare and light pollution'. Given the proximity of the proposed development to the Public House, Shepherd Neame is seeking verification from the developers that the proposals will not result in a significant impact in respect of these factors which could be damaging to both the living conditions of its tenant and trade.

(v) Conservation / Heritage issues

The East India Arms is a 'non-designated heritage asset' (NPPF Para 135) of architectural and historic merit. It is located within the Lloyds Area Conservation Area. As such, Shepherd Neame is concerned that the scale, height, massing and

design of the proposals would have a significant detrimental impact on the setting of its property and the Conservation Area. Shepherd Neame is seeking verification from the developers on the extent to which the proposals have taken into account these important issues as part of a 'historic building / conservation area assessment'.

In the above context, Shepherd Neame considers that the proposals constitute overdevelopment which is contrary to The London Plan (July 2011) Policy 7.7: Location and Design of Tall and Large Buildings and Policy 7.8: Heritage Assets & Archaeology and the heritage and design policies set out in the City of London Core Strategy (DPD), Adopted September 2011.

For the above reasons, Shepherd Neame considers that planning permission for the proposed development at 40 Leadenhall Street should be REFUSED until such a time that the developer has taken adequate steps to mitigate the impact of the proposed development on surrounding local business uses and residential tenants.

Please direct all enquires on this matter to Mr S Milliken on [REDACTED] or email on [REDACTED]

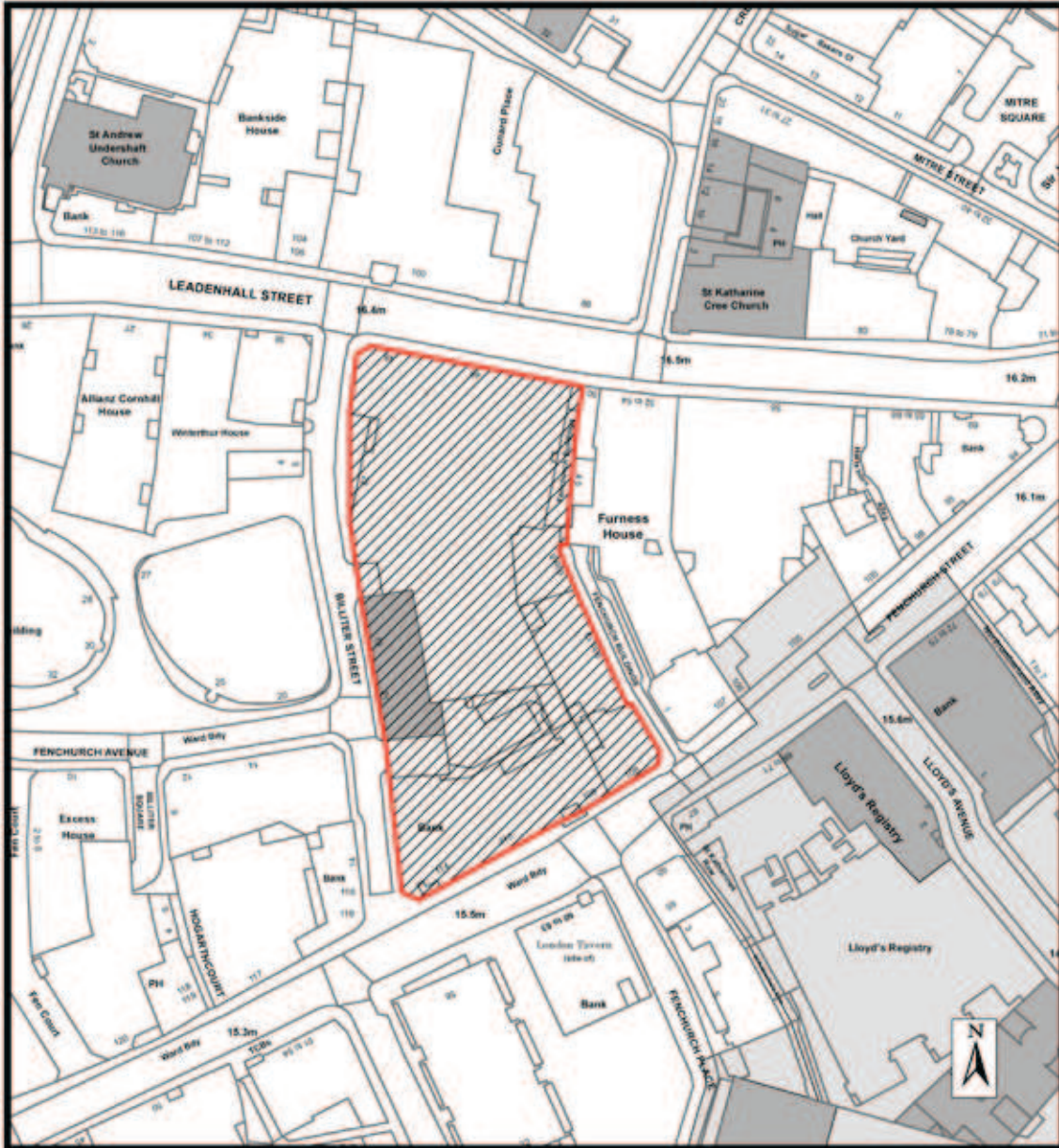
Yours faithfully,

MILLIKEN & COMPANY

Agenda Item 5b

Committee:	Date:
Planning and Transportation	25 February 2014
Subject: 19-21 & 22 Billiter Street, London EC3 Demolition of the rear elevation and rooftop structures; works of repair, refurbishment and reinstatement throughout the building in conjunction with the change of use of the ground and first floor to retail/cafe and restaurant/bar (A1/A3/A4) use and the building's integration into the redevelopment of the surrounding site.	
Ward: Aldgate	Public For Decision
Registered No: 13/01005/LBC	Registered on: 14 October 2013
Conservation Area: No	Listed Building: Grade II
<u>Summary</u>	
<p>The report on the related planning application (13/01004/FULEIA) sets out the policies, representations and considerations relevant to this application for listed building consent.</p>	
Recommendation	
<p>That listed building consent be granted for the above proposal in accordance with the details set out in the attached schedule.</p>	

Site Location Plan



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ADDRESS:
19-21 & 22 Billiter St., 49 Leadenhall St., 108 & 109-114 Fenchurch St., 6-8 & 9-13 Fenchurch Buildings

CASE No.
13/01004/FULEIA

-  SITE LOCATION
-  LISTED BUILDINGS
-  CONSERVATION AREA BOUNDARY



DEPARTMENT OF THE BUILT ENVIRONMENT





See report on 13/01004/FULEIA.

Unitary Development Plan and Core Strategy Policies

CS12 Conserve or enhance heritage assets

To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors.

SCHEDULE

APPLICATION: 13/01005/LBC

19-21 & 22 Billiter Street, London EC3

Demolition of the rear elevation and rooftop structures; works of repair, refurbishment and reinstatement throughout the building in conjunction with the change of use of the ground and first floor to retail/cafe and restaurant/bar (A1/A3/A4) use and the building's integration into the redevelopment of the surrounding site.

CONDITIONS

- 1 The works hereby permitted must be begun before the expiration of five years from the date of this consent.
REASON: To ensure compliance with the terms of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 2 No part of the building(s) shall be demolished (unless otherwise permitted by the Local Planning Authority in the circumstances identified in this condition) before a contract or series of contracts for the carrying out of substantial works of redevelopment have been made and planning permission has been granted for the development for which the contracts provide. Such contracts shall include the construction of all foundations, above ground framework and floor structures. Works of demolition may be permitted prior to the completion of the contract(s) if the Local Planning Authority is satisfied that the site is required for archaeological investigation and the developer has submitted evidence to show that development will proceed upon completion of the investigation.
REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Core Strategy: CS12.
- 3 The stability of the structure to remain must, throughout the period of demolition and reconstruction, be assured before any works of demolition begin, taking into account any rapid release of stress, weather protection, controlled shoring, strutting, stitching, reinforcement, ties or grouting as may occur to be necessary.
REASON: To ensure the stability of the structure to be retained in accordance with the following policy of the Core Strategy: CS12.

- 4 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) details of the proposed new rear facades including typical details of the fenestration and entrances;
 - (b) details of changes to the ground floor entrance;
 - (c) details of new entrances
 - (d) details of windows and external joinery;
 - (e) details of all alterations to the existing facade;
 - (f) details of new work and work in making good to the interior of the building including the colour scheme.
- REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policy of the Core Strategy: CS12
- 5 The works hereby approved are only those specifically indicated on the drawing(s) referred to in conditions to this consent.
- REASON: In order to safeguard the special architectural or historic interest of the building in accordance with the following policy of the Core Strategy: CS12.
- 6 The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission: drawings numbered PA1000, 1198, 1199, 1399, 1400, 1401, 1402, 1403, 1404, 1405, 1410, 1420, 1421, 1549, 1550, 1551, 1552, 1553, 1554, 1555, 2499, 2500/01, 2501/01, 2502/01, 2503/01, 2504/01, 2505/01, 2510/01, 2520/01, 2521/01, 2614.
- REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

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Committee(s):	Date(s):
Planning & Transportation Policy & Resources Court of Common Council	25/02/2014 20/03/2014 01/05/2014
Subject: Adoption and Implementation of the City of London Community Infrastructure Levy	Public
Report of: Director of the Built Environment	For Decision

Summary

The Community Infrastructure Levy (CIL) is a statutory charge on new development intended to help fund the provision of new infrastructure. Upon adoption it will largely replace the existing approach to s106 planning obligations, which will need to be scaled back.

The City Corporation has prepared a Community Infrastructure Levy. This has been subject to early engagement with the development industry and two rounds of formal public consultation during 2013. In November 2013, it was submitted to the Planning Inspectorate for Public Examination by an independent planning inspector.

The inspector's report into the City CIL has now been received. The inspector has concluded that the City CIL provides an appropriate basis for charging the levy in the City of London and recommends that it be approved without amendment. However there is a need for some factual updating of the text, which are termed 'correctable errors', in order to maintain consistency with the revised CIL Regulations.

The 2008 Planning Act requires that the City CIL be adopted by resolution of the Court of Common Council.

Recommendation(s)

Members are asked to:

1. Note that the inspector's report supported the proposed City CIL and recommended its approval.
2. Approve the proposed 'correctable errors' to the City of London Community Infrastructure Levy Charging Schedule and approve the Charging Schedule for adoption, with implementation from 1st July 2014.
3. Approve the Regulation 123 List, concerning infrastructure to be funded by the City CIL, which sits alongside the City CIL Charging Schedule.
4. Delegate to the City Planning Officer and/or Development Director

and/or Director of the Built Environment authority to approve scaled back s106 Agreements in place of the full form of s106 Agreements in cases where the planning application has been approved subject to a full s106 Agreement, and where it has not been possible to complete the s106 Agreement prior to implementation of the City CIL, and where the delegated officer considers it appropriate to do so.

5. Agree as a transitional measure to honour proposed expenditure in s106 Agreements, where it has not been possible to complete the Agreements, and where the specific s106 expenditure was relied upon in determining that applications were acceptable.

Main Report

Background

1. The Community Infrastructure Levy (CIL) is a statutory charge on new development intended to help fund the provision of new infrastructure to support development.
2. CIL is intended to replace s106 planning obligations as the main source of developer contributions towards new infrastructure. Unlike s106, CIL is a fixed charge and is not subject to site-specific viability testing. CIL should be consistent with and support the implementation of the local plan. It can be used to fund the provision, improvement, replacement, operation or maintenance of infrastructure. Regulations specifically exclude CIL from funding affordable housing and revenue schemes e.g. education, skills and job brokerage. Funding for such elements, together with site specific mitigation measures, will need to continue to be sought through scaled-back s106 planning obligations.
3. CIL regulations require two rounds of public consultation on the draft CIL, similar to those required for local plans:
 - Preliminary Draft Charging Schedule Consultation. This is intended to enable early consultation and engagement with developers, residents and others in the property industry before CIL charge rates are finalised. Consultation on the City CIL Preliminary Draft Charging Schedule took place between 25th March and 13th May 2013.
 - Draft Charging Schedule Consultation. This consultation should represent a local authority's final proposals for the CIL. The City CIL Draft Charging Schedule was subject to consultation between 24th July and 4th October 2013.
4. Following consultation, the Draft Charging Schedule, any comments received and the evidence base supporting the CIL must be submitted for public examination by an independent examiner.

Current Position

5. Consultation on the City CIL Draft Charging Schedule generated a total of 16 responses, of which 6 which were objections covering the principle of setting

a CIL, the proposed CIL rates, or proposals for payment of CIL by instalments. All representations, together with the Draft City CIL and supporting evidence, were submitted to the Planning Inspectorate on 7th November 2013 for Public Examination by an independent planning inspector.

6. As part of the Examination, the inspector asked for further statements from those individuals and organisations who had responded to the City CIL Draft Charging Schedule. A public hearing was programmed for 16th January 2014. No further statements were forthcoming and no requests were received to attend the hearing and the inspector cancelled the public hearing and dealt with the City CIL through consideration of the City Corporation's written evidence, Draft Charging Schedule and written representations to the CIL.
7. The Inspector's report was received by the City Corporation on 23rd January 2014. It is a short report, which compliments the City Corporation on its approach and the quality of its evidence and recommends approval of the City CIL without amendment. The Inspector's summary is set out below and the full report is available on the City Corporation's website: www.cityoflondon.gov.uk/cil .

"This report concludes that the City of London Community Infrastructure Levy Draft Charging Schedule provides an appropriate basis for the collection of the Levy in the City of London. The report is very brief, reflecting the thoroughness of the City Corporation's approach, the comprehensiveness of the evidence that supports the Schedule, and the relatively few objections to it. It is convincingly demonstrated that the Levy is set at a level that will not put the growth of the City of London at risk. I recommend that the Schedule be approved in its published form, without amendment."

Adoption and Implementation of City CIL Charging Schedule

8. Following receipt of the inspector's report, Committee approval is now sought to formally adopt and implement the City of London Community Infrastructure Levy Charging Schedule, which is attached at Appendix 1. The 2008 Planning Act requires that formal approval of the City CIL should be through a meeting of the Court of Common Council.
9. The City CIL will apply a charge on the uplift of development in the City at a rate of £75 per square metre for office development and £95 per square metre for residential development, except on the riverside where a residential rate of £150 per square metre will be charged. Nil rates will be charged for education and health related development and development necessary for the operational purposes of the emergency services. All other development will be charged at £75 per square metre.
10. Implementation of the City CIL is proposed to commence on 1st July 2014. This date will allow sufficient time between adoption of the City CIL and implementation to allow officers and developers to complete outstanding s106 planning obligations negotiations and thereby avoid abortive work. It is likely that there will be an increased workload on officers within the Built Environment and Comptroller and City Solicitor's Departments in the run up to implementation.

Correctable Errors

11. Since the City CIL Charging Schedule was submitted for public examination, the Government has published new Community Infrastructure Levy (Amendment) Regulations 2014. These amendment regulations introduce new categories of mandatory exemption and relief from the payment of CIL and amend the formula to be used when calculating the CIL charge. At the time of writing this report, the new regulations were in draft form and had not been made as a Statutory Instrument, although this is expected to happen prior to the meeting of the Planning & Transportation Committee. Subject to the regulations being made as a Statutory Instrument, it is proposed that these amendments be incorporated into the City CIL upon its adoption.
12. CIL regulations prevent the City Corporation from simply making such changes to its CIL Charging Schedule, requiring that they be formally identified as 'correctable errors'. The proposed changes are identified using strikethrough for deleted text and underline for new text in the City CIL Charging Schedule, attached at Appendix 1, and are also set out in the separate schedule of 'correctable errors' in Appendix 2.
13. Alongside these regulatory changes, it is necessary to make minor amendments to the City's CIL Charging Schedule to ensure that it reads as an adopted document, rather than a draft. Again, these are required to be identified as 'correctable errors'.

S106 Planning Obligations

14. Upon implementation the City CIL will replace most of the City's current s106 planning obligations mechanism. In parallel with the development of the CIL, a revised s106 Planning Obligations Supplementary Planning Document has been prepared. This scales back City s106 planning obligations requirements to meet CIL regulatory requirements and will ensure that contributions can continue to be made by developers towards affordable housing and training, skills and job brokerage, as well as site specific mitigation, highways improvements and reinstatements and carbon off-setting. The s106 Planning Obligations SPD has been subject to public consultation and a report seeking the adoption of the SPD will be brought before a future meeting of the Planning & Transportation Committee. Implementation of the SPD will be on the same date as that for the City CIL.
15. Subject to the approval of this report by the Planning & Transportation Committee, all current applicants and those making planning applications prior to the CIL implementation date, will be notified of the proposed implementation date. Applicants will be encouraged to provide all the necessary and required information, including draft s106 Agreements, to enable timely determination of applications prior to CIL implementation.
16. All efforts will be made to complete full s106 Agreements already authorised by the Planning & Transportation Committee (or minor variations approved under delegated authority) prior to implementation of the City CIL. However, there may be cases where this is not possible. It is anticipated that unless there are exceptional circumstances, the completion of such agreements in a scaled-back form, and the payment of CIL, will not materially alter the

considerations relevant to the decisions to grant planning permission. In order to ensure that applications which straddle both regimes can be progressed efficiently, it is recommended that the Committee authorise the appointed senior officer to approve the use of a scaled back agreement in place of a full agreement, where the officer is satisfied that this is appropriate and will not introduce new material planning considerations. This will also be subject to applicants completing the necessary CIL notices so that the required CIL to which the development becomes liable can be charged and processed.

17. There may also be cases where Members, in determining whether applications were acceptable, have agreed that specific projects should be funded from s106 contributions, and those contributions cannot be specifically required after the implementation of the City CIL. Committee approval is, therefore, sought to honour such expenditure through CIL funding as a transitional measure, subject to the completion of scaled back agreements.

Regulation 123 List

18. CIL Regulations require that CIL charging authorities publish a list, known as a Regulation 123 List, of the types or specific pieces of infrastructure that will be funded, or part funded, through CIL. The City Corporation has consulted on a draft Regulation 123 List at each stage of the preparation of the City CIL and submitted this list to the planning inspector as evidence in support of the City CIL. Members are now asked to formally approve this list, identifying the broad types of infrastructure that CIL will be used to fund. The list is deliberately broad in scope to provide flexibility on the future use of CIL funds for new infrastructure provision. The Regulation 123 List is attached at Appendix 3.
19. Regulations allow future changes to be made to the Regulation 123 List without a need to amend the City CIL Charging Schedule, provided that the City Corporation undertake 'appropriate local consultation'.

Instalments Policy

20. CIL regulations allow the City Corporation to adopt a policy enabling the payment of City CIL in instalments. Regulations also indicate that, in London, if a borough or the City does not adopt such a policy, then payment will be subject to the provisions of any instalments policy adopted by the Mayor in respect of his CIL.
21. The Mayor has adopted an instalments policy for his CIL, which allows payment in 2 instalments. The Mayoral CIL is collected by the City Corporation on his behalf and, to ensure more effective administration of the City and Mayoral CIL processes, the Mayor's instalments policy has been included within the City CIL Charging Schedule. Regulations allow any future changes to the instalments policy to be progressed by approval of the Planning & Transportation Committee and publication of details on the City's website.

Discretionary Relief from CIL

22. Part 6 of the Community Infrastructure Levy Regulations 2010 (as amended) allows local authorities to apply additional, discretionary relief from CIL in

exceptional circumstances. The City CIL is supported by a robust evidence base and viability appraisal, which demonstrates that it should not impact on the overall viability of development across the City. The City CIL Charging Schedule therefore does not propose to make further discretionary relief available. Where there are genuine issues of viability, there is flexibility within the retained s106 planning obligations mechanism to address viability concerns.

23. The impact of the City CIL will be kept under review and regulations allow the City Corporation to amend its approach to discretionary relief at any point in the future, by means of a notice on its website, if monitoring shows that the City CIL is having an adverse impact on development viability. Any proposals for changing the approach to discretionary relief would be brought to the Planning & Transportation Committee for approval.

Corporate & Strategic Implications

24. The preparation of a Community Infrastructure Levy for the City of London accords with the requirements of:
 - Corporate Plan vision to support and promote City as a world leader in international and financial business services.
 - Department of the Built Environment Business Plan 2013-2016, Key Performance Indicator PP1: Prepare City Community Infrastructure Levy (CIL) and the procedure for prioritising CIL spending.
 - Core Strategy policy CS4: Planning Contributions

Implications

25. Setting a City CIL will ensure that contributions from developers can continue to be pooled to fund capital investment in new infrastructure. CIL Regulations allow the City Corporation to retain up to 5% of annual CIL charges to cover CIL preparation and administrative costs and so the CIL process should be self-financing on an ongoing basis.
26. Early engagement with the development industry, the two stage consultation process and the public examination have enabled a City CIL rate to be set which should not impact on the overall viability of development in the City or its attractiveness as an office location.
27. There are no legal issues arising from this report.

Conclusion

28. The City of London Community Infrastructure Levy has undergone public examination by an independent planning inspector. The Inspector has concluded that the proposed City CIL rates are appropriate and set at a level which will not put the growth of the City at risk, whilst continuing to deliver capital funding to help deliver necessary infrastructure improvements. It is therefore recommended that the City of London CIL be adopted, with implementation taking place from 1st July 2014.
29. Delegated authority is sought to allow transitional measures to address the potential requirement to seek scaled back s106 Agreements alongside the

CIL where it has not been possible to complete s106 Agreements already authorised by the Planning & Transportation Committee. Committee approval is also sought for the use of CIL monies to honour agreed expenditure on specific projects, where s106 Agreements cannot be completed.

Appendices

- Appendix 1 – City of London Community Infrastructure Levy Charging Schedule
- Appendix 2 – List of Correctable Errors in the City of London CIL Charging schedule
- Appendix 3 – City of London Community Infrastructure Levy, Regulation 123 List

Background Papers:

Report to Planning & Transportation Committee 25/06/2013, Policy & Resources Committee 27/06/2013 and Court of Common Council 18/07/2013, 'Consultation on City of London Community Infrastructure Levy Draft Charging Schedule'

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CITY OF LONDON

COMMUNITY INFRASTRUCTURE LEVY

CHARGING SCHEDULE

MAY 2014



PROPOSED CITY OF LONDON DRAFT COMMUNITY INFRASTRUCTURE LEVY CHARGING SCHEDULE

The Charging Authority

The City of London Corporation is a charging authority for the Community Infrastructure Levy for the purposes of Part 11 of the Planning Act 2008 (as amended).

Schedule of Rates

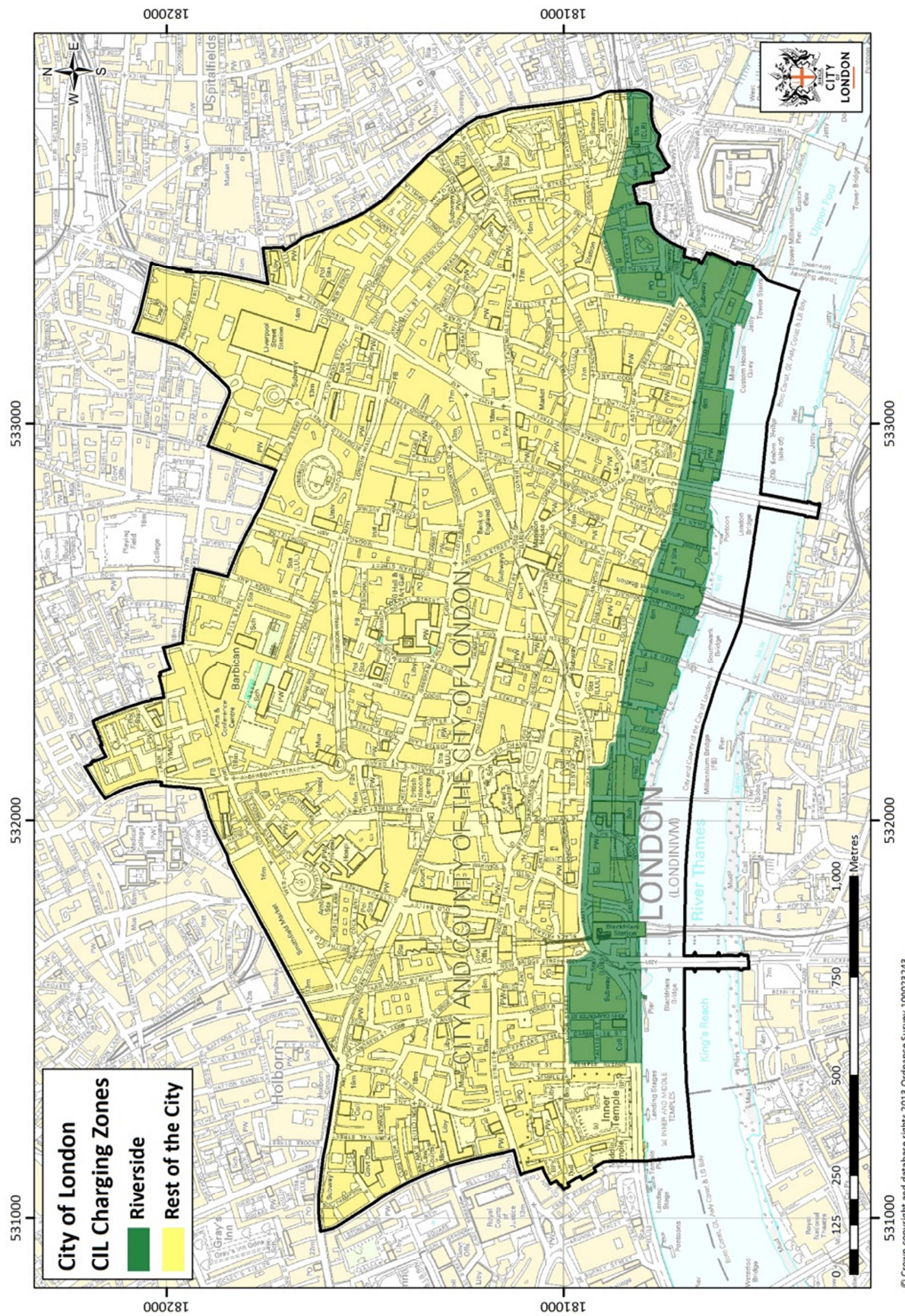
The City of London proposes to charge CIL in respect of development in the City of London at the following rates (expressed as pounds per square metre net additional floorspace, gross internal area):

Table 1: City of London CIL Charging Zones and Rates

Land Use	Zone	CIL Rate (£ per m²)
Offices	City-wide	£75
Residential	Riverside	£150
Residential	Rest of City	£95
Development used wholly or mainly for the provision of medical or health services, except the use of premises attached to the residence of the consultant or practitioner	City-wide	Nil
Development used wholly or mainly for the provision of education as a school or college under the Education Acts or as an institution of higher education	City-wide	Nil
Development used wholly or mainly for the operational purposes of the emergency services	City-wide	Nil
All other uses	City-wide	£75

Relevant zones are shown on the CIL Charging Zones Map.

Figure 1: CIL Charging Zones



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Calculation of the CIL Charge

The amount to be charged for each development will be calculated in accordance with Regulation 40 of the Community Infrastructure Levy Regulations 2010 (as amended). For the purposes of the formulae in paragraphs (5) and (6) of Regulation 40 (~~set out in Annex 4~~), the relevant rate (R) is the rate for each charging zone shown in Table 1.

As set out in Part 5 of the Community Infrastructure Levy Regulations 2010 (as amended), the above CIL rates shall be tied to the Royal Institution of Chartered Surveyors "All In Tender Price Index"; the rate of CIL charged will therefore alter depending on the year planning permission for the chargeable development is first granted.

Scope of CIL

CIL will be chargeable on the net additional floorspace (gross internal area) of all new development apart from those exempt under Part 6 of the Community Infrastructure Levy Regulations 2010 (as amended). Those exempt from the charge are as follows:

- developments where the gross internal area of new build on the relevant land will be less than 100 square metres (does not apply where development will comprise one or more dwellings);
- buildings into which people do not normally go, or go into only intermittently for the purpose of inspecting or maintaining fixed plant or machinery;
- residential annexes or residential extensions;
- self-build housing or self-build communal development;
- buildings owned by charities and used wholly or mainly for a charitable purpose*;
- those parts of a development used for social housing*.

*Applications for charitable or social housing relief must be submitted to the City Corporation in accordance with Part 6 of the Community Infrastructure Levy Regulations 2010 (as amended).

Discretionary Relief

Part 6 of the Community Infrastructure Levy Regulations 2010 (as amended) provides for discretionary relief from CIL for exceptional circumstances. The ~~proposed~~ CIL rates in this Charging Schedule have been informed by a detailed viability study, which has demonstrated that a combination of the CIL, scaled back s106 planning obligations and reasonable site specific mitigation should not have an adverse impact on the general viability of development across the City. Where issues of viability arise and are supported by a verified viability appraisal, the City Corporation will consider the potential for reductions in both City and Mayoral s106 planning obligations. The City Corporation does not therefore propose to offer any other discretionary or exceptional relief from CIL. If there is a more general issue

over viability then that will be addressed through monitoring and review of the CIL rates.

Payment Instalments

In line with Regulation 70 of the Community Infrastructure Levy Regulations 2010 (as amended), payment of the City and Mayoral CIL should be made in accordance with the following categories:

- Where the payable amount of CIL is £500,000 or less, the whole amount shall be paid in a single instalment not more than 60 days after commencement of the development.
- Where the payable amount is more than £500,000, developers have the option to pay two instalments:
 - The greater of £500,000 or half the value of the total payable amount 60 days after commencement, and
 - The remainder 240 days after commencement.

Mayoral CIL

In accordance with Regulation 10 of the Community Infrastructure Levy Regulations 2010 (as amended), the City Corporation is a collecting authority for the Mayoral CIL. This is currently set at a level of £50 per square metre and will be levied in addition to the proposed City of London CIL rates.

Statutory Compliance

This Charging Schedule has been issued, approved and published in accordance with the Community Infrastructure Levy Regulations 2010 (as amended) and Part 11 of the Planning Act 2008.

This Schedule was approved by the Court of Common Council of the Mayor and Commonalty and Citizens of the City of London on 1st May 2014

This Schedule takes effect on 1st July 2014

Annex 1

Extract from the Community Infrastructure Levy Regulations 2010 (as amended)

Calculation of chargeable amount

40.—(1) The collecting authority must calculate the amount of CIL payable (“chargeable amount”) in respect of a chargeable development in accordance with this regulation.

(2) The chargeable amount is an amount equal to the aggregate of the amounts of CIL chargeable at each of the relevant rates.

(3) But where that amount is less than £50 the chargeable amount is deemed to be zero.

(4) The relevant rates are the rates at which CIL is chargeable in respect of the chargeable development taken from the charging schedules which are in effect—

- (a) at the time planning permission first permits the chargeable development; and
- (b) in the area in which the chargeable development will be situated.

(5) The amount of CIL chargeable at a given relevant rate (R) must be calculated by applying the following formula—

$$\frac{R \times A \times I_P}{I_C}$$

where—

A = the deemed net area chargeable at rate R;

I_P = the index figure for the year in which planning permission was granted; and

I_C = the index figure for the year in which the charging schedule containing rate R took effect.

(6) The value of A in paragraph (5) must be calculated by applying the following formula—

$$G_R - K_R - \left(\frac{G_R \times E}{G} \right)$$

where—

G = the gross internal area of the chargeable development;

G_R = the gross internal area of the part of the development chargeable at rate R;

E = an amount equal to the aggregate of the gross internal areas of all buildings which—

(a) on the day planning permission first permits the chargeable development, are situated on the relevant land and in lawful use; and

(b) are to be demolished before completion of the chargeable development; and

K_R = an amount equal to the aggregate of the gross internal area of all buildings (excluding any new build) on completion of the chargeable development which—

(a) on the day planning permission first permits the chargeable development, are situated on the relevant land and in lawful use;

(b) will be part of the chargeable development upon completion; and

(c) will be chargeable at rate R.

(7) The index referred to in paragraph (5) is the national All in Tender Price Index published from time to time by the Building Cost Information Service of the Royal Institution of Chartered

Surveyors; and the figure for a given year is the figure for 1st November of the preceding year.

~~(8) But in the event that the All-in Tender Price Index ceases to be published, the index referred to in paragraph (5) is the retail prices index; and the figure for a given year is the figure for November of the preceding year.~~

~~(9) Where the collecting authority does not have sufficient information, or information of sufficient quality, to enable it to establish—~~

~~(a) the gross internal area of a building situated on the relevant land; or~~

~~(b) whether a building situated on the relevant land is in lawful use,~~
the collecting authority may deem the gross internal area of the building to be zero.

~~(10) For the purposes of this regulation a building is in use if a part of that building has been in use for a continuous period of at least six months within the period of 12 months ending on the day planning permission first permits the chargeable development.~~

~~(11) In this regulation “building” does not include—~~

~~(a) a building into which people do not normally go;~~

~~(b) a building into which people go only intermittently for the purpose of maintaining or inspecting machinery; or~~

~~(c) a building for which planning permission was granted for a limited period.~~

~~(12) In this regulation “new build” means that part of the chargeable development which will comprise new buildings and enlargements to existing buildings.~~

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**CITY OF LONDON
COMMUNITY INFRASTRUCTURE LEVY CHARGING
SCHEDULE
CORRECTABLE ERRORS**

Change Ref	Proposed Change	Justification
1	Title: delete 'proposed' and 'draft'	To reflect the fact that the CIL Charging Schedule has been adopted
2	Calculation of the CIL Charge , line 4: delete '(set out in Annex 1)'	To reflect deletion of Annex 1 from the Charging Schedule
3	Scope of CIL: Add <ul style="list-style-type: none"> • Residential annexes or residential extensions • Self-build housing or self-build communal development 	To reflect new mandatory exemptions in the Community Infrastructure Levy (Amendment) Regulations, 2014
4	Discretionary Relief , line 3: delete 'proposed'	To reflect the fact that the CIL Charging Schedule has been adopted
5	Mayoral CIL , line 4: delete 'proposed'	To reflect the fact that the CIL Charging Schedule has been adopted
6	Annex 1: delete annex 1	Annex 1 has been superseded by amended Regulation 40 in the Community Infrastructure Levy (Amendment) Regulations, 2014. Charging Schedule already refers to the use of Regulation 40 in calculating CIL, so no need to include an extract from the Regulations

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CITY OF LONDON COMMUNITY INFRASTRUCTURE LEVY

REGULATION 123 LIST MAY 2014

Infrastructure to be funded by CIL

Community facilities
Decentralised energy facilities
Education facilities
Emergency services facilities
Flood defence and flood risk alleviation
Pipe subways
Play space facilities
Publicly accessible open space, sports and recreation facilities
Public health care facilities
Public realm enhancement
Transport improvements

Unless the need for specific infrastructure contributions arises directly from:

- a) fewer than five developments, where section 106 planning obligations arrangements may continue to apply if the infrastructure is required to make the development acceptable in planning terms; or
- b) a need for highways alterations, reinstatement or other works necessary to make a development acceptable in planning terms, where s278 Highways Agreements will continue to apply.



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Committee(s):	Date(s):
Planning & Transportation	25 th February 2014
Subject: Consultation on the City's Draft Local Flood Risk Management Strategy	Public
Report of: Director of the Built Environment	For Decision

Summary

The Flood and Water Management Act 2010 requires that the City Corporation, as Lead Local Flood Authority for the City, should develop, maintain, apply, and monitor the application of, a strategy for local flood risk from surface run off, groundwater and ordinary watercourses in the City. The draft Local Flood Risk Management Strategy (LFRMS) has been prepared taking account of technical flood risk modelling which has been published in the City's Strategic Flood Risk Assessment 2012 (SFRA). It takes a cross departmental and external partnership approach incorporating actions that will be required to reduce the risk of flooding in the City, to respond effectively in the event of flooding and to improve resistance and resilience thereby ensuring speedy recovery after a flood.

Public consultation on the draft LFRMS is required by the Flood and Water Management Act. This report seeks approval of the draft LFRMS for public consultation.

The final version of the City's LFRMS will feed into the Flood Risk Management Plan for London that is due to be prepared by the Environment Agency by December 2015.

Recommendation(s)

Members are asked to:

- Approve the attached draft City of London Local Flood Risk Management Strategy for public consultation for a period of at least 6 weeks.
- Approve delegation of authority to the Chairman and Deputy Chairman to adopt the finalised City of London Local Flood Risk Management Strategy provided that public consultation responses do not necessitate further material changes to the draft document.

Main Report

Background

1. The Flood and Water Management Act 2010 gave local authorities new responsibilities as lead local flood authorities (LLFA). Part 1 of the Act requires all LLFAs in England to develop, maintain, apply, and monitor the application of, a strategy for local flood risk from surface run off, groundwater and ordinary watercourses, in their area. The strategy must at least set out who the risk management authorities are in the area and their relevant functions, the authority's objectives for managing flood risk, as well as proposed measures to deliver the objectives, and timescales for implementation of the measures; how those measures are to be paid for as well as their costs and benefits; how and when the strategy will be reviewed; and how the strategy contributes to the achievement of wider environmental objectives. The LLFA must consult affected risk management authorities and the public about its strategy and provide guidance on the application of the strategy.
2. Under the direction of the officer Flood Risk Steering Group a draft Local Flood Risk Management Strategy (LFRMS) has been prepared which sets out the City Corporation's approach to reducing the risks associated with flooding. (see Appendix 1).
3. Flooding in the City is influenced by actions beyond the City's boundaries therefore the draft LFRMS includes a commitment to partnership working with other flood risk management authorities including the Environment Agency, Thames Water, the GLA and neighbouring boroughs who are LLFAs for their areas.
4. The draft LFRMS has been prepared with the benefit of extensive flood risk modelling evidence which was reported to the Planning & Transportation Committee in July 2012 and is published on the City Corporation's website through the City of London Strategic Flood Risk Assessment 2012.
5. The July 2012, Planning & Transportation Committee agreed that officers should investigate options for alleviation of surface water flood risk at Paul's Walk on the Thames Riverside and Farringdon Street/New Bridge Street, as these are the areas of the City which are most vulnerable to surface water flood risk. The draft LFRMS takes account of Initial Assessments of options for flood risk management in these areas which were carried out following the Environment Agency's methodology. These assessments conclude that major engineering projects would be very expensive and difficult to deliver, would not offer cost effective solutions and that resistance and resilience measures are the most cost effective option for reducing the impact of flooding on people and property in these areas.
6. Plans and strategies of this type are subject to Strategic Environmental Assessment (SEA) which evaluates the social, economic and environmental impacts of the implementation of the strategy. A draft SEA report has been prepared and concludes that a proactive approach to managing flood risk, as

recommended in the draft LFRMS, will have potential social, economic and environmental benefits for the City and beyond, in the short and long term.

7. The draft LFRMS has been informed by an Equality Impact Assessment (EqIA) to ensure that there are no adverse impacts on relevant target groups. The report of this EqIA will be available during the public consultation. The SEA report, EqIA report and the flood risk management Initial Assessments are all available in the Members' Reading Room.

Options

8. The City Corporation has a range of statutory duties with regard to flood risk in its roles as Planning Authority, LLFA and as a Category 1 Responder under the Civil Contingencies Act. The draft LFRMS incorporates actions to address these various responsibilities including reduction in the likelihood of flooding, improved resistance and resilience to flooding, emergency response and recovery planning in the event of flooding.

Proposals

9. The draft LFRMS sets out the City's approach to flood risk defining the following objectives for managing flood risk in the City:
 - To provide up to date information regarding the level of flood risk within the City taking account of emerging climate change impacts,
 - To reduce the vulnerability and cost to City businesses, residents and visitors of flood risk,
 - To respond effectively in the event of flooding providing emergency assistance to those in need,
 - To assist in recovery enabling the City residents and businesses to resume normal activities promptly,
 - To engage with other flood risk management authorities taking action to reduce flood risk through partnership working within and beyond the City's boundaries.
10. The draft LFRMS identifies actions that the City will take to achieve these objectives indicating who is responsible for each action, the resources required and proposals for funding.
11. The draft LFRMS will be published for public consultation for a period of at least 6 weeks to ensure that other risk management authorities, statutory bodies, City businesses and the general public can contribute to its development. The SEA report and EqIA will be published alongside the draft LFRMS for consultation.
12. After consideration of the consultation responses the City of London Local Flood Risk Management Strategy will be finalised. It is recommended that authority for approval be delegated to the Chairman or Deputy Chairman of this Committee, unless consultation responses necessitate material changes to the draft which would then be brought back to Committee for consideration.

13. The implementation of the LFRMS will continue to be managed through the officer Flood Risk Steering Group as agreed by Members in June 2011.

Corporate & Strategic Implications

14. The preparation of the draft LFRMS will assist in fulfilling the City Corporation's statutory duties as Lead Local Flood Authority, Planning Authority, and as a Category One Responder under the Civil Contingencies Act.
15. The proposals in this report will contribute to the City Together Strategy objectives of a World Class City which protects promotes and enhances our environment and which is safer and stronger.

Other Implications

16. **Financial Implications** – Funding and resources to implement this strategy will come from a number of different sources.
 - Existing City Corporation revenue and capital budgets.
 - Grant funding may be available from sources such as the Drain London fund which is managed by the GLA and the Flood and Coastal Erosion Risk Management Grant in Aid, which is administered by the Environment Agency on behalf of Defra.
 - Thames Water, which is responsible for the upgrading of sewerage infrastructure to prevent sewer flooding and to take account of future climate predictions.
 - Utility companies and property owners, who have site specific responsibility for flood risk alleviation, resistance and resilience of their premises.
 - City developers, who have responsibility to ensure that flood risk is addressed in building design and associated landscaping.

Resourcing considerations will include direct project funding, staff resources, expert consultancy requirements and training needs.

17. **Legal Implications** – The Flood and Water Management Act 2010 and Flood Risk Regulations 2009 impose statutory duties on the City Corporation as Lead Local Flood Authority for the City of London. The Civil Contingencies Act 2004 and Planning Acts also require the City Corporation to implement specific flood risk related activities. This draft LFRMS brings together in a single document the actions related to flood risk which will assist in fulfilling these statutory duties.

18. **Property Implications** - the draft LFRMS confirms that the City is at low risk of river and groundwater flooding but identifies limited areas of the City that are at some risk of surface water flooding. Should flooding occur in these areas, this could have significant implications for property owners and infrastructure providers with consequential impacts elsewhere in the City. Therefore it is important to ensure that this information is publicised so that property owners, occupants and infrastructure providers can implement resistance and resilience measures. Actions identified in the draft LFRMS will

provide reassurance that the City is resilient to intense rainfall events that have resulted in severe floods in other parts of the UK and Europe in recent years.

Conclusion

19. The draft City of London Local Flood Risk Management Strategy provides details of the City's approach to reducing flood risk in the City and ensuring timely recovery in the event of flooding.

20. Public consultation will assist in the final development of the LFRMS ensuring that it takes account of the views of a wide range of other interested parties.

Appendices

Appendix 1: draft City of London Local Flood Risk Management Strategy

Background Papers

1. City of London Strategic Flood Risk Assessment 2012 prepared by Halcrow for the City of London Corporation.
2. Initial Assessments and accompanying modelling technical note prepared by Halcrow for the City of London Corporation 30th Oct 2012.
3. Planning & Transportation Committee Report 3rd July 2012 – City of London Strategic Flood Risk Assessment 2012.
4. Planning & Transportation Committee Report 2nd June 2011 – Flood Risk – New Duties under the Flood and Water Management Act 2010.
5. Strategic Environmental Assessment report for the City of London Local Flood Risk Management Strategy - Jan 2014
6. Equalities Impact Assessment on the draft Local Flood Risk Management Strategy 2014-2020 – Feb 2014

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City of London Corporation
Draft Local Flood Risk Management
Strategy

2014 - 2020

March 2014



This document is available for public consultation from XXX to XXX

Comments should be sent to

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draft

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1 Introduction

The City is at relatively low risk of flooding with specific areas at some risk from river flooding and surface water/sewer flooding (Fig 1). However the consequences of flooding in these restricted parts of the City could be very high in terms of disruption to business, inconvenience to occupiers and reputational damage.

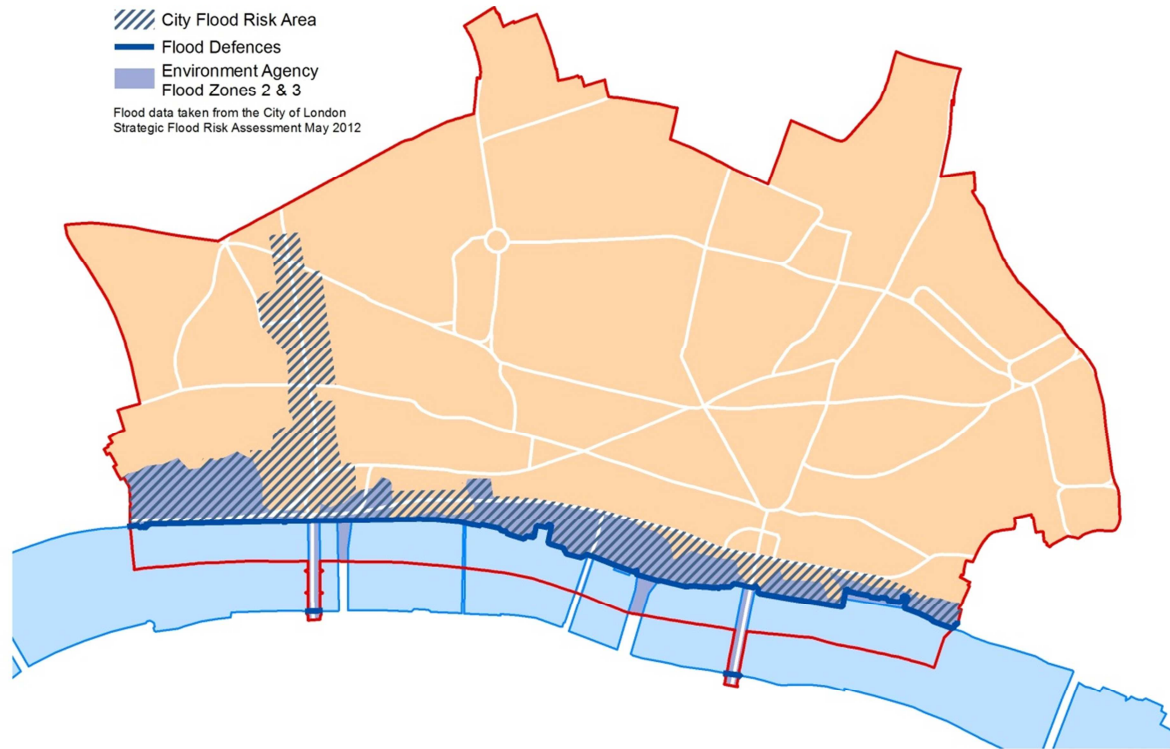


Figure 1: Flood Risk in the City of London

The City's flood risks must be considered strategically since flood risks are associated with river catchments which extend well beyond the City's boundaries. Changing weather patterns as a result of climate change will also influence the City's future probability of flooding with more intense rainfall events creating conditions where flash flooding and overloading of the sewer network could become more frequent. Sea level rise will increase the risk of flooding from the tidal Thames in future decades. As a consequence past experience of flooding is not necessarily an accurate predictor of future flood risk.

The City is protected from River flooding by the Thames Barrier and by local flood defences along the riverside. The Thames Estuary 2011 Plan (TE2100 plan) identifies the wider actions which are needed to protect London from future flooding, some of which will need to be implemented within the City. Surface water/sewer flooding is a risk along Farringdon Street and the Thames riverside as a result of rainwater catchments as far afield as Hammersmith to the west and Hampstead to the north of the City. It is impossible to completely eliminate the possibility of flooding therefore an important element of flood preparedness is the

implementation of measures to provide resistance, preventing flood waters entering properties and flood resilience enabling rapid recovery in the event of flooding. Emergency planning provides the assurance that in the event of flooding procedures are in place to respond effectively.

This strategy identifies the approach the City Corporation is taking to the flood risks that affect the City, the actions that are underway or planned to reduce these risks and the processes by which this strategy will be kept up to date.

The Flood and Water Management Act 2010 assigns various responsibilities to Lead Local Flood Authorities including the requirement to develop, maintain apply and monitor a strategy for local flood risk management in its area. The City Corporation, as unitary authority for the Square Mile is the Lead Local Flood Authority for the City.

This strategy covers flood risk affecting the City's geographic area; it does not include flood risks on City owned or managed land beyond the City's boundaries.

2 Flood Risk Management Strategy requirements

The Flood and Water Management Act 2010 specifies the Lead Local Flood Authority's duties with regard to Local Flood Risk Management Strategies and outlines the elements that must be included in a Flood Risk Management Strategy. Table 1 shows these requirements and where each one is covered in the City of London Local Flood Risk Management Strategy.

Table 1: Flood and Water Management Act 2010 section 9 (4) Strategy Requirements

The Flood and Water Management Act 2010 section 9 (4) requires that the strategy must specify:	Where it is covered in this strategy
(a) the risk management authorities in the authority's area,	Appendix 2
(b) the flood and coastal erosion risk management functions that may be exercised by those authorities in relation to the area,	Appendix 2
(c) the objectives for managing local flood risk (including any objectives included in the authority's flood risk management plan prepared in accordance with the Flood Risk Regulations 2009),	Chapter 4
(d) the measures proposed to achieve those objectives,	Chapter 4 and Chapter 5
(e) how and when the measures are expected to be implemented,	Chapter 5
(f) the costs and benefits of those measures, and how they are to be paid for,	Chapter 5
(g) the assessment of local flood risk for the purpose of the strategy,	Chapter 3
(h) how and when the strategy is to be reviewed, and	Chapter 6
(i) how the strategy contributes to the achievement of wider environmental objectives.	Chapter 7

3 Assessment of local flood risks

Signpost to the Flood and Water Management Act 2010 Section 9 (4) requirements

This section deals with

(4)(g) the assessment of local flood risk for the purpose of the strategy

3.1 Flood risk modelling

Historically the City has not experienced significant flooding since 1928 when an area around Blackfriars was subject to flooding. The exact cause of this flooding is not known but it is likely to have been as a result of localised breach or overtopping of the flood defence wall or overloading of the sewer system following inundation elsewhere in London. Due to the City's economic importance large scale flood defences have provided protection in the intervening years. However climate change is affecting weather patterns resulting in greater risk of flooding, and the paving over of areas which previously absorbed rainwater run-off has resulted in altered flood risk compared with previous decades. In order to predict the future risk of flooding computer modelling has been carried out by the Environment Agency with respect to river and tidal flooding and by Halcrow on behalf of the City Corporation for ground water, surface water and sewer flooding. The City of London Strategic Flood Risk Assessment provides details of this modelling and is the primary source of evidence of the future City flooding risks. It should be noted that modelling provides the best prediction of how flooding may affect the City but monitoring and investigation will improve the accuracy of this data.

3.2 River and tidal flood risk

The City of London 2012 Strategic Flood Risk Assessment (SFRA) shows that limited areas of the City are at risk from river flooding in the absence of any flood defences. This shows the situation should the river defences be overtopped or breached. The risk is confined to the riverside south of Thames Street and the Temples area (Fig 2). In reality the City is protected from river flooding by local flood defences along the riverside and by the Thames Barrier which protects the wider tidal Thames from flooding. Future flood risk from the Thames has been analysed through the Thames Estuary 2100 project which proposes various actions to reduce future risk, taking account of the impacts of climate change including sea level rise. Estuary wide actions promote the approach of making space for flood waters in flood plains along the estuary as opposed to flood defence raising. However in central London the opportunities for absorbing tidal flood waters into the landscape are limited therefore local actions in the City include the need to raise the flood defence walls by up to 1 metre by 2065.

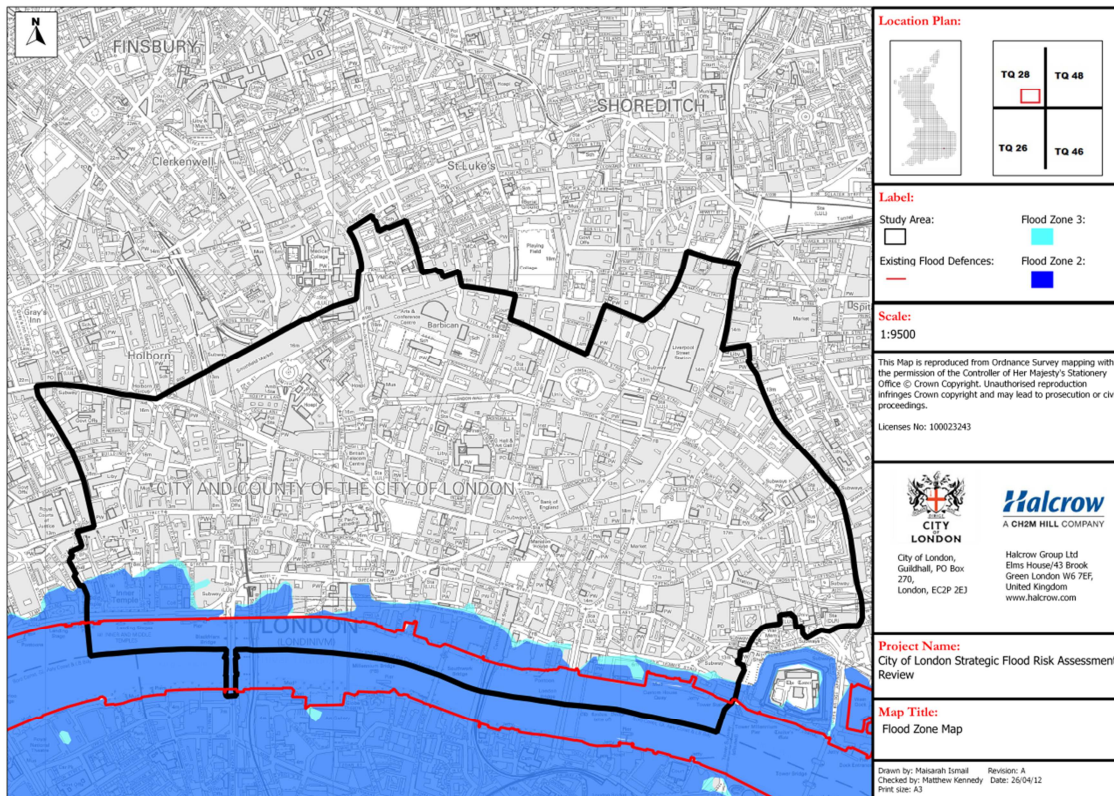


Figure 2 Areas at risk of river flooding

3.3 Surface water and sewer flood risk

The risk of flooding from surface water and sewer overflow is also confined to restricted areas of the City including the former Fleet Valley at Farringdon Street and the Thames Riverside (fig 3). This flooding is caused by overloading of the combined drainage and sewer network resulting in overflows from manholes in these areas. The use of Sustainable Drainage Systems in buildings and landscaping assists in reducing the rate at which surface water enters the sewer network thus reducing surface water flood risk.

Example of local actions to reduce surface water flood risk

The City's Open Spaces Department supports this corporate strategy by making sure paving in the City's gardens drains to natural ground, for example by using soak ways, rather than to the piped City drainage system. Trees and other planting, the use of green roofs and green walls are also assisting in flood risk reduction, where appropriate.

Given the density of the buildings and development in the City, building rainwater harvesting is encouraged through the planning process. An example is the proposed harvesting of rainwater as part of the redevelopment of 10 Trinity Square to irrigate Seething Lane Garden

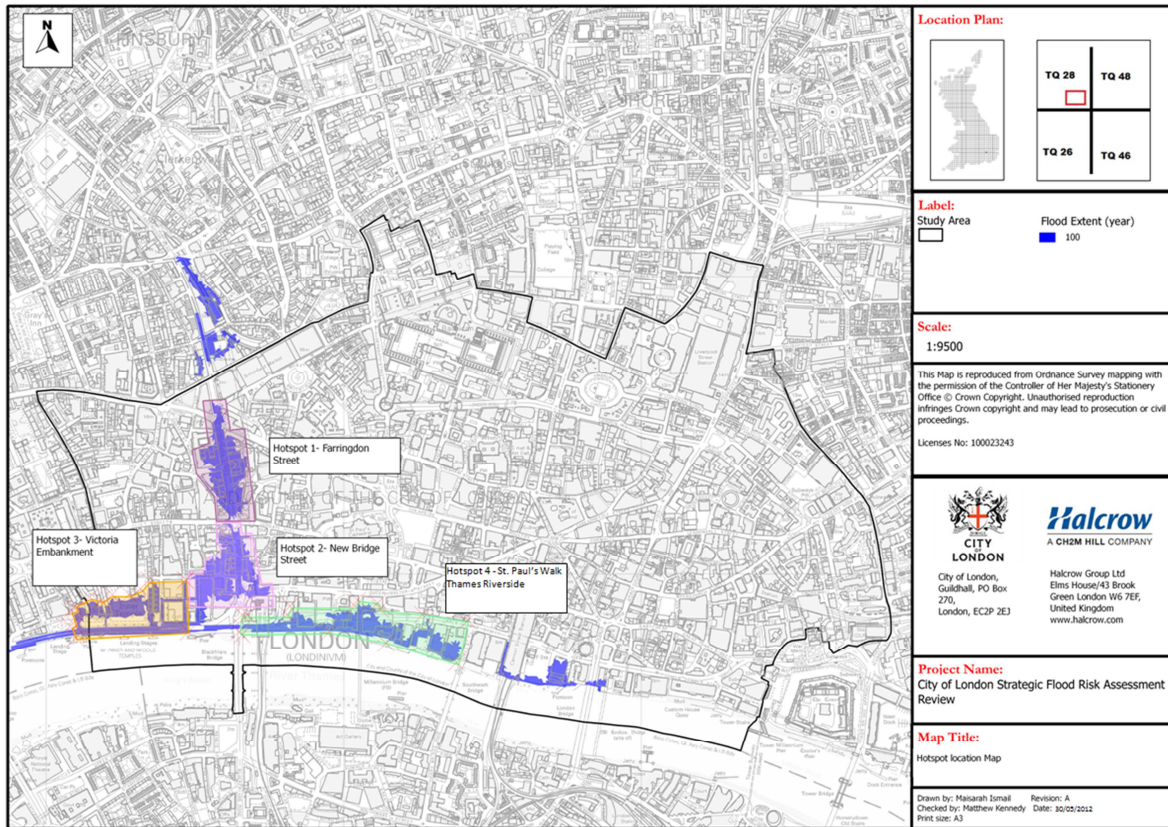


Figure 3 Surface water and sewer flooding zones

The sewers that serve this area have wide catchments extending throughout Camden to the north (Fig 4) and as far as Hammersmith and Fulham to the west (Fig 5); therefore local action within the City of London to reduce the risk is unlikely to be effective. The actions to alleviate flood risk in these areas extend across a wide area and include installation of Sustainable Drainage Systems (SuDS) across the drainage catchment and maintenance and improvement of the Thames Estuary wide flood defences. Measures to alleviate flood risk will also have other benefits for water resource management through rainwater harvesting and reuse; and for water quality through reducing the level of rainwater entering the drainage network thus reducing the potential for sewer discharges.

Example of a wider action which reduces flood risk in the City.

The surface water catchment areas for the City's flood risk hotspots extend to the edge of Hampstead Heath (Figs 4 & 5). The City Corporation is planning works to ensure that the pond dams on Hampstead Heath do not fail or cause flooding in the local area. Any such protection from flood risk in the Hampstead Heath area provides consequential benefits in reducing the risk of sewer overflows elsewhere in this catchment area, including the flood risk hotspots in the City.

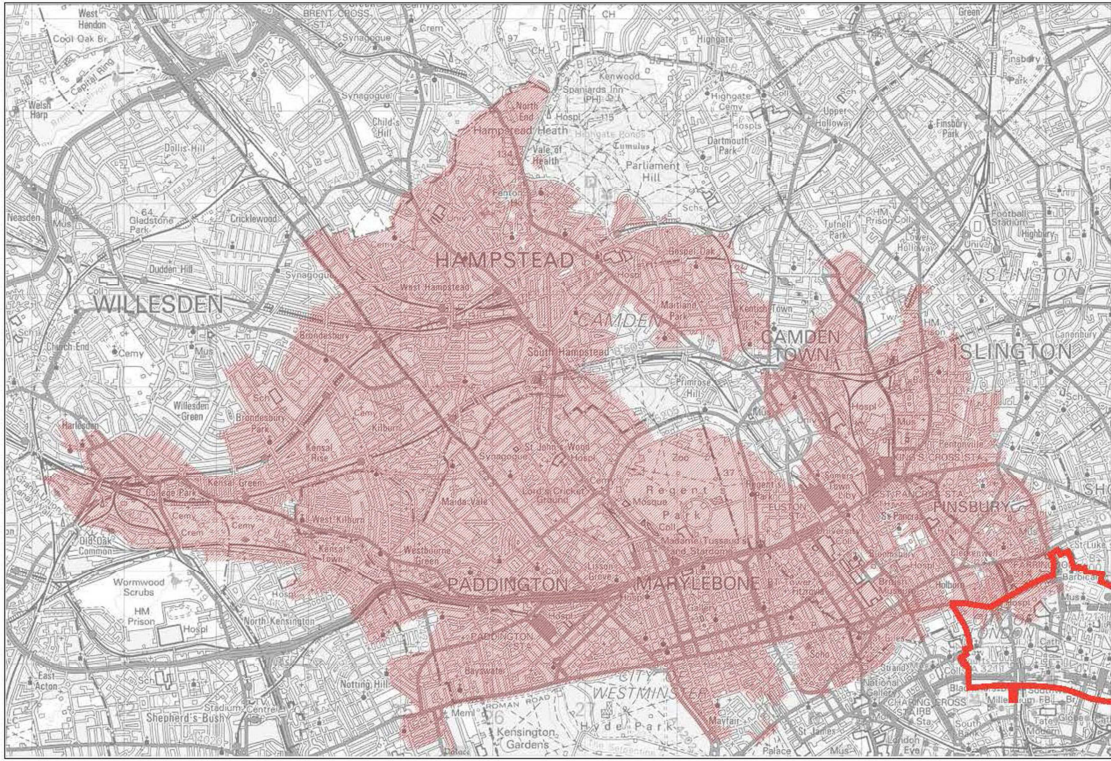


Figure 4: Map showing the catchment area for flood risk in Farringdon Street

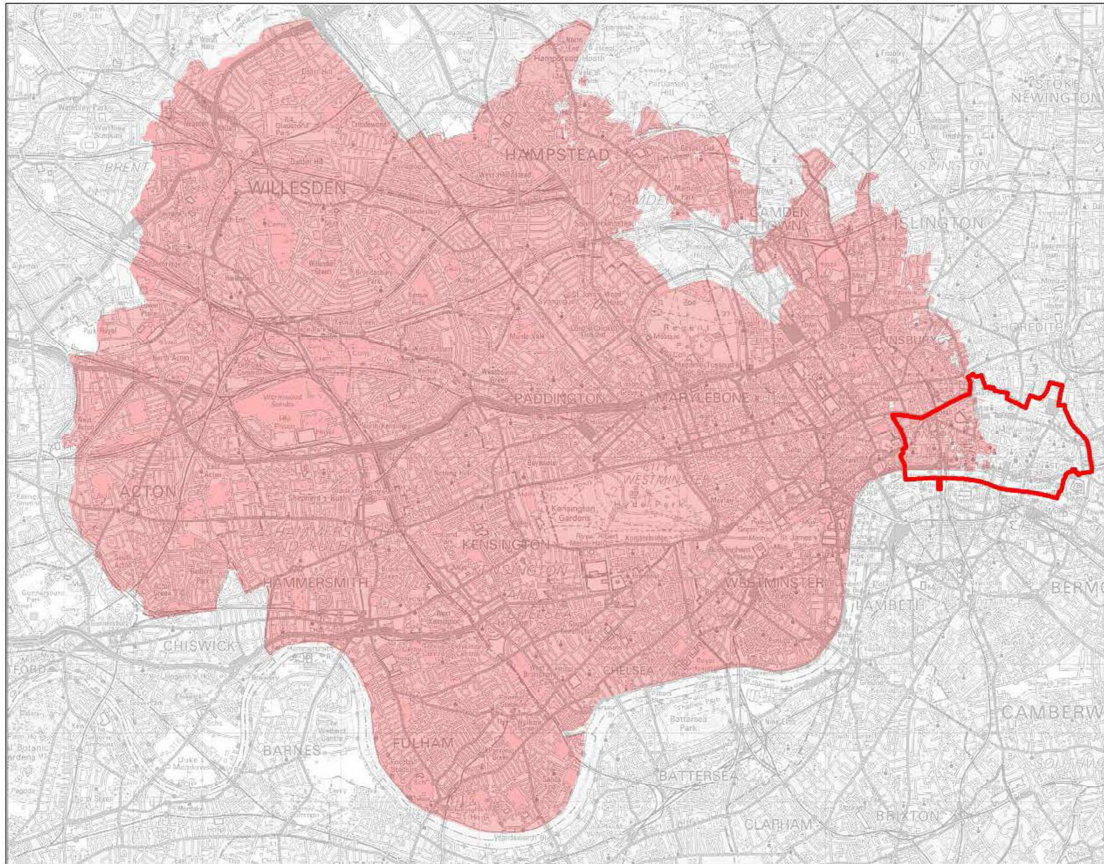


Figure 5: Map showing the catchment area for flood risk in the Paul's Walk area

3.4 Ground water flood risk

The City is protected from ground water flooding by the GARDIT programme which maintains groundwater levels in the deep chalk aquifer at between -30 and -50 m AOD. The City may also be vulnerable to groundwater flooding from the shallow aquifer which comprises sand and gravel with high porosity and permeability. The areas of the City which are most at risk from groundwater flooding from this shallow aquifer are shown in Fig 6: Areas with increased potential for elevated groundwater. Complex interactions between rainfall infiltration, basement barriers and the predominance of impermeable surfaces in the City, makes this type of flood risk difficult to predict, however flooding from this source is not thought to be likely in the short to medium term. Longer term impacts of climate change on ground water flood risk are less certain.

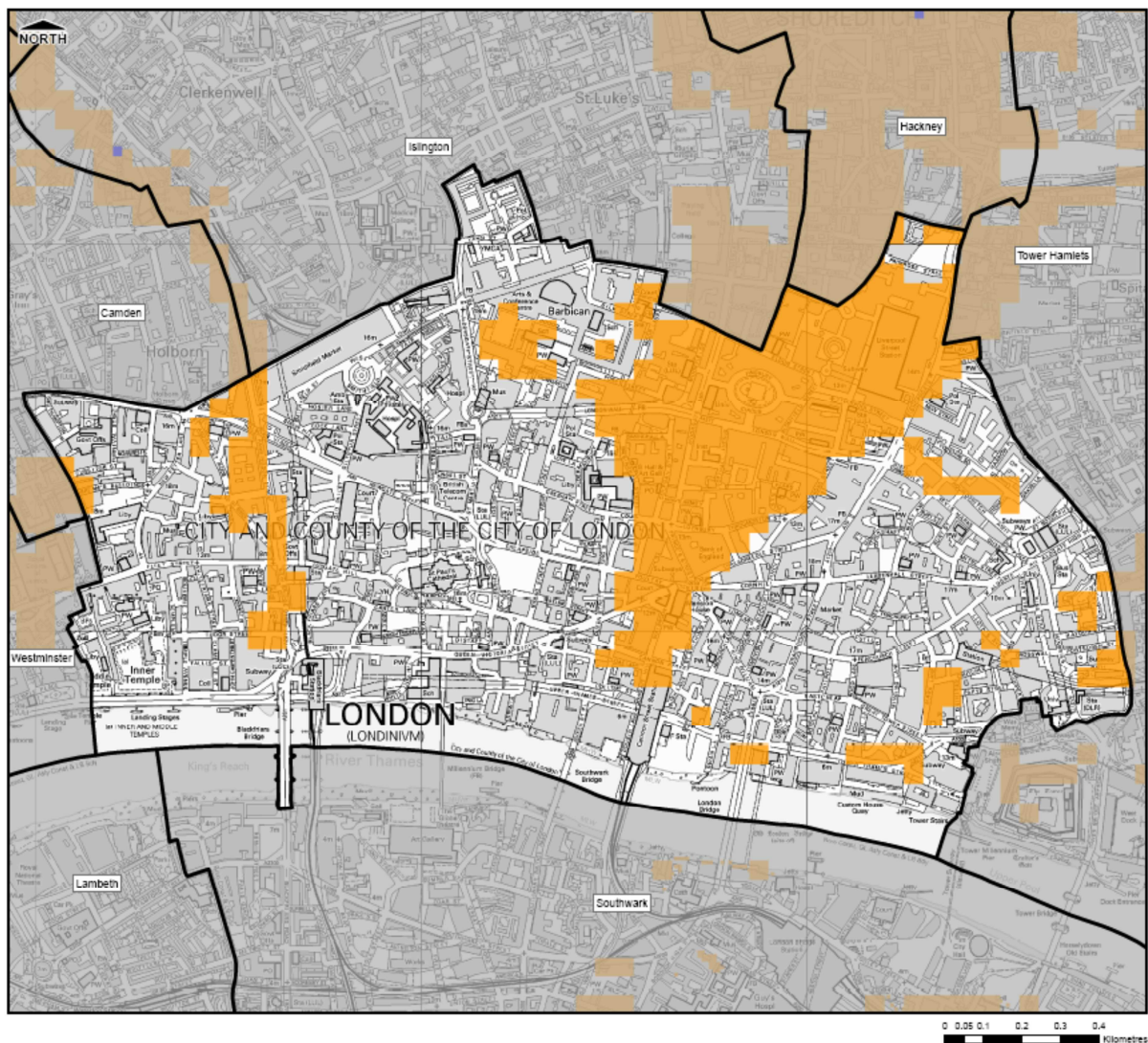


Figure 6: Areas with increased potential for elevated groundwater

3.5 Climate change and flood risk

Our climate is changing and is likely to continue to change for many decades to come. The City of London Climate Change Adaptation Strategy (2010) identifies the expected changes that London will face, which include an increasing magnitude and frequency of intense rainfall events.

Flooding is a natural process and the speed of inundation and duration varies greatly. With climate change, however, the frequency, velocity, depth, patterns and severity of flooding are forecast to increase causing flash flooding, and heavier average winter precipitation that will put us at greater risk of flooding.

The City of London Climate Change Adaptation Strategy (2010) is based on the UK Climate Projections 2009 (UKCP09). These scenarios are generated with probabilistic data. No climate model can give a single definite answer to what the future will look like, however, under the high emissions scenario (which given the failure of COP 19 to deliver any meaningful agreement look the most likely) peak rainfall is likely to increase significantly.

In the figure below, the black line shows the central estimate (50th percentile) of the increase in precipitation on the wettest winter day for the high emissions scenario. The wide grey bars show the likely range of change (33rd to 66th percentiles). The error bars show the 10th and 90th percentile events (future increase in precipitation on the wettest winter day is very unlikely to be outside this range).

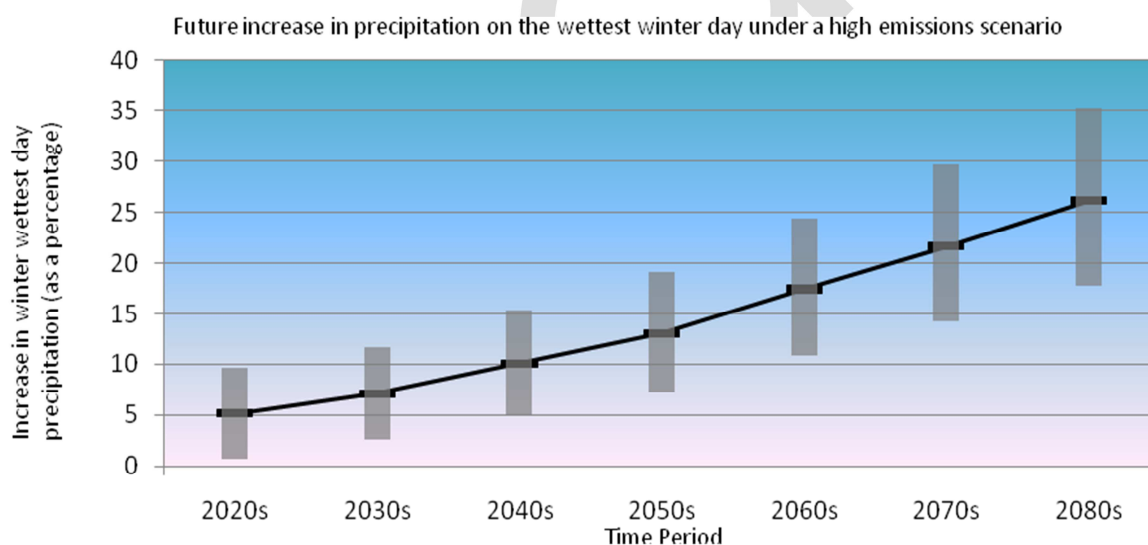


Figure 7: Future rainfall as a result of climate change

It is clear that unless action is taken, flood risks in the City of London will increase. Climate change is increasing the magnitude and frequency of intense rainfall events that cause flash flooding. According to the London Local Climate Impacts Profile (LCLIP) published by the Greater London Authority (GLA) heavy rain and flash flooding were the most frequently occurring weather incidents reported in the media, with cases of river flooding also being reported. Existing problems have also been identified within the City. For example, the existing drainage system at the

Guildhall Art Gallery cannot cope with intense rainfall at times, and this has led to some flooding of its basement, damage and associated cost.

3.6 Strategic Flood Risk Assessment

The City of London Strategic Flood Risk Assessment (SFRA) (2012) provides the results of the latest flood risk modeling and mapping for the City. Neighbouring boroughs' SFRAs and Local Flood Risk Management Strategies provide further evidence of the risks elsewhere in London which may affect the City.

draft

4 Objectives for Managing Flood Risk in the City

Signpost to the Flood and Water Management Act 2010 Section 9 (4) requirements

This section deals with

(c) the objectives for managing local flood risk (including any objectives included in the authority's flood risk management plan prepared in accordance with the Flood Risk Regulations 2009),

The following objectives for managing local flood risk aim to reduce the risk and impact of flooding on the City:

- To provide up to date information regarding the level of flood risk within the City taking account of emerging climate change impacts
- To reduce the vulnerability and cost to City businesses, residents and visitors of flood risk
- To respond effectively in the event of flooding providing emergency assistance to those in need
- To assist in recovery enabling the City residents and businesses to resume normal activities promptly
- To engage with other flood risk management authorities taking action to reduce flood risk through partnership working within and beyond the City's boundaries

4.1 Objective 1: Flood Risk Information

To provide up to date information regarding the level of flood risk within the City taking account of emerging climate change impacts

City of London SFRA 2012

In 2007 the City Corporation published its first Strategic Flood Risk Assessment which was updated in 2012. The City of London Strategic Flood Risk Assessment (SFRA) 2012 provides information on the flood risks the City faces from fluvial and tidal, surface water, sewer overflows and groundwater. The SFRA 2012 brings together evidence from the City of London SFRA 2007, Drain London Surface Water Management Plan and Preliminary Flood Risk Assessment. New modelling has been undertaken, taking account of the drainage and sewer network thereby providing an up to date assessment of the potential risks from surface water and sewer overflows.

Flood Maps for Surface Water (FMfSW)

The Environment Agency (EA) has a duty to publish flood risk and flood hazard mapping for the whole of London which has been identified as a Flood Risk Area under the Flood Risk Regulations 2009. The City Corporation has commissioned more detailed modelling than the EA for the City and this data has been supplied for incorporation into the Flood Map for Surface Water (FMfSW) thus providing the most up to date information on flood risk for the City. The City Corporation will engage with the EA to ensure that future reviews of the FMfSW continue to include the most up to date mapping and modelling, including any future predicted impacts of climate change.

What we will do:

- We will review the City of London SFRA at least every 5 years or more frequently if evidence suggests that this is necessary. This frequency of review will enable the impacts of climate change to be taken into account as evidence emerges.
- We will keep under review the SFRA's and flood risk modelling that is carried out for neighbouring boroughs through the Central London North Flood Risk Partnership
- Where feasible, we will provide the most up to date mapping and modelling to the EA for incorporation in future reviews of the FMfSW

4.2 Objective 2: Reduced vulnerability and cost of flooding

To reduce the vulnerability and cost to City businesses, residents and visitors of flood risk

4.2.1 Planning

New development provides an opportunity to review existing flood risk potential for each site and ensure that future use of the site reduces the vulnerability of occupants to flooding and provides flood protection for a wider area where possible. The NPPF technical guidance identifies which land uses are suitable for sites that are at risk of flooding. The City Corporation applies this guidance in order to avoid locating vulnerable uses, such as basement dwellings or essential infrastructure, in areas that are at risk of flooding.

The City Corporation encourages the use of green roofs and green walls as they reduce or delay the amount of water discharged into the drainage system (along with rainwater attenuation tanks and other methods). We encourage developers of new developments to install green roofs and green walls and to retrofit them in refurbishments. Case studies of properties with green roofs within the City are available on the City of London website to promote their use (see references).

The City of London Climate Change Adaptation Strategy, which is available to the public on the City of London website, identifies the priority risks associated with climate change and proposes adaptation measures. These are designed to ensure the City's infrastructure and services cope under a changing climate. The report identifies specific risks and opportunities associated with managing flood risk. The Thames Estuary 2100 plan recommends that flood defence raising will be required to take account of sea level rise by 2065. Development that is being planned now may still be in place beyond 2065 and should be designed to factor in these higher flood defences which otherwise could obscure views of the river.

What we will do:

- Apply the National Planning Policy Framework (NPPF) and technical guidance on flood risk, developing and implementing flood risk policy in the Local Plan which accords with the Sequential and Exceptions Tests.
- Implement planning policy to avoid the development of vulnerable uses in flood risk areas
- Require the use of green roofs and green walls and other urban drainage techniques.
- Highlight the need for future raising of flood defences along the riverside to developers of property in this area
- Use pre-application meetings to promote flood resistance and resilience measures to property owners considering refurbishment or redevelopment in the City Flood Risk Area.

4.2.2 Flood resistance and resilience

The City Corporation has established a corporate-wide officer Flood Risk Steering Group, enabling joint and integrated working across Departments. This integrated approach ensures that new developments within the City are flood resistant and resilient, and that existing properties including heritage assets improve their resilience to flooding without damage to their design or heritage value.

Flood resistance is the process of preventing flood waters from entering buildings and spaces. The City's buildings and spaces differ from those in other parts of London because of the predominance of office buildings

Flood resilience is the process of designing buildings and spaces so that if flooding occurs it creates minimal damage and enables rapid recovery.

The City Corporation have used Drain London funding to create a fixed term research post of Flood Resistance and Resilience Officer to work with City businesses, residents and different departments within the City of London Corporation to reduce the vulnerability and raise awareness of surface water flooding in the City. There are several stages to this flood resistance and resilience programme which will take place over the coming year:

- the development of evidence-based responses to reduce risk;
- the identification and co-operation of key stakeholders;
- the development of a planning advice note on flood resistance and resilience to be factored into future planning permissions;
- the creation of case studies and development of recovery/resilience advice; and
- the identification of secondary benefits for biodiversity and urban greening of flood resistance and resilience measures
- the development of online resources available on the City of London website and a conference/seminar for flood risk authorities, building owners and occupiers to attend.

All of these stages will improve the overall understanding of flooding in the City and assist in recovery enabling the normal activities to be resumed promptly.

What we will do

- Promote flood resistance and resilience measures to property owners in the City Flood Risk Area
- Work to ensure all City Corporation infrastructure is resistant and resilient to flood risk, such as the Waste Transfer Station at Walbrook Wharf

4.2.3 Flood Insurance

Property insurance claims for flood damage across the UK have increased significantly over recent years and are set to increase further due to the impacts of climate change. Since 2000 flood insurers have been providing cover under a "Statement of Principles" agreement with the government which ensures that flood insurance is available to householders and small and medium sized enterprises (SMEs). Large commercial properties are not covered by the Statement of Principles and therefore need to arrange for flood risk insurance at market rates. The Statement of Principles expired in June 2013.

The Government's preferred option for ensuring that flood insurance is available to householders in the future is the proposed "Flood RE" scheme. Flood RE would provide a reinsurance fund, through a levy on the insurance industry, to provide insurance cover for residential properties which would otherwise be uneconomic to insure due to flood risk. Flood RE would provide fixed price flood insurance to be reviewed annually. Parliamentary approval through the Water Bill will put in place the legislation for this scheme to be implemented. Final implementation is likely to be in summer 2015. In the meantime the insurance industry has voluntarily agreed to continue providing cover under the Statement of Principles. The Flood RE scheme is intended to be a transitional scheme which would gradually evolve over the next 25 years at which time a free market for all flood risk insurance would take over.

There are very few residential properties in the City which are at risk of flooding; consequently the Flood RE scheme will have little impact in the City. Commercial premises will not be covered by Flood RE therefore if flood risk increases as a result of climate change, commercial properties within the City flood risk area may be affected by market pressures for insurance cover. This could particularly affect SMEs.

The City Corporation regularly reviews its approach to issues which present a potential risk to the City. Flood risk is one of the issues on the City Corporation's Strategic Risk Register and is reviewed in the light of emerging information such as climate change projections. Monitoring of the implementation of this LFRMS will inform the periodic reviews of risk.

What we will do

- Continue to monitor the progress of the Flood RE proposals and assess their impact on the City
- Continue to assess flood risk for the City Corporation's strategic risk register in the light of emerging information.

4.2.4 SuDS approvals

The City of London Corporation as the Lead Local Flood Authority for the City of London has a duty to develop a Sustainable Drainage Approval Body (SAB) to approve all non-exempt building proposals. This approval will be required before construction can commence and will run in parallel with planning approval for any application placed before it. The approvals should be in accordance with The National Standards for Sustainable Drainage.

The SAB was scheduled to be operational from 1 April 2014 but has now been delayed as the Government is refining the proposed procedures and related National Standards.

What we will do

- Continue to develop the necessary SAB processes within the City Corporation to fulfil this obligation within the timeframe laid down by Government

4.2.5 Asset register

The Corporation has an obligation under the Flood and Water Management Act 2010 to maintain a register of all drainage assets. Given the nature and size of the City there are limited features that could be classified as drainage assets. Those identified are the highway gullies and the river defences including those buildings that act as a defence against river flooding.

What we will do

- The City Corporation has implemented a dynamic Highway Management System (HyMS). This will include information on assets which have an impact on the LFRMS. Public access to this register will be made available through the City of London web site.
- Update the condition and state of repair of the flood risk assets on HyMS incorporating Environment Agency data on river flood defence walls annually.

4.2.6 Flood investigation

The City Corporation has an obligation under the Flood and Water Management Act to carry out investigation of reported flooding incidents. Flooding incidents are generally reported through the Contact Centre who will pass the report to the Drainage Section of the Highways & Cleansing Division. An officer will then investigate the incident and record the information. Where there are multiple properties affected by flooding from a single source the officer will record the information and produce a report.

What we will do

- Continue to maintain the register of flooding incidents
- Produce reports for instances of multiple property flooding from a single source

4.2.7 Warning and Informing

The City Corporation's Security and Contingency Planning team is able to assist City businesses with the development and exercising of their business continuity and emergency plans. Further information about accessing this support can be found on the City Corporation's website:

<http://www.cityoflondon.gov.uk/business/support-promotion-and-advice/business-continuity-advisory-centre/Pages/default.aspx>

The City Corporation is a Category 1 responder under the Civil Contingencies Act and is responsible for warning and informing the public. Public information provision will be undertaken in accordance with the Emergency Preparedness¹ and “Expectations and Indicators of Good Practice Set for Category 1 and 2 Responders²”.

Live flood warning is available through the Environment Agency for river and groundwater flooding and research is currently progressing to enable rapid forecasting of urban flooding from manholes and other sewerage nodes. In the event of an emergency, the City Corporation will work together with other agencies including the emergency services and neighbouring Local Authorities to respond as set out within the Multi Agency Flood Plan and the City’s Emergency Management Plan.

Consideration of the needs of all the City’s communities has been taken into account in preparation of the Multi Agency Flood Plan and the City’s Emergency Management Plan. The City will adopt an inclusive approach to warning and informing paying particular attention to those who may be more vulnerable during flooding events.

What we will do

- Continue to support the City’s businesses and residents by warning and informing them of flood risks and supporting business continuity and emergency plans
- Encourage businesses and communities that are at risk of flooding to use the Environment Agency’s flood warning service for river and groundwater flooding and any future flood warning system for surface water / sewer flooding.

4.2.8 Site Specific Flood Risk Management Plans

The Flood Risk Regulations 2009(regulation 26) requires that LLFAS prepare a flood risk management plan in relation to each relevant flood risk area. Virtually the whole of London has been identified as a flood risk area under these regulations and this will be addressed strategically by the Environment Agency. The areas at specific risk in the City are Farringdon Street, Paul’s Walk and Victoria Embankment. The City Corporation will prepare specific flood risk management plans for these areas which will feed into the Environment Agency’s strategic Flood Risk Management Plan for London.

What we will do

- Prepare and implement site specific flood risk management plans for Farringdon Street, Paul’s Walk and Victoria Embankment

¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/61030/Chapter-7-Communicating-with-the-Public_18042012.pdf

²https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/252341/Expectation_and_Indicators_of_Good_Practice_Set_for_category_1_2_Responders.pdf

4.3 Objective 3: Emergency response to flooding

To respond effectively in the event of flooding providing emergency assistance to those in need

The City Corporation has Emergency Response plans in place. These plans include the Multi Agency Flood Plan, the Emergency Management Manual and Rest Centre Plans for those evacuated from their homes.

- The **Multi Agency Flood Plan** covers the requirement for a multi-agency response to a flood incident in the City of London.
- The **Emergency Management Manual** is a plan used by the City Corporation to respond to major incidents within the City.
- The City Corporation also has a **Rest Centre Plan** which details how the Local Authority could care for those evacuated from their homes due to an incident. The City Corporation has plans for Rest Centres in more than one location within the City.

Local Authorities can be contacted 24/7 to initiate a response capability.

The contact number for the City Corporation is (daytime hours) are 020 7332 3417/1969/3584 and 3914.

Out of hours the City Corporation can be reached on 020 7606 3030.

What we will do:

- Ensure that emergency arrangements and plans are in place to respond to major incidents

4.4 Objective 4: Recovery from flooding

To assist in recovery enabling the City residents and businesses to resume normal activities promptly

The City Corporation intends to reduce the impact of flooding in the City and to create a model of best practice for dealing with flood risks for owners of commercial property and critical infrastructure.

The City Corporation has local plans and London has regional plans in place to assist businesses and residents with the return to normality.

During the latter stages of a major flooding incident (the recovery period and return to normality) the City Corporation may be able to provide services and staff to assist with the following resources drawn from day to day operations such as;

- Technical and Engineering Advice
- Building control
- Highways services
- Public health and environmental issues
- Provision of reception centres
- Re-housing and accommodation needs
- Transport
- Psychosocial support
- Help lines
- Welfare and financial needs

Depending on the severity of the flooding, the City Corporation may decide to establish a Community Assistance Centre to undertake a detailed Community Impact Assessment, to provide advice and support to affected people and to support the recovery of the community in a local setting.

The City Corporation may also decide to establish a Business Information Centre (BIC), to undertake a Business Impact Assessment, to provide advice and support to affected businesses and to support the recovery of the City's business community.

Where multiple properties are affected by a single source of flooding, the City Corporation will investigate the causes and impact of flooding and prepare a report outlining any actions to reduce the risk of reoccurrence.

What we will do:

- Ensure that recovery arrangements and plans are in place to deal with flood recovery.

4.5 Objective 5: Partnership working

To engage with other flood risk management authorities taking action to reduce flood risk through partnership working within and beyond the City's boundaries

Flooding does not respect local authority boundaries therefore it is essential that Lead Local Flood Authorities work in partnership across local authority boundaries and with a range of agencies to build up a comprehensive picture of the flood risks and actions to reduce that risk.

The Flood and Water Management Act (2010) gives local authorities the lead in managing local flood risk and has designated the City Corporation as the Lead Local Flood Authority (LLFA) for the City of London. This role requires partnership with all relevant bodies to help manage flood risk in the area.

The 'duty to cooperate' is a statutory requirement in the Localism Act 2011, which amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an on-going basis to maximise the effectiveness of Local and Marine Plan preparation relating to strategic cross boundary matters.

4.5.1 Drain London

In order to fulfil these roles the City Corporation works in partnership with a wide range of other organisations including the Environment Agency, Thames Water, the emergency services, Transport for London (TfL) and multiple utility infrastructure providers, such as UK Power Networks and BT. Partnership working with other London boroughs has been established through membership of the Drain London Forum. This partnership group was established by the Greater London Authority (GLA) to bring together the GLA, the London boroughs and the City of London, the Environment Agency, Thames Water, Transport for London and London Councils to address surface water flooding issues. The Drain London Forum assists boroughs with their responsibilities for managing flood risk by sharing good practice, knowledge and expertise.

4.5.2 Environment Agency

Partnership working with the Environment Agency (EA) covers a number of different aspects including assistance in fulfilling the requirements of the Flood Risk Regulations 2009. Through this partnership the City Corporation completed and published a Preliminary Flood Risk Assessment, funded through Drain London in December 2011. In December 2013 the Environment Agency published comprehensive flood mapping covering all sources of flooding. The City Corporation provided additional modelling for the Environment Agency's published maps to ensure that the most accurate and consistent picture of flood risk is presented. Future collaboration with the EA will include preparation of Flood Risk Management Plans for areas at risk of flooding. These plans will be published by December 2015.

The Environment Agency is also the lead organisation co-ordinating the Thames Estuary 2100 Project. The Thames Estuary 2100 plan (TE 2100 plan) identifies mitigation that will reduce the City's vulnerability to river flood risk from the River Thames and its tidal influences. Local actions include raising the flood defences along the riverside by up to 1 metre by 2065. Further protection will result from wider actions such as

allowing sacrificial water storage in flood plain areas elsewhere in the Thames Estuary during periods of heavy rainfall.

The Environment Agency (EA) co-ordinates the funding of flood mitigation projects through the Flood and Coastal erosion Risk Management Grant-in-Aid (FCRM GiA). The costs of each scheme are balanced against the value of the benefits that the scheme would bring in order to allocate funding in the most cost effective manner. Assessment of a series of possible actions to alleviate flood risk in Farringdon Street and Paul's Walk on the Thames Riverside found that major engineering projects would be very expensive and difficult to deliver, would not offer cost effective solutions and concluded that flood resistance and resilience measures in the immediate area provides the most cost effective option for protecting businesses from flooding. EA do not normally allocate Grant-in-Aid funding for resistance and resilience measures but co-operation will continue to explore possible EA funding to reduce flood risk in the City.

4.5.3 Port of London Authority

The Port of London Authority works to ensure navigational safety along the tidal Thames, promote use of the river and safeguard its unique marine environment. It works in partnership with people looking to use the river whether for trade, travel, recreation or pleasure. The City Corporation will work in partnership with the Port of London Authority to ensure that flood risk is taken into account in consideration of development associated with the River Thames.

4.5.4 Neighbouring boroughs

More detailed flood risk planning is carried out with the members of the Central London North Partnership Group which comprises the boroughs that form the catchment areas that affects the City's flood risk: Islington, Camden, Westminster, Kensington & Chelsea and Hammersmith & Fulham. Liaison with Tower Hamlets and Newham, which are the receiving LLFAs for the City's surface water drainage and sewers, is also essential.

The City Corporation commissioned research into possible mitigation measures which could reduce the risk of surface water and sewer flooding. Initial assessments carried out according to the Environment Agency's requirements for funding identified that local mitigation projects would be ineffective in preventing flooding. Projects would need to cover the wider catchment which covers much of Camden to the north and extends into Westminster, Kensington and Chelsea and Hammersmith and Fulham to the west. Alleviation of flooding in the City's flood risk hotspots would require extensive retrofitting of Sustainable Drainage Systems (SuDS) in these areas. The cost of such widespread intervention would far outweigh the benefits and therefore would not be eligible for Environment Agency funding.

The City will continue to pursue the incorporation of SuDS into new and existing buildings in these catchment areas. Neighbouring boroughs, the GLA, Thames Water and the Environment Agency will be key partners in progressing this action. Section 13 of the Flood and Water Management Act 2010 imposes a duty on risk management authorities to co-operate with other relevant authorities in the exercise of their flood risk management functions.

In relation to individual developments in a neighbouring borough, where the relevant SuDS approval body believes a road in the City will be affected it has a duty consult the City, in the City's role as highways authority.

4.5.5 Utility and transport providers

Thames Water is an important partner in the implementation of flood mitigation and resistance measures. Thames Water has a remit through the utilities regulator OFWAT to reduce the number of properties affected by sewer flooding. OFWAT impose strict criteria and will only fund projects where there is a history of internal sewer flooding of premises during 1 in 10 year rainfall events. Although not strictly a flood risk mitigation project the proposed Thames Tideway Tunnel Project will intercept combined sewer outflow pipes and prevent them from discharging sewage into the Thames during heavy rain storms. In parallel with this Thames Water is promoting the use of Sustainable Drainage (SuDS) to reduce the rate and quantity of surface water run-off into London's combined sewerage network.

Other utility and transport providers will need to be kept up to date with the flood risks affecting their networks. Flood risk strategies provide an opportunity for engagement with these organisations

4.5.6 Technical bodies

London Drainage Engineering Group (LoDEG), Association of Thames Drainage Agencies (ATDA) and Construction Industry Research and Information Association (CIRIA) provide technical support and training related to flood risk and SuDS.

4.5.7 Emergency Services

In the event of an emergency, the City will work together with other agencies including the emergency services and neighbouring Local Authorities to respond as set out within the Multi Agency Flood Plan and the City's Emergency Management Plan.

What we will do:

- Work through Drain London to contribute to a coherent London wide approach to flood risk
- Work with the Central London North Flood Risk Partnership Group to ensure that appropriate policies are included in our partner's Flood Risk Strategies and Local Plans
- Work with the Environment Agency to implement the City's actions from the TE 2100 Plan and the requirements of the Flood Risk Regulations
- Continue to discuss possible funding of local projects with the Environment Agency
- Engage with and make representations to Thames Water and OFWAT to progress widespread retrofitting of SuDS into existing properties through the Thames Water draft five year plan consultation process

- Work with utility providers to build resistance and resilience to flood risk ensuring prompt recovery following a flood incident
- Work with technical bodies to provide technical guidance and training to increase awareness of flood risk and mitigation.
- Work with emergency services to provide effective response to flooding incidents.

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5 Actions to reduce flood risk in the City

Signpost to the Flood and Water Management Act 2010 Section 9 (4) requirements

This section deals with

- (d) the measures proposed to achieve the objectives,
- (e) how and when the measures are expected to be implemented,
- (f) the costs and benefits of those measures, and how they are to be paid for,

5.1 Measures to achieve objectives

The measures to be implemented to achieve the objectives will consist of a combination of local actions through the spatial planning and development management functions, SuDS approvals, flood investigation and promotion of business and continuity awareness, complemented by wider actions in partnership with other flood risk management bodies.

5.2 Site Specific Flood Risk Management Plans

The Flood Risk Regulations 2009 require that Lead Local Flood Authorities prepare flood risk management plans for identified Flood Risk Areas by December 2015. These Flood Risk Areas are defined at a wide scale such that virtually the whole of London is defined as a Flood Risk Area. It is the Environment Agency's intention to co-ordinate the preparation of these Flood Risk Management Plans to meet the regulations. Flood Risk Strategies and any site specific flood risk management plans prepared by LLFAs will feed into the Environment Agency's Plan for the whole of London.

The City Corporation intends to prepare Flood Risk Management Plans for these three areas by December 2015.

Farringdon Street & New Bridge Street

Paul's Walk

Victoria Embankment

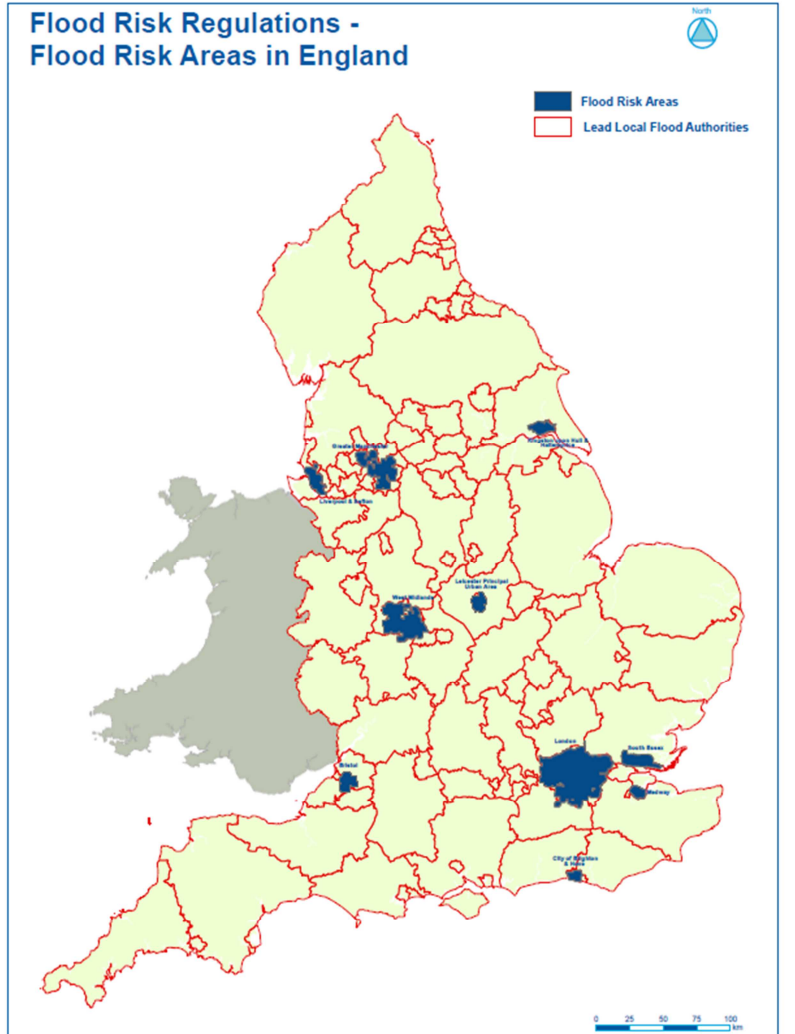


Figure 8 Flood Risk Areas – England

5.3 Funding & Resources

Funding and resources to implement this strategy will come from a number of different sources.

- As LLFA the **City Corporation** is responsible for co-ordination and co-operation with other risk management authorities to address flood risk in the City and in this role will use existing resources to fulfil many of the actions identified in the action plan.
- In addition to this, **grant funding** may be available from sources such as the Drain London fund which is managed by the GLA and the flood and coastal erosion risk management Grant in Aid (FCRM GiA) which is administered by the Environment Agency on behalf of Defra.
- **Thames Water** is responsible for the upgrading of sewerage infrastructure to prevent sewer flooding and to take account of future climate predictions.
- Utility companies and **property owners** are responsible for site specific flood risk alleviation, resistance and resilience of their premises

- City **developers** are responsible for ensuring that flood risks are addressed in building design and associated landscaping.

Resourcing considerations will need to include direct project funding, staff resources, expert consultancy requirements and training needs to implement the Flood Risk Action Plan.

5.4 Flood Risk Action Plan

Action	Who	When	Resources	Funding
Objective 1: Up to date information on flood risk				
We will review the City of London SFRA at least every 5 years or more frequently if evidence suggests that this is necessary. This frequency of review will enable the impacts of climate change to be taken into account as evidence emerges.	Built Environment-Planning	2017	City Corporation Consultancy expertise	City Fund revenue budget
We will keep under review the SFRAs and flood risk modelling that is carried out for neighbouring boroughs through the Central London North Flood Risk Partnership Group	Built Environment Planning Drainage	Annually	City Corporation Neighbouring LLFAs	City Fund revenue budget
We will provide the most up to date mapping and modelling to the EA for incorporation in future reviews of the FMfSW	Built Environment Planning	2013 to be reviewed by 2019	City Corporation Consultancy expertise	City Fund revenue budget
Objective 2: To reduce vulnerability and cost of flood risk				
Apply the National Planning Policy Framework (NPPF) and technical guidance	Built Environment Planning	On-going	City Corporation Developers	City Fund revenue budget

on flood risk, developing and implementing flood risk policy in the Local Plan which accords with the Sequential and Exceptions Tests.			Environment Agency	
Implement planning policy to avoid the development of vulnerable uses in flood risk areas	Built Environment Planning	On-going	City Corporation Developers Environment Agency	City Fund revenue budget
Require the use of green roofs and green walls and other urban drainage techniques in new development and encourage in existing buildings to improve flood resilience	Built Environment Planning Town Clerks	On-going	City Corporation Developers	City Fund revenue budget
Highlight the need for future raising of flood defences along the riverside to developers of property in this area	Built Environment Planning	2013- 2065	City Corporation Environment Agency	City Fund revenue budget
Use pre-application meetings to promote flood resistance and resilience measures to property owners considering refurbishment or redevelopment in the City Flood Risk Area.	Built Environment Planning	On-going	City Corporation	City Fund – revenue budget
Promote flood resistance and resilience measures to property owners	Town Clerks	2013-14	City Corporation Drain London	Drain London Funding Local services support grant - Defra
Work to ensure all City Corporation	Town Clerks	On-going	City	City Fund revenue

infrastructure is resistant and resilient to flood risk, such as the Waste Transfer Station at Walbrook Wharf	Built Environment Highways & Cleansing City Surveyors		Corporation	budget Capital budget for resilience improvements
Continue to monitor the progress of the Flood RE proposals and assess their impact on the City	Town Clerks Built Environment	2013-2025	City Corporation	City Fund revenue budget
Continue to assess flood risk for the City's risk register	Built Environment	Annually	City Corporation	City Fund revenue budget
Continue to develop the necessary SAB processes within the City Corporation to fulfil this obligation within the timeframe laid down by Government	Built Environment	2014	City Corporation Additional staff and training required	City Fund revenue budget SAB application fees
The Corporation is committed to developing a dynamic Highway Management System (HyMS). It is proposed to include information of these assets within HyMS and create a link to this section of the strategy.	Built Environment Highways & Cleansing	On-going	City Corporation Environment Agency	City Fund revenue budget
Monitor the condition and state of repair of gullies and structures and update the information as necessary	Built Environment Highways & Cleansing	On-going	City Corporation Environment Agency	City Fund revenue budget
Continue to maintain the register of flooding incidents	Built Environment Highways & Cleansing	On-going	City Corporation	City Fund revenue budget

Produce reports for instances of multiple property flooding from a single source	Built Environment Highways & Cleansing	On-going	City Corporation	City Fund revenue budget
Continue to support the City's businesses and residents by warning and informing them of flood risks and supporting business continuity and emergency plans	Town Clerks Security and Contingency Planning	On-going	City Corporation	City Fund revenue budget
Prepare and implement site specific flood risk management plans for Farringdon Street, Paul's Walk and Victoria Embankment	Town Clerks Built Environment Security & Contingency Planning	2014/15	City Corporation, Neighbouring boroughs, Thames Water, Environment Agency, GLA	City Fund revenue budget Potential grant funding
Objective 3: Emergency response to flooding				
Ensure that emergency arrangements and plans are in place to respond to major incidents	Security and Contingency Planning	On-going	City Corporation, Emergency Services, Environment Agency, City businesses and residents	City Fund revenue budget Other organisations' funds
Objective 4: Recovery following flooding				
Ensure that recovery arrangements and plans are in place to deal with flood recovery.	Security and Contingency Planning	On-going	City Corporation, Emergency Services, Environment Agency, building owners	City Fund revenue budget Other organisations' funds
Objective 5: Engagement with other flood risk				

management authorities				
Work through Drain London to contribute to a coherent London wide approach to flood risk	Built Environment Planning & Drainage	On-going	City Corporation, GLA	City Fund revenue budget Other organisations' funds
Work with the Central London North Flood Risk Partnership Group to ensure that appropriate policies are included in our partner's Flood Risk Strategies and Local Plans	Built Environment Planning & Drainage	On-going	City Corporation North London Central Partnership Group	City Fund revenue budget Other organisations' funds
Work with the Environment Agency to implement the City's actions from the TE 2100 Plan and the requirements of the Flood Risk Regulations	Town Clerks	Short term 2010 to 2035 Medium term 2035 to 2050 Long term 2050 to 2100	City Corporation Environment Agency	City Fund revenue budget Other organisations' funds
Continue to discuss possible funding of local projects with the Environment Agency	Built Environment	Short term 2010 to 2015	City Corporation Environment Agency	City Fund revenue budget Environment Agency funds
Work with Thames Water and OFWAT to progress widespread retrofitting of SuDS into existing properties through the Thames Water draft twenty five year plan consultation process	Built Environment	Consultation on plan for 2015 to 2040	City Corporation Thames Water	City Fund revenue budget Thames Water funding
Work with utility providers to build	Town Clerks	On-going	City Corporation,	City Fund revenue

resistance and resilience to flood risk ensuring prompt recovery following a flood incident	Built Environment		Utility Providers, Building owners	budget Utility providers funding
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6 Strategy review

Signpost to the Flood and Water Management Act 2010 Section 9 (4) requirements

This section deals with:

(h) how and when the strategy is to be reviewed,

6.1 Public Consultation

The draft Local Flood Risk Management Strategy will be subject to public consultation in line with the requirements of the City Corporation's Statement of Community Involvement.

6.2 Approval process

The draft Local Flood Risk Management Strategy has been considered and approved by the Planning & Transportation Committee for public consultation.

6.3 Governance and monitoring

Implementation of the Strategy will be overseen by the officer Flood Risk Steering Group. The Flood Risk Steering Group is chaired by the Director of the Built Environment and includes representatives from Built Environment, City Surveyors, Contingency Planning, and Town Clerks.

6.4 Review

The Strategy will be reviewed by the Planning & Transportation Committee every five years alongside the City of London's Strategic Flood Risk Assessment.

7 Wider sustainability objectives

Signpost to the Flood and Water Management Act 2010 Section 9 (4) requirements

This section deals with

(i) how the strategy contributes to the achievement of wider environmental objectives

7.1 Strategic Environmental Assessment

The City of London draft Local Flood Risk Management Strategy has been subject to Strategic Environmental Assessment (SEA) which evaluates the impact that the strategy will have on wider sustainability objectives. Strategic Environmental Assessment (SEA) is the process by which strategic plans and programmes are assessed to ensure that they take account of social, environmental and economic objectives for the area, fulfilling the requirements of the Strategic Environmental Assessment (2001/EC/42) (SEA Directive). SEA was used during the preparation of the strategy to evaluate options for achieving the flood risk objectives against a series of wider sustainability objectives.

The sustainability objectives relevant to the Flood Risk Management Strategy were determined at the SEA scoping stage which included consultation with the Environment Agency, English Heritage, Natural England, GLA and flood risk partnership group members.

The sustainability objectives relevant to the Local Flood Risk Management Strategy are as follows:

1. To protect the health, wellbeing and safety of workers, residents and visitors
2. To protect property and essential infrastructure
3. To protect the historic environment, archaeological heritage and landscape
4. To protect and enhance biodiversity
5. To protect water quality and resources
6. To adapt to the impacts of climate change
7. To minimise adverse impacts on the economy

The impact of the flood risk strategy options was assessed against these wider sustainability objectives taking account of the positive, negative and neutral impacts, and the geographic scale and timescale of the impact (short, medium or long term). Comments are included to highlight the significant effects of the preferred options in terms of direct or indirect effects, whether effects are permanent or temporary and whether there are likely to be cumulative effects.

The conclusions of the SEA are reported in the Strategic Environmental Assessment Report and are summarised below:

SEA Objective 1: To protect the health, wellbeing and safety of workers, residents and visitors.

Assessment of options against each of the Flood Risk Strategy objectives indicates that a positive proactive approach will bring benefits in relation to the protection of the health, wellbeing and safety of workers, residents and visitors. The greatest danger to health is from sewer flooding which is influenced by actions in a wide catchment area beyond the City. Therefore partnership working particularly on SuDS implementation in neighbouring boroughs is a key activity to protect the health wellbeing and safety of workers, residents and visitors.

SEA Objective 2: To protect property and essential infrastructure

A proactive approach, making sure that flood risk information is up to date and local measures are implemented to enhance resistance and resilience to flooding, will provide the best opportunities for protection of property and essential infrastructure. The SEA identifies that the adoption of a co-ordinated approach to flood investigation, flood risk asset management and emergency planning are important elements for property protection.

SEA Objective 3: To protect the historic environment and archaeological heritage

The SEA assessment identifies that the most effective actions to protect historic assets against flood risk include promotion of resistance and resilience measures warning and informing and the preparation of co-ordinated management plans and emergency and contingency plans for areas that are at risk of flooding. A lack of partnership working beyond the city's boundaries could present greater risks to historic assets by increasing the risk of surface water flooding exacerbated by actions in neighbouring boroughs.

SEA Objective 4: To protect and enhance biodiversity

The register of flood risk assets where maintenance and state of repair are recorded in one place presents opportunities for the protection and enhancement of biodiversity particularly associated with the river defence flood walls which provide important habitats along the river Thames area of metropolitan importance for nature conservation. Partnership working is identified as important in protection and enhancement of biodiversity since it will enable input from organisations with varied expertise, for example the Environment Agency and the Port of London Authority, in ensuring that flood risk management plans take account of biodiversity.

SEA Objective 5: To protect water quality and resources

The development of an effective SuDS approvals process will be important in protecting water quality and resources through the impact of SuDS in reducing rainwater run-off and preventing sewer overflows and also in conserving water by collecting it for landscape watering etc. The preparation of co-ordinated plans for flood risk areas and flood recovery will also assist in avoiding water pollution and making the best use of water resources.

SEA Objective 6: Climate Change Adaptation

The uncertainties related to climate change make it essential that review of the City of London Strategic Flood Risk Assessment is carried out at regular intervals in order to identify where climate change is having an impact on flood risks. Similarly partnership working is important to gain knowledge of how climate change is affecting the sewer flooding catchment areas and how sea level rise is affecting the flood risk from the Thames.

SEA Objective 7: Minimise impacts on the economy

The provision of accurate flood risk information and the preparation of co-ordinated flood risk management and recovery plans will be the most useful aspects in minimising impacts on the economy. Warning and informing will also form a crucial activity in making sure that businesses in the flood risk areas are aware of the risks and make appropriate contingency plans.

Overall conclusion

The SEA has considered a “Do Nothing” approach against a series of proposed actions related to flood risk. The “Do Nothing” option results in poorer outcomes against each of the SEA objectives. Therefore a positive approach to flood risk management is recommended.

Appendix 1 Legislative context

Pitt review

Flood risk planning has assumed a high profile due to the extreme flooding events of summer 2007 and the subsequent Pitt Review 'Learning Lessons from the 2007 Floods' which was published in Dec 2008. The recommendations of this report, along with legislative changes, require that local authorities assume a new role in co-ordination of measures to minimise flood risk in their areas. More recent flooding in 2012 has placed greater emphasis on flood risk planning as the frequency of extreme weather events increases.

The Flood Risk Regulations 2009 came into force on 10th Dec 2009. These regulations transpose EC Directive 2007/60/EC assessment and management of flood risks and impose new duties on the Environment Agency and local authorities, including the City as a lead local flood authority to:

- Prepare a preliminary flood risk assessment by June 2011, for publication by the Environment Agency in December 2011, showing the probability of flooding and consequences for human health, the environment, cultural heritage and economic activity
- Prepare flood risk maps and flood hazard maps by June 2013, for publication by the Environment Agency in December 2013
- Prepare a flood risk management plan for areas which are at significant risk of flooding by June 2015, for publication by the environment Agency in December 2015

Flood and Water Management Act 2010 – received Royal Assent on 8th April 2010. It gives local authorities new responsibilities as lead local flood authorities (LLFA):

Part 1 of the act requires all lead local flood authorities in England to:

- Develop, maintain, apply, and monitor the application of, a strategy for local flood risk from surface run off, groundwater and ordinary watercourses, in their area. The strategy must at least set out who the risk management authorities are in the area and their relevant functions, the authority's objectives for managing flood risk, as well as proposed measures to deliver the objectives, and timescales for implementation of the measures; how those measures are to be paid for as well as their costs and benefits, how and when the strategy will be reviewed, and how the strategy contributes to the achievement of wider environmental objectives. The lead local flood authority must consult affected risk management authorities and the public about its strategy and provide guidance on the application of the strategy.
- Investigate flooding incidents in its area and report on its findings.

- Establish and maintain a register of structures or features which may significantly affect flood risk in their area including information regarding ownership and state of repair.
- Contribute to sustainable development in the discharge of its flood risk duties.
- Assume the power to designate features with respect to flood risk and subsequently to act as responsible authority for such features.

Part 2 of the act gives local authorities new duties as “approving bodies” with regard to drainage including:

- Approving rainwater drainage systems before commencement of any construction works which have drainage implications
- Adopting and maintaining approved systems which affect more than one property
- Approval of surface water drainage systems prior to connection to public sewers. (Automatic right of connection to public sewers is removed by this Act).

Part 3 of the act provides legislative powers for:

- Consolidation of legislation relating to flood risk including Water Industry Act 1991, the Water Resources Act 1991, the Land Drainage Act 1991, the Reservoirs Act 1975, the Highways Act 1980 (so far as relevant to water), the Environment Act 1995 (so far as relevant to water), the Public Health Act 1936 (so far as relevant to water) and the Coast Protection Act 1949.
- Provision of funding by Parliament to pay for expenditure under the Act

As Lead Local Flood Authority, the City Corporation is responsible for preparing and implementing a Flood Risk Management Strategy for the City. The Requirements of the Flood and Water Management Act with respect to this Flood Risk Management Strategy are set out in fig 1

Fig 1: Requirements of the Flood and Water Management Act 2010

Section 9 Local flood risk management strategies: England

(1) A lead local flood authority for an area in England must develop, maintain, apply and monitor a strategy for local flood risk management in its area (a “local flood risk management strategy”).

(2) In subsection (1) “local flood risk” means flood risk from—

- (a) surface runoff,
- (b) groundwater, and
- (c) ordinary watercourses.

(3) In subsection (2)(c) the reference to an ordinary watercourse includes a reference to a lake, pond or other area of water which flows into an ordinary watercourse.

(4) The strategy must specify—

- (a) the risk management authorities in the authority's area,
 - (b) the flood and coastal erosion risk management functions that may be exercised by those authorities in relation to the area,
 - (c) the objectives for managing local flood risk (including any objectives included in the authority's flood risk management plan prepared in accordance with the Flood Risk Regulations 2009),
 - (d) the measures proposed to achieve those objectives,
 - (e) how and when the measures are expected to be implemented,
 - (f) the costs and benefits of those measures, and how they are to be paid for,
 - (g) the assessment of local flood risk for the purpose of the strategy,
 - (h) how and when the strategy is to be reviewed, and
 - (i) how the strategy contributes to the achievement of wider environmental objectives.
- (5) The strategy must be consistent with the national flood and coastal erosion risk management strategy for England under section 7.
- (6) A lead local flood authority must consult the following about its local flood risk management strategy—
- (a) risk management authorities that may be affected by the strategy (including risk management authorities in Wales), and
 - (b) the public.
- (7) A lead local flood authority must publish a summary of its local flood risk management strategy (including guidance about the availability of relevant information).
- (8) A lead local flood authority may issue guidance about the application of the local flood risk management strategy in its area.
- (9) A lead local flood authority must have regard to any guidance issued by the Secretary of State about—
- (a) the local flood risk management strategy, and
 - (b) guidance under subsection (8).

This strategy will be subject to Strategic Environmental Assessment (SEA) as required by the SEA Directive and will be reviewed by other stakeholders during a period of public consultation prior to adoption.

Civil Contingencies Act 2004

Local Authorities have 7 duties under the Civil Contingencies Act 2004

- To operate with other local responders to enhance coordination and efficiency;
- Ensure information is shared with local responders to enhance coordination:
- Carry out risk assessments
- Have emergency plans in place
- Have business continuity management arrangements in place
- Have arrangements in place to warn and inform the public in the event of an Emergency

- Provide advice and assistance to businesses and voluntary organisations regarding business continuity management

Planning Guidance

– The National Planning Policy Framework (NPPF) was introduced in 2012 and provides Government guidance on Planning. The Core Planning principles include the following requirements

- support the transition to a low carbon future in a changing climate, taking full account of **flood risk** and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy)
- promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, **flood risk mitigation**, carbon storage, or food production)

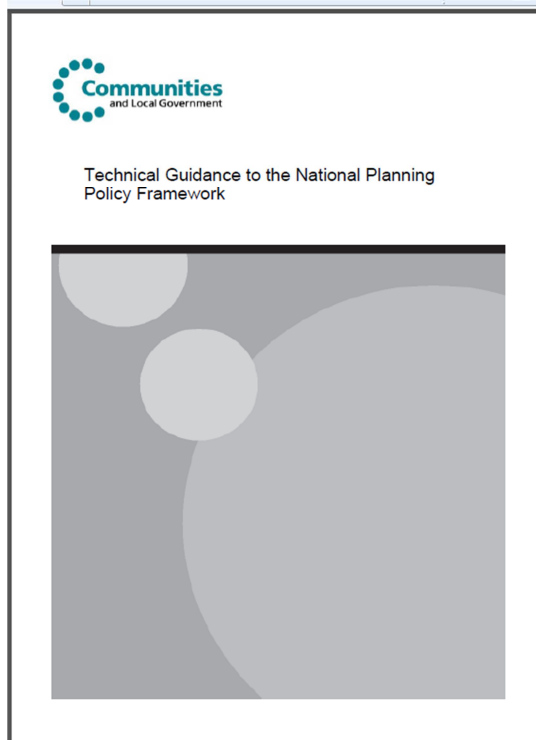
Section 10 of the NPPF states that “Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations.

National Planning Policy Framework requirements for development

Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Local Plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards. Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by:

- applying the Sequential Test;
- if necessary, applying the Exception Test;
- safeguarding land from development that is required for current and future flood management;
- using opportunities offered by new development to reduce the causes and impacts of flooding; and
- where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations.

The NPPF is supported by technical guidance which provides details of how the flood risk elements of the NPPF should be applied.



Other City of London strategies and plans

The City Corporation has adopted a number of plans and strategies which are relevant to this Flood Risk Management Strategy and these have been taken into account in its preparation:

- **Sustainable Community Strategy**

The City Together is a non-executive partnership that brings together the key public, private and voluntary sector providers in the City with representatives from the City's resident, business, worker and faith communities.

The City Together's role is to generate and pursue a collectively agreed long term vision with strategic objectives for the City, designed to promote the economic, social and environmental wellbeing of the City of London. The City Together also aims to promote and encourage more effective partnership working and is responsible for developing the City's Sustainable Community Strategy called 'The City Together Strategy: The Heart of a World Class City'. Through The City Together, our diverse communities and partners can work together to support the continued success of the City in a way that meets the needs of our residents, businesses, workers and visitors.

- **Climate change adaptation strategy**

The City of London's Climate Change Adaptation Strategy (2010 update) uses the latest UK Climate Projections, UKCP09 and builds on the impacts previously identified in the London Climate Change Partnership's publication, 'London's Warming' 1.

The climate change risks for the City are summarised below:

- Hotter, drier summers,
- Milder, wetter winters,
- More frequent extreme high temperatures,
- More frequent heavy downpours of rain,
- Significant decreases in soil moisture content in summer,
- Sea level rise and increases in storm surge height,
- Possible higher wind speeds.

The City of London's Climate Change Adaptation Strategy, aims to identify the priority risks associated with climate change and proposes adaptation measures which are designed to ensure that the City's infrastructure and services cope under a changing climate.

- **Core Strategy/Local Plan**

The City's adopted Core Strategy sets out the future vision and key polices for planning the City of London. This will be replaced in 2014 by a new planning strategy for the City of London called the Local Plan. The Plan sets out the vision for shaping the Square Mile in the future and contains the policies by which planning decisions will be made.

The Core Strategy and emerging Local plan set out the City's approach to flood risk associated with new development requiring flood risk assessments for any development sites located in the City Flood Risk Area.

The Local Plan is accompanied by a Policies Map (in two parts) that shows where its policies operate.

- **Multi Agency Flood Plan**

The Multi Agency Flood Plan outlines the various responsibilities of different organisation with regard to emergency and contingency planning for flood risk.

Appendix 2 Flood Risk Powers and Responsibilities

Signpost to the Flood and Water Management Act 2010 Section 9 (4) requirements

a) The risk management authorities in the authority's area and

b) The flood and coastal erosion risk management functions that may be exercised by those authorities in relation to the area,

Risk Management Authorities and other interested parties

The Flood and Water Management Act 2010 recognises the following authorities as risk management authorities:

- Lead Local Flood Authorities (LLFA)
- The Environment Agency
- Water companies
- Highways authorities
- Internal Drainage Boards (not relevant to the City)
- District and borough councils

These risk management authorities have a duty to co-operate with each other in the exercise of their duties and the power to take on flood risk functions from other authorities by mutual agreement.

The relevant risk management authorities for the City are the City Corporation as LLFA for the square mile, the Environment Agency which exercises a national and regional role in co-ordinating flood risk management, Thames Water as the water company and sewerage undertaker for the City, and Transport for London as the Highways Agency for parts of the City.

A number of other authorities, although not defined as risk management authorities, have a role to play in the management of flood risk in the City. These include the Greater London Authority (GLA) which manages the Drain London project, improving information on flood risk for London; Network Rail which manages mainline stations feeding the City; the Emergency Services and first responders in tackling flooding incidents; the Marine Management Organisation and the Port of London Authority; and neighbouring boroughs as LLFAs for their areas since they also influence the City's flood risk management.

Risk management functions in the City

Authority	Function	Responsibilities
City Corporation	Lead Local Flood Authority	Strategic role in overseeing the management of local flood risk i.e. flood risk from surface water runoff, groundwater and ordinary watercourses. This includes responsibility for <ul style="list-style-type: none"> • Preparing a Local Flood Risk Management Strategy • Investigation of flooding incidents and

		<p>preparation of flood incident reports</p> <ul style="list-style-type: none"> • Maintaining register of assets that impact on flood risk and registering appropriate assets • Implementing SuDS Approval Body (SAB)
City Corporation	Planning Authority	Ensuring that development does not increase vulnerability to flood risk for new and existing properties
City Corporation	Category 1 responder under the Civil Contingencies Act	Ensuring that systems and processes are in place to provide emergency response to flooding
City Corporation	Highway Authority	Duty to maintain the highway including responsibility for drain and gully maintenance on non-strategic roads in the City
Environment Agency	Strategic Role	National strategic responsibility for overseeing flood risk actions with regard to the Flood Risk Regulations 2009 and Flood & Water Management Act 2010
Environment Agency	Operational role	<p>Responsible for overseeing maintenance of flood defences including Thames Barrier</p> <p>Management of flooding from reservoirs, main rivers and the sea</p> <p>Advisory Emergency Planning role in assessment of Multi Agency Flood Plans</p> <p>Advisory Planning role in assessment of flood risk associated with planning policy and development</p>
Thames Water	Sewerage undertaker	<p>Responsible for provision and maintenance of the sewer network</p> <p>Upgrade of sewer network to facilitate increased drainage capacity requirements</p> <p>Responsible for implementation of Thames Tideway Tunnel to prevent sewer outflows into the Thames</p>
Transport for London	Transport infrastructure provider	Responsible for provision and maintenance of strategic road network and London Underground and bus networks ensuring their resilience to flood

		risk
Network Rail	Transport infrastructure provider	Responsible for provision and maintenance of railway network serving mainline stations in the City and their resilience to flood risk
Greater London Authority	Drain London	Facilitation of co-ordinated working on flood risk across London including provision of guidance and information
Neighbouring boroughs	LLFA s for their areas	Strategic role in overseeing the management of local flood risk in their areas and liaison with other LLFAs affected.
Businesses and Residents	Property owners	Responsible for flood resistance and resilience and emergency and contingency planning associated with properties
Utility companies	Utility providers	Responsible for provision and maintenance of utility infrastructure – electricity , gas telecommunications etc. and ensuring its resilience to flood risk

Glossary

City Flood Risk Areas – Areas of the City that are at risk of river or surface water flooding as defined in the City of London Local Plan

Drain London – Multi agency partnership co-ordinated by the Greater London Authority to provide pan London information and advice on flood risk

Flood Zones – Environment Agency defined zones with varying probabilities of river flooding

- Flood Zone 1- Low probability of flooding - less than 1 in 1,000 annual probability of river or sea flooding (<0.1%)
- Flood Zone 2 – Medium probability of flooding - between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1% – 0.1%)
- Flood Zone 3 - High probability of flooding - a 1 in 100 or greater annual probability of river flooding (>1%)

FMfSW – Flood Map for Surface Water – National scale maps published by the Environment Agency showing surface water flood risk.

LLFA - Lead Local Flood Authority – The local authority with the statutory responsibility for flood risk management in its local area. The City Corporation is the LLFA for the City of London geographic area.

LRMS – Local Flood Risk Management Strategy – Strategy for managing flood risk at a local level as required by the Flood and Water Management Act 2010

Multi Agency Flood Plan – Emergency Plan for responding to flooding

NPPF – National Planning Policy Framework – The government's statement of planning guidance to local planning authorities, issued by the Department of Communities and Local Government in March 2012. The City Corporation must take account of it in preparing and implementing its planning policies.

Preliminary Flood Risk Assessment – preliminary assessment of the risk of flooding as required by the Flood Risk Regulations 2009

Risk Management Authorities – authorities defined in the Flood and Water Management Act as having flood risk responsibilities

Sequential Test and Exceptions Test – Tests to be applied to proposals for new development in order to avoid allowing vulnerable uses in areas that are prone to flooding. Details of these tests can be found in the Technical Guidance to the National Planning Policy Framework March 2012

SEA – Strategic Environmental Assessment – assessment of the likely environmental, social and economic assessment of the implementation of plans and programmes as required by the EU Strategic Environmental Assessment Directive

SFRA – Strategic Flood Risk Assessment – comprehensive assessment of the risks of flooding from all sources

Surface Water Management Plan – plan for the management of surface water to reduce risk of flooding from this source.

TE2100 – Thames Estuary 2100 Plan – Environment Agency's plan for addressing flood management in the Thames Estuary up to 2100

References

Other City of London strategies eg air quality

http://www.cityoflondon.gov.uk/NR/rdonlyres/0115B849-EA52-417D-8ED3-CBCC52B20E1C/0/HS_EH_CityofLondonAirQualityStrategy2011to2015.pdf

City of London Climate Change Adaptation Strategy (2010)

http://www.cityoflondon.gov.uk/services/environment-and-planning/sustainability/Documents/pdfs/SUS_AdaptationStrategyfinal_2010update.pdf

City of London Green Roof Case Studies

<http://www.cityoflondon.gov.uk/services/environment-and-planning/planning/heritage-and-design/Documents/Green-roof-case-studies-28Nov11.pdf>

Essex County Council Flood Risk Management Strategy
http://www.essex.gov.uk/Publications/Documents/Local_Flood_Risk_Management_strategy.pdf

Camden Flood Risk Management Strategy

<http://www.camden.gov.uk/ccm/content/environment/green/climate-change/camdens-role-as-a-lead-local-flood-authority.en>

LGA guidance on Flood Risk Management Strategies

http://www.local.gov.uk/local-flood-risk-management/-/journal_content/56/10180/3618366/ARTICLE

Planning Acts

<http://www.planningportal.gov.uk/planning/planningpolicyandlegislation/currentlegislation/acts>

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draft

Agenda Item 6c

Committee:	Date(s):
Planning and Transportation Committee	25/02/2014
Subject: Parking Ticket Office Update and Annual Statistics	Public
Report of: The Director of the Built Environment	For Information
Summary	
<p>This report provides an update to Members on the activities and progress of the Parking Ticket Office (PTO) over the last year with further commentary on key service issues over recent years.</p> <p>The report sets out the way in which the service delivers the aims set by your Committee, our work with business and our response to the night time economy. It also sets out how the service has continued to improve by acting upon customer feedback resulting in more efficient services and improving success rates for appeals. The report also sets out how we have improved access to information and specifically comments upon the work we have done to improve our website.</p> <p>To amplify the headline data given in the Business Plan, Appendix One gives a set of statistics for the PTO over the last five years.</p> <p>Recommendation</p> <p>Members are asked to:</p> <ul style="list-style-type: none">• Note the report for information.	

Main Report

Background

1. Parking and traffic enforcement in the Square Mile plays a key role in reducing congestion, improving access and road safety, as well as providing for effective and efficient business activity. The Parking Ticket Office is central to the effective delivery of parking and traffic enforcement in the City. To give some idea of the work of the PTO, it deals with a high volume of letters and emails each year (26,000 last year) in relation to the parking tickets issued (65,000 last year). The service aims to be customer focused and works with an ethos of continuous improvement. Examples of how the service has been developed are set out below:-

Examples

2. Working with Business.

We always aim to facilitate business activity in the City where practicable. One example is our work with G4S who are the main company delivering and collecting

cash for banks, businesses and other organisations in the Square Mile. Their vehicles account for 3% of all the PCNs issued in the City. This is not only costly for them but can result in congestion and/or increased road danger. We have worked with them to review where they park in relation to particular clients and thus been able to suggest alternative locations or timings. This has seen them improve their approach to parking and, as a consequence, the number of PCNs issued to G4S has reduced by 33%. Our time spent on processing challenges and payments in relation to their tickets has also reduced from circa 16 hours to a couple of hours each month. This partnership work between the company and the City was shortlisted for a Highways Institute award and has been recommended as best practice at London Councils Parking Managers' Seminars.

3. Responding to the City's night time economy.

Our Civil Enforcement Officers carry out regular on-street and CCTV enforcement which has proved particularly helping in reducing/stopping illegal parking associated with the night-time economy. In relation to Smithfield Market, we have now started using our Smart Car to carry out evening enforcement to encourage private vehicles to keep the goods vehicle bays free for the market and other businesses in the area. With the aim of being open and fair we issued warning notices for 3 weeks prior to formal enforcement using the Smart Car which started in October 2013. We intend to survey market traders to see if this provides an improved ease of parking.

4. Acting on customer feedback.

We regularly reviews areas where high levels of Penalty Charge Notices (PCNs) are being issued to check that signage is clear and understandable and whether we need to review our policy, procedures or operational requirements.

A prime example of this is the Crossrail closure at Old Broad Street. We considered the restriction had been clearly signed using government approved signage but motorists were receiving a high level of PCNs. As a result, officers firstly consulted drivers to establish how, if at all, the signage might be made clearer. We consulted upon a range of signs and asked what they considered to be the clearest. Once agreed we then applied to the Department for Transport (DfT) for authorisation for this 'non-regular' signage. As a consequence the level of PCNs has reduced by 66% in the first 6 months and the improved compliance has helped to reduce the risk of a serious accident or fatality in the area. We will similarly be reviewing our disabled bay and suspension signage over the coming year further to customer feedback.

5. Delivering efficient services.

We have introduced a new back office system, revised staff targets and improved processes. The current back office system costs much less than the previous system yet has improved efficiency and quality. As a consequence, we have improved our letter response times by 50% and we are now maintaining an average response time of 6 days against a target of 10 days; the previous target was 15 days. We received payment for over 80% of the PCNs we issued last year, the highest recovery rate in London. It is important that we measure our recovery rate to ensure that we are effectively recovering debts and pursuing those who avoid payment.

6. Appeals.

One of the challenges for the Parking Ticket Office has been to improve its performance in relation to appeals lodged at the Parking and Traffic Appeals Service. Relatively few PCNs (4%) go to this stage as our aim is to be able to resolve the issue earlier in the process. There is no financial merit in us pursuing appeals as we pay a fee for each one, and even if we win, we do not get costs. This was one area of service that became a lower priority whilst resources were directed to improving the office I.T. and back office systems. In 2012/13 we achieved a significant improvement in performance and, whilst there are still some cases not contested where it is right to do so, our success rate for contested appeals has improved from 20% to 64% in the current year.

7. Improving access to information.

We have worked hard over the last year to improve the information available and functionality of our web pages. In the last year we have reviewed over 40 pages and have introduced mapping services in areas regularly visited. Customers have access to photographs and videos relating to their case on our website so they can see the evidence of the contravention and decide whether to pay or challenge the charge. We have moved from a position where 20% of payments were made via the website to about 50%, currently thereby saving officer time and improving efficiency.

8. Improving compliance via CCTV enforcement.

PCNs issued to vehicles by on-street officers have been at a steady level for the last few years, suggesting the level of enforcement is commensurate to the level of compliance on-street. There are still a number of regular obstructive, serious or dangerous parking and traffic contraventions which take place and are difficult to address with on-street officers. These are either short intentional stops (e.g. parking on a pedestrian crossing or footway 'to go for a burger') or moving traffic contraventions (such as banned turns, no-entry signs, etc.).

Officers sought and have now received approval from the DfT to enforce contraventions either via mobile or static cameras, and this is a key tool to improving compliance. (We have responded to recent central government consultation on the use of CCTV to make this point). The City of London has moved from a position where 80% of its PCNs were issued on-street 5 years ago to circa 55% currently. We are clear in the City that we will only use CCTV to enforce serious contraventions – parking on footways, bus stops, loading bans, etc. For less serious contraventions – overstaying on pay and display bays, parking on yellow lines, etc. – we only use on-street officers, in line with Statutory and Operational Guidance and to allow officers to physically check for permits, dispensations, pay and display tickets, etc. The aim is managing kerbside space for the maximum benefit for all users.

Statistics

9. Appendix One is a table with the statistics for the service for the last five years. A number of those statistics are those which we use to measure the effectiveness of our service and to carry out trend analysis to inform and identify changes we need to make. We also report statistics which we are regularly asked for by motorists or journalists (top 5 streets, amount of income, etc.). To highlight some of the statistics, what they mean and how they are used:

10. Levels of Penalty Charge Notices (PCNs) by type:

2012/2013	Number
PCNs issued:	
On-street PCNs	39,575
Stationary CCTV PCNs	6,469
Moving Traffic PCNs	17,461
Vehicle drove away/prevented from serving	1,511
Total (excludes void/unissued PCNs):	65,016

11. PCN levels throughout London have decreased year on year for the last few years. The City of London issued fewer PCNs last year than the preceding year. This is positive as we need to ensure that enforcement is commensurate to the level of non-compliance and as compliance increases the level of PCNs will decrease.
12. Top five streets for PCNs (2012/2013):

Top 5 streets for PCNs (income).
Old Broad Street (£973,730)
Finsbury Circus (£159,510)
Ropemaker Street (£104,802)
Cornhill (£89,194)
West Smithfield (£65,171)

13. The figures above show that the level of PCNs in Old Broad Street was disproportionately high. This should be addressed by the change in signs we effected in March 2013 (referred to above) which have already improved compliance and reduced PCNs. We will review this year the levels of PCNs in Finsbury Circus as part of our on-going programme to see whether the high level of PCNs continue and whether a similar change to signage would be appropriate.
14. Cancellations and write offs (2012/2013):

Cancellations and Write Offs	11,017
% of PCNs resulting in cancellation/write off	17%

15. Circa 40% of the PCNs issued by the City of London result in an informal challenge (e.g. a letter or email in response to the initial PCN). This is relatively high and is partly attributable to the fact that we follow statutory guidance and advertise that we will hold the PCN at the discounted rate whilst challenges are being considered. The level of people taking this to formal appeal is around 4% as set out earlier. 17% of all PCNs are either cancelled for various reasons (proof they were delivering and not parked, disabled driver's first PCN, vehicle breakdown, signs not compliant, etc.) or written off where, for example, we are unable to trace the debtor (who may be a company that has gone into liquidation).
16. Income and expenditure (2012/2013):

Payments for PCN received	£4,216,355
Payments received for TFL enforcement	£35,77
Enforcement (PCN) expenditure	£4,109,629
Net PCN income	£142,503

17. The enforcement operation, taken on its own, has run at a loss for 3 out of the last 5 years. This demonstrates that the City of London is using enforcement powers appropriately to encourage compliance, improve safety and keep traffic moving with any revenue/loss being a by-product of that aim rather income targets being the primary objective.
18. We have recently completed the tender process for the on-street parking enforcement service. The incumbent contractors were successful and the new contract starts in March 2014..

Conclusion

19. Members are asked to note this report for information.

Appendices

- Appendix 1 – Parking Ticket Office Statistics for last 5 years

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	2008/2009	2009/2010	2010/2011	2011/2012	2012/2013	2013/2014 - Mid Year (October)	Annual Projected	Note
	£, Number, days or %	£, Number, days or %	£, Number, days or %	£, Number, days or %	£, Number, days or %	£, Number, days or %		
PCNs issued:								
On-street PCNs	36,909	37,798	35,245	41,690	39,575	18,584	37,168	
Stationary CCTV PCNs	5,184	9,907	21,609	18,320	6,469	12,808	25,616	One
Moving Traffic PCNs	4,640	6,143	3,463	14,399	17,461	2,518	5,036	
Vehicle drove away/prevented from serving	297	1,863	2,055	2,342	1,511	633	1,266	
Total (excludes void/unissued PCNs):	47,013	55,719	62,372	73,847	65,016	34,543	69,086	
Top 5 contraventions:								
Contravention 1	Yellow lines - 12,655 PCNs	Loading Ban - 15,706	Loading ban - 23,779	Loading ban - 20,249	Loading ban - 20,343			
Contravention 2	Loading ban - 11,333 PCNs	Yellow lines - 12,239	Yellow lines - 11,348	Yellow lines - 13,040	No-entry sign - 14,162			
Contravention 3	Paid time expired - 3,935 PCNs	Footway Parking - 4,195	Footway parking - 4,775	No-entry sign - 10,548	Yellow lines - 11,965			
Contravention 4	No P&D ticket - 3,144 PCNs	Paid time expired	Paid time expired - 3,706	Footway parking - 4,118	Suspended bay - 4,138			
Contravention 5	Footway parking - 2,717 PCNs	No P&D ticket - 3,689	Pedestrian crossing - 3,365	Suspended bay - 3,940	Paid time expired - 2,933			
Top 5 streets for PCNs:								
Street 1	OLD BROAD STREET - £191,385	LIVERPOOL STREET - £201,015	OLD BROAD STREET - £218,300	OLD BROAD STREET - £840,633	OLD BROAD STREET - £973,730			
Street 2	LIVERPOOL STREET - £155,590	OLD BROAD STREET - £198,785	FINSBURY CIRCUS - £122,980	FINSBURY CIRCUS - £201,860	FINSBURY CIRCUS - £159,510			
Street 3	FINSBURY CIRCUS - £116,305	GRESHAM STREET - £162,040	WEST SMITHFIELD - £95,280	CORNHILL - £124,030	ROPEMAKER STREET - £104,802			
Street 4	CORNHILL - £92,040	FINSBURY CIRCUS - £92,270	LIVERPOOL STREET - £89,339	CANNON STREET - £119,005	CORNHILL - £89,194			
Street 5	WEST SMITHFIELD - £74,559	WEST SMITHFIELD - £68,755	GRESHAM STREET - £54,320	WEST SMITHFIELD - £91,280	WEST SMITHFIELD - £65,171			
Clamp/Removals								
Clamps	20	12	0	1	0	0	0	
Removals	437	512	373	363	368	230	460	
Totals:	457	524	373	364	368	230	460	
Night-time Economy PCNs								
On-Street - 10pm to 6am	1281	1535	1327	2116	2369	1121	2,242	
CCTV - 7pm to 11pm	638	795	1287	1276	924	704	1,408	
Total (includes void/unissued PCNs):	1,919	2,330	2,614	3,392	3,293	1,825	3,650	
Recovery Rate	83%	83%	81%	81%	81%	83%	84%	
No. of Letters in response to initial PCN	13,789	20,048	16,500	29,685	26,289	12,335	24,670	
Letter response times	13 days	13 days	19 days	12 days	6 days	6 days	6 days	
% of PCNs resulting in letter or email	29%	36%	26%	40%	40%	36%	36%	
No. of Formal Appeals to Tribunal	1,783	2,700	1,572	1,872	1,189	972	1,444	
Appeal success rate for contested appeals	69%	74%	0%	15%	20%	63%	65%	
Appeals not contested	1,139	2,291	1,521	1,700	534	623	746	Two
% of PCNs resulting in formal appeal	4%	5%	3%	3%	2%	3%	2%	
Cancellations and Write Offs	7,052	8,357	10,140	10,739	11,017	5,497	10,994	
% of PCNs resulting in cancellation/write off	15%	15%	16%	15%	17%	16%	16%	
Payments for PCN received	£2,758,286	£2,873,534	£3,319,565	£4,516,286	£4,216,355	£2,088,860	£4,177,720	
Payment received for TfL enforcement	£41,775	£48,696	£46,052	£34,799	£35,777			
Enforcement expenditure	£3,667,192	£3,897,212	£3,665,518	£3,730,064	£4,109,629	£1,838,561	£3,677,121	Three
Net PCN income	-£867,131	-£974,982	-£299,900	£821,021	£142,503	£250,300	£500,599	
Parking Payments by type:								
Web	30%	35%	42%	46%	46%	50%	50%	
Phone	26%	36%	34%	31%	33%	30%	30%	
Post	44%	28%	24%	23%	21%	20%	20%	
Parking Payments by stage:								
PCN/NTO stage (first stage)	not available	not available	91.23%	95.47%	95.17%			
Charge Certificate (increased charge stage)	not available	not available	8.12%	4.44%	4.38%			
Order for recovery (debt reg. stage)	not available	not available	0.49%	0.06%	0.31%			
Warrant (bailiff stage)	not available	not available	0.17%	0.03%	0.15%			

Note One - For 2012-13, there were a higher amount of moving traffic PCNs due to high levels of non-compliance with a no-entry sign at Old Broad Street and we focussed on that area due to the pedestrian/cyclist/traffic danger element of motorists disregarding these signs.

Note Two - We had circa 500 appeal cases this year for one private taxi firm who have a contract with a company in Primrose Street. We were satisfied that they were waiting for clients to arrive and not just parking so we withdrew from the appeals.

We have given advice to the company on alternative equidistant locations better suited to wait for clients, they have adopted these and PCNs have reduced by 90%.

Note Three - We used last year's figures as a guide for mid-year update estimate as we pay in arrears for some services so payment for services already provided would not appear paid at mid-year.

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Committee(s):	Date(s):
Planning and Transportation Police Committee	25 February 2014 28 February 2014
Subject: Road Danger Reduction Update	Public
Joint Report of: Director of the Built Environment, and Commander of Operations – City of London Police	Information

Summary

This report is the twice-yearly progress report in relation to the City's Road Danger Reduction Plan (RDR Plan).

Approved in January 2013 (last update published in June 2013), the RDR Plan includes a challenging programme of activities aimed at making our streets safer and achieving our stated Local Implementation Plan (LIP) 2020 casualty reduction targets. This report gives an update on progress against that baseline delivery programme (see Appendix 1).

This report comments on a number of significant achievements that have been made over the last year. Amongst these, a significant milestone has been the establishment of a Road Danger Reduction Partnership including the City of London (CoL) Police, Transport for London, and the Greater London Authority. The RDR Partnership meets quarterly and aims to co-ordinate road safety activities between partners and develop innovative solutions to reducing casualty figures in the City.

Other significant achievements commented upon within this report include the recent improvements to Holborn Circus which historically has been one of the City's worst accident hotspots, the expansion of our contra-flow cycling programme which aims to facilitate cyclists using quiet back streets rather than heavily tracked streets, and the City's success in becoming the only Local Authority to have achieved the Fleet Operators Recognition Scheme's (FORS) Gold Standard. The award of the Gold Standard reflects the City Corporation's extensive driver training programme, both for its own drivers and for contractors, as well as the progress in the City generally, in making vehicles safer for cyclists and pedestrians.

This report also sets out the City's RDR programme for 2014/15 and includes commentary on progress towards delivery of a 20mph speed limit within the City which is programmed for implementation in July of this year.

Recommendation - that Members:

Note progress made to date in delivery of the City's Road Danger Reduction Plan.

Main Report

Background

1. The current RDR Plan was agreed by the Planning and Transportation Committee in January 2013. The plan sets out a range of measures designed to help reduce casualties in the City and achieve the targets set out in our approved Local Implementation Plan (LIP). These targets require the City to reduce the number of killed or seriously injured (KSI) by 50%, and to reduce all casualties by 30% by 2020, compared to the 2004-2008 baseline figure. In practice this means we have to reduce KSIs to 24.7 and other casualties to 258 per annum over a three year annual average.
2. The RDR Plan was agreed against a backdrop of a steady increase in casualties over the previous 3 years with some 423 casualties in 2012 including 57 KSIs. The plan sought to strengthen coordination of the work of those agencies whose work impacts upon the safety of the City's streets and in so doing deliver an effective and efficient programme of activities.
3. Road Danger Reduction benefits all on-street activity and all street-based modes of transport. All actions, building to a safer environment for cycling, walking and other vulnerable modes of transport in the City, are either delivered directly through the RDR plan, or through complementary projects and programmes.

Key Successes 2013 to date

Road Danger Reduction Partnership

4. The Road Danger Reduction Partnership including TfL, the City of London Police, GLA Public Health and the City of London Directorate of the Built Environment, has been established and is working together to integrate policies and programmes to reduce on-street casualties.

20 MPH Speed Limit

5. A 20 mph speed limit proposal for the City has been approved by the Court of Common Council and is expected to be in place by summer 2014. Progress is being made through consultation on the Traffic Management Order (published 28th January), design of the scheme, and working with stakeholders (including the CoL Police and TfL) to implement. Consultation responses will be received and any objections will be reported to Planning and Transportation Committee in spring 2014 ahead of implementation. Proposals for the scheme have been agreed with key partners including adjoining boroughs and Transport for London. Boundary roads have been agreed to be 20 mph except for the City of Westminster where the boundary roads will persist as 30 mph. TfL has agreed to make the Bishopsgate and Farringdon Street corridors 20 mph on a trial basis.

Safety Assessments

6. The City's Road Safety team have top sliced approximately 20% of their time resource and commenced assessing the safety of street corridors favoured by cyclists and other streets where road danger is elevated above average. Following assessment, action plans have been agreed and are being programmed for delivery. Furthermore the team is delivering safety training for Highways and Sites Inspectors with a particular emphasis on reducing dangers associated with street works.

Education, Training and Publicity:

7. ETP continues as the key to the CoL road safety strategy. Following roll-out of the award-winning Happy Feet pedestrian safety campaign for children, the City continues to target its road safety resource towards vulnerable groups and to base its activities on the best available intelligence and advice.

Engineering Improvements

8. These have remained a high priority, with a £3.5m programme to redesign Holborn Circus due to complete in April this year. Also, a £15m programme of works is scheduled to commence on site in July this year to remove the problematic Aldgate Gyratory system and create a new public space. The review of the Bank surface level junction has commenced, to improve safety and efficiency. A number of smaller safety related schemes have also been delivered such as new courtesy crossings and contra-flow cycling schemes.

Fleet Operators Recognition Scheme (FORS)

9. The City remains the only gold standard local authority within the Fleet Operator Recognition Scheme (FORS). We are delivering Safer Urban Driver training to staff and contractors as well as working with contractors to improve the safety of their vehicles with measures such as: audible left turn warning equipment (this equipment alerts cyclists, pedestrians and other road users that the vehicle is turning left), 360° cameras (these cameras give the driver all round vision in the vehicle including visibility of 'blind spots'), left hand side sensors (alerts the driver to any movement down the left side of the vehicle), large goods vehicle side guards (they can protect cyclists and pedestrians from being swept underneath the vehicle), cyclist risk awareness signage on the rear of the vehicle (this raises awareness that the vehicle may turn left), and Class VI front mirror (giving the view to the low front of vehicle, removing driver blind spot). Class VI mirrors are mandatory.

Political Engagements with TfL

10. It has been agreed that an annual meeting with the Deputy Mayor for Transport will include Road Danger Reduction as an agenda item. The first of these meetings has been set for autumn 2014.

2013 Road Safety Data

11. Confirmed casualty statistics for 2013 are available for the 9 month period January-September. These can be compared to a similar period in previous years.

2013 Preliminary results

Jan-Sept only	Killed and Seriously Injured	Slight	Total
2010	30	252	282
2011	36	258	294
2012	42	288	330
2013	39	207	246

12. It is of course too early to draw any trends from last year's data although doubtless the delivery of the programme to date and 20 mph in particular has done much to raise people's awareness of road danger. What can be said, however, is that in the last 9 months there has been a slight but encouraging reduction in casualties in the City, with 39 KSI's and 207 slight casualties. If this level of reduction were to be sustained, the 2020 target could be exceeded. Therefore, even though no conclusion can be drawn from 2013 statistics, it does demonstrate that there is the capacity to achieve the targets set out in paragraph 1 above, albeit with the need for continued effort and investment in RDR measures and initiatives.
13. Looking more widely than the City, Members will be aware that there was a cluster of serious injuries and fatalities in London in the final quarter of 2013 and for the London area there have been a total of 14 cycling fatalities in 2013. These fatalities continue to place road danger reduction high on the London-wide political agenda and demonstrate the need for a continued focus upon delivery of road danger reduction measures.
14. The 2013 comprehensive casualty data for the City will be available later in the year. A report on the analysis and inference from the 2013 casualty data, and comparison with previous years, will be presented in September. Officers continue to work to identify casualty trends. Data-sets are being reviewed and it is planned to engage a research institute to support this analysis. Our intention is to better shape our intervention programmes based upon the evidence that can be derived from analysis and similarly to increase our focus upon the evaluation of programme elements to ensure we become increasingly effective in our interventions.
15. Given the uncertainties and difficulties of correlating the origins of risk from road danger to effected parties, the City is promoting a strong partnership ethos between stakeholders. Evidence is available from a range of businesses and activities that 'collaboration and joint working' (partnership) is very likely to give good results. This reinforces the importance of the coordinated approach we are now adopting through our RDR Partnership.

Look Forward to 2014/15

16. Appendix 1 is a summary of programme tasks, actions and plans for the approved CoL Road Danger Reduction Programme. Within this there are a number of specific initiatives that should be emphasised.

Pedestrian Model

17. A pedestrian model of the City is in development. The intention is to better understand pedestrian movement and how this will be impacted by future developments such as Cross Rail etc. This information will be used to enhance pedestrian safety by improved street design. The model also will allow proposals for new traffic schemes and developments to be appraised and available space optimised for pedestrian safety. The base model is to be operational and testing commenced by March 2015.

Freight Strategy

18. P&T Committee (Sept 2013) agreed to work towards the adoption of a City Freight Strategy with the objective of collaborating with City businesses to manage deliveries and freight activities to reduce the impact of heavy vehicles on the street City's streets during the commute period/high traffic times. It is intended to work with TfL and local businesses to initiate and test the effectiveness of a number of pilot projects, such as consolidation centres and timed delivery zones, over the next two years in order to feed into the development of the strategy which is expected to be drafted by March 2016.

The City-wide 20mph limit

19. The limit is to be installed and operational by July 2014. It is conservatively estimated that this will lead to a 7% reduction in casualties. Negotiations have now been had with all neighbouring boroughs and in all cases other than the City of Westminster agreement has been reached that shared boundary roads will be 20 mph. Indeed, the majority of the London boroughs that adjoin the City are already subject to 20 mph speed limits. Where there are areas near to the City that have a higher speed limit there are (with the exception of the City of Westminster) detailed plans in place to lower the speed limit to 20 mph in roughly the same timescale as the City's proposals, e.g., the London Borough of Southwark, which is to make all streets under its control 20 mph in the next six months.

Major infrastructure investment

20. Designing out road danger within our highway network remains a crucial element of our road danger reduction plan. In 2014/15 we will see progress in relation to several major initiatives. Holborn Circus will be completed delivering improvement to what has historically been one of the worst accident hot spots in the City. Work will commence in July on the removal of the Aldgate gyratory scheme and officers will be developing options for the improvement of another accident hot spot, Bank Junction. All of this work will bring benefit for the reduction of road danger.

Education, Training and Publicity

21. Appendix 2 is a summary of the Road Safety programme proposed to be delivered through joint working of the City of London Police and the DBE Road Safety Team. This programme is assembled and managed through the cooperative working of these organisations and as required through Task 3 of the RDR programme.

Corporate & Strategic Implications

22. The City has a statutory duty, the Road Traffic Act 1988, to promote road safety and ensure that changes to the highway infrastructure are as safe as possible.
23. The City Together Strategy: The Heart of a World Class City 2008 - 2014 sets out a priority to 'encourage walking and cycling safely'. It highlights that there are 'competing interests in road usage' and that 'the number of cyclists is likely to continue to grow, which is to be encouraged'. It also states that the City should 'encourage improvements to transport safety, especially road safety'.
24. The Corporate Plan 2009 - 12 states that we provide excellent services for our community by 'working to ensure the City residents and businesses enjoy an environment which is safe and, as far as possible, free from risks to health and welfare'.
25. The Road Danger Reduction Plan is key to one of the seven programmes in the approved LIP 2011. It will serve, along with the other six programmes, to deliver on LIP objective LIP 2011.3, which is "To reduce road traffic dangers and casualties in the City, particularly fatal and serious casualties and casualties among vulnerable road users".
26. There is no significant negative impact on any of the City's equality target groups.

Conclusions

- It is too early to draw any trends from last year's preliminary collision data. In the 9 months to September 2013 there was an encouraging reduction in casualties in the City. However, even though no conclusion can be drawn, this does demonstrate that there is capacity to achieve the targets set out in paragraph 1 above, albeit with the need for continued effort and investment in RDR measures and initiatives.
- The Road Danger Reduction Partnership is sharing intelligence, learning from effective practice and integrating programmes and resources. The Partnership brings together the skills and management necessary to support the programme and it has enabled improved sharing of intelligence and joint development of road danger reduction strategies.
- More needs to be done to understand the detail behind the cause of accidents to enable more effective intervention strategies. This research along with an increased focus upon evaluation of campaigns and other programmes remains essential if we are to continue to improve the efficacy and efficiency of our road danger reduction work.

Background Papers:

25th June 2013 “Road Danger Reduction Plan 2013 - Progress Report”

Philip Everett

Director of the Built Environment T: 020 7332 3229

Appendix 1 - Road Danger Reduction Programme - Update Schedule

	Action	Expected outcome	Timeframe
	Short term (to December 2014)		
1.	<p>Refocus Road Safety team to conduct safety monitoring of streets within the City to identify danger hotspots and possible remedial measures.</p> <p>Delivery Update – 3 reviews have been undertaken to date at Fleet St, West Smithfield, Cannon St with the next planned in Charterhouse St, to be undertaken by mid-February. 20% of the Road Safety resource previously used for Education Training and Promotion has been allocated to Highway Safety Reviews. Implementation of remedial actions commenced in January 2014. Each matter raised is being tracked through to resolution. Mid-2014 RDR update will report back.</p> <p>Funding – This change is being delivered by redeploying existing staff at no additional cost. Works costs identified are utilising LIP and Local Risk funding.</p>	Safer streets	April 2013 onwards (Progressing – 3 surveys complete)
2.	<p>Investigate 20 mph speed limit/zone</p> <p>Delivery Update – Investigation complete May 2013. Report finalised to P&T cttee and then Court 12th September 2013.</p> <p>Funding – none required</p>	Safer streets and people	Complete
3.	<p>Implement 20 mph speed limit/zone (depends upon the outcome of 2 above)</p> <p>Delivery Update – TfL has given acceptance of the proposals with the exception of Upper and Lower Thames Streets and the Tower gyratory. The Traffic Order has been published for consultation on 28th January.</p> <p>Delivery of the scheme is currently planned for summer 2014. Go live date to be confirmed.</p> <p>Funding – £200K included in LIP / Local Risk funding for 2014 -15.</p>	Safer streets and people	Dec 2014 (on - schedule)
4.	<p>More focused and evidence based enforcement/ETP activity, with a strong emphasis on cyclists, those on foot and motorcyclists. To include a cost benefit analysis based upon the promotion of safer cycling in Cheapside.</p> <p>Delivery Update – Surveys and accident statistics from Cheapside</p>	Safer people	

	<p>indicate that the highway is safer now than before these works. The road is narrower and this encourages better behaviours and greater attention to safety. Corporate Gateway 7 report scheduled for the Spring/ Summer 2014.</p> <p>The Road Safety Team and City Police are jointly reviewing the existing programme of Enforcement and ETP activity to develop a revised evidence-based programme with a strong emphasis on the safety of cyclists, pedestrians and motorcyclists. This work is now planned to commence through the Partnership meetings in early 2014 to address the detailed of an integrated 2014/15 programme.</p> <p>Funding – The cost of the Cheapside monitoring (totalling £40K) is met from the approved Cheapside capital project and on-street parking reserve.</p> <p>The review of the enforcement/ETP programme will be undertaken within existing staff resources in the Road Safety Team and City Police. Implementation of the revised integrated programmes will also be met from within existing resources.</p>		<p>January 2014 onwards</p>
<p>5.</p>	<p>Investigation and development of measures for implementation in the medium and longer term, including better data collection and analysis, development of a pedestrian model and commencement of a programme of street auditing looking first at junctions with high casualty rates and at least one key cycle route across the City.</p> <p>Delivery Update – The City and City Police are reviewing the casualty data collected by the Police with a view to improving information on causation factors including collecting speed data when over 20 mph.</p> <p>An initial assessment will be completed by the City and the City Police by March 2014.</p> <p>Data is limited, as killed and seriously injured events are limited to about 40-50 per year. An application has been made to the O2 Local Government Digital Fund for a camera system to capture data of near miss incidents that would not otherwise routinely be reported.</p> <p>Additionally a project proposal for data analysis and programme outcome assurance will be advanced. CoL is seeking an agreement with a major London University or similar research institute to determine the causes of incidents and collisions and seek advice on the origin of on-street danger. This 'causation inference modelling' is to give guidance on possible interventions for resolution and mitigation of the danger. CoL is also seeking advice on programme outcome assurance.</p> <p>A database of cycle counts across the City and collision data involving cyclists has been collated. Application has been made through TfL's Borough Cycling Programme for funds to carry out screen-line counts for cycling numbers. A rigorous and detailed survey is planned for late - summer 2014 subject to funding being made available from TfL.</p> <p>A pedestrian model is proposed to be built for the City. Initial assessment of the scope of the model is complete. Appraisal of the</p>	<p>Safer streets</p>	<p>March 2014</p>

	<p>pre-qualification questionnaire is to be completed for early 2014. A detailed scoping of the scale of the network to be modelled is underway. The business case for the model is kept under review, subject to affordability.</p> <p>Funding – The Pedestrian Model is to be funded through the TfL LIP allocation.</p>		
6.	<p>Implement approved engineering measures; both large and small – e.g. Holborn Circus, 2-way cycling, advance cycle stop lines.</p> <p>Delivery Plan – The following safety-related measures are due for implementation prior to December 2014:</p> <ul style="list-style-type: none"> • 2 way cycling in 18 streets (£100k): <i>Completed 2012/13</i> • Further 2 way cycling in 12 streets (£125k): <i>8 completed. 20 being consulted. Additional 12 minimum to be completed by March 2014</i> • Advance cycle stop lines at 8 junctions (£16k): <i>Completed 2012/13. ASL's also included in Wood Street/London Wall scheme</i> • Cycle permeability schemes at 6 to 12 locations (£50k): <i>3 locations suitable. Beech St/Golden Lane; Beech St/ Gresham St; and Wood St/ London Wall subject to TfL scheme all by the end of March 2014</i> • Informal pedestrian crossings at 3 locations (£56k): <i>3 locations to be delivered by March 2014. These are Wood Street Gresham St; Fenchurch Street at Plantation Place; and Goswell Rd/ Fann St all by the end of March 2014</i> • Gresham Street/St Martins le Grand highway changes (£160k): <i>Completed</i> • 5 Broadgate highway changes (£1m): <i>Delivery in summer 2014 for the Road Danger Reduction element (S.106) s.t. British Land Programme</i> • Holborn Circus junction enhancement (£3.25m) <i>Under construction, to be completed on-site by Mar 2014</i> • Milton Court highway changes (£1.6m): <i>Completed</i> • Stonecutter Street closure (£100k): <i>Completed. Temporarily used as diversionary route for Holborn Circus</i> • Commencement of the works for the removal of the Aldgate Gyrotory system. July 2014 • Commencement of option development for the improvement of Bank Junction. January 2014 and ongoing <p>Funding – The advance cycle stop lines funded from the City's local risk budget. The other measures are funded by TfL and</p>	Safer streets	Dec 2014 and see task completions in update

	developer contributions.		
7.	<p>Review management of road works, temporary reinstatements and construction sites, including road safety elements of the Considerate Contractors scheme; to deliver better safety outcomes.</p> <p>Delivery Plan –</p> <p>A review of the management of streetworks including inspections, staff training has been undertaken. Proposal is to increase training of Highways and Sites inspectors. Revised training in scoping and to be rolled-out in March 2014.</p> <ol style="list-style-type: none"> 1) The Guidance Notes for Activities on the Public Highway, which includes scaffolds and hoardings for building sites, is to be reviewed. Initial scoping with stakeholders completed, re-write due by end of March 2014 for roll-out. 2) The Considerate Contractors Scheme (CCS) is to be reviewed to emphasise the road safety requirements. Now anticipated for completion - April 2014. <p>Funding – The review of streetworks' management, the Guidance Notes and the CCS will be funded from Highways local risk budget.</p> <p>Additional Delivery: Approximately 90% of sites are estimated to be registered into the CCS. Utilities are all registered under CCSS except for BT Openreach. (Approached recently to review their position).</p>	Safer streets	<p>April 2014</p> <p>March 2014</p> <p>April 2014</p>
8	<p>Review the safety aspects of the operations and contracts undertaken using vehicles within the City, ensuring that all drivers are trained in relation to cycle safety and the fleet is fitted with appropriate safety measures such as reverse cameras, audible warning, and 'Fresnel' mirrors.</p> <p>Delivery Plan –</p> <ol style="list-style-type: none"> 1) The driver training programme Safer Urban driving has been delivered to 200 members of staff and contractors' personnel. 2) A programme of fitting safety equipment to all CoL and contractors' vehicles was due for completion by July 2013 and this has been done. <p>Funding – Driver training was funded from the Built Environment local risk budget (£15K) and a contribution from TfL (£4k). The cost of fitting existing vehicles with safety equipment is being met from the TfL funded Road Danger Reduction budget for 2012/13 (£13k). Contractors continue to upgrade existing vehicles and specify sensors and mirrors for new and existing plant in accordance with the Construction Logistics Cycle Standard – works related road risk. (Dec 2013)</p>	Safer people	<p>Initially complete and continuing</p>

	<p>Additional Delivery - The City continues to be the only authority to be Freight Operators Recognition Scheme (FORS) Gold compliant under this Transport for London scheme. In 2013, the requirement for FORS compliance has been added to the Parking Enforcement contract.</p> <p>Work is being initiated to assess the number of large vehicles operating in the city, and the extent of FORS and CCS registration and compliance.</p> <p>The London Mayor is consulting on the enforcement of fitting safety side bars and mirrors to large vehicles.</p>		
9.	<p>Engagement with TfL to secure improvements on the TLRN and to lobby for the optimisation of signal timings to improve road safety.</p> <p>Delivery Plan – A City-wide Road Danger Reduction Partnership has been established including representatives of the City, the City of London Police and TfL and meets on a quarterly basis commencing in June 2013.</p> <p>Additional sites are being considered for introducing pedestrian count-down timers and cycle only advanced greens (as already in use in Brighton), subject to emerging guidance from TfL.</p> <p>Funding – The cost of organising the Road Danger Reduction Partnership is low and any incidental costs are met from the City Transportation local risk budget for 2013/14 and 2014/15.</p>	Safer streets	Commenced June 2013 and continues quarterly
10.	<p>Hold annual Member-level City Road Danger Reduction meeting with TfL.</p> <p>Delivery Plan – The first annual Member-level meeting with representatives of the GLA/TfL is now planned for mid-year 2014.</p> <p>Funding – The cost of organising and hosting the meeting will be met from the City Transportation local risk budget for 2014/15.</p>		Summer 2014. To be arranged
11.	<p>Strengthen work with the City Police at an operational and strategic management level.</p> <p>Covered through items 4 and 9 above.</p>		

Appendix 2

Education, Training and Publicity Programme Department of the Built Environment – in partnership with City of London Police

January 2014 – December 2014

Notes:

1. DBERST is Director of Built Environment Road Safety Team
2. CoL Police is the City of London Police – various divisions and teams
3. Lead may be joint between the Road Safety Team and Police and mutually supportive
4. Some activities are delivered by Police under 'business as usual', then a campaign when intelligence indicates requirement. For example cycle lights enforcement in October and November each year
5. TISPOL is the European Traffic Police Network
6. ACPO is the association of Chief Police Officers (UK)

Generic Monthly Schedule

Activity	Period	Lead	Stakeholder/ Location
Operation Atrium	Each month. Typically educate/promote for 2 weeks beforehand	CoL Police	DBERST
Exchanging Places	2 each month	CoL Police	London Fire brigade, DBERST
Highways Monitoring	Through each month	DBERST	Actions by CoL, DBE and Police
National TISPOL and ACPO Campaigns Detail below -	Through the year. Eg: seatbelt, speeding, Carriage of Dangerous Goods, HGV Ops, Coach & tourist ops, summer & winter drink drive campaigns.	CoL Police and some by DBERST	
Safety Audits	TBA – most weeks, varies	DBERST	
Business Exhibitions	TBA – typically each month	DBERST	

Medium Term Activities

Activity	Period	Lead	Stakeholder/ Location
City Cycle Forum – user group meeting	Jan, then TBA	DBE	User Groups meet CoL, CoL Police
Safer City Partnership meeting	Feb and to follow	DBE and CoLPolice	
Capital City Cycle Safe Campaign	Each month – complements Operation Atrium inc cycle and vehicle driver behaviour	CoL Police	DBERST
Bikability Cycle Training for children and adults	All year	DBERST	
Tourist Cycle and Pedestrian Campaign. Includes Op Coachman and Op Tourist	Ongoing HGV checking complemented by Mar, Jul for Coachman and Tourist resp.	CoL Police	DBERST
Operation Mermaid (condition and hours worked compliance)	Feb, Mar, May, Jul, Oct	CoL Police	
Operation Giant (licencing and insurance compliance)	Each month - 3 per month	CoL Police	
Bike Safe – bike registering	Aug (tbc)	CoL Police	
Bus and Trucks - TISPOL	Feb, Jul, Oct	CoL Police	
Speed Campaign – TISPOL	Apr and Aug	CoL Police	
Seatbelts - TISPOL	Mar and Sep	CoL Police	
Drink/Drug drive ACPO and TISPOL	ACPO-Jun (through month), Dec (through month). TISPOL-Jun (1week) and Dec (1 week)	CoL Police	
Carrying Dangerous Goods – ACPO campaign	Feb, Apr, Sep, Nov	CoL Police	
'Happy Feet' Pedestrian Training	Jan (4days), Feb (8days)	DBERST	Sir John Cass, Charterhouse Square, St Pauls School
Highways/ Streetworks training	Feb (Pilot), then TBA	DBERST	
Bus Backs campaign	Aug	DBERST	
Railway Station Pedestrian Campaign	Oct (through month), Dec (through month)	DBERST	CoL Police support on occasions

Short-Term

Name	Date		Stakeholder/Location
'High Vis' Ped and Cyclist Campaign	Jan (5 days) - Done	CoL Police	
Charterhouse Square Schools Safety Meeting	Jan (one off) - Done	DBERST	
'City Citizen' Pedestrian Training. Year 3 Children	Jan (one off) – Done, future dates tbc	DBERST	Sir John Cass School
'City Citizen' Key Stage 3 Pedestrian Training – older audience	April, May,	DBERST	CoL Police
Exchanging Places Heading Home	14 th January (one-off)	CoL Police	DBERST
National Women's Day	Mar	DBERST	CoL Police
London Marathon	Apr	DBERST	CoL Police
Adult Learners Fayre	May	DBERST	
Hampstead Heath safety day	May, Oct	DBERST	Hampstead Heath Users
Barbican Residents Safer Cycle Sunday	June	DBERST	CoL Police
National Bike Week	June	DBERST	CoL Police
CAPT Child Safety Week	June	DBERST	CoL Police
Cycle Hire Safety	Jun, Aug	DBERST	
Children's Safety Day (Wood Street)	Jun	DBERST	CoL Police
St Paul's Summer Fete	Jul	Led by City of Westminster	CoL Police, LFB
Be Safe Week	Aug	DBERST	London Transport Museum, TfL
Bus Backs Campaign	Aug	DBERST	
Prudential Ride London	Aug	DBERST	CoL Police
Back to School Pedestrian Campaign	Sept (two weeks)	DBERST	CoL Police
City Life Family Festival	Sept	DBERST	CoL Police
Lord Mayor's Show	Nov (one day)	DBERST	CoL Police
Car Cutting Safe Driving Event – in Atrium or similar	Nov (typically)	LFB	CoL Police, DBERST
BRAKE (Road Safety week)	Nov	DBERST	CoL Police

Agenda Item 6e

Committee(s):	Date(s):
Planning and Transportation	25 th February 2014
Subject: Department of the Built Environment, Business Plan Progress Report for Q3	Public
Report of: Director of the Built Environment	For Information
<p>This report sets out the progress made during Q3 (October – December) against the 2013/16 Business Plan. It shows what has been achieved, and the progress made against our departmental objectives and key performance indicators.</p> <p>At the end of the third quarter 2013/14 I was £672k (9.1%) underspent against the local risk budget to date of £7.4m, over all the services covering the Planning & Transportation Committee. Appendix B sets out the detailed position for the individual services covered by this department.</p> <p>Overall I forecast a year end underspend position of £411k (4.2%) for my City Fund and Bridge House Estate services.</p> <p>Recommendation(s)</p> <p>Members are asked to:</p> <ul style="list-style-type: none">• note the content of this report and the appendices• receive the report	

Main Report

Background

1. The 2013-16 Business Plan of the Department of the Built Environment was approved by this committee on 22nd March 2013. As agreed, quarterly progress reports have been provided.

Key Performance Indicators and Departmental Objectives

2. During the period of this Business Plan, my departmental management team monitored 32 KPIs, and this includes five corporate KPIs. Details of all KPIs can be found in Appendix A.
3. We are achieving 29 of the 32 KPIs. However as in previous quarters the Road Casualties figures are subject to the longer term Road Danger Reduction plan. This is a 20 year target, which in addition to the 20mph speed limit in June this year, should see a significant drop of road casualties in the City over the years to come.

4. The London target of 41% of household waste being recycled now looks unlikely to be met in this financial year; however our YTD recycling figure is 39.3% which shows a steady improvement from 2011/12 (37.1%) and 2012/13 (37.33%). We have a number of resident communication and engagement campaigns planned for this quarter which have the specific aim of increasing the current recycling rate.
5. Our Service Response Standards results are consistent with previous quarters, however we are not meeting the targets for the number of visitors pre-advised through Condecco (our visitor management software). This is largely to do the volume of meetings we have with companies who will often not confirm all attendees until the time of the meetings. We monitor this data monthly and find that this is the cause for the majority of cases.
6. On the Departmental Objectives, all are proceeding as expected. In particular the Draft Local Plan which was published in December and the City CIL Draft Charging Schedule which was submitted in December 2013.

Financial and Risk Implications

7. The third quarter monitoring position for Department of Built Environment services covered by Planning & Transportation Committee is provided at Appendix B. This reveals a net underspend to date of £672k (9.1%) against the overall local risk budget to date of £7.4m for 2013/14.
8. I currently forecast a year end underspend position of £411k (4.2%) for City Fund and Bridge House Estate services. The table below details the summary position by Fund.

Local Risk Summary by Fund	Latest Approved Budget £'000	Forecast Outturn £'000	Variance from Budget +Deficit/(Surplus)	
			£'000	%
City Fund	9,612	9,201	(411)	4.3%
Bridge House Estates	239	239	0	0%
Total Built Environment Services Local Risk	9,851	9,440	(411)	4.2%

9. The reasons for the significant budget variations are detailed in Appendix B, which sets out a detailed financial analysis of each individual division of service relating to this Committee, for the services the Director of Built Environment supports.
10. The better than budget position at the end of the third quarter is principally due to additional off-street parking fee income; a temporary reduction in staffing costs for the Traffic Management; the committing of expenditure later in the financial year for budget provision allocated for the Barbican Area Strategy and legal fees for Smithfield planning application appeal; and unallocated departmental contingency sums that I am considering my options to reallocate to service area budgets.

11. I anticipate this current better than budget position will continue to provide a projected year end underspend, subject to income activity achieving projected levels.

Achievements

12. The Monument Subway refurbishment project won the First Group Skills Award at this year's National Railway Heritage Awards, for the quality of the restoration and work.
13. Recent improvements to the lighting in the Guildhall Crypts, was recognised at the LUX annual awards ceremony as winner of "Hospitality and Leisure Project of the Year". This award highlights the close working partnership with the Department of the Built Environment and the City Surveyors. Judges called DPA's scheme in the Guildhall's crypts as 'a beautiful treatment of a beautiful space'.
14. At the National LABC Building Excellence Awards 2013, the 52 Minorities project won the "Best Social or Affordable Housing Development" category. The project had recently won the Greater London Award.
15. The Cleansing Service has won Keep Britain Tidy's "Innovation Award" for its "no ifs, no butts" campaign. The award was received for the holistic approach taken by the campaign to reduce the 123,000 cigarette butts dropped in the City daily.
16. There has been some excellent results from the GIS team, meeting the targets relating to INSPIRE (Infrastructure for Spatial Information in the European Community). This data is now available on data.gov.uk and is available to the public in various formats.

2014/15 Business Plan

17. The 2014/15 Business Plan will be presented to this Committee on April 8th 2014.

Appendices

- Appendix A – Q2 KPI results
- Appendix B – Finance Report

Background Papers:

DBE Business Plan 2013 - 2016

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Departmental Key Performance Indicators

		Target 13-14	Q1	Q2	Q3	
	Transportation & Public Realm					
NI 191	To reduce the residual annual household waste per household.	508.5kg	88.5kg	94.33kg	97.30kg	😊
NI 192	Percentage of household waste recycled.	41%	39.77%	39.33%	38.81%	😞
NI 195	Percentage of relevant land and highways from which unacceptable levels of litter, detritus, graffiti and fly-posting are visible.	2%	1.04% (March)	1.21 (July)	0.25% (October)	😊
LTR2	Percentage of valid PCN debts recovered.	80%	83.35%	82.46%	85.41%	😊
LTR3a	Respond to percentage of PCN correspondence within 10 days (was 15).	90%	100%	100%	100%	😊
TPR1	No more than 3 failing KPI's, per month on new Refuse and Street Cleansing contract	<9 per quarter	4	4	2	😊
TPR2	No more than 3 failing KPI's, per month on new Highway Repairs and Maintenance contract.	<9 per quarter	<9 per quarter	<9 per quarter	1	😊
TPR3a	Reduction by 10% (or 5 people) in the number of persons killed or seriously injured compared to the 2010 baseline of 41 persons killed or seriously injured.	Target ≤ 9 persons Actual 5 persons	Target ≤ 9 persons Actual 12 persons	Target ≤ 9 persons Actual 12 persons	Target ≤ 9 persons Actual 15 persons	😞
TPR3b	Reduction by 5% (or 19 people) in the total number of road traffic casualties compared to 2010 baseline of 380 persons.	Target ≤ 90 persons Actual 18 persons	Target ≤ 90 persons Actual 57 persons	Target ≤ 90 persons Actual 105 persons	Target ≤ 90 persons Actual 84 persons	😊
TPR5	3 New Area Strategies agreed by	3	On target	Completed	Completed	😊

		Target 13-14	Q1	Q2	Q3		
	Committee by March 31st 2014						
Page 246	<p>Comments</p> <p>NI 192: Overall YTD recycling figure is 39.3% this demonstrates a steady improvement from 2011/12 (37.1%) and 2012/13 (37.33%). The current target of 41% was a stretching target which we are still striving for. When compared to other inner London boroughs recycling rates we are performing extremely well. We have a number of resident communication and engagement campaigns planned for this quarter which have the specific aim of increasing the current recycling rate.</p> <p>TPR3a/TPR3b – These are provisional figures as the figures supplied by Transport for London are always three months behind. We have had 39 people seriously injured so far this year from January to September (provisional figures), with no fatalities. The total number of casualties so far this year, from January to September, is 246 people. Figures reported on a quarterly basis are not necessarily very meaningful as, with small numbers (i.e., especially for TPR3a) individual collisions can have a big bearing on a quarter’s total. The end-of-year annual figures are more meaningful as this averaging allows trends to become more apparent with less distortion by individual incidents. However, the industry standard for comparison of casualty statistics is in fact a three-year period.</p> <p>TPR3a was deliberately set, as a local stretch target, to be more challenging than the statutory target for the number of persons killed or seriously injured set by the City on the requirement of the Mayor of London and reported annually to Transport for London. (TPR3b is, however, significantly less challenging than the equivalent Mayoral target of a 12.5% reduction by 2013 from a baseline of the 2004–2008 average.)</p> <p>TPR5 – 4 Strategies have been approved by committees:</p> <ul style="list-style-type: none"> • Fenchurch and Monument – February 2013 and April 2013 • Bank – April 2013 and May 2013 • Liverpool Street – July 2013 and September 2013 • West Smithfield – November 2013 and January 2014 						
		District Surveyor’s (Building Control)					
	LBC1	To decide 90% of standard 5 week applications within the timescale compared with the number of applications received under these	90%	89%	100%	92%	😊

		Target 13-14	Q1	Q2	Q3	
	terms.					
LBC2	To decide 90% of 8 week applications within the timescale where this has been agreed compared with the number of application received under these terms.	90%	92%	90%	94%	😊
LBC3	To issue a completion certificate within 10 days of the final inspection of completed building work in 85% of eligible cases. (was 14 days in 2011/12)	85%	97%	100%	92%	😊
	Planning Policy					
PP1	Consult the public on the City's preliminary draft Community Infrastructure Levy (CIL) in March 2013, draft CIL in July 2013 and progress through Examination to adoption by April 2014.	April 2014	On target	On target	On target; Draft CIL examined Jan 2014	😊
PP2	Publish and submit draft Local Plan by October 2013 and progress to examination by April 2014.	April 2014	Slight delay	Slight delay	Draft Local Plan published Dec 2013	😊
PP3	Publish development pipeline information bi-annually (June & Dec) and publish further 2011 Census analysis on residents by December 2013 and on workers by March 2014.	March 2014	Delay by ONS	Pipeline information on track; Census publications delayed by ONS	Pipeline information published Nov 2013; Census publications delayed by ONS	😊
PP4	Improve submissions of the local street gazetteer to the National Address	Bronze Standard	Bronze Standard	Gold Standard	Gold Standard	😊

		Target 13-14	Q1	Q2	Q3	
	Gazetteer and achieve at least Bronze national standard.					
PP5	Ensure internal and public-facing GIS services are available 98% of the working day excluding IS service disruptions).	98%	99.4%	98.2%	99.9%	😊
Comments						
	Development Management					
DM1a	Process 65% of minor planning applications within 8 weeks	65%	76%	66%	65%	😊
DM1b	Process 75% of other planning applications within 8 weeks	75%	70%	74%	85%	😊
DM3	Process 100% of standard land charge searches within 7 working days (12-13 target 100% in 8 days)	100%	100%	100%	100%	😊
DM4	To publish four conservation area appraisals and management proposals by 31 st March 2013	4	On track	On track	On track	😊
DM5	Ensure 90% of valid planning applications are viewable online within 3 working days of validation on UniForm	90%	90%	87.5%	100%	😊
DM6	Provide access observations to 95% planning applications within 14 days of receipt of information	95%	96%	97%	100%	😊
DM7	To manage responses to requests under the Freedom of Information act within 20 working days. (Statutory target of 85%)	85%	98%	100%	100%	😊
DM8	Investigate 100% of alleged breaches of planning control within 10 working	100%	100%	100%	100%	😊

		Target 13-14	Q1	Q2	Q3	
	days of receipt of complaint					
Comments						
	Service Response Standards					
SRS A	All external visitors to be pre-notification via the visitor management system.	100%	66.3%	62.8%	67.1%	☹
SRS B	Where an appointment is pre-arranged, visitors should be met within 10 minutes of the specified time where Visitors arrive at Guildhall North or West Wing receptions.	100%	95.2%	90.9%	90.3%	☹
SRS C	Emails to all published (external-facing) email addresses to be responded to within 1 day.	100%	100%	100%	75%	☹
SRS D	A full response to requests for specific information or services requested via email within 10 days.	100%	100%	100%	100%	☺
SRS E	Telephone calls to be picked up and answered within 5 rings/20 seconds	90%	92.1%	92.3%	93.1%	☺
SRS F	Voicemail element only target 10%	10%	11.1%	10.7%	10.4%	☹
Comments	SRS A – this figure is relatively stable, however a large volume of meetings held by the department often result in more attendees than anticipated; hence the result. SRS C – this is a sample of only four external facing mailboxes, such a small sample impacts highly on the results					

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Department of Built Environment Local Risk Revenue Budget - 1st April to 31st December 2013
(Income and favourable variances are shown in brackets)

Appendix B

	Latest Approved Budget 2013/14 £'000	Budget to Date (Apr-Dec)			Actual to Date (Apr-Dec)			Variance Apr-Jun £'000	Forecast for the Year 2013/14			Notes
		Gross Expenditure £'000	Gross Income £'000	Net Expenditure £'000	Gross Expenditure £'000	Gross Income £'000	Net Expenditure £'000		LAB £'000	Forecast Outturn £'000	Over / (Under) £'000	
Planning & Transportation (City Fund)												
Town Planning	2,328	2,148	(402)	1,746	2,044	(410)	1,634	(112)	2,328	2,297	(31)	1
Planning Obligations Monitoring	63	112	(65)	47	71	(58)	13	(34)	63	63	0	
Transportation Planning	220	1,700	(1,535)	165	1,704	(1,579)	125	(40)	220	216	(4)	
Road Safety	291	226	(8)	218	201	(22)	179	(39)	291	278	(13)	
Street Scene	0	106	(106)	0	186	(186)	0	0	0	0	0	
Building Control	118	1,109	(1,020)	89	1,088	(955)	133	44	118	120	2	
Highways	3,539	3,411	(757)	2,654	3,396	(772)	2,624	(30)	3,539	3,539	0	
Traffic Management	(955)	676	(1,392)	(716)	583	(1,357)	(774)	(58)	(955)	(954)	1	2
Off Street Parking	(66)	1,853	(1,903)	(50)	1,805	(2,058)	(253)	(203)	(66)	(201)	(135)	3
On Street Parking	3,561	2,696	(25)	2,671	2,689	(29)	2,660	(11)	3,561	3,561	0	
Drains & Sewers	294	455	(235)	220	438	(239)	199	(21)	294	276	(18)	
Contingency	219	164	0	164	0	0	0	(164)	219	6	(213)	4
	9,612	14,656	(7,448)	7,208	14,205	(7,665)	6,540	(668)	9,612	9,201	(411)	
Planning & Transportation (BHE)												
London Bridge	62	46	0	46	47	0	47	1	62	62	0	
Blackfriars Bridge	48	36	0	36	36	0	36	0	48	48	0	
Southwark Bridge	44	33	0	33	32	0	32	(1)	44	44	0	
Millennium Bridge	85	64	0	64	60	0	60	(4)	85	85	0	
	239	179	0	179	175	0	175	(4)	239	239	0	
TOTAL PLANNING & TRANSPORTATION COMMITTEE	9,851	14,835	(7,448)	7,387	14,380	(7,665)	6,715	(672)	9,851	9,440	(411)	

Notes

- Town Planning** - favourable variance to date is mainly due to budget provision relating to Barbican Area Strategy £50k and legal fees for Smithfield planning application appeal £60k, not due to be committed until later in the financial year.
- Traffic Management** - favourable variance to date is mainly due to reduction in staff costs due to delays in recruiting temporary staff to work on inspections.
- Off Street Parking** - favourable variance to date and projected year end underspend is mainly due to additional car park income fees.
- Contingency** - as part of the estimate review process, spare resources of £282K were identified to spend in 2013/14, for which the Director has agreed to transfer £63K to Public Conveniences for additional Urilift costs, leaving a remaining balance of £219K that still needs to be reallocated to his service area budgets. A further £6K will be transferred to Transportation Planning for the Aldgate Business Partnership.

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Committee(s):	Date(s):
Planning and Transportation	25 February 2014
Subject: Update: Management of Public Lifts, Escalators and the Millennium Inclinators	Public
Report of: City Surveyor	For Information

Summary

This report is to provide the Committee with a 3 month status report with regard to management of the public lifts/escalators and the Millennium Bridge inclinators. It details the approach being taken to improve and sustain performance.

Background

The City Surveyor maintains 210 lifts and 7 escalators for the City. This does not include the Housing Estates. This portfolio includes 19 public lifts, 4 of which are located in car parks. Originally there were 8 lift maintenance suppliers, following the PP2P initiative led to a single company, Apex Lifts commencing on 2 July 2012.

The Action Plan introduced to address sub-standard performance which was tabled at this committee 26 November 2013, has been carried out. All actions within the Action Plan have been introduced and have resulted in an improved approach.

A copy of the action plan is included as Appendix 1.

Recommendation

Members are asked to note the report.

Main Report

Lifts and Escalators

Monitoring & Performance

1. To improve Apex Lift's response time to any breakdown, each public lift and escalator has been fitted with an Electronic Monitoring Unit (EMU). In addition, to support the EMU service, dedicated BT phone lines are being monitored and tested every 24 hours. This is an improved service in relation to the previous 7 day arrangement.

2. The EMU system is Web based whereby all out of service alerts (known as 'pings') are forwarded directly to Apex Lifts 24/7- 365 days per year.
3. Planned preventative maintenance (PPM) visits have been increased from monthly to fortnightly. This has been achieved by varying the overall lifts maintenance contract at no additional cost. For example, the lesser used lifts receive a reduced number of PPM visits.
4. To further improve monitoring and breakdown reaction time, the implementation of an independent lift and escalator monitoring service is being considered. This would be undertaken by Charter Security who currently successfully manage the City's lift 'trapping service". The notification of an out of service lift will thus potentially go direct to Charter Security who will immediately inform Apex Lifts.
5. Condition surveys for each lift have been completed and as a result critical spares lists have been created. The condition survey's identify future improvements and will be added to the forward maintenance plans that are being formulated in order that maintenance work and cost can be accurately forecast.

Cleaning

6. All lifts and escalators are cleaned by MITIE Cleaning and inspected on a weekly basis. This was previously carried out monthly. In addition, quarterly deep cleans have been scheduled to be undertaken by Mitie Cleaning. There has been a demonstrable improvement of cleanliness of the lifts.

Millennium Inclinor

Current Status and Improvements Undertaken

7. A dedicated electronic monitoring unit (EMU) and phone line has been installed and real time monitoring is now in place. This enables the lift engineer to monitor the operation of the inclinor and out of service notifications sent to Apex Lifts to ensure a quick response time is achieved.
8. A condition survey has been completed and as a result a critical spares list has been developed.
9. The Lift Performance reports included in the appendices demonstrate the general improvement of 'in service' time over the period September 2013 to January 2014.

Proposed Improvement Works

10. As proposed at the Planning and Transportation Committee meeting (26th November 2013), the department's technical team has carried out a technical survey of the Inclinor and discovered that a large number of breakdowns are due to water ingress.

11. As a result of the technical survey a number of improvements have been proposed. In summary the report proposes the following improvements;
 - a. Relocation of electrical controls within the lift pit area
 - b. Overhaul the access hatch to make it water tight
 - c. Introduce additional external surface water drainage
 - d. Overhaul internal drainage collection and disposal mechanism
12. The estimated financial implication for the above proposal is approximately £16,000 which will be funded by a combination of the bridges 50 year plan repairs and maintenance fund and local risk budgets.

Moorgate Escalator

Overview

13. Due to age (39 years), the general condition, poor performance and a lack of freely available spares, the 'down escalator' was moth-balled and used as a readily available source for spare parts to support and provide a reliable 'up service'. Works and options were detailed and subsequently approved by Planning and Transportation Committee ref: Report CS 387/12.
14. The works were undertaken during December 2012 at a cost of approximately £25,000 inclusive.
15. The constrained 'up service' originally was required for a minimum of 15-18 months pending the new escalator which is to be installed by the Crossrail project.

Crossrail and New Escalators Update

16. Two new escalators by Crossrail have an estimated installation date extended from November 2014 to summer 2015. This constitutes a longer delay than originally conveyed by Crossrail.
17. The department's technical team has reviewed the Crossrail escalator specification and has proposed particular design and material changes. This is to ensure that escalators offer operational resilience and can be effectively and efficiently maintained by the City. The proposal is currently being considered by Crossrail.
18. At the time of writing this report, Crossrail has written to the City stating that they 'may need to cut off the power to the high walk and the escalator area' from the 17th March. Crossrail has been contacted with a request for more detail with regards to alternative arrangements.

Improvements Undertaken

19. Due the age, condition and obsolete parts it is becoming increasingly difficult and challenging to rectify breakdown faults. However some improvements have been introduced;
20. A new specialist escalator sub-contractor has been employed by Apex Lifts which has resulted in an improved attendance time. Additionally, the planned preventative maintenance (PPM) has been increased to fortnightly visits (previously monthly).
21. The electronic monitoring unit (EMU) has been upgraded and is monitored each 24 hour period.

Conclusion

22. As a result of the actions taken, the performance of the public lifts has improved. This is illustrated in the accompanying Lift/Escalator Performance reports (Appendices 2, 3 and 4).
23. As a result of the lift/escalator age and because of the volume of usage, breakdowns are inevitable. Additionally spare parts are difficult to find and require specialist supplier and/or manufacture. This results in longer than expected outages and repair lead-in times.
24. Public misuse of the lifts and/or escalators is experienced especially with the high volume of usage, which subsequently cause unforeseen outage periods.
25. The lifts, escalators and Millennium Inclinor operation are now monitored more effectively whereby any breakdown is immediately captured and relayed to Apex Lifts.
26. The improvements made and the options going forward will create additional resilience with regard to its operation and service. The improvement measures are being implemented by using local risk budgets and the 50 year bridges repairs and maintenance fund.
27. The improvements to date have been evidenced in the recent good performance and low rate of outage shown on the 'lift reports' included in appendices 2, 3 and 4.
28. Improvements will continue to be driven by your Officers.

Appendices

- Appendix 1 – Action Plan
- Appendix 2 – Planning & Transportation Committee Lift Report
21 September 2013 to 22 November 2013
- Appendix 3 - Planning & Transportation Committee Lift Report
25 November 2013 to 09 January 2014

- Appendix 4 - Planning & Transportation Committee Lift Report
10 January 2014 to 30 January 2014

Background Papers:

Reference within this report is made to previous Committee Reports;

Planning & Transportation Committee ref: Report CS 387/12

Planning & Transportation Committee ref: Report CS 431/13

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Apex Proposed Action Plan

Item No.	Item	Issue	Immediately (From 30.09.13)	Short - Medium Term (One Month)	Long Term (Contract Term)	Outcome/Conclusion
1	Emergency Attendances	Apex have consistently failed this KPI. Over the last 6 periods there has been between 12 and 35 failures to attend within the two hour emergency attendance target against a target of zero.	Apex to apply a dedicated administrator to the COL contract who will monitor all calls. This will ensure that when a call is placed, the SLA can be monitored and logistical planning can be utilised to ensure the KPI's are met. Additionally, Apex to work closely with COL to ensure that the KPI's are correct at time of call placement. (please see attached last period KPI report with comments from Apex to give a starting point for discussion).	In addition to the current direct staff employed to complete the PPM's and calls, Apex to apply a callout technician who will predominantly react to all COL calls where logistically practicable. Of course, it should prove that through the correct KPI timescale agreement and management, this will further positively impact the service delivery on reactive calls.	KPIs monitored and hit through ALL periods. Clear and exacting feedback to be provided to allow open discussion from an educated perspective.	a) Looking at feasibility of splitting Acute + P1's to separate KPI's. b) Dedicate staff supplied by Apex.
2	Attendance - Priorities 2-4	This KPI passed in Periods 11 & 12 but there was a decrease of over 31% in Period 13 (65.27% against a target of 96%. However this has now improved but still not meeting the target.	See attached current period KPI report with Apex feedback. Next KPI report to be submitted with accurate feedback from Apex in line with the contract terms.	As detailed above, moving forward Apex to apply sufficient labour through admin and skilled site staff and again a forward plan on accurate KPI information at point of call.	KPIs monitored and hit through ALL periods. Clear and exacting feedback to be provided to allow open discussion from an educated perspective.	a) Completed as scores are passing priorities 2-4.
3	Work Completion	Apex have consistently failed this KPI scoring between 57.86% and 84.9% against a target of 97% over the last 6 periods.	Dedicated Admin to monitor work completions, where risk becomes apparent, escalation to COL CM to plan logistics to meet with KPI's. Additionally as detailed, improvement between Apex and COL on KPI levels.	Education of current dedicated staff to ensure they are keyed into the relevant correct KPI's following agreement with COL. Constant monitoring by CM and Admin team at Apex, definitive feedback on KPI report to be discussed at contract meetings.	All work completions to be completed within contract KPI's	a) Administrator is in place. b) More accurate reporting against priorities therefore more effective use of priorities.
4	Personnel Changes in June 2013	Looking at the scores and stats it appears that performance has dropped since this change period.	Apex re-routing complete. Had no impact on KPI's as current dedicated team have not been changed. Re-routing has allowed callout engineers to be located within a closer vicinity to COL, allowing flexibility and reactive measures to be put in place should callout work load require it.	With monitoring by admin and escalation to Apex COL CM, and additional local staffing numbers, logistical planning can be clearer to adapt to all eventualities regarding callout load.	All contractual KPI's to be met through the correct escalation measures and logistical planning as required.	a) Apex Contract Manager has been replaced. b) New Apex Service Director introduced and more familiar with the portfolio.

Apex Proposed Action Plan

Item No.	Item	Issue	Immediately (From 30.09.13)	Short - Medium Term (One Month)	Long Term (Contract Term)	Outcome/Conclusion
5	Frequency of Meetings	It was agreed to move from weekly to fortnightly meetings in May as both parties were reasonably happy with performance at that time. This clearly is not working, is a different format required?	Apex suggest that as most of the required robust plan requirements were being discussed, now the plan is in place it would be suggested that bi weekly meetings remain in place.	To be adjusted as Apex service delivery does improve.	To be adjusted as and when agreed.	a) Completed.
6	CAFM System	It was reported in the minutes of 13/09/12 that the CAFM was live at Apex and subject to getting the firewall issue resolved would be available to CoL. To date this has not happened. This was committed to as part of the contract.	Apex CAFM IT developer has contacted COL and awaits contact to agree convenient times to attend Guildhall complex, to ascertain what the final issues are and to provide.	Ongoing discussions to agree the COL requirements for the CAFM system of course following the required training.	Updates as necessary to provide clear information for COL usage.	a) Currently discussing with CoL IS Department regarding security and firewall.
7	Quality of PPMs	Following an assessment undertaken by an external consultant plus CoL's own audit inspections, approximately 60 lifts were identified with a mixture of items from minor to serious issues that need to be rectified urgently. This significant number is extremely concerning as two full maintenance cycles have been completed.	Recent combined Audits have confirmed that with the exception of 1 minor item all the requirements within Schedules 1-4 including those items within the independent consultants reports have been concluded.	Recent further schedules have been issued. These will be managed by the Apex COL CM to be completed within the indicated timescales. Additional combined audits between the COL lift engineer and Apex Cm to confirm completion to a mutually agreed satisfactory level.	Current plan to be adopted moving forward. Apex CM and COL lift engineer to ensure combined audits are to be completed within reasonable timescales following confirmation of completion.	a) Joint audit process commenced 19 November 2013 - ongoing process.
8	Critical Spares	Lack of critical spares has contributed to delays in getting lifts back into service e.g. Tower Bridge. We currently should have a limited supply as agreed early in the contract, further review update now contract is 1+ year in. A supply should be kept in stock.	Apex refute the tower bridge house scenario, as this was outside everyone's control and discussed with the COL lift engineer team. Although following this we have agreed to supply critical spares to Tower bridge. Of course this does not cover the rest of the portfolio and as agreed we do have critical spares for the type of aged units on the COL portfolio all as detailed at mobilisation.	Develop a critical spares list for any units that cause sufficient concern over supply chain that may delay any callout or reactive works completion. Specifically and which will be detailed below covering the public units in the first instance.	Critical spares to be stored covering the portfolio.	a) Completed and ongoing - part of audit process. - discussed at fortnightly meeting.

Apex Proposed Action Plan

Item No.	Item	Issue	Immediately (From 30.09.13)	Short - Medium Term (One Month)	Long Term (Contract Term)	Outcome/Conclusion
9	Piano Lift at GSMD	This lift was out of service for several weeks. This is a business critical lift that needs to be maintained effectively. Very politically sensitive.	Apex have provided the report and costs following the tests required and carried out by the COL preferred suppliers. Delay was due to awaiting report details from COL approved supplier. Apex have detailed to COL they will not use this supplier moving forward.	Works as per recommendations provided by Apex.	Following works, lift should continue to be reliable and efficient.	a) Completed.
10	Payment on time	This is unacceptable from CoL.	Apex to forward the relevant information according to the timeframe specified in the contract.	Apex to notify CoL if they have not received payment and provide the necessary back up documentation to enable CoL to investigate and resolve any issues immediately. Monthly	No Late payments.	a) Completed. - process established to speed up payment.
11	Public Lifts	12x public lifts that are high profile and closely monitored by elected members on behalf of their Ward(s). On too many occasions these are reported as not working correctly or out of service. Additionally the inclinators and public escalators suffer too many breakdowns and periods of not working. Generally, sourcing replacement parts, repairs and rectification works take too long.	All units have been surveyed by Apex. Each engineer specific to each lift are to carry out Technical PPMs ensuring the lifts/Escalators are running at their optimum characteristics using the current equipment.	Continued focus by Apex team on all Public units to ensure the correct levels of maintenance are carried out. Apex suggest that possible enhanced maintenance regimes should be applied to these units as a variation to the contract in consideration of their focus. Additionally, Apex are currently populating a COL investment plan (example: Upgrade door operator at Pilgrims reach, replace control panel on Wood street scenic lift to a British made generic type to name a few).	Continued focus on PPM levels, potential enhanced maintenance levels. COL investment.	a) Public Lifts have an increased PPM regime i.e. fortnightly rather than monthly. b) Monitoring process enhanced and more resilient.
12	Asset Register	This has been requested to be delivered in CoL format which is imperative to meet CoL lift/escalator insurance requirements. Asset register includes condition surveys and PPM schedules. Thereafter forward maintenance plans can be formulated.	Apex are commencing updating and infilling on the agreed template.	All information as required, inclusive of a forward maintenance and budget plan to be completed as soon as humanly possible.	Following all information provided, ongoing maintenance plan to be adhered to and additionally investment programme from COL with Apex to be agreed to ensure the forward life of the current aged equipment across the portfolio.	a) Asset Register for each public lift completed.

Apex Proposed Action Plan

Item No.	Item	Issue	Immediately (From 30.09.13)	Short - Medium Term (One Month)	Long Term (Contract Term)	Outcome/Conclusion
13	Barbican	Standard of service the Barbican is receiving is poor taking into consideration the lift technician (plus assistant) previously worked for the Barbican and therefore the knowledge base should be in place. More effective usage of this resource and improved performance fundamental due to the business critical usage of lifts in the Barbican Centre.	Apex have as agreed taken a considered view on all lifts at the Barbican. This has included employing specialist cleaners to clean down L8, L17 and L20, all of which are local to kitchens. Additionally the on site engineer has revisited all other units an brought them to an acceptable standard.	Apex suggest combined re-visits to all Barbican units with COL lift engineer to ensure that meet with COL requirements. Focus by on site engineer to ensure PPM levels are kept up to the required levels.	Quarterly audits by Apex CM of all Barbican units. Potential investment by COL to upgrade lifts to ensure future reliability and efficiency.	<ul style="list-style-type: none"> a) Condition Surveys for each lift being carried out to produce an Asset Plan. b) All Lifts have been audited. c) Morning inspections conducted by Apex and BC each day. d) Trend issues currently being identified.

PLANNING AND TRANSPORTATION COMMITTEE RESPONSIBILITY

Location And Age	Status	% of time in service between 21/09//2013 and 22/11/2013	Period of time Not in Use Between 21/09//2013 to 22/11/2013	Comments Where the service is 95% or less or by exception
Atlantic House 2001	IN SERVICE	100%	0 Hours	
Little Britain Modernised 2007	IN SERVICE	96.2%	67 Hours	
London Wall (No.1) Lift Eastern Pavilion 2003	IN SERVICE	99.2%	14 Hours	
London Wall (No.1) Lift Western Pavilion 2003	IN SERVICE	97.7%	41 Hours	
London Wall (No.1) Western Pavilion Escalator (DOWN) 2003	IN SERVICE	97.7%	41 Hours	
London Wall (No.1) Western Pavilion Escalator (UP) 2003	IN SERVICE	98.5%	27 Hours	
Millennium Bridge Inclinor 2000	IN SERVICE	99.0%	18 Hours	
Moor House 2005	IN SERVICE	99.4%	10 Hours	
Moorgate Escalator (UP) 1973	OUT SERVICE	54.4%	229 Hours	<ul style="list-style-type: none"> • STV (Sub contractor) attended, engineer was unable to rectify fault due to age and obsolete parts. • Parts arrived engineer attended rectified fault and left in service
Pilgrim Street 1992	IN SERVICE	99.4%	10 Hours	

PLANNING AND TRANSPORTATION COMMITTEE RESPONSIBILITY

Location And Age	Status	% of time in service between 21/09//2013 and 22/11/2013	Period of time Not in Use Between 21/09//2013 to 22/11/2013	Comments Where the service is 95% or less or by exception
Tower Hill 2002	IN SERVICE	100%	0 Hours	
Wood Street Public Lift (Royex House) 2008	IN SERVICE	99.8%	3 Hours	
Speed House	IN SERVICE	99.9%	2 Hours	
Tower Bridge	IN SERVICE	100%	0 Hours	

Additional information

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PLANNING AND TRANSPORTATION COMMITTEE REPORT

Location And Age	Status as of 9/01/2014	% of time in service between 25/11/2013 and 9/01/2014	Period of time Not in Use Between 25/11/2013 to 9/01/2014	Comments Where the service is 95% or less or by exception
Atlantic House 2001	IN SERVICE	100%	0 hours	
Little Britain Modernised 2007	IN SERVICE	96.3%	41 hours	
London Wall (No.1) Lift Eastern Pavilion 2003	IN SERVICE	99.6%	4 hours	
London Wall (No.1) Lift Western Pavilion 2003	IN SERVICE	100%	0 hours	
London Wall (No.1) Western Pavilion Escalator (DOWN) 2003	IN SERVICE	82.5%	193 hours	This is related to the Christmas period. Stop button activated customer misuse engineer reset on arrival, however has been called out to attend to the same fault several days running.
London Wall (No.1) Western Pavilion Escalator (UP) 2003	IN SERVICE	80.2%	218 hours	Stop button activated customer misuse engineer reset which caused a panel fault. The parts were ordered however, due to the Christmas period there was a delay in receiving parts, repair and return to service.
Millennium Bridge Inclinators 2000	IN SERVICE	97.8%	24 hours	
Moor House 2005	IN SERVICE	100%	0 hours	
Moorgate Escalator (UP) 1973	IN SERVICE	99.3%	7 hours	
Pilgrim Street 1992	IN SERVICE	100%	0 hours	

PLANNING AND TRANSPORTATION COMMITTEE REPORT

Location And Age	Status as of 9/01/2014	% of time in service between 25/11/2013 and 9/01/2014	Period of time Not in Use Between 25/11/2013 to 9/01/2014	Comments Where the service is 95% or less or by exception
Tower Place - Public Lift 2002	IN SERVICE	100%	0 hours	
Tower Place – Scenic Lift	IN SERVICE	99.5%	5 hours	
Wood Street Public Lift (Royex House) 2008	IN SERVICE	93.0%	77 hours	The lift fault identify parts were ordered and is now back in service
Speed House	IN SERVICE	99%	10 hours	
Tower Bridge	IN SERVICE	100%	0 hours	

PLANNING AND TRANSPORTATION COMMITTEE REPORT

Location And Age	Status as of 30/01/2014	% of time in service between 10/01/2014 and 30/01/2014	Period of time Not in Use Between 10/01/2014 to 30/01/2014	Comments Where the service is 95% or less or by exception
Atlantic House 2001	IN SERVICE	100%	0 hours	
Little Britain Modernised 2007	IN SERVICE	85%	72 hours	Door fault. Engineer attended parts required and ordered engineer returned and fitted new door protection. Left in working order
London Wall (No.1) Lift Eastern Pavilion 2003	IN SERVICE	100%	0 hours	
London Wall (No.1) Lift Western Pavilion 2003	IN SERVICE	100%	0 hours	
London Wall (No.1) Western Pavilion Escalator (DOWN) 2003	IN SERVICE	98.9%	5 hours	
London Wall (No.1) Western Pavilion Escalator (UP) 2003	IN SERVICE	100%	0 hours	
Millennium Bridge Inclinators 2000	IN SERVICE	100%	0 hours	
Moor House 2005	IN SERVICE	100%	0 hours	
Moorgate Escalator (UP) 1973	IN SERVICE	93.3%	32 hours	Public Mis-use over a weekend 'Stop button' activated. Engineer attended and rectified fault.
Pilgrim Street 1992	IN SERVICE	100%	0 hours	
Tower Place - Public Lift 2002	IN SERVICE	100%	0 hours	

PLANNING AND TRANSPORTATION COMMITTEE REPORT

Location And Age	Status as of 30/01/2014	% of time in service between 10/01/2014 and 30/01/2014	Period of time Not in Use Between 10/01/2014 to 30/01/2014	Comments Where the service is 95% or less or by exception
Tower Place – Scenic Lift	IN SERVICE	100%	0 hours	
Wood Street Public Lift (Royex House) 2008	IN SERVICE	97.0%	14 hours	
Speed House	IN SERVICE	99.3%	3 hours	
Tower Bridge – Under Span	IN SERVICE	100%	0 hours	

Additional information

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Agenda Item 8

TO: **PLANNING AND TRANSPORTATION
COMMITTEE**

Tuesday, 25 February 2014

FROM: **AUDIT AND RISK MANAGEMENT
COMMITTEE**

Tuesday, 28 January 2014

STRATEGIC RISK REVIEW (SR5) - FLOODING IN THE CITY

The Committee received a report of the Director of the Built Environment, setting out Strategic Risk 5, in respect of Planning in the City. During the discussion the following items were raised/noted:

- The Draft Local Flood Risk Management Strategy would soon be presented to the Planning and Transportation Committee, before being subject to public consultation. It was likely to be refined and adopted later in 2014.
- Regarding surface water flooding risk in the Fleet Valley and behind the Thames river walls; the Director explained that engineering solutions, such as major new drainage pipes or storage tanks, were either impractical, in such a constrained location, or not cost effective and were therefore not supported by the Environment Agency. Instead, greater use would be made of sustainable drainage designs, combined with greater emphasis on flood resistance and resilience measures for occupiers at risk. Members felt that engineering solutions should be investigated further and that the effect of the overtopping of the dams at Hampstead Heath should also be considered. The Chairman of the Planning and Transportation Committee was in attendance at the meeting and acknowledged this request.

RESOLVED, that:

1. That engineering solutions, as outlined above, be investigated further, by the Planning and Transportation Committee, along with the effect of the overtopping of the dams at Hampstead Heath.
2. That the outcome be reported back to Audit and Risk Management Committee.

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Agenda Item 12

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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