



Planning and Transportation Committee

Date: TUESDAY, 21 MARCH 2017
Time: 10.30 am
Venue: LIVERY HALL - GUILDHALL

Members:

| | |
|--|----------------------------------|
| Christopher Hayward (Chairman) | Alderman Robert Howard |
| Deputy Alastair Moss (Deputy Chairman) | Deputy Henry Jones |
| Randall Anderson | Alderman Vincent Keaveny |
| Alex Bain-Stewart | Oliver Lodge |
| David Bradshaw | Paul Martinelli |
| Henry Colthurst | Deputy Brian Mooney |
| Revd Dr Martin Dudley | Sylvia Moys |
| Peter Dunphy | Graham Packham |
| Emma Edhem | Judith Pleasance |
| Sophie Anne Fernandes | Deputy Henry Pollard |
| Deputy Bill Fraser | James de Sausmarez |
| Marianne Fredericks | Deputy Tom Sleigh |
| George Gillon | Graeme Smith |
| Alderman David Graves | Angela Starling |
| Deputy Brian Harris | Patrick Streeter |
| Graeme Harrower | Deputy James Thomson |
| Alderman Peter Hewitt | Michael Welbank (Chief Commoner) |

Enquiries: Amanda Thompson
tel. no.: 020 7332 3414
amanda.thompson@cityoflondon.gov.uk

Lunch will be served in Guildhall Club at 1PM
NB: Part of this meeting could be the subject of audio or video recording

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) Planning and Transportation Committee (Pages 1 - 6)

To agree the public minutes and summary of the meeting held on 28 February 2017.

For Decision

- b) Streets and Walkways Sub-Committee (Pages 7 - 14)

To receive the draft minutes of the meeting held on 14 February 2017.

For Information

4. DELEGATED DECISIONS OF THE CHIEF PLANNING OFFICER AND DEVELOPMENT DIRECTOR

Report of the Chief Planning Officer and Development Director.

For Information
(Pages 15 - 28)

5. VALID APPLICATIONS LIST FOR COMMITTEE

Report of the Chief Planning Officer and Development Director.

For Information
(Pages 29 - 30)

6. REPORTS OF THE CHIEF PLANNING OFFICER

- a) 117 - 121 Bishopsgate London EC2M 3UJ (Pages 31 - 46)

For Decision

- b) 117 - 121 Bishopsgate London EC2M 3UJ (Pages 47 - 60)

For Decision

- c) The Turret, John Wesley Highwalk Barbican London EC2 (Pages 61 - 66)

For Decision

- d) The Turret, John Wesley Highwalk Barbican London EC2 (Pages 67 - 166)

For Decision

- e) Leadenhall Market Draft SPD (Pages 167 - 254)

For Decision

- f) Construction Site Noise Monitoring (Pages 255 - 272)

For Decision

- g) 15 Trinity Square Unauthorised Short Term Letting-Enforcement Report
(Pages 273 - 276)

For Information

- h) Preparation of Planning Technical Guidelines for Development in the City
(Pages 277 - 278)

For Information

7. REPORTS OF THE DIRECTOR OF THE BUILT ENVIRONMENT

- a) Road Danger Reduction Programme 2017/18 (Pages 279 - 336)

For Decision

- b) Cultural Hub Public Realm Temporary Projects 2017: 'Quick Wins' (Pages 337 - 356)

For Decision

- c) Allocation of the 2017/18 Transport for London Local Implementation Plan funding and reallocation of part of the 2016/17 funding (Pages 357 - 366)

For Decision

- d) City of London Local Plan Review: Outcome of public consultation on Issues and Options (Pages 367 - 424)

For Information

- e) Department of the Built Environment Risk Management – Quarterly Report
(Pages 425 - 438)

For Information

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

9. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

10. 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.

For Decision

Part 2 - Non-public Agenda

11. NON-PUBLIC MINUTES

- a) Planning and Transportation Committee (Pages 439 - 440)

To agree the non-public minutes of the meeting held on 28 February 2017.

For Decision

- b) Streets and Walkways Sub-Committee (Pages 441 - 442)

To receive the draft non-public minutes of the meeting held on 14 February 2017.

For Information

12. TRIG LANE STAIRS AND CASTLE YARD WHARF ESSENTIAL REPAIRS TO THE FLOOD DEFENCE WALL.

Report of the City Surveyor.

For Information
(Pages 443 - 456)

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.

PLANNING AND TRANSPORTATION COMMITTEE

Tuesday, 28 February 2017

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

Present

Members:

Christopher Hayward (Chairman)
Randall Anderson
Alex Bain-Stewart
David Bradshaw
Henry Colthurst
Revd Dr Martin Dudley
Peter Dunphy
Emma Edhem
Marianne Fredericks
George Gillon
Alderman David Graves

Deputy Brian Harris
Graeme Harrower
Alderman Vincent Keaveny
Oliver Lodge
Paul Martinelli
Deputy Brian Mooney
Sylvia Moys
Graham Packham
Judith Pleasance
James de Sausmarez
Patrick Streeter

Officers:

| | | |
|-------------------|---|---|
| Amanda Thompson | - | Town Clerk's Department |
| Jennifer Ogunleye | - | Town Clerk's Department |
| Deborah Cluett | - | Comptroller and City Solicitor's Department |
| Alison Hurley | - | Assistant Director Corporate Property Facilities Management |
| Carolyn Dwyer | - | Director of Built Environment |
| Annie Hampson | - | Department of the Built Environment |
| Iain Simmons | - | Department of the Built Environment |
| Peter Young | - | City Surveyor's Department |
| Mark Lowman | - | City Surveyor's Department |
| Steve Presland | - | Transportation & Public Realm Director |
| Ted Rayment | - | Department of the Built Environment |
| Gwyn Richards | - | Department of the Built Environment |

1. CHAIRMAN'S UPDATES

London Planning Awards

The Chairman reported that the City of London Corporation (CoL) had been granted the esteemed Mayor's Award for Planning Excellence, hailing the City Corporation overall winner of the most prestigious event for the planning and development sector.

The CoL also received the Mayor's Award as recognition for their win in the Best Conceptual Project category for the wind modelling of the Eastern Cluster.

On behalf of the Committee the Chairman expressed congratulations to all those involved.

George Gillon

The Chairman reported that this would be George Gillon's last meeting as a Member of the Committee as he was due to stand down from the Court of Common Council in March 2017.

On behalf of the Committee the Chairman expressed his sincere thanks to Mr Gillon for all his exceptional hard work and dedication to the Planning and Transportation Committee and wished him well for the future.

2. APOLOGIES

Apologies for absence were received from Deputy Alastair Moss, Sophie Anne Fernandes, Deputy Bill Fraser, Alderman Peter Hewitt, Alderman Robert Howard, Deputy Henry Jones, Deputy Greg Jones QC, Deputy Henry Pollard, Graeme Smith, Deputy James Thomson and Michael Welbank.

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

There were no declarations of interest.

4. MINUTES

The minutes of the meeting held on 7 February 2017 were agreed as a correct record subject to the inclusion of apologies for absence from Deputy Henry Pollard.

5. DELEGATED DECISIONS OF THE CHIEF PLANNING OFFICER AND DEVELOPMENT DIRECTOR

The Committee received a report of the Chief Planning Officer and Development Director in respect of development and advertisement applications dealt with under delegated authority.

RESOLVED – That the report be noted.

6. VALID APPLICATIONS LIST FOR COMMITTEE

The Committee received a report of the Chief Planning Officer and Development Director which provided details of valid planning applications received by the department since the last meeting.

RESOLVED – That the report be noted

7. PUBLIC LIFT UPDATE

The Committee received a report of the City Surveyor providing an update in respect of the status of public lifts and escalators in the City.

In relation to the fault at the Tower Place Car Park where the lift had been out of service due to a fault on the telephone line, Members expressed concern that BT had taken thirty- seven hours to resolve the issue and asked if officers could liaise with BT regarding an enhanced service.

RESOLVED: That the report be received and its content noted.

8. REPORTS RELATIVE TO PLANNING APPLICATIONS

8.1 22 Bishopsgate

The Committee considered a report of the Chief Planning Officer (CPO) in relation to the site of the 62 storey tower at 22 Bishopsgate which was currently being constructed.

The CPO reported that the current scheme was for a tower comprising 59 storeys at ground and above with an amended design to the top. The tapering of the upper storeys previously approved had been omitted and replaced by a flat topped lower tower. In other respects the design of the elevations remained as before. The applicants had advised that the lowering of the tower in the new proposal was in response to construction management constraints in relation to aviation safeguarding issues.

The CPO concluded that while the change in design diminished the design and visual impact of the building, the proposal accorded with the development plan as a whole, it would preserve the setting of listed buildings and preserve or enhance the character or appearance of the St Helen's Place Conservation Area, and it was acceptable subject to the imposition of conditions and to a Section 106 agreement.

Several Members spoke in support of the application which they felt was sympathetic in design and would play a supporting role in the apex of the skyline, the designers had also had to work within the constraints of air traffic control which had affected the previous application. Other Members expressed concern regarding the height of the viewing gallery which they felt could be higher, the less elegant revised design, and the number of objections received which needed to be taken into account.

Arising from the discussion the application was put to the vote, the result of which was as follows:-

17 Votes in favour of the application
4 Votes against
1 Abstention

RESOLVED - That

- 1) Planning permission be granted in accordance with the details set out in the attached schedule subject to:
 - (a) the Mayor of London being given 14 days to decide whether to allow the Corporation to grant planning permission as recommended, or to direct refusal, or to determine the application himself (Article 5(1)(a) of the Town & Country Planning (Mayor of London) Order 2008);
 - (b) planning obligations and other agreements being entered into under Section 106 of the Town & Country Planning Act 1990 and Section 278 of the Highway Act 1980 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed;
- (2) Approval be given in principle that the land affected by the building which are currently public highway and land over which the public have right of access 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 the various areas under the delegation arrangements approved by the Court of Common Council.
- (3) 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.

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

Pedestrian crossing over Upper Thames St, Queenhithe

A Member asked why the blocked up pedestrian crossing over Upper Thames St in Queenhithe could not be opened up and used.

The Director of the Built Environment advised that the crossing was privately owned and the owners were intending to have it removed as it was unsafe. The crossing was not a public right of way so the City of London could not influence the decision.

The Member asked if it would be possible to find out who the owners were to discuss the issue and asked for a more detailing response to be provided. He further asked if they could be asked to provide more visible signage that the crossing was out of use.

Traffic Congestion

In response to a question concerning why no notice had been given of the road closure at Holborn Circus on 10 February 2017 which had resulted in serious congestion, the Director of the Built Environment advised that this had been due to a major water leak near electric power cables and a diversion had been put in place within one hour. Both TfL and neighbouring Boroughs had been made aware of the issue, temporary signage put in place, and the incident communicated through social media and the CoL website.

Several Members expressed concern that temporary signage was often inadequate and too close to the incident to enable drivers to avoid it, also social media messages wouldn't help those driving.

Officers undertook to provide a more detailed report on the issue including an update on the introduction of 'congestion officers' and better methods of communication to the public.

10. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

There were no items of urgent business.

11. EXCLUSION OF THE PUBLIC

RESOLVED – That under Section 100A(4) 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 1 of Schedule 12A of the Local Government Act.

12. DEPARTMENT OF THE BUILT ENVIRONMENT - BUSINESS PLAN PROGRESS REPORT FOR Q3 16/17

The Committee received and noted a report of the Director of the Built Environment setting out the progress made during Q3 (October - December) against the 2016/17 Business Plan.

13. OLD SWAN STAIRS, SWAN LANE ESSENTIAL REPAIRS TO THE FLOOD DEFENCE WALL.

The Sub-Committee noted a report of the City Surveyor which proposed a project for essential repairs to the flood defence wall at Old Swan Stairs, Swan Lane.

14. BRIDGE MASTER'S HOUSE PHASE II - POST COMPLETION WORKS - PARAPET STRENGTHENING

The Sub-Committee noted a report of the City Surveyor which sought delegated authority to the Town Clerk to consider an Issue report regarding the Bridge Master's House – Phase 2 project.

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

The non-public questions were noted.

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

There were no non-public urgent items of business.

The meeting closed at 12.40 pm

Chairman

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STREETS AND WALKWAYS SUB (PLANNING AND TRANSPORTATION) COMMITTEE

Tuesday, 14 February 2017

Minutes of the meeting of the Streets and Walkways Sub (Planning and Transportation) Committee held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Tuesday, 14 February 2017 at 10.30 am

Present

Members:

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|--|-----------------------------------|
| Christopher Hayward (Chairman) | Marianne Fredericks |
| Graham Packham (Deputy Chairman) | Deputy Brian Harris |
| Randall Anderson | Alderman-Elect Gregory Jones QC |
| Deputy John Barker (Ex-Officio Member) | Jeremy Simons (Ex-Officio Member) |
| Emma Edhem | |

In Attendance

Officers:

| | | |
|--------------------|---|-------------------------------------|
| Jennifer Ogunleye | - | Town Clerk's Department |
| Amanda Thompson | - | Town Clerk's Department |
| Olumayowa Obisesan | - | Chamberlain's Department |
| Steve Presland | - | Department of the Built Environment |
| Iain Simmons | - | Department of the Built Environment |
| Ian Hughes | - | Department of the Built Environment |
| Simon Glynn | - | Department of the Built Environment |
| Alan Rickwood | - | City of London Police |

1. APOLOGIES FOR ABSENCE

Apologies were received from Deputy Alastair Moss.

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

There were no declarations of interest.

3. MINUTES

The minutes of the meeting held on 6 December were agreed as a correct record subject to the following amendments:

4.1 Bank Junction Improvements

It was felt that the proposal would not cause traffic gridlock as the same modelling approach had been successfully used when designing the new junction at Holborn Circus.

4. **OUTSTANDING REFERENCES**

RESOLVED – That the list of outstanding references be noted and updated as appropriate.

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

5.1 **Gateway 4 Detailed Options Appraisal - Shoe Lane Quarter Public Realm Enhancements**

The Sub-Committee received a Gateway 4 report seeking approval of the proposed public realm, highway and security improvement option in the area of the Shoe Lane Quarter to enable the project to move to Gateway 5 and progress the detailed design.

The project involved a wide range of measures on the highway that would enhance the public realm on Stonecutter Street, Shoe Lane and Plumtree Court to provide an improved environment for the high number of workers, residents and visitors expected in the area.

Members noted that the proposed public realm, highway and security layout option had been developed in consultation with key stakeholders and businesses that formed the Shoe Lane Quarter Working Party.

A detailed discussion took place with a number of questions and comments made by Members in relation to the ongoing maintenance of the granite setts, the impact of the proposed traffic management changes on vehicle movements and cycle routes, the positioning of lighting columns on the street rather than building mounted, the suitability of slot drains and night time servicing.

Members were advised that it was anticipated that the proposed scheme would have a positive impact on pedestrians and cyclists, and a number of the concerns raised would be addressed as part of the detailed design stage and presented at Gateway 5.

Arising from the discussion a Member MOVED an amendment to the recommendations to exclude approval for lighting columns on the street. This was SECONDED and a vote was taken:

5 AGAINST
3 FOR

A vote on the original recommendations was then taken and the Sub-Committee unanimously RESOLVED to:

- a) Approve the proposed public realm, highway and security improvements (as shown in Appendix 2 of the report) to be progressed to detailed design;

- b) Approve further investigation to reopen Shoe Lane north to northbound traffic;
- c) Approve the departures from standard for public realm elements;
- d) Authorise Officers to enter into any legal agreements required to progress the highway works as proposed, including entering into a Section 8 Agreement with TfL;
- e) Agree an increase in budget of £555,872, to complete detailed design as shown in Appendix 4;
- f) Delegate authority for any adjustments between elements of the £1,021,872 required budget to the Director of the Built Environment in conjunction with the Chamberlain's Head of Finance provided the total approved budget of £1,021,872 is not exceeded; and
- g) Note that public engagement on the proposals follows this report and the results will be reported at Gateway 5.

5.2 Gateway 4/5 Detailed Options Appraisal & Authority to Start Work - 11-19 Monument Street

The Sub-Committee received a Gateway 4/5 report comprising the detailed options appraisal and authority to start development work at 11-19 Monument Street.

The scope of the project at G3 had comprised functional changes to accommodate the development, as well as environmental enhancements in the project area, including the raising of the southern section of Fish Street Hill and relocation of parking, the re-surfacing of Pudding Lane, and the relocation or introduction of street furniture and trees.

Members were advised that in September 2016 a public consultation was carried out on the outline design. There were five formal responses received, and four that provided supportive comments. Strong feedback was given with regards to accessibility improvements to Monument yard, including removing the changes in level to provide a unified surface throughout the whole area.

It was now proposed that rather than having two processes, one for reparations and one for enhancements, these should be combined to make the implementation phase of the project more streamlined and efficient. The reparations budget had therefore been included within the project cost, increasing the overall project cost.

In response to a question concerning the removal of the Monument Street hoarding, the Sub-Committee were advised that TfL wanted to retain this although they had agreed to cut it back and officers were liaising with TfL to ensure this was done.

RESOLVED – To approve

- a) The design for Option 2 as detailed in Appendix 1 of the report;
- b) The implementation budget of £964,358 fully funded from the 11-19 Monument Street S278 and S106 Agreements and 20 Fenchurch Street S106 Agreement, including any interest and indexation accrued (see Section 5 and Appendix 3 of this report);
- c) The budgets should be adjusted to reflect the tables in Appendix 1;
- d) Budget adjustments, if required, between work, staff costs and fees to facilitate the completion of the project, providing the overall budget is not exceeded; and
- e) The advertisement and implementation of the necessary traffic order changes required, subject to the outcome of the statutory consultation requirements.

5.3 Gateway 4/5 - Authority to Start Work - Newgate Street / Warwick Lane Safety Improvements

The Sub-Committee received a Gateway 4/5 report in relation to the Newgate Street/Warwick Lane safety improvements.

Members were advised that at the time of the last gateway (1/2) report, the data had ranked this junction as the 9th most dangerous location on the City's highway network. However, in the latest data, it was now ranked the second behind Bank Junction due to a combination of improvements being achieved elsewhere and a worsening of safety at this junction.

The proposal was therefore to make this junction safer and improve pedestrian amenity wherever possible, whilst minimising any impacts on vehicle journey times.

The report detailed a number of options which had now been evaluated and Members were advised that the most beneficial and recommended option was to introduce traffic signals to control all movements including the introduction of pedestrian green/red man facilities throughout. This option was expected to save an average of 2.6 collisions per year.

Members spoke in support of the recommended Option 4 however also stressed the need to promote behavioural change to reduce the number of collisions and casualties, and suggested that this could be undertaken as part of the consultation exercise.

RESOLVED – To:

- a) Approve Option 4 subject to the project obtaining TfL scheme approval;

- b) Approve the procurement approach and the proposed way forward
- c) Approve a budget allocation of £90,000 to be funded from LIP allocation for 2016/17
- d) Approve, subject to the Planning & Transportation Committee agreeing an additional £60,000 from the LIP grant for 2017/18 to be allocated to this project
- e) Authorise the start of works.

5.4 Special Events on the Highway

The Sub-Committee received the annual report outlining the major events planned for the coming year and providing Members with an opportunity to consider and comment on the appropriateness of these events, taking into account their nature, scale and impact, as well as the benefits they would bring.

Members were advised that there were 15 major events planned for 2017, the same as the previous year, of which 13 had taken place before and 2 were new one-off events - International Association of Athletics Federations (IAAF) World Championship marathon and Open House.

The report also updated Members on the outcome of new or one-off events that took place in 2016, as well as other matters related to special events such as 'root & branch' reviews, changes to the road network and drones for filming.

RESOLVED - To

- a) Agree to support the events outlined in the report and detailed in Appendix 1; and
- b) Note that a root and branch review is planned for Standard Chartered Great City Race and the City of London Mile Run Fast events for 2018.

6. QUARTERLY SUMMARY OF CITY OF LONDON POLICE TARGETED ROADS POLICING ACTIVITY.

The Sub-Committee received a report of the CoL Police detailing recent and forthcoming planned criminal enforcement and educational activity carried out by the CoL Police Transport and Highways Operations Group (THOG) in support of the City of London Road Danger Reduction Plan, National Police enforcement campaigns, and public safety.

Members raised a number of questions in relation to the data given and how the information was categorised, and also sought clarification on the enforcement activity undertaken.

Members welcomed the report and the work being done to improve public safety, but expressed concern at the nature of some of the statistics which again highlighted the need for behavioural change, especially in relation to pedestrians who were injured due to 'lack of attention'.

Officers confirmed that the information would be used to inform the Road Danger Reduction Steering Group.

RESOLVED – That the report be noted.

7. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**

In response to a question concerning buses making illegal turns as a result of lack of appropriate signage in the vicinity of the Cycle Superhighway, officers undertook to contact TfL.

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

There were no items of urgent business.

9. **EXCLUSION OF THE PUBLIC**

RESOLVED – That under Section 100A(4) 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 1 of Schedule 12A of the Local Government Act.

10. **SKATEBOARDING - ST. PAUL'S CHURCHYARD**

The Sub-Committee received a report of the Director of the Built Environment updating on the findings of the trial to provide furniture in St Paul's Churchyard with aim of reducing opportunities for skateboarding, and presenting a number of permanent options available.

11. **FINSBURY CIRCUS REINSTATEMENT**

The Sub-Committee considered and approved a report of the Director of Open Spaces which proposed a Project for the reinstatement of Finsbury Circus following the completion of the Crossrail works.

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

There were no non-public questions.

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

There were no non-public items of urgent business.

The meeting ended at 12.40 pm

Chairman

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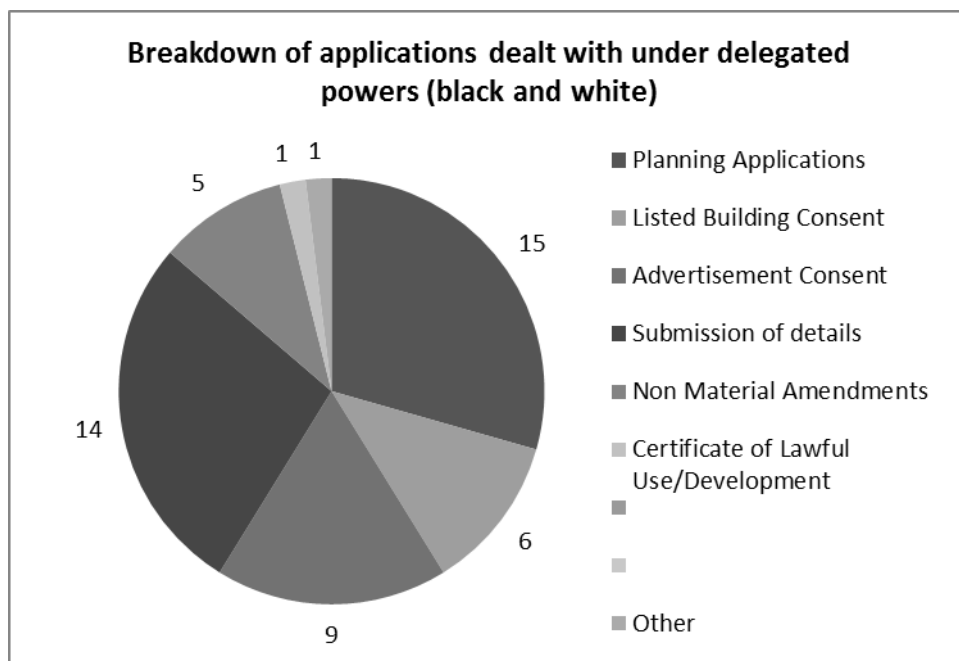
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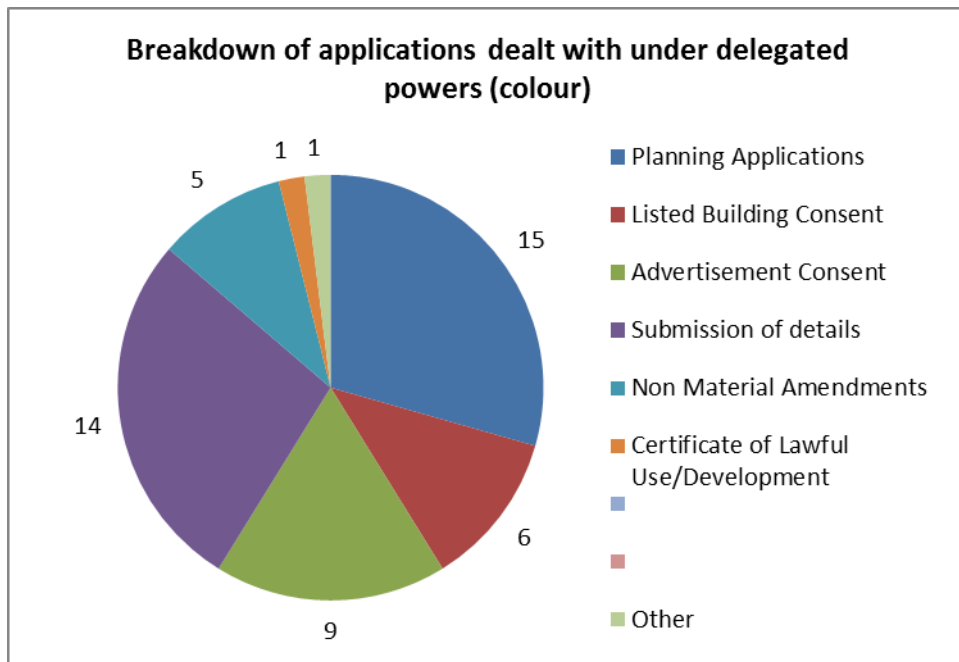
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| Committee(s) | Dated: |
| Planning and Transportation | 21 st March 2017 |
| Subject: Delegated decisions of the Chief Planning Officer and Development Director | Public |
| Report of: Chief Planning Officer and Development Director | For Information |

Summary

Pursuant to the instructions of your Committee, I attach for your information a list detailing development and advertisement applications determined by the Chief Planning Officer and Development Director or those so authorised under their delegated powers since my report to the last meeting.

In the time since the last report to Planning & Transportation Committee 51(Fifty-one) matters have been dealt with under delegated powers. Fourteen (14) relate to submission of details of previously approved schemes. Nine (9) applications for advertisement consent have been dealt with, which none was refused. Fifteen (15) applications for development have been approved including 3650sq.m of floorspace and two (2) applications for change of use.





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 | Decision & Date of Decision |
|-------------------------------|---|---|-----------------------------|
| 16/01318/MDC Aldgate | Dixon House 72 - 75 Fenchurch Street London EC3M 4BR | Details of junctions with adjoining premises pursuant to condition 4(e) of planning permission (application no. 14/00579/FULL) dated 25th February 2015 and condition 2(e) of listed building consent (15/00323/LBC) dated 26th May 2015. | Approved 14.02.2017 |
| 16/01342/FULL Aldgate | The Baltic Exchange 38 St Mary Axe London EC3A 8EX | Upgrade to existing telecommunications equipment comprising: (i) minor relocation of existing antennas and installation of three additional antennas; (ii) replacement of an equipment cabinet; and (iii) ancillary works. | Approved 14.02.2017 |
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| 16/01343/LBC Aldgate | The Baltic Exchange 38 St Mary Axe London EC3A 8EX | Upgrade to existing telecommunications equipment comprising: (i) minor relocation of existing antennas and installation of three additional antennas; (ii) replacement of an equipment cabinet and (iii) ancillary works. | Approved 14.02.2017 |
| 16/01359/LBC Aldgate | Dixon House 72 - 75 Fenchurch Street & 1 Lloyds Avenue London EC3M 4BR | Cleaning of stone on the external facade. | Approved 14.02.2017 |
| 16/01154/ADVT Aldersgate | 61 St Martin's-le-Grand London EC1A 4ER | Installation and display of: (i) externally illuminated fascia sign measuring 1.3m wide by 0.5m high located at a height of 2.5m above ground floor level; (ii) two externally illuminated fascia signs measuring 2.4m wide by 0.5m high located at a height of 2.5m above ground floor level; (iii) externally illuminated projecting sign measuring 0.9m wide by 1.73m high located at a height of 3.8m above ground floor level. | Approved 14.02.2017 |
| 15/01181/POD C Broad Street | 1 Angel Court & 33 Throgmorton Street London EC2N 2BR | Submission of the utility connection requirements of the development pursuant to Schedule 3 paragraph 10 of the Section 106 agreement dated 14 November 2014 planning application reference 13/00895/FULL. | Approved 16.02.2017 |
| 16/01367/FULL Broad Street | 1C Angel Court And 31/32 Throgmorton Street London EC2R 7HB | Use of private land for the placing out of tables and chairs ancillary to the adjoining retail use at Angel Court. | Approved 21.02.2017 |

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|-------------------------------|--|--|----------------------------|
| 16/01161/LBC Broad Street | 13 Austin Friars London EC2N 2HE | Internal alterations to the ground floor - i) removal of modern partitions; ii) installation of new partition to form a narrower entrance hall and one large room; iii) removal of Travertine stone floor tiles and replacement with carpet; iv) upgrade of existing downlighters to LEDs; and v) installation of two suspended pendant light fittings in the entrance hall. | Approved 23.02.2017 |
| 17/00038/FULL Broad Street | 120 Old Broad Street London EC2N 1AR | Upgrade to existing telecommunications equipment comprising the replacement of six existing antennas and four RRUs with 11 new antennas and 16 RRUs, the removal and replacement of three equipment cabinets and ancillary works. | Approved 02.03.2017 |
| 17/00047/NMA Bishopsgate | 117, 119 & 121 Bishopsgate, Alderman's House, 34-37 Liverpool Street, 1 Alderman's Walk And Part of White Hart Court London EC2M 3TH | Non material amendment under S96A of the Town and Country Planning Act to alter the description of development under planning permission 09/00192/FULL (and amended by 13/01199/FULMAJ) as follows: Redevelopment behind partial retained facades on Bishopsgate and Liverpool Street to provide uses as specified on the approved plans at ground and basement levels and office (Class B1) at part ground and 1st to 8th floors. | Approved 17.02.2017 |
| 16/01286/ADVT Bishopsgate | New Chapter House 14 New Street London EC2M 4TR | Installation and display of an internally illuminated sign measuring 0.13m(h) by 1.54m(w), displayed at a height of 3.18m above ground floor level. | Approved 21.02.2017 |

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| 16/01253/FULL Bishopsgate | New Chapter House 14 New Street London EC2M 4TR | Demolition of part of the existing ground floor facade and replacement with a new frontage and altered access at the ground floor. | Approved 22.02.2017 |
| 16/01330/FULL Bishopsgate | New Chapter House 14 New Street London EC2M 4TR | Installation of plant equipment within an existing enclosure. | Approved 28.02.2017 |
| 16/00889/POD C Bread Street | 2 - 6 Cannon Street London EC2 | Submission of open space specification, open space method statement and utility connection requirements of the building pursuant to schedule 3 paragraphs 12.1.1 and 13.1.1 of the section 106 agreement dated 30 July 2015 and planning application reference 14/00780/FULMAJ. | Approved 23.02.2017 |
| 17/00066/NMA Bread Street | 2 - 6 Cannon Street London EC4M 6YH | Non-material amendment under Section 96A of the Town and Country Planning Act 1990 (as amended) to planning permission 14/00780/FULMAJ dated 01.12.14 to install a rooflight at roof level. | Approved 02.03.2017 |
| 17/00020/MDC Castle Baynard | 4 John Carpenter Street London EC4Y 0AN | Details of plant noise levels pursuant to the discharge of condition 2 (b) of planning permission 16/00022/FULL dated 31.03.2016. | Approved 14.02.2017 |
| 16/01110/NMA Castle Baynard | Bridge House 181 Queen Victoria Street London EC4V 4DD | Non-material amendment under Section 96A of the Town and Country Planning Act 1990 (as amended) to planning permission 14/00186/FULL dated 24.04.14 to allow amendments to retain an existing structural wall and make alterations to the proposed windows at lower ground floor level on the south elevation. | Approved 02.03.2017 |
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| 17/00017/CLOP D Castle Baynard | 21 Whitefriars Street London EC4Y 8JJ | Application under Section 192 of the Town and Country Planning Act 1990 (as amended) for a Certificate of Lawful Development (Proposed) for alterations to the ground floor elevation in accordance with Part 7 Class F of the Town and Country Planning (General Permitted Development) (England) Order 2015. | Grant Certificate of Lawful Development 06.03.2017 |
| 16/01363/LBC Cripplegate | 93 Speed House Barbican London EC2Y 8AU | Removal of non-structural internal walls to facilitate the creation of a semi open-plan kitchen onto living room. Alterations to various internal doors. | Approved 16.02.2017 |
| 16/01142/FULL Cornhill | 45 - 47 Cornhill London EC3V 3PF | Replacement of all existing metal framed single glazed windows with new metal framed double glazed windows and the installation of new replacement plant equipment at roof level. | Approved 16.02.2017 |
| 16/01143/ADVT Cornhill | 45 - 47 Cornhill London EC3V 3PF | Installation of one set of non-illuminated letters and logo measuring 0.75m high by 2.90m wide and 6.00m above ground level. | Approved 16.02.2017 |
| 16/01361/NMA Candlewick | 32 Lombard Street London EC3V 9BQ | Non-material amendment under Section 96a of the Town & Country Planning Act 1990 (as amended) to Condition 23 of planning permission 14/01103/FULL (granted 30.05.15) to allow for detailing changes to the southern elevation. | Approved 14.02.2017 |

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| 15/01312/FULM AJ Coleman Street | 56-60 Moorgate, 62-64 Moorgate & 41-42 London Wall London EC2 | Demolition of 41-42 London Wall; Dismantling and re-erection of the front facade of 62-64 Moorgate in a stretched form and demolition of the remainder of the building; Demolition behind retained facade of 56-60 Moorgate with dismantling and reconstruction of the facade at 4th and 5th floors in a stretched form. All to provide a new building at 41-42 London Wall and behind the facades of 56-64 Moorgate, comprising office accommodation (Class B1a) at part ground, and first to seventh floors, and flexible (dual) retail (Class A1) and restaurant (Class A3) at ground and basement floors, replacement windows and shopfronts. New entrance at 56-60 Moorgate, together with ancillary plant at roof level. Provision of cycle parking, refuse and recycling storage. (Total floorspace 3,650sq.m GIA). | Approved 14.02.2017 |
| 16/01353/ADVT Coleman Street | 160 - 161 Salisbury House London Wall London EC2M 5QD | Installation and display of : (i) internally illuminated fascia sign measuring 3.3m wide by 0.7m high located at a height of 3.6m above ground floor level (ii) internally illuminated fascia sign measuring 3.4m wide by 0.7 high located at a height of 3.67m above ground floor level (iii) internally illuminated projecting sign measuring 0.6m wide by 0.6 high located at a height of 2.7m above ground floor level. | Approved 14.02.2017 |

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| 16/01304/ADVT Coleman Street | 25 Copthall Avenue London EC2R 7BP | Installation and display of: (i) one set of halo illuminated fascia lettering measuring 0.16m high by 4.8m wide at a height of 3.7m above ground floor level; (ii) one set of illuminated fascia lettering measuring 0.16m high by 4.6m wide at a height of 3.7m above ground floor level on a background fascia panel; (iii) two sets of non-illuminated numbers measuring 0.85m high by 0.64m wide at a height of 1.17m above ground floor level to each column; (iv) two sets of halo illuminated numbers measuring 0.945m high by 0.7m wide at a height of 1.67m above ground floor level to either side of the office entrance; (v) one internally letter only illuminated projecting sign measuring 0.571m high by 0.4m wide at a height of 2.69m above ground floor level. | Approved 02.03.2017 |
| 16/01354/ADVT Coleman Street | City Point 1 Ropemaker Street London EC2Y 9AW | Installation and display of: (i) one internally illuminated fascia sign measuring 2.38m high by 1m wide at a height above ground of 0.03m; (ii) one internally illuminated fascia sign measuring 0.19m high by 2.01m wide at a height above ground of 2.37m; and (iii) one internally illuminated projecting sign measuring 1.26m high by 0.5m wide at a height above ground of 2.26m. | Approved 02.03.2017 |
| 16/01174/FULL Cheap | 143 - 144 Cheapside London EC2V 6BJ | Installation of a new full height glazed double door and new fascia panel. | Approved 14.02.2017 |

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| 16/01175/ADVT Cheap | 143 - 144 Cheapside London EC2V 6BJ | Installation and display of ; (i) one halo illuminated fascia lettering measuring 0.21m high by 3.33m wide at 2.89m above ground floor level; (ii) an internally illuminated projecting sign measuring 0.61m high by 0.61m wide at 2.64m above ground floor level. | Approved 14.02.2017 |
| 16/01347/FULL Cheap | 81 - 82 Cheapside London EC2V 6EB | Alterations to the existing shopfront. | Approved 14.02.2017 |
| 16/01348/ADVT Cheap | 81 - 82 Cheapside London EC2V 6EB | Installation and display of : i) internally illuminated projecting sign measuring 0.6m wide by 0.4m high located at a height of 3.6m above ground floor level; ii) internally illuminated fascia sign measuring 4.1m wide by 0.6m high located at a height of 3.5m above ground floor level iii) internally illuminated fascia sign measuring 0.7m wide by 0.5m high located at a height of 3.6m above ground floor level. | Approved 14.02.2017 |
| 16/01299/MDC Cordwainer | 60 Cheapside London EC2V 6AX | Details of dormer windows pursuant to part c) of condition 2 and Construction Management Plan pursuant to conditions 3 and 5 of planning permission dated 11th June 2016 (reference 15/00095/FULL). | Approved 23.02.2017 |
| 16/01194/POD C Dowgate | Cannon Green Building 27 Bush Lane & 1 Suffolk Lane London EC4R OAN | Submission of Local Procurement, Jobs and Brokerage statement pursuant to schedule 3 paragraph 2.1 and 4.2 of the Section 106 agreement dated 4th November 2016 application reference 16/00102/FULL. | Approved 14.02.2017 |

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| 16/01300/FULL Dowgate | 76 Cannon Street London EC4N 6AE | Installation of: (i) a new entrance and canopy on the Cannon Street elevation; (ii) creation of a new terrace at roof level; (iii) installation of a balustrade to the existing level six terrace. | Approved 16.02.2017 |
| 16/01364/LBC Farringdon Within | Holborn Viaduct London EC1A 2AT | Installation of 10 lanterns and associated infrastructure to arches below Farringdon Street Bridge. | Approved 16.02.2017 |
| 16/01233/MDC Farringdon Within | 20 Old Bailey London EC4M 7AN | Submission of details of particulars and samples of the materials to be used on all external faces of the building including external and ground level surfaces of the north, south and west facades as amended in application 16/00417/FULL and details of the position and size of the green roofs pursuant to conditions 8 (part a), (part f), (part g), (part i) and 10 of planning permission dated 30/06/2016 (16/00417/FULEIA). | Approved 21.02.2017 |
| 16/01089/FULL Farringdon Within | 77 Carter Lane London EC4V 5EP | Installation of a rooflight in the roof of Flat 7. | Approved 23.02.2017 |
| 17/00037/MDC Farringdon Within | Site Bounded By 34-38, 39-41, 45-47 & 57B Little Britain & 20, 25, 47, 48-50, 51-53, 59, 60, 61, 61A & 62 Bartholomew Close, London EC1 | Noise Dust Vibration Management Plan for Phase 3 (demolition) pursuant to Condition 14 (in part) of planning permission dated 24 July 2015 (ref: 15/00417/FULMAJ). | Approved 02.03.2017 |
| 16/01134/FULL Farringdon Without | Halsbury House 35 Chancery Lane London WC2A 1EL | Use of part of the ground floor and part of the lower ground floor for a spin studio (Class D2) in lieu of retail (Class A1-A3) (300sq.m). | Approved 14.02.2017 |

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| 16/01230/POD C Farringdon Without | Dewhurst House 24-30 West Smithfield London EC1 | Submission of Local Procurement Strategy and Local Training, Skills and Job Brokerage Strategy pursuant to schedule 5 paragraph 2.1, 3.2 and 3.5 of Section 106 agreement dated 17 November 2016 in association with planning permission for redevelopment, application reference 16/00215/FULL | Approved 14.02.2017 |
| 16/01289/MDC Farringdon Without | 25-26 Chancery Lane London WC2A 1LB | Details of external surfaces within the site boundary pursuant to condition 6(o) of planning permission 11/00426/FULMAJ dated 28.03.12. | Approved 14.02.2017 |
| 17/00079/NMA Farringdon Without | 25 - 32 Chancery Lane & 2 Bream's Building London WC2A 1LS | Non-material amendment under section 96A of the Town and country Planning Act 1990 (as amended) to planning permission 11/00426/FULMAJ dated 28.03.2012 to revise the internal layout of proposed retail uses at ground and lower ground floor levels. | Approved 02.03.2017 |
| 16/01369/LDC Langbourn | 60 Lombard Street London EC3V 9EA | Submission of details of the new staircase and landing within the main entrance lobby pursuant to partial discharge of condition 2(f) of listed building consent dated 13.09.2016 (Ref: 16/00651/LBC). | Approved 14.02.2017 |
| 16/00858/MDC Langbourn | Land Bounded By Fenchurch Street, Fen Court, Fenchurch Avenue And Billiter Street (120 Fenchurch Street), London EC3 | Submission of details of the roof garden for level 15 pursuant to discharge of condition 18 (f) (in part) of planning permission dated 8th February 2016 (14/00237/FULMAJ). | Approved 16.02.2017 |

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| 15/01114/FULL Lime Street | 36 Great St Helen's London EC3A 6AP | Section 73 (a) application for the implemented partial demolition of the building and retention of works carried out without complying with the following conditions 2, 3, 4, 5, 6, 7, 8, 10 of planning permission dated 13th February 2014 (App No 13/01130/FULL). | Approved 21.02.2017 |
| 16/00210/MDC Tower | 76 - 86 Fenchurch Street, 1 - 7 Northumberland Alley & 1 & 1A Carlisle Avenue London EC3N 2ES | Details of (i) external materials; (ii) new facades, fenestration and entrances; (iii) a typical bay of the development; (iv) stonework; (v) soffits, handrails and balustrades; (vi) junctions with adjoining premises; (vii) ventilation and air-conditioning for retail uses; and (viii) the location, size and design of louvres and plant screens, all pursuant to conditions 11 (a), (b), (c), (d), (e), (f), (h) and (i) of planning permission (application no.15/00702/FULMAJ) dated 20th January 2016. | Approved 14.02.2017 |
| 16/01261/ADVT Tower | 1 Aldgate London EC3N 1RE | Installation and display of: (i) one set of internally illuminated letters measuring 0.3m high by 1.39m wide at a height above ground of 3.5m; (ii) one set of vinyl letters measuring 0.1m high by 0.4m wide at a height above ground of 3.4m; and (iii) one projecting sign measuring 0.6m high by 0.72m wide at a height above ground of 3.49m. | Approved 14.02.2017 |
| 16/01366/FULL Tower | 2 America Square London EC3N 2LU | Change of use of ancillary car parking (Class B1) use to retail (Class A1) use and associated works to include improvements to landscaping and public access. | Approved 17.02.2017 |

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| 17/00011/MDC Tower | 10 Trinity Square London EC3N 4AJ | Details of alterations to the Tower Room including the location of plant pursuant to condition 10(d) (in part), 10(h) (in part), 17 and 18 of planning permission (application no. 11/00317/FULMAJ) dated 29th March 2012 and condition 4(i) (in part) of listed building consent (application no. 14/00778/LBC) dated 16th January 2015. | Approved 28.02.2017 |
| 16/01132/FULL Walbrook | The Bank of England Threadneedle Street London EC2R 8AH | Application under S73 of the Town and Country Planning Act for the variation of Condition 3 of planning permission 15/00742/FULL dated 12.11.2015 for the installation of three boiler flues and two generator flues extending from basement level to roof level, to extend the period of the temporary works to 01.12.2019. | Approved 14.02.2017 |
| 16/01133/LBC Walbrook | The Bank of England Threadneedle Street London EC2R 8AH | Application under Section 19 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to vary Condition 3 of listed building consent 15/00763/FULL dated 12.11.2015 for the installation of three boiler flues and two generator flues extending from basement level to roof level, to extend the period of the temporary works to 01.12.2019. | Approved 14.02.2017 |

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| 17/00010/BANK Walbrook | Site Bounded By King William Street, Cannon Street, Abchurch Lane & Nicholas Lane Incorporating 10 King William Street, 12 Nicholas Lane, 14 Nicholas Lane, 135-141 Cannon Street, 143-149 Cannon Street & 20 Abchurch Lane, London, EC4 | Submission of details of a programme of archaeological work pursuant to condition 7 (in part) of TWAO dated 15.12.2015. | Approved 28.02.2017 |
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Agenda Item 5

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| Committee(s) | Dated: |
| Planning and Transportation | 21 st March 2017 |
| Subject: Valid planning applications received by Department of the Built Environment | Public |
| Report of: Chief Planning Officer and Development Director | For Information |

Summary

Pursuant to the instructions of your Committee, I attach for your information a list detailing development applications received by the Department of the Built Environment since my report to the last meeting.

Any questions of detail arising from these reports can be sent to plans@cityoflondon.gov.uk.

Details of Valid Applications

| Application Number & Ward | Address | Proposal | Date of Validation |
|---|--|--|---------------------------|
| 17/00106/FULL Bishopsgate | Eldon House, 2 - 3 Eldon Street, London, EC2M 7LS | Replacement of windows and door at ground floor level and installation of a projecting canopy. | 13/02/2017 |
| 17/00111/FULL Bishopsgate | 11 Devonshire Square, London, EC2M 4YR | Installation of an entrance post at Building 11 Devonshire Square. | 15/02/2017 |
| 17/00140/FULL Bread Street | The London Stock Exchange, 10 Paternoster Square, London, EC4M 7DX | Installation of a war memorial at ground floor level on the Rose Street elevation of the building. | 21/02/2017 |
| 17/00146/FULL Bridge And Bridge Without | 23 - 29 Eastcheap, London, EC3M 1DE | Installation of louvres within the stallriser on the Philpot Lane elevation. | 25/02/2017 |

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| 16/01255/FULL Coleman Street | 25 Copthall Avenue, London, EC2R 7BP | Installation of illuminated stretched fabric ceiling panels to replace the existing shallow barrel vaulted coiffeurs ceiling within undercroft. Removal of side fixed light fittings; top hung metal framed signs to undercroft to be replaced with new side fixed retail signage. Installation of external floor finishes to the three bay colonnades. | 07/02/2017 |
| 17/00102/FULL Cripplegate | City Of London School For Girls St Giles' Terrace, Barbican, London, EC2Y 8BB | Refurbishment of timber framed windows and timber doors and replacement of clerestory metal framed windows. | 10/02/2017 |

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| Committee: | Date: |
| Planning and Transportation | 21 March 2017 |
| Subject: 117 - 121 Bishopsgate London EC2M 3UJ External alterations to the shopfront, installation of two Automated Telling Machines (ATMs) to the shopfront and associated works. | Public |
| Ward: Bishopsgate | For Decision |
| Registered No: 17/00062/FULL | Registered on: 27 January 2017 |
| Conservation Area: Bishopsgate | Listed Building: No |

Summary

The application is for the installation of modern glazed shopfronts at 117-121 Bishopsgate.

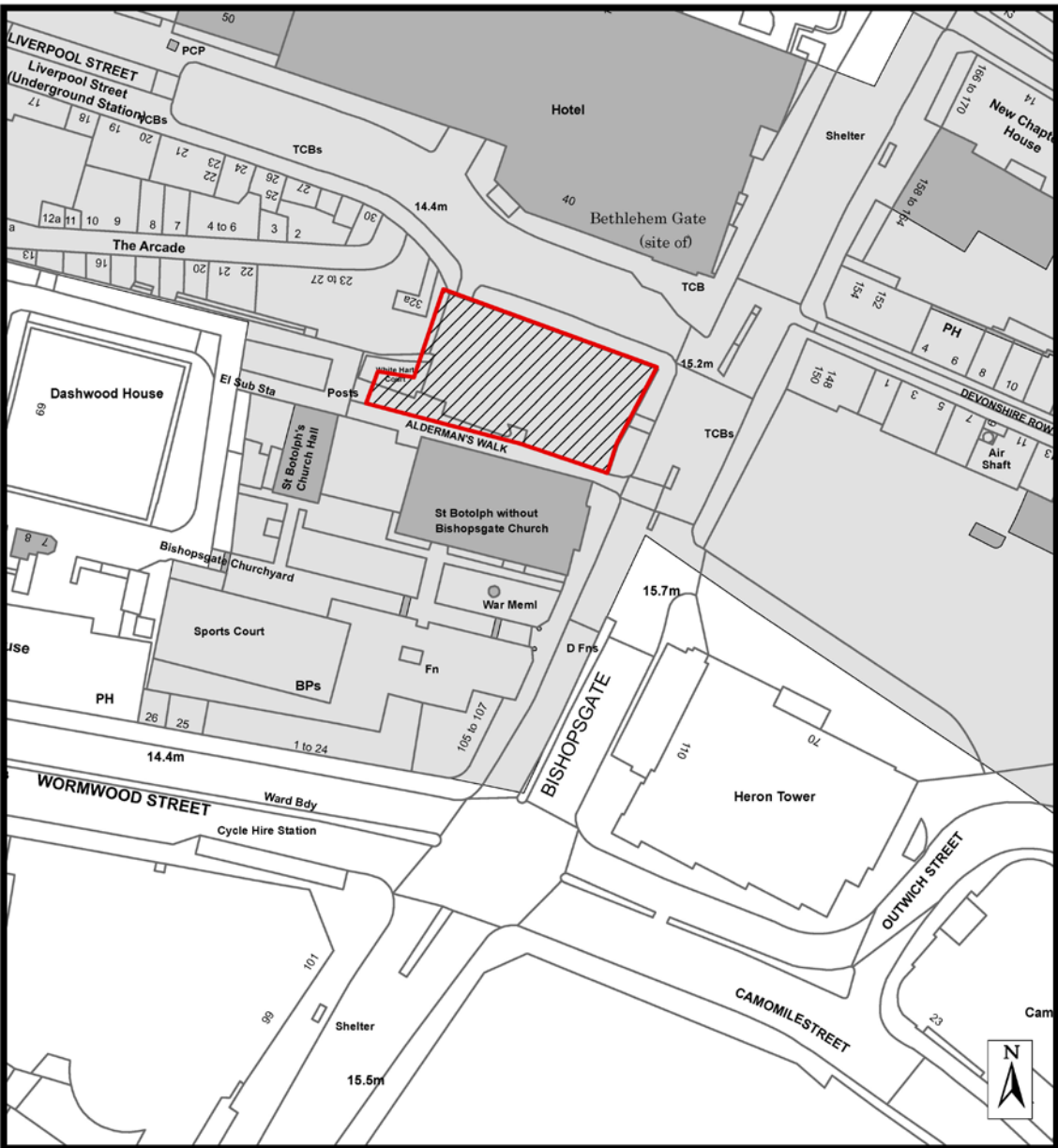
117-121 Bishopsgate occupies a large and prominent corner site at the junction of Bishopsgate and Liverpool Street, opposite Liverpool Street Station, the 'gateway' to the City from the north and east. The site is in the Bishopsgate Conservation Area and in a Principal Shopping Centre. It is adjacent to and within the immediate setting of two listed buildings, St Botolph's Without Bishopsgate (grade II*) and grade II listed Great Eastern Hotel.

It is considered that the unsympathetic alterations to the shopfront, incorporating substantial elements of glazing and removing the attractive architectural features of the stallrisers, pilasters and transoms and installation of large, open, glazing, the proposed shopfront would detract from the appearance of the two buildings and thereby the character and appearance of the Bishopsgate Conservation Area and the setting of St Botolph's Church (grade II*) and the former Great Eastern Hotel (grade II), contrary to London Plan Policies 7.6 and 7.8, Local Plan Policies CS 10, CS 12, DM 10.1, DM 10.5, DM 12.1, DM 12.2 and DM 12.3 and policies contained in the National Planning Policy Framework.

Recommendation

It is therefore recommended that the planning application be refused for the grounds set out in the attached schedule.




City of London Site Location Plan



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ADDRESS:
117-121 Bishopsgate

CASE No.
17/00062/FULL

-  SITE LOCATION
-  LISTED BUILDINGS
-  CONSERVATION AREA BOUNDARY



DEPARTMENT OF THE BUILT ENVIRONMENT

117-121 Bishopsgate

17/00062/FULL



View of site from Bishopsgate looking west



View of site from Bishopsgate looking south-west

Main Report

Site

1. 117-121 Bishopsgate occupies a large and prominent corner site at the junction of Bishopsgate and Liverpool Street, opposite Liverpool Street Station, the 'gateway' to the City from the north and east. The site is in the Bishopsgate Conservation Area and in a Principal Shopping Centre. It is adjacent to and within the immediate setting of two listed buildings, St Botolph's Without Bishopsgate (grade II*) and grade II listed Great Eastern Hotel.
2. Planning permission was approved on 28 March 2012 (and amended on 23 June 2014, Ref. 13/01199/FULMAJ)) for:
Redevelopment behind partial retained facades on Bishopsgate and Liverpool Street to provide retail (A1) use at ground and basement and office (B1) at (part) ground and 1st to 8th floors.
3. This permission is now largely implemented.
4. 117 and 119-121 Bishopsgate are notable buildings which make a positive contribution to the character and appearance of the Bishopsgate Conservation Area and are considered to be undesignated heritage assets. 117 Bishopsgate, in the south eastern corner of the site, is opposite the Church of St Botolph's Without Bishopsgate, with elevations to Alderman's Walk and White Hart Court. Originally early 18th Century, it is four storeys plus attic above a basement with a ground floor retail unit and ancillary office above. 119-121 Bishopsgate, dating from 1829, is four-storeys (above basement) stucco-fronted building which until recently housed the White Hart Public House (A4 use) which occupied part of the basement and ground, with office uses above.
5. The buildings were previously considered for listing in 2006 and although not listed, are of historic and aesthetic significance because of the early 19th century frontage buildings which retain their classical proportions and many of their original details. As such, they make a positive contribution to the traditional historic streetscape, particularly to Bishopsgate and have group value with grade II* listed St Botolph's Church to their south and the grade II listed Great Eastern Hotel to the north.

Relevant Planning History

6. Planning permission and a subsequent amendment application was granted for redevelopment behind partial retained facades on Bishopsgate and Liverpool Street to provide retail (A1) use at ground and basement and office (B1) at (part) ground and 1st to 8th floors. (Ref 09/00192/FULMAJ and 13/01199/FULMAJ). These works are currently under construction and almost complete.

7. The decision included condition 15 which required details of shopfronts (and other specific design details) Two applications relating to the shopfront design and proposed materials have been approved (Refs. 15/00930/MDC and 16/00070/MDC).
8. A non-material amendment and a S73 variation of condition application have recently been approved to enable the use of the ground and basement as flexible A1/A2 (Refs. 17/00047/NMA and 17/00041/FULL), to enable use of the premises as a bank.
9. A concurrent application for express advertisement consent (Ref. 17/00063/ADVT) is before your committee for determination.

Proposals

10. Planning permission is sought for external alterations to the shopfront, installation of two Automated Telling Machines (ATMs) and associated works.

Consultations

11. The application has been publicised on site and in the press. No comments were received as a consequence of this consultation.
12. The Conservation Area Advisory Committee objected to the proposal considering that:
Losing the stall risers and pilasters would be detrimental to the Conservation Area, radically changing the original character of this former restoration project.

Policy Context

13. The Development Plan consists of the London Plan and the City of London Local Plan. The London Plan and Local Plan policies that are most relevant to this case are set out in Appendix A of this report.
14. Government policy is contained in the National Planning Policy Framework (NPPF) and guidance in the National Planning Practice Guide (NPPG).

Considerations

15. 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 conservation area, to apply considerable weight and importance to the need to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area. (S71 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).

In considering whether to grant planning permission for development which affects a listed building or its setting, to apply considerable weight and importance to the need to have special regard for 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). In this case the duty is to the desirability of preserving the setting of listed buildings;

16. The principal issues in considering this application are:
- Design and Conservation: The impact of the proposal on the host buildings; the impact on the character, appearance and heritage significance of the Bishopsgate Conservation Area and; the impact on the setting of nearby listed buildings.
 - Access: The accessibility of the building to all users.

Design and Conservation

17. In assessing this application, special attention should be paid to preserving or enhancing the character and appearance of the Conservation Area. The Bishopsgate Conservation Area covers Bishopsgate and its environs and contains buildings that display an exceptional richness and variety in architectural styles and age. The significance of the Conservation Area is therefore architectural and historical.
18. In determining the previous applications (09/00192/FULMAJ and 13/01199/FULMAJ), significant weight was afforded to the retention of the facades of the historic buildings on the site, to ensure the site's architecture remained contextual, particularly when viewed at street level and this is noted at Page 16 of the Bishopsgate Conservation Area Character Summary and Management Strategy SPD (adopted September 2014). This describes the buildings as:

Forming a small group with St Botolph's Church, 117 and 119-121 are the earliest buildings on the west side of the street in the conservation area. The White Hart Inn, 119-121, was rebuilt in 1829 to replace its 16th century predecessor, in a simple neoclassical regency style with a

stuccoed exterior and an entrance to the remaining section of White Hart Court. Although very different in style, the group is linked by the use of pale coloured materials: stone for the church and cream painted stucco for the row of adjacent buildings. These buildings contrast strongly with the use of red brick at the former Great Eastern Hotel across the junction to Liverpool Street, where the built scale changes significantly too.'

19. The site is identified in local views within the Conservation Area Character Summary. View 4 explicitly identifies the view north towards St Botolph's and the former White Hart Inn as being important.
20. The current application for the installation of a new shopfront proposes significant alterations to the shopfront design as approved by applications 15/00930/MDC and 16/00070/MDC by removing pilasters, transoms and stallrisers in order to install large modern glazed areas in order to improve visibility into the bank. The applicant states in their supporting documents that they take an individual design approach to each building. Despite detailed pre-application discussions and further discussions and negotiations throughout the course of this application no satisfactory resolution has been reached. The negotiations sought to reach a suitable design approach, which would have continued to provide a high level of visibility into the bank but which would be in-keeping with the building, Conservation Area and setting of nearby listed buildings and thereby be considered to be in accordance with policies. However, the applicant has chosen not to amend their design, in favour of providing large elements of glazing which they describe as easy to clean, low maintenance and easy to replace if damaged. These considerations do not address the architectural significance of the buildings and their location within the Conservation Area.
21. Policy DM 10.5 of the Local Plan relates specifically to shopfronts and requires their design to be consistent with the upper floors of the corresponding building and compatible in scale and appearance with the surrounding streetscene. The proposed alterations are considered to be inappropriate to the building as they fail to have regard to the historic character of the attractive historic, retained facades and would appear incongruous within the streetscene.
22. The shopfront does not respect the differing character of the two distinct but complementary historic buildings that make up the site and would undermine the architectural significance and integrity of the buildings, eroding their relationship with nearby buildings, particularly the neighbouring St Botolph's church which is one of the most important buildings in the Conservation Area and thereby detract from the character and appearance of the wider Conservation Area.
23. The National Planning Policy Framework, at paragraph 132, states that great weight should be afforded to the conservation of heritage assets. Paragraph 134 states that where such harm is caused to the

significance of designated assets then this should be weighed against the potential public benefits. In line with the Court of Appeal judgement in *Barnwell Manor Wind Energy Ltd v East Northants DC* [2014] EWCA Civ 137 when special attention is to be paid pursuant to a statutory duty under sections 66 or 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 it is to be given “considerable importance and weight” by the decision-maker when carrying out the balancing exercise, whether the harm is substantial or less than substantial.

24. The harm that would be caused by the shopfront to the significance of the undesignated heritage asset, the wider Conservation Area and the setting of nearby listed buildings is considered to be significant. This harm should be weighed against the public benefits of the proposal.
25. The public benefit of the scheme, identified by the applicant are that the bank actively employs staff from the local community, hosts events for local businesses, Chambers of Commerce, Town Centre Managers, charities and schools and that they present themselves by conceptually being a retailer rather than a bank. The bank would therefore have economic benefits which provides some weight in favour of the development. However, these benefits arise from the use and a shopfront which would be acceptable in design terms would not prevent these benefits from being realised and in this case, with the proposed design, the public benefits of the shopfront do not outweigh the harm caused to the Bishopsgate Conservation Area and Officers are of the view that this public benefit could continue to be provided with a revised shopfront design. The quality of the City’s historic environment contributes to its status as a ‘World Financial Centre’ and the balance between the new and safeguarding the old is a significant planning balance that needs to be made.
26. Suitably design ATMs within an appropriate shopfront would be acceptable.

Access

27. The proposed shopfront would be accessible to all users in accordance with policy DM 10.8

Conclusions

28. Due to the unsympathetic alterations to the shopfront, incorporating substantial elements of glazing and removing the attractive architectural features of the stallrisers, pilasters and transoms and installation of large, open, glazing, the proposed shopfront would detract from the appearance of the two buildings and thereby the character and appearance of the Bishopsgate Conservation Area and the setting of St Botolph’s Church (grade II*) and the former Great Eastern Hotel (grade II), contrary to London Plan Policies 7.6 and 7.8,

Local Plan Policies CS 10, CS 12, DM 10.1, DM 10.5, DM 12.1, DM 12.2 and DM 12.3 and policies contained in the National Planning Policy Framework.

29. The application is therefore recommended for refusal.

Background Papers

Internal

Letter 14th February 2017 from the Access Adviser to Deloitte Real Estate

External

Planning Statement January 2017 Deloitte

Covering Letter 26th January 2017 Deloitte

Letter 25th February 2017 City of London Conservation Area Advisory Committee.

Appendix A

London Plan Policies

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

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 7.8 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.

Relevant Local Plan Policies

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.

DM10.1 New development

To require all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;

- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

DM10.5 Shopfronts

To ensure that shopfronts are of a high standard of design and appearance and to resist inappropriate designs and alterations. Proposals for shopfronts should:

- a) respect the quality and architectural contribution of any existing shopfront;
- b) respect the relationship between the shopfront, the building and its context;
- c) use high quality and sympathetic materials;
- d) include signage only in appropriate locations and in proportion to the shopfront;
- e) consider the impact of the installation of louvres, plant and access to refuse storage;
- f) incorporate awnings and canopies only in locations where they would not harm the appearance of the shopfront or obstruct architectural features;
- g) not include openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity;
- h) resist external shutters and consider other measures required for security;
- i) consider the internal treatment of shop windows (displays and opaque windows) and the contribution to passive surveillance;
- j) be designed to allow access by users, for example, incorporating level entrances and adequate door widths.

DM10.8 Access and inclusive design

To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished), open spaces and streets, ensuring that the City of London is:

- a) inclusive and safe for all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;
- b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
- c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.

2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.
3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.
4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.2 Development in conservation areas

1. Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.
2. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.
3. Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement building, and ensuring that the developer has secured the implementation of the construction of the replacement building.

DM12.3 Listed buildings

1. To resist the demolition of listed buildings.
2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

SCHEDULE

APPLICATION: 17/00062/FULL

117 - 121 Bishopsgate London EC2M 3UJ

External alterations to the shopfront, installation of two Automated Telling Machines (ATMs) to the shopfront and associated works.

REASONS FOR REFUSAL

- 1 Due to the unsympathetic alterations to the shopfront, incorporating substantial elements of glazing and removing the attractive architectural features of the stallrisers, pilasters and transoms and installation of large, open, glazing, the proposed shopfront would detract from the appearance of the two buildings and thereby the character and appearance of the Bishopsgate Conservation Area and the setting of St Botolph's Church (grade II*) and the former Great Eastern Hotel (grade II), contrary to London Plan Policies 7.6 and 7.8, Local Plan Policies CS 10, CS 12, DM 10.1, DM 10.5, DM 12.1, DM 12.2 and DM 12.3 and policies contained in the National Planning Policy Framework.

INFORMATIVES

- 1 The Plans and Particulars accompanying this application are: drawings numbered ES0; ES0.1;E0.0; E1.0; E1.1; E3.0; E3.1; E3.2. A0.0; A1.0 Rev 2; A1.1 Rev 2; A3.0; A3.1; A3.2; A4.0; A4.1; A5.0; A5.1; A5.2; A7.1.
- 2 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 Local 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.

However, notwithstanding the above, it has not been possible to achieve solutions to the problems as the proposals are contrary to planning policies, do not demonstrate other over-riding material considerations, and negotiations could not overcome the problems.

City of London Conservation Area Advisory Committee

Mr. Ted Rayment,
Department of the Built Environment,
Corporation of London,
P.O. Box 270,
Guildhall,
London EC2P 2EJ

25th February 2017

Dear Sir,

At its meeting on 23rd February 2017 the City of London Conservation Area Advisory Committee considered the following planning application and reached the decision given below:

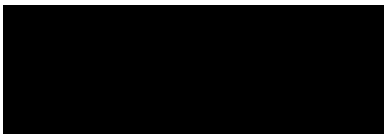
C.26 17/00062/FULL - 117 - 121 Bishopsgate, London EC2M 3UJ
Bishopsgate Conservation Area/Bishopsgate Ward. Ward Club rep. Peter Luscombe.

External alterations to shopfront, installation of two Automated Telling Machines (ATMs) to shopfront, display of advertisements and associated works.

The Committee objected to the proposal considering that losing the stall risers and pilasters would be detrimental to the conservation area, radically changing the original character of this former restoration project.

I should be glad if you would bring the views of the Committee to the attention of the Planning and Transportation Committee.

Yours faithfully,



Mrs. Julie Fox
Secretary

| | |
|---|--|
| Committee: | Date: |
| Planning and Transportation | 21 March 2017 |
| Subject: 117 - 121 Bishopsgate London EC2M 3UJ Installation and display of (i) nine internally illuminated fascia signs each measuring 0.63m high by 6.8m wide; 0.63m high by 8.3m wide; 0.63m high by 5.8 wide; 0.63m high by 2.4m wide; 0.63m high by 2.4m wide; 0.63m high by 5.4m wide; 0.63m high by 2.9m wide; 0.63m high by 3m wide; 0.63m high by 5.7m wide respectively all at a height of 3.3m above ground level; (ii) one internally illuminated fascia sign measuring 0.63m high by 2.5m wide at a height of 3.18m above ground level; (iii) four internally illuminated projecting signs measuring 0.571m high by 1.124m wide at a height of 3.39m above ground floor level and (iv) two internally illuminated ATM signs measuring 0.179m high by 0.464m wide at a height of 1.51m above ground floor level; (v) two internally illuminated ATM signs measuring 0.08m high by 0.31m wide at a height of 1.29m above ground floor level and two non illuminated door handle logo sign. | Public |
| Ward: Bishopsgate | For Decision |
| Registered No: 17/00063/ADVT | Registered on: 3 February 2017 |
| Conservation Area: Bishopsgate | Listed Building: No |

Summary

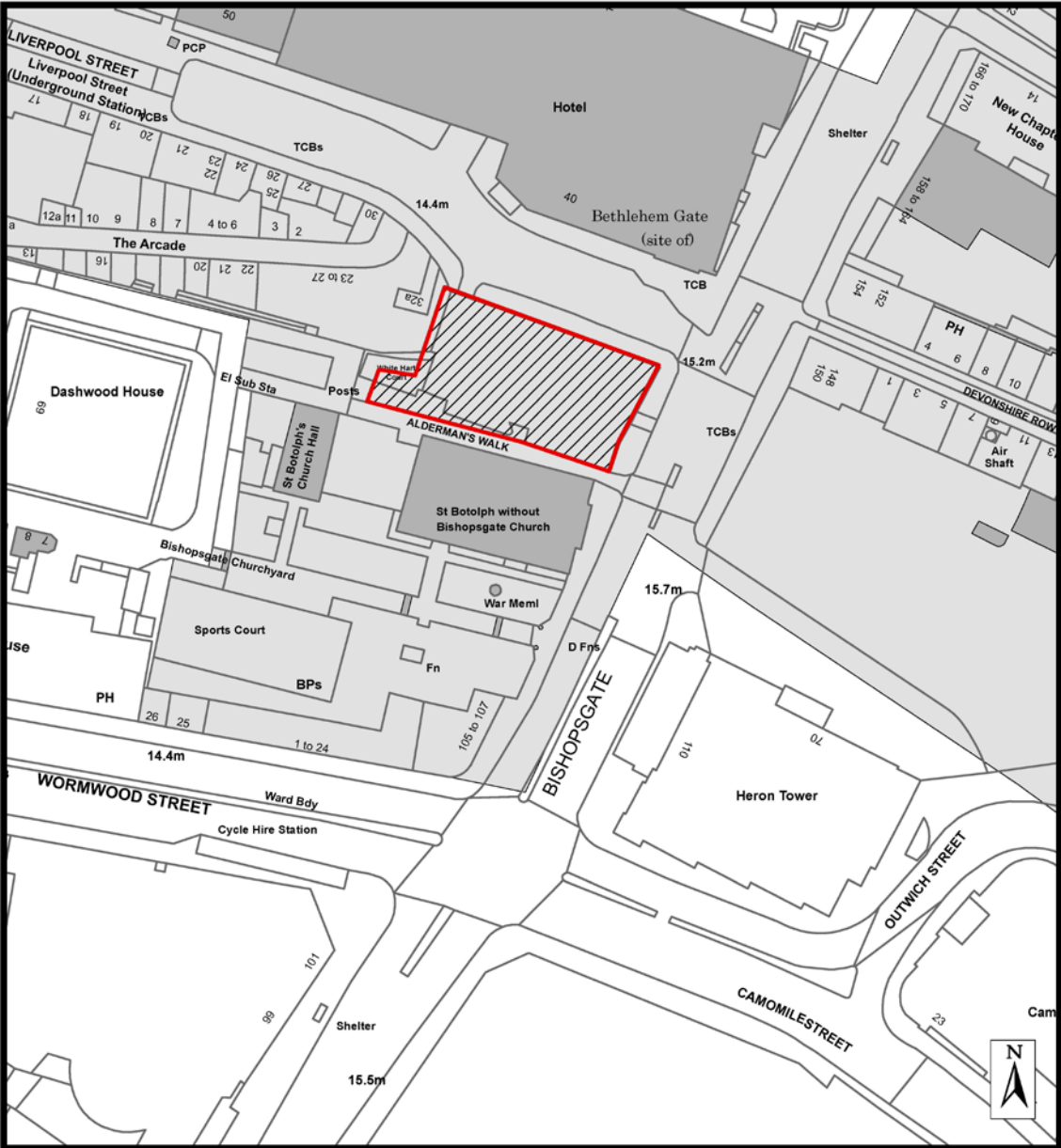
An application for express consent for advertisements has been submitted for the display of adverts at 117-121 Bishopsgate in relation to the use of the premises as a bank.

The proposed commercial advertising is considered to be unacceptable owing to its detrimental impact on the integrity of the building and character of the street through the incorporation of such insensitive advertisement proposals to the ground floor frontage. By virtue of the size, design, illumination, quantum and positioning on the building they would be visually dominant and highly conspicuous, particularly when viewed at night. The prominence of the advertisement would be exacerbated by the lack of strident and excessive advertising in the locality and the exposed location of the building at a junction with Liverpool Street and the relationship with to the setting of the Grade II* Listed St Botolph's Without Church. The proposals would be entirely out of character with the Bishopsgate Conservation Area.

Recommendation

It is therefore recommended that the express consent for adverts be refused for the grounds set out in the attached schedule.

City of London Site Location Plan



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ADDRESS:
117-121 Bishopsgate

CASE No.
17/00063/ADVT

-  SITE LOCATION
-  LISTED BUILDINGS
-  CONSERVATION AREA BOUNDARY



DEPARTMENT OF THE BUILT ENVIRONMENT

117-121 Bishopsgate

17/00063/ADVT



View of site from Bishopsgate looking west



View of site from Bishopsgate looking south-west

Main Report

Site

1. As described in the planning report in respect of 17/00062/FULL.

Proposal

2. Express consent is sought for the installation of ten internally illuminated fascia signs, four internally illuminated projecting signs, four internally illuminated ATM signs and two non-illuminated door handle logo signs.

Relevant Site History

3. There is a concurrent application for alterations to the shopfront before you today and the relevant site history is set out within that report (Ref.17/00062/FULL).

Comments

4. The Conservation Area Advisory Committee objected to the proposals, stating:
The fully internally illuminated fascia signs are overpowering and detrimental to the Conservation Area. The Committee also objected to the internally illuminated projecting signs considering them to be excessive in number and in depth recommending that there be a total of two signs. The Committee had no objection to the location of the ATM machines, but objected to the internally illuminated signage.
5. Detailed pre-application and post application discussions were held when concerns in relation to the proposals were raised and suggestions made as to what would be likely to be acceptable. No amendments have been made to the proposal following these discussions.

Policy Context

6. The Development Plan consists of the London Plan and the City of London Local Plan. The London Plan and Local Plan policies that are most relevant to this case are set out in Appendix A of this report.
7. Government policy is contained in the National Planning Policy Framework (NPPF) and guidance in the National Planning Practice Guidance (NPPG). Relevant in this case are:
Paragraph 67 of the NPPF states "Poorly placed advertisements can have a negative impact on the appearance of the built and natural environment".
Paragraph 132 gives great weight to conserving heritage assets in a manner appropriate to their significance, noting that any harm or loss to heritage assets should require clear and convincing justification. It states that significance can be harmed through alteration of the

heritage asset or development within its setting.

Paragraph 133 and 134 advise on cases where proposals would lead to substantial or less than substantial harm to the significance of a designated heritage asset. In both cases, harm needs to be weighed against public benefits, although the tests for substantial harm are more rigorous.

8. The City of London Corporation has Supplementary Planning Guidance on Shopfronts. This sets out that in order to protect the dignified character of the City's streets, advertising should respect and enhance its locality. Particular care is necessary in Conservation Areas and listed buildings. Where illumination is considered to be appropriate, it should be from external sources as it is more discreet than bulky fascia boxes. No more than one projecting sign per business elevation will normally be acceptable.
9. Bishopsgate Conservation Area Character Summary and Management Strategy SPD (adopted September 2014) says:
'The character of signage is generally traditional and restrained, and there are few illuminated signs or conspicuous shop canopies that might otherwise have a substantial impact on the area's character and appearance. There are many locations where the quality and appearance of signage and advertising in the area could be enhanced, consistent with its traditional character.'

Considerations

10. In accordance with The Town and Country Planning (Control of Advertisements) (England) Regulations 2007, advertisement control is exercised in the interests of amenity and public safety taking into account the provisions of the development plan, so far as they are material, and any other relevant factors. Factors relevant to amenity include the general characteristics of the locality, including the presence of any feature of historic, architectural, cultural or similar interest.
11. The material considerations in the assessment of this application are the impact that the proposed advertisements would have on the appearance of the building as a non-designated heritage asset within the Conservation Area, impact on the streetscape and visual amenity of the locality and impact on the setting of nearby listed buildings, in the context of local and national planning policy and guidance.

Visual Amenity

12. The City of London, in exercising control over advertisement material, in accordance with adopted Local Plan policies, seeks to maintain the dignified character of the City by keeping advertisement material restrained. In the interests of the visual amenity of the townscape, it is important that advertising should be designed with regard to the context of the site and in keeping with the character of the area in general. It has been City of London policy for many years to resist intrusive signage. Advertising has been generally restrained both in quantity and form, with limited illumination, particularly in Conservation Areas. The benefits of this long-standing policy are evident throughout the City's townscape.
13. The application proposes 10 separate fascia signs, all of which would be entirely illuminated, with blue internally-illuminated background and red and white internally-illuminated letter advertising.
14. Because of the type of internal illumination proposed, the fascias would step forward, wrapping around the soffit of the glazing accentuating their bulk and extending below the retained abaci of the pilasters on Bishopsgate and projecting further than the finely detailed decorative Venetian dentil course, modillion cornice consul brackets, in particular, in closer views. This would be particularly marked on 117 Bishopsgate, where the fascia would project significantly forward of any string course, cornice or pediment so as to appear visually discordant accentuated by the design and degree of illumination.
15. The proposed static internal-illumination to the entire fascia signs, projecting signs and ATM signs is proposed to be 540 candelas per metre squared. Illumination at this level is considered to be very high and contrary to our Advertisement policy (DM 10.6) and the supporting paragraphs 3.10.36 and 3.10.37 which is that advertisements should not be illuminated in Conservation Areas or in the settings of listed buildings. The advertisement at 180 Bishopsgate (KFC) which has been cited as a comparable by the applicant, has a maximum illumination of 200 candelas per metre squared (Ref. 16/00887/ADVT) and only relates to the logo and therefore is not comparable.
16. The use of a mirrored and polished steel frame with bulky internally-illuminated acrylic panels and pushed through red and white lettering would make the proposed fascias unsympathetic to the historic buildings on which they would be placed.

17. The four proposed projecting signs would be excessive in number with three on the elevation facing Bishopsgate and one on the Liverpool Street elevation which would be internally-illuminated and project 1.2m over the pedestrian footway. Measuring 0.571m high by 1.124m wide, their size would not comply with City Byelaws. The degree of projection and width, the illumination and their number would be inappropriate in the context of these buildings and would be unparalleled within the Bishopsgate Conservation Area.
18. The proposed two ATM machines would each incorporate two illuminated advertisements which would add to the excessive advertising.
19. The harsh and stark appearance of the proposed adverts would detract from views of St Botolph's Church, undermining it as the principal local landmark and reducing the harmonious relationship it has with this group of buildings when viewed in association with the Church.
20. The proposed commercial advertising is considered to be unacceptable owing to its detrimental impact on the integrity of the building and character of the street through the incorporation of such insensitive advertisement proposals to the ground floor frontage. By virtue of the size, design, illumination, quantum and positioning on the building they would be visually dominant and highly conspicuous, particularly when viewed at night. The prominence of the advertisements would be exacerbated by the lack of strident and excessive advertising in the locality, the exposed location of the building at a junction with Liverpool Street and the relationship with to the setting of the grade II* Listed St Botolph's Without Church. The proposals would be entirely out of character with the Bishopsgate Conservation Area.

Public Safety

21. The advertisements would be located on the fascia of the building and would not detrimentally impact on public safety.

Conclusions

22. The proposed ten internally illuminated fascia signs, four internally illuminated projecting signs and four internally illuminated ATM sign , by reason of their bulk and size, location obscuring architectural details, design, illumination, proliferation and their visually obtrusive, incongruous and discordant appearance would cause significant harm to the visual amenity of the building and the area, including harm to the

character and appearance of the Bishopsgate Conservation Area and detrimental to the settings of the listed Church of St Botolph's Without Bishopsgate (grade II*) and the listed former Great Eastern Hotel (grade II), contrary to London Plan Policies 7.6 and 7.8 and Local Plan Policies CS 10, CS 12, DM 10.5, DM 10.6, DM 12.1 and DM 12.2 and paragraphs 67 and 132-134 of the NPPF.

23. Accordingly, it is recommended that express consent for advertisements be refused.

Background papers

External

Proposed signage strategy schedule January 2017 Deloitte

Planning Statement, January 2017 Deloitte

Covering Letter, 26 January 2017 Deloitte

Letter 25th February 2017 City of London Conservation Area Advisory Committee.

Appendix A

London Plan Policies

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

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 7.8 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.

Relevant Local Plan Policies

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.

DM10.6 Advertisements

- 1) To encourage a high standard of design and a restrained amount of advertising in keeping with the character of the City.
- 2) To resist excessive or obtrusive advertising, inappropriate illuminated signs and the display of advertisements above ground floor level.

DM10.5 Shopfronts

To ensure that shopfronts are of a high standard of design and appearance and to resist inappropriate designs and alterations. Proposals for shopfronts should:

- a) respect the quality and architectural contribution of any existing shopfront;
- b) respect the relationship between the shopfront, the building and its context;
- c) use high quality and sympathetic materials;
- d) include signage only in appropriate locations and in proportion to the shopfront;
- e) consider the impact of the installation of louvres, plant and access to refuse storage;
- f) incorporate awnings and canopies only in locations where they would not harm the appearance of the shopfront or obstruct architectural features;

- g) not include openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity;
- h) resist external shutters and consider other measures required for security;
- i) consider the internal treatment of shop windows (displays and opaque windows) and the contribution to passive surveillance;
- j) be designed to allow access by users, for example, incorporating level entrances and adequate door widths.

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.
2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.
3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.
4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.2 Development in conservation areas

1. Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.
2. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.
3. Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement building, and ensuring that the developer has secured the implementation of the construction of the replacement building.

SCHEDULE

APPLICATION: 17/00063/ADVT

117 - 121 Bishopsgate London EC2M 3UJ

Installation and display of (i) nine internally illuminated fascia signs each measuring 0.63m high by 6.8m wide; 0.63m high by 8.3m wide; 0.63m high by 5.8 wide; 0.63m high by 2.4m wide; 0.63m high by 2.4m wide; 0.63m high by 5.4m wide; 0.63m high by 2.9m wide; 0.63m high by 3m wide; 0.63m high by 5.7m wide respectively all at a height of 3.3m above ground level; (ii) one internally illuminated fascia sign measuring 0.63m high by 2.5m wide at a height of 3.18m above ground level; (iii) four internally illuminated projecting signs measuring 0.571m high by 1.124m wide at a height of 3.39m above ground floor level and (iv) two internally illuminated ATM signs measuring 0.179m high by 0.464m wide at a height of 1.51m above ground floor level; (v) two internally illuminated ATM signs measuring 0.08m high by 0.31m wide at a height of 1.29m above ground floor level and two non illuminated door handle logo sign.

REASONS FOR REFUSAL

- 1 The proposed ten internally illuminated fascia signs, four internally illuminated projecting signs and four internally illuminated ATM sign , by reason of their bulk, size, location obscuring architectural details, design, illumination, proliferation and their visually obtrusive, incongruous and discordant appearance would cause significant harm to the visual amenity of the building and the area, including harm to the character and appearance of the Bishopsgate Conservation Area and detrimental to the settings of the listed Church of St Botolph' s Without Bishopsgate (grade II*) and the listed former Great Eastern Hotel (grade II), contrary to London Plan Policies 7.6 and 7.8 and Local Plan Policies CS 10, CS 12, DM 10.5, DM 10.6, DM 12.1 and DM 12.2 and paragraphs 67 and 132-134 of the NPPF.

INFORMATIVES

- 1 The Plans and Particulars accompanying this application are: drawings numbered ES0; ES0.1;E0.0; E1.0; E1.1; E3.0; E3.1; E3.2. A0.0; A1.0 Rev 2; A1.1 Rev 2; A3.0; A3.1; A3.2; A4.0; A4.1; A5.0; A5.1; A5.2; A7.1.

City of London Conservation Area Advisory Committee

Mr. Ted Rayment,
Department of the Built Environment,
Corporation of London,
P.O. Box 270,
Guildhall,
London EC2P 2EJ

25th February 2017

Dear Sir,

At its meeting on 23rd February 2017 the City of London Conservation Area Advisory Committee considered the following planning application and reached the decision given below:

C.26 17/00063/ADVT - 117 - 121 Bishopsgate, London EC2M 3UJ

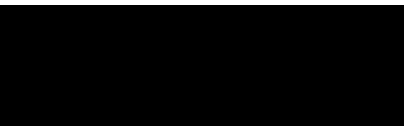
Bishopsgate Conservation Area/Bishopsgate Ward. Ward Club rep. Peter Luscombe.

Installation and display of (i) nine internally illuminated fascia signs each measuring 0.63m high by 6.8m wide; 0.63m high by 8.3m wide; 0.63m high by 5.8 wide; 0.63m high by 2.4m wide; 0.63m high by 2.4m wide; 0.63m high by 5.4m wide; 0.63m high by 2.9m wide; 0.63m high by 3m wide; 0.63m high by 5.7m wide respectively all at a height of 3.3m above ground level; (ii) one internally illuminated fascia sign measuring 0.63m high by 2.5m wide at a height of 3.18m above ground level; (iii) four internally illuminated projecting signs measuring 0.571m high by 1.124m wide at a height of 3.39m above ground floor level and (iv) two internally illuminated ATM signs measuring 0.179m high by 0.464m wide at a height of 1.51m above ground floor level; (v) two internally illuminated ATM signs measuring 0.08m high by 0.31m wide at a height of 1.29m above ground floor level and two non-illuminated door handle logo sign.

The Committee objected to the fully internally illuminated fascia signs considering them to be overpowering and detrimental to the conservation area. The Committee also objected to the internally illuminated projecting signs considering them to be excessive in number and in depth recommending that there be a total of two signs. The Committee had no objection to the location of the ATM machines, but objected to the internally illuminated signage.

I should be glad if you would bring the views of the Committee to the attention of the Planning and Transportation Committee.

Yours faithfully,



Mrs. Julie Fox
Secretary

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| | |
|---|--|
| Committee: | Date: |
| Planning and Transportation | 21 March 2017 |
| Subject: The Turret, John Wesley Highwalk Barbican London EC2 Insertion of new windows, walls, internal partition walls, mezzanine, new flue at roof level, and other alterations in connection with the use of the space as a residential unit. | Public |
| Ward: Aldersgate | For Decision |
| Registered No: 16/00770/LBC | Registered on: 22 July 2016 |
| Conservation Area: | Listed Building: Grade II |

Summary

The site forms the south western corner of the Barbican Estate and is located at the southern end of Aldersgate Street close to the Museum of London rotunda. The building is Grade II listed and is described in the listing description as "a glazed brick service tower containing stairs to Aldersgate Street and up to roof, with rounded walls and pyramidal roof". This application relates to the podium and upper level. The podium level offers access to the John Wesley Highwalk which leads to the Museum of London to the south and Thomas More House to the north. The upper level is currently gated and inaccessible to the public.

This report covers both the Planning and Listed Building applications submitted for the change of use of part of the podium and upper level of the Turret to form a single residential unit (use class C3) and associated internal and external alterations. The proposal is similar to the planning permission and listed building consent (08/00029/LBC and 08/00030/FULL) that were allowed on appeal in 2008 (not implemented) although includes improvements to the scheme.

The application has been amended. A total of 31 representations have been received to the original application: 30 objections and 1 letter of support. A further 9 representations were received to the amended application: 8 objections and 1 letter of support. The Twentieth Century Society has objected to the application. It is their view that the proposed works would detract substantially from the architectural interest of the turret. Historic England did not wish to offer any comment on this application.

Recommendation

- a) Listed building consent be granted for the works referred to above in accordance with the details set out on the attached schedule.

Main Report

For full report see application 16/00768/FULL.

Relevant Local Plan Policies

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.

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.
2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.
3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.
4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.3 Listed buildings

1. To resist the demolition of listed buildings.
2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

SCHEDULE

APPLICATION: 16/00770/LBC

The Turret, John Wesley Highwalk Barbican London EC2

Insertion of new windows, walls, internal partition walls, mezzanine, new flue at roof level, and other alterations in connection with the use of the space as a residential unit.

CONDITIONS

- 1 The works hereby permitted must be begun before the expiration of three 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 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 works pursuant to this consent 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 the elevation facing onto John Wesley Highwalk;
 - b) details of all alterations to the existing façade including submission of a method statement detailing works required to form new openings in the brickwork on the building's eastern elevation to accommodate new windows;
 - c) details of fenestration and external joinery, including new skylight;
 - d) details of the John Wesley Highwalk elevation and entrance;
 - e) details of all alterations to the public stairway including soffits, infill panels to the sides of the staircase, and lighting;
 - f) details of soffits, hand rails and balustrades including those within the southernmost arched opening on the Aldersgate frontage.
 - g) details of the integration of plant, flues, fire escapes, and other excrescences at roof level;
 - h) details of plant and ductwork to serve the existing A3 premises below.REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
- 3 Before any works thereby affected are begun, a full photographic survey of the exterior of the building, including relevant areas of the John Wesley Highwalk, the public stairs and their continuation to the upper level, and the top floor space, shall be submitted to and approved in writing by the Local Planning Authority. All photographs should be labelled and clearly identified on floorplans.

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 Local Plan: DM12.3.

- 4 The works hereby permitted shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this consent: Location plan and dwg nos 585.15_1_A_200_RevC, 585.15_1_A_201_RevC, 585.15_1_A_202_RevB, 585.15_1_A_203_RevC, 585.15_1_A_400_RevC, 585.15_1_A_401_RevC, 585.15_1_A_402_RevC, 585.15_1_A_500_RevC, 585.15_1_A_501_RevC, 585.15_1_A_502_RevC, 585.15_1_A_503_RevC, 585.15_1_A_504_RevA, and 585.15_1_A_600.

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: | Date: |
| Planning and Transportation | 21 March 2017 |
| Subject: The Turret, John Wesley Highwalk Barbican London EC2 Conversion of podium level and upper floors of Turret to form one two bedroom residential dwelling (Use Class C3), including the insertion of windows. The proposals include the rescission of part of the City Walkway. | Public |
| Ward: Aldersgate | For Decision |
| Registered No: 16/00768/FULL | Registered on: 22 July 2016 |
| Conservation Area: | Listed Building: Grade II |

Summary

The site forms the south western corner of the Barbican Estate and is located at the southern end of Aldersgate Street close to the Museum of London rotunda. The building is Grade II listed and is described in the listing description as "a glazed brick service tower containing stairs to Aldersgate Street and up to roof, with rounded walls and pyramidal roof". This application relates to the podium and upper level. The podium level provides access to the John Wesley Highwalk which leads to the Museum of London to the south and Thomas More House to the north. The upper level is currently gated and inaccessible to the public.

This report covers both the Planning and Listed Building applications submitted for the change of use of part of the podium and upper level of the Turret to form a single residential unit (use class C3) and associated internal and external alterations. The proposal is similar to the planning permission and listed building consent (08/00029/LBC and 08/00030/FULL) that were allowed on appeal in 2008 (not implemented) and includes improvements to the scheme.

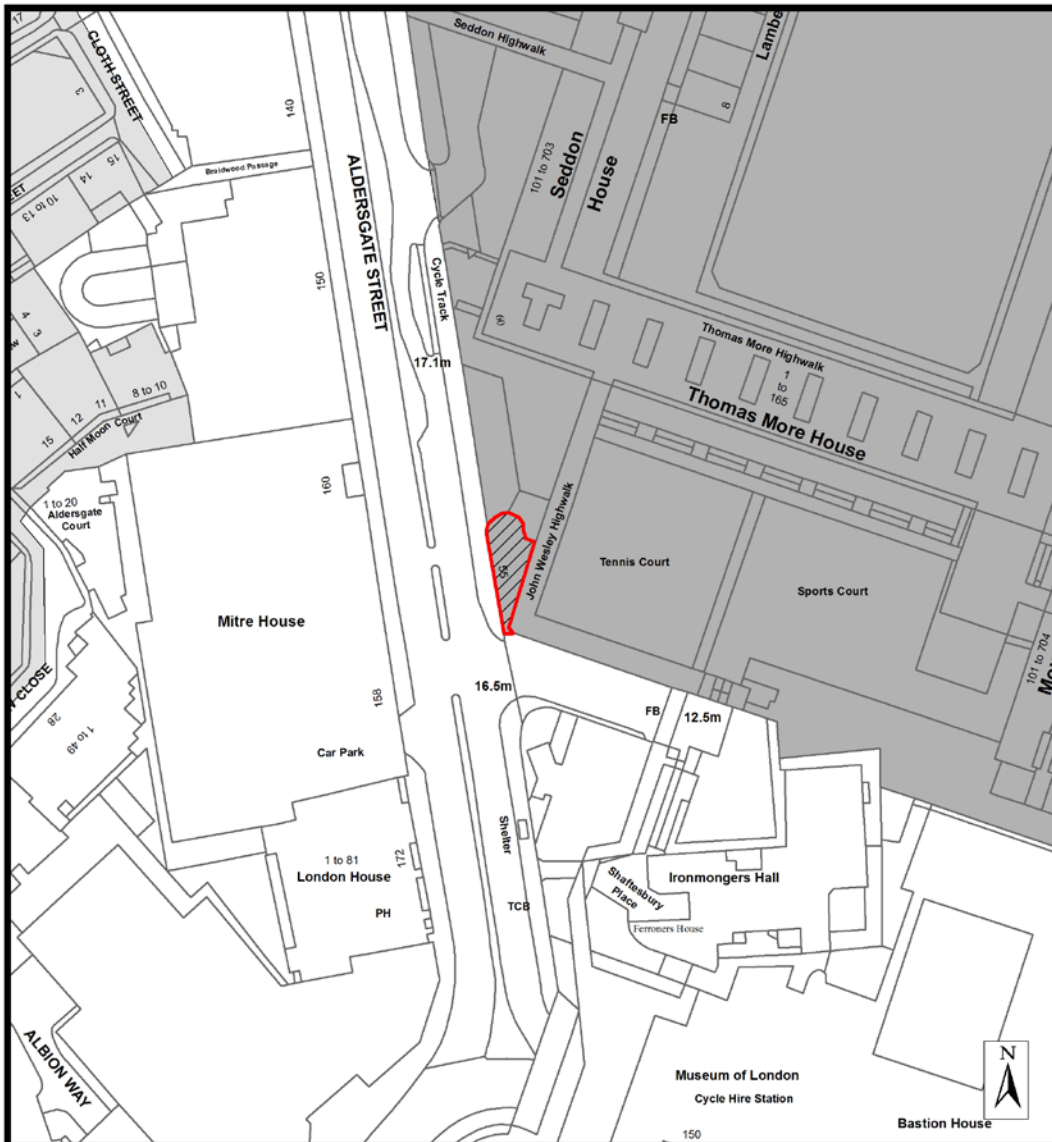
The scheme has attracted a number of objections including the Twentieth Century Society and one letter of support.

The proposed alterations to the Highwalk and upper levels of the Turret to accommodate a residential unit would not be detrimental to its special architectural or historic interest. The proposals would result in improvements to the public walkway passing through the structure and make effective use of the empty upper sections of the building. The proposals are considered to be an improvement on the scheme that was allowed on appeal in 2008. The principle of residential use is acceptable.

Recommendation

- a) Planning permission be granted for the development referred to above in accordance with the details set out on the attached schedule.
- b) The Chief Planning Officer, in consultation with the Comptroller & City Solicitor, be instructed to take the necessary steps to rescind part of the City Walkway.

Site Location Plan





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ADDRESS:

From John Wesley Highwalk to Seddon Highwalk
Thomas More Highwalk, Barbican EC2

CASE No.
16/00768/FULL

-  SITE LOCATION
-  LISTED BUILDINGS
-  CONSERVATION AREA BOUNDARY
-  CITY OF LONDON BOUNDARY



DEPARTMENT OF THE BUILT ENVIRONMENT



Main Report

Site

1. The site forms the south western corner of the Barbican Estate and is located at the southern end of Aldersgate Street close to the Museum of London rotunda. The building is Grade II listed and is described in the listing description as “a glazed brick service tower containing stairs to Aldersgate Street and up to roof, with rounded walls and pyramidal roof”.
2. The Turret comprises ground and basement (which are occupied by a restaurant), podium and upper level with a consistent plan form. The John Wesley staircase and lift provide access to and from podium level, which is classified as City Walkway, to Aldersgate Street. It was intended to continue the City Walkway over Aldersgate Street via a pedestrian bridge but this was not implemented.
3. Abutting the staircase tower is a wedge shaped area that houses the useable accommodation within the structure.
4. The podium level provides access to the John Wesley Highwalk which leads to the Museum of London to the south and Thomas More House to the north. The upper level of the turret is currently gated and inaccessible to the public.

Proposals

5. Applications have been made for:
 - Planning permission for the conversion of the podium level and upper floors of the Turret to form one two bedroom residential dwelling (Use Class C3) (201sq.m.) and the insertion of windows and replacement flue. The proposals include the rescission of part of the City Walkway (12sq.m).
 - Listed building consent for insertion of new windows, walls, internal partition walls, mezzanine floor and replacement flue to roof level, and other alterations in connection with the use of the space as a residential unit.
6. This report deals with the considerations for both applications.
7. The proposed alterations to the Turret are as follows:
 - insertion of internal partitions, stairs and mezzanine floor;
 - insertion of glazing to existing openings and the creation of new arrow slit windows to the east elevation;
 - creation of new external wall and entrance door at podium level;
 - a replacement flue to terminate at roof level; and
 - the loss of 12sq.m of City Walkway at podium level.

Relevant Planning History

8. On 3rd June 2008 the Planning and Transportation Committee, contrary to the City Planning Officer's recommendation, refused planning permission

and listed building consent for 'Change of use of podium level and upper floors of Turret to form a single residential dwelling (Use Class C3). Insertion of windows, new wall to podium, flue outlet at roof level and other associated alterations.' (08/00029/LBC and 08/00030/FULL). These refusals were appealed and allowed by the Planning Inspectorate but the scheme was not implemented and is no longer extant.

9. The current proposals have clear similarities to the scheme granted on appeal but differ in that the extension for residential floorspace at podium level is smaller, resulting in less of an impact on the City Walkway and there is a different configuration of the proposed new windows on the east elevation.
10. Since the approval of planning permission and listed building consent in 2008 there has been a material change in that the City of London Local Plan and the London Plan have been adopted. However the policy aims and objectives in relation to the principal considerations for this scheme are substantially the same.
11. A concurrent scheme for a similar proposal but with the addition of a glazed extension to create an internal residential staircase was withdrawn.

Consultations

12. The views of other City of London departments have been taken into account in the consideration of this scheme.
13. The applications as first submitted resulted in 31 representations. 1 from the City of London School for Girls in support of the application; 27 from residents objecting to the application, 1 from the Seddon House Group objecting to the application; 1 from the Thomas More House Group objecting to the application and 1 from the Barbican Association objecting to the application (representations attached).
14. The grounds of objection to the initial proposals were:
 - The impact on the architectural concept of the Barbican as a fortress.
 - The glazing of the slits and the arches and the introduction of windows would ruin the appearance and symbolic meaning of the Turret.
 - The roof terrace would cause noise and disturbance.
 - Impact of light pollution, if the lighting on the stairwell and podium are increased to compensate for the loss of natural daylight.
 - Loss of privacy from new windows and the roof terrace.
 - It was intended that the structure was for the use of the public.
 - The highwalk is a safe and largely crime free area.
 - Sets a precedent for the privatisation of other parts of the Estate.
 - The staircase and lift should be retained for public use.
 - The podium level would be restricted.
15. Historic England did not wish to offer any comments on the application.

16. The Twentieth Century Society objects to the application. Its concerns are that the glazing of the arched windows would disrupt the void; darkness is a key feature of the building and if converted to residential use it would be lit up at night; breaking through the blank east wall would disrupt the robust solidity of the building form; the insertion of a mezzanine level would mean that the stairwell space would be entirely altered; and the public viewing gallery would be lost. It is their view that the proposed works would detract substantially from the architectural interest of the turret.
17. Following the first round of consultation the application was amended and a second consultation was carried out. The roof terrace has been removed from the proposal and the proposed windows in the east elevation have been amended so that they are now smaller with the balconies omitted thereby reducing the visual impact of the alterations. A total of eight objections and one letter of support were received from residents regarding the amended application (representations attached). The issues raised are as previously received and include :
- Alterations would detract from the appearance and character of the listed building.
 - Undermining the architectural integrity and original purpose of the turret.
 - The proposals are incongruous with the architecture of the Barbican.
 - The loss of voids and the installation of new windows and the glazing of the arrow slits.
 - Request that if approved, the details would be comprehensively covered by conditions.
18. The Twentieth Century Society maintains its objection to the application.
19. The matters raised in objection to the scheme are dealt with under Considerations below.

Policy Context

20. The Development Plan consists of the London Plan and the City of London Local Plan. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix A to this report.
21. Government Guidance is contained in the National Planning Policy Framework (NPPF).

Considerations

22. The Corporation, in determining the applications for planning permission and listed building consent 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, any local finance considerations so far as material to the application, and other material considerations. (Section 70(2) 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 or listed building consent 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);
- The effect of the duties imposed by section 66(1) is to require decision-makers to give considerable weight and importance to the desirability of preserving the special architectural and historic interest of the listed building.

23. In respect of sustainable development the NPPF states at paragraph 14 that 'at the heart of the NPPF is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision taking... for decision taking this means: approving development proposals that accord with the development plan without delay...'.

Principal Issues

24. The main considerations in this case are;

- I. whether the principle of the use of the Turret for residential accommodation is acceptable;
- II. whether the amenity of nearby residents would be adversely affected;
- III. whether the loss of the Highwalk is justified; and
- IV. whether the alterations to the listed building are acceptable.

Use

25. The proposal would create a self-contained, two bedroom residential unit accessed from podium level. The proposed unit would have its entrance and living accommodation in the upper parts of the Turret, utilising the existing staircase.

26. It was originally intended to continue the City Walkway from the Turret over Aldersgate Street via a pedestrian bridge linking into the building opposite, however this was not implemented. The upper level of the Turret was to have been used as a viewing platform but the upper part of the structure has remained as a vacant space and is gated. The provision of residential accommodation is encouraged in national and local planning guidance where appropriate.

Residential amenity

27. Objections have been received on the grounds of loss of residential amenity as a result of overlooking, an increase in smells from the flue serving the existing street level restaurant and noise from construction works.

28. The nearest residential accommodation is in London House on Aldersgate Street which is 33 metres away, Thomas More House which is 30 metres away and Mountjoy House which is 94 metres away (at the closest points). It is considered that the residential properties are sufficient distance away not to experience a loss of amenity from overlooking. A roof terrace is no longer proposed and the roof would be accessed for maintenance purposes only.
29. At present the flue serving the ground floor restaurant terminates at podium level within the Turret. It is proposed to replace the flue so that it runs internally up to an external extract at roof level which would disperse smells at high level. Existing residential properties are a sufficient distance away so as not to experience smells from the flue.
30. The proposal does not include any demolition and building works would be contained generally within the Turret lessening the potential to cause a nuisance to nearby residential occupiers. However, to ensure that is the case, appropriate conditions to mitigate the impact of construction works upon nearby residents are recommended.

Impact upon the podium level City Walkway

31. The application would involve the loss of 12sq.m of City Walkway at podium level as opposed to the loss of 27sq.m in the scheme, granted on appeal. The lift and staircase access between podium level and the pavement would remain available for members of the public to access the Walkway from the street. The north-south route along the Highwalk would be unchanged.
32. The current proposals have been developed to reduce the impact on the John Wesley Highwalk space within the Turret. The previously approved scheme infilled the space at the head of the stairs to make room within the residential unit for an entrance and kitchen. In the current proposals, only an entrance and minimal lobby space would be incorporated at Podium level. Pedestrians at this level would continue to experience a widening of the Highwalk as the elevated highwalk enters the Turret space. Natural light would be maintained through two of the openings to Aldersgate Street and the space would continue to be well lit from the opening in the John Wesley Highwalk structure to the east.
33. The scheme has been designed to take account of potential safety and security issues as well as the "fear of crime." The residential entrance would provide an additional sense of passive surveillance to the area, which would deter antisocial activity, such as vandalism.
34. Lighting levels to the lift and stair would remain acceptable and the remaining public area within the Turret would be brightened during the day by the introduction of replacement lighting to the pedestrian stairwell. This lighting would be secured by condition. Overall it is considered that the loss of the small area of Walkway is acceptable as it does not impact on the route and is less than previously approved.

Design

35. The proposals raise a number of design and listed building issues. The principal issues are addressed below:

Changes at Highwalk Level

36. The finishes to the elevation fronting the Walkway are currently shown as brick to match the existing brickwork of the Turret but the external appearance of the new walls at this level are still the subject of discussion and would be conditioned. The front door would match the entrances of the Barbican's Wallside flats, which are accessed directly from the Highwalk level.

Fenestration and Unglazed Openings

37. Currently with the exception of those associated with the ground floor restaurant, the Turret's openings are unglazed. To implement the proposals it would be necessary to glaze a number of the openings at podium and upper levels on the Aldersgate Street elevation, and the "arrow slits" on the stair tower. Additional glazed slits would be formed on the rear elevation.
38. The glazing to these windows would be set back into the reveals to ensure that the "triumphal arch" appearance on the Aldersgate Street frontage would remain legible and the arrow slots have sufficient depth to remain visually convincing.
39. The southernmost windows on the Aldersgate frontage would remain unglazed since the tapering nature of the building's plan means that there is very little usable space behind these openings. It is proposed to fill these recesses with planting.

Listed Building Implications

40. The principal elements of the scheme that would impact on the special architectural or historic interest of the structure are those proposed at Highwalk level and the introduction of glazing described above.
41. The Turret is a unique structure on the Barbican and is one of the elements on the Aldersgate Street perimeter that embody the imagery of fortifications. The eastern elevation has the austere, robust appearance of a defensive bastion. In response to objections, the inappropriately large windows and balconies formerly proposed for this elevation have been amended and the glazed balustrade to the parapet deleted. The four additional arrow slit windows on the eastern elevation are considered to be in keeping with the existing character of the building. The upper level windows provide natural light to the top floor of the flat.
42. On its western elevation, the proportions of the structure and the shape and arrangement of its openings reference a classical triumphal arch. The introduction of glazing to the Aldersgate elevation could potentially dilute this impression because the openings would no longer read as dark voids. The scale of the building, however, with its three strongly defined vertical arches and heavy raw concrete horizontal bands set within large flat brick

expanses would dispel an unacceptably domestic appearance. The glazing of these openings was previously approved.

43. The Turret is an integral part of the Highwalk around the Barbican and the proposed alterations and residential use would not compromise this function. The look-out onto Aldersgate Street would be maintained, and the loss of the small area of public access at podium level can be balanced by the benefits of bringing the upper levels of the building into residential use and improving surveillance of the Highwalk as a result.

Waste

44. It is proposed that the existing waste storage and collection facilities in the Barbican estate are used which is acceptable to the Community Facilities Manager.

Planning Obligations and Community Infrastructure Levy

Mayoral and City Community Infrastructure Levy (CIL)

45. The Mayoral and City CIL would apply to development over 100sq.m with the exception of social housing, education related development, health related development and development for charities for charitable purposes. In the case of Mayoral CIL a charge of £50 per sq.m would be applied and in the case of City CIL a charge £95 per sq.m for Rest of City Residential will be charged to any developments which create an uplift in GIA of 100sqm or the creation of one or more dwellings.
46. The Mayoral CIL charge has been calculated to be £10,050 and the City CIL has been calculated to be £19,095 based on a GIA of 201sq.m.
47. A total CIL charge of £29,145 has been calculated.
48. Under the CIL regulations the City Corporation is able to retain 4% of the Mayoral CIL income and 5% of the City CIL income as an administration fee.
49. The proposed development would not attract a Mayoral planning obligation Crossrail charge as the uplift would be less than 500sq.m GIA.

Conclusions

50. It is considered that the proposed alterations to the Highwalk and upper levels of the Turret to accommodate a residential unit would not be detrimental to its special architectural or historic interest. The proposals would make effective use of the empty upper sections of the building. The proposals are considered to be an improvement on the scheme that was allowed on appeal in 2008. The introduction of a new residential unit is acceptable.

Background Papers

Internal

Memo, Community Facilities Manager, 04.08.2016

Memo, Department of Markets and Consumer Protection, 01.09.2016

External

Letter, Historic England, 11.08.2016

Letter, Twentieth Century Society, 17.08.2016

Email, Twentieth Century Society, 13.12.2016

Mr Russell Bell - 04.08.2016 & 21.09.2016

Mr Adrian Quan - 04.08.2016

Mr Joseph Reeves - 04.08.2016

Ms Samantha Logan - 05.08.2016

Mrs Julia Minton - 07.08.2016

Mr Ian Goggin - 10.08.2016

Mr Brendan Barnes - 20.08.2016

Mr Gordon Wise - 22.08.2016

Jane Smith - 23.08.2016

Cathryn Worrell - 24.08.2016

Ms Leila Smith - 24.08.2016

Pauline Pearson - 24.08.2016 & 20.12.2016

Michele Cohen - 26.08.2016

Dr Andrew Ormsby - 28.08.2016

Mrs Susan Cox - 29.08.2016

Larry Marden - 29.08.2016 & 19.12.2016

Caroline Reed - 29.08.2016 & 16.12.2016

John and Jan McLean – 29.08.2016 & 19.12.2016

Roger Cheveley - 30.08.2016

Mr Charles Creffield - 30.08.2016

Mr Daniel Edwards - 30.08.2016, 19.12.2016

Dr Angeles Rodriguez de Cara - 30.08.2016

Mr Alan Bubbear (City of London School for Girls) - 30.08.2016

Peter Inskip - 30.08.2016 & 13.12.2016

Mr Andrew Walker - 30.08.2016

Christopher Makin - 31.08.2016 & 25.11.2016

Helen Kay (Barbican Association- Chair) - 31.08.2016

Tilley Paul - 31.08.2016

Mr Gareth Randell - 31.08.2016

Averil Baldwin - 01.09.2016

Robert B. Barker - 01.09.2016 & 19.12.2016

Charles Creffield - 01.09.2016

Jim Davies - 01.09.2016

Brian Parkes - 01.09.2016

Mr Christopher Makin - 25.11.2016

Mrs Helen Hudson - 25.11.2016

Mr Lee Mallett - 28.11.2016

Robert B Barker MPhil(RCA) - 19.12.2016

D A Rogers - 21.12.2016

Mr PJ Jansen van Vuuren - 15.01.2017

Design and Access Statement, MacKay and Partners

Internal Refurbishment Report, MacKay and Partners

Appendix A

London Plan Policies

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

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

Policy 3.4 Taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. Development proposals which compromise this policy should be resisted.

Policy 3.5 Housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment, taking account of strategic policies in this Plan to protect and enhance London's residential environment and attractiveness as a place to live.

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

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.

Relevant Local Plan Policies

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.

DM10.1 New development

To require all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain

and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;

b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;

c) appropriate, high quality and durable materials are used;

d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;

e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;

f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;

g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;

h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;

i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;

j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;

k) there is provision of amenity space, where appropriate;

l) there is the highest standard of accessible and inclusive design.

DM12.3 Listed buildings

1. To resist the demolition of listed buildings.

2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

DM15.6 Air quality

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.

2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.

3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).

4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.
5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.
6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

DM15.7 Noise and light pollution

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.
2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.
3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.
4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.

DM21.1 Location of new housing

1. New housing should be located on suitable sites in or near identified residential areas. Within these areas a mix of appropriate residential and commercial uses will be permitted.

2. New housing will only be permitted where development would not:

- a) prejudice the primary business function of the City;
- b) be contrary to policy DM 1.1;
- c) inhibit the development potential or business activity in neighbouring commercial buildings and sites; and
- d) result in poor residential amenity within existing and proposed development, including excessive noise or disturbance.

DM21.3 Residential environment

1. The amenity of existing residents within identified residential areas will be protected by:

- a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
- b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.

2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.

3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.

4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.

5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

SCHEDULE

APPLICATION: 16/00768/FULL

The Turret, John Wesley Highwalk Barbican London EC2

Conversion of podium level and upper floors of Turret to form one two bedroom residential dwelling (Use Class C3), including the insertion of windows. The proposals include the rescission of part of the City Walkway.

CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of three 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 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 policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to any work commencing in order that the impact on that the impact on amenities is minimised from the time that development starts.
- 3 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 works pursuant to this consent 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 the elevation facing onto John Wesley Highwalk;
 - b) details of all alterations to the existing façade including submission of a method statement detailing works required to form new openings in the brickwork on the building's eastern elevation to accommodate new windows;
 - c) details of fenestration and external joinery, including new skylight;

- d) details of the John Wesley Highwalk elevation and entrance;
- e) details of all alterations to the public stairway including soffits, infill panels to the sides of the staircase, and lighting;
- f) details of soffits, hand rails and balustrades including those within the southernmost arched opening on the Aldersgate frontage.
- g) details of the integration of plant, flues, fire escapes, and other excrescences at roof level;
- h) details of plant and ductwork to serve the existing A3 premises below.

REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.

- 4 Before any works thereby affected are begun, a full photographic survey of the exterior of the building, including relevant areas of the John Wesley Highwalk, the public stairs and their continuation to the upper level, and the top floor space, shall be submitted to and approved in writing by the Local Planning Authority. All photographs should be labelled and clearly identified on floorplans.
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 Local Plan: DM12.3.

- 5 All residential premises in the development shall be designed and constructed to attain the following internal noise levels:
Bedrooms- 30dB LAeq,T* and 45dB LAmax
Living rooms- 30dB LAeq, T*
*T- Night-time 8 hours between 23:00-07:00 and daytime 16 hours between 07:00-23:00.
A test shall be carried out after completion but prior to occupation to show that the criteria above have been met and the results must be submitted to and approved in writing by the Local Planning Authority prior to occupation of any part of the building.
REASON: To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with the Local Plan: DM21.3 and D21.5.

- 6 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 Local Plan: DM15.7.

- 7 No boilers that have a dry NOx emission level exceeding 40 mg/kWh (measured at 0% excess O2) shall at any time be installed in the building.

REASON: To comply with policy DM15.6 of the Local Plan and policies 7.14B a and c of the London Plan.

- 8 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: Location plan and dwg nos 585.15_1_A_200_RevC, 585.15_1_A_201_RevC, 585.15_1_A_202_RevB, 585.15_1_A_203_RevC, 585.15_1_A_400_RevC, 585.15_1_A_401_RevC, 585.15_1_A_402_RevC, 585.15_1_A_500_RevC, 585.15_1_A_501_RevC, 585.15_1_A_502_RevC, 585.15_1_A_503_RevC, 585.15_1_A_504_RevA, and 585.15_1_A_600.

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 Local 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 Mayoral Community Infrastructure Levy is set at a rate of £50 per sq.m on "chargeable development" and applies to all development over 100sq.m (GIA) or which creates a new dwelling.

The City of London Community Infrastructure Levy is set at a rate of £75 per sq.m for offices, £150 per sq.m for Riverside Residential, £95 per sq.m for Rest of City Residential and £75 on all other uses on "chargeable development".

The Mayoral and City CIL charges will be recorded in the Register of Local Land Charges as a legal charge upon "chargeable development" when development commences. The Mayoral CIL payment will be passed to Transport for London to support Crossrail. The City CIL will be used to meet the infrastructure needs of the City.

Relevant persons, persons liable to pay and owners of the land will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: www.planningportal.gov.uk/cil).

Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Section 106 Planning Obligations Officer. This Notice is available on the Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.



Historic England

LONDON OFFICE

Ms Catherine Linford
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Direct Dial: 0207 973 3777

Our ref: P00521317

11 August 2016

Dear Ms Linford

**Arrangements for Handling Heritage Applications Direction 2015 &
T&CP (Development Management Procedure) (England) Order 2015
FROM JOHN WESLEY HIGHWALK TO SEDDON HIGHWALK THOMAS MORE
HIGHWALK BARBICAN LONDON
Application No 16/00768/FULL**

Thank you for your letter of 1 August 2016 notifying Historic England of the application for planning permission relating to the above site. Our specialist staff have considered the information received and we do not wish to offer any comments on this occasion.

Recommendation

This application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.

It is not necessary for us to be consulted again on this application. However, if you would like further advice, please contact us to explain your request. We can then let you know if we are able to help further and agree a timetable with you.

In returning the application to you without comment, Historic England stresses that it is not expressing any views on the merits of the proposals which are the subject of the application.

Please note that this response relates to historic building and historic area matters only. If there are any archaeological implications to the proposals it is recommended that you contact the Greater London Archaeological Advisory Service for further advice (Tel: 020 7973 3712).

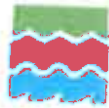


1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST

Telephone 020 7973 3700
HistoricEngland.org.uk



Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.



Historic England

LONDON OFFICE

Yours sincerely



Claire Brady

Inspector of Historic Buildings and Areas

E-mail: claire.brady@HistoricEngland.org.uk



1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST

Telephone 020 7973 3700
HistoricEngland.org.uk



Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.



Catherine Linford
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Sent by email: PLNComments@cityoflondon.gov.uk

17 August 2016

Our ref: 99 04 15

Dear Catherine Linford,

16/00770/LBC and 16/00768/FULL Change of use of podium level and upper floors of Turret to form one two bedroom residential dwelling (Use Class C3), including the insertion of windows at the John Wesley Highwalk, Barbican London

Thank you for consulting the Twentieth Century Society on the above listed building and planning applications. These were discussed at the Society's August casework committee meeting, and the Society wishes to **object** to the application, which seeks to convert the upper storeys of the John Wesley Turret into a single private residence. The letter below sets out our views.

Significance

The John Wesley Turret – or the Aldersgate Turret as it is also known – is a three storey high structure to the South West of the Barbican site. The turret is simple yet highly expressive in form and detail, and makes a powerful impact on the streetscape. It is described within the 2001 listing description for the Barbican Estate as a 'glazed brick service tower containing stairs to Aldersgate Street and up to the roof, with rounded walls and pyramidal roof'. The ground floor frontage has been partially infilled by a restaurant – this is unsympathetic and occurred prior to designation. Apart from this intervention, the turret is generally unaltered. In function it makes playful reference to a watch tower or gatehouse, but the novelty of its function is contrasted effectively with the austerity of its form.

Large tripartite arched windows overlook the street and rise from ground level, bisected by massive concrete floor slabs which form part of the façade. Light falls through the pyramidal roof of the circular tower element, and percolates softly through the narrow, staggered apertures giving the stairwell an interesting quality of light. The roof lantern is the only glazed element of the tower – all windows and access points remain open. The east wall facing inwards to the Barbican complex is smooth and blank so that views into the building are dark, contributing to its austere and mysterious character. Standing from within the turret at podium level however, views open up across the walkways, as well as out into the street and into the light-well of the turret.

The turret acts as a physical gateway by providing access to the high walk which runs behind it, but also as a symbolic reference to the site of the Roman London Wall on which the Barbican is in part built – the name Barbican derived from the Latin 'Barbecana' meaning fortified outpost. The turret originally functioned as a viewing platform, a space for contemplation where the 'city within the city'

The Twentieth Century Society, 70 Cowcross Street, London EC1M 6EJ
tess@c20society.org.uk
www.c20society.org.uk, Tel: 020 7250 3857

could be reflectively experienced. It should not be understood as a redundant space, but as an expression of the generous and civic-minded planning ethos of the early post-war period.

The turret is a small part of the urban ensemble, but one which has been carefully considered, and which makes an important and novel contribution to the distinctive architectural language of the estate. It provides public space in a manner which expressly makes links to the sites history, creating a unique sense of place.

Policy

Paragraph 5.6 of the Barbican Listed Building Management Guidelines SPD – Vol.1, October 2009 states that 'It is the smaller buildings set around landscaped courts that create the ambiance of the Estate itself. The geometric order of the buildings and spaces is a strong feature of the Estate when read in the context of the city plan... It is important that the external spaces in the Barbican are not diminished or compromised by infill development or extensions. Routes traversing the estate are provided through and under buildings and across spaces – continuing into the adjoining parts of the City – and this permeability is a significant part of the Estates coherence and connectivity.' (p.39)

Paragraph 133 of the NPPF states that 'Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.'

Twentieth Century Society Comment

The proposals will include the following; punching through of elongated windows to the blank east wall; the insertion of an external stairwell and separate entrance hall; the glazing of windows at upper levels; the insertion of a mezzanine floor. These proposals will be taken in turn;

- The perceived depth of the space and the darkness it contains is a key feature of the building, very much in the vein of Louis Kahn's contemporary work at the Indian Institute of Management (1962-74). Insertion of reflective glazing to windows would disrupt this perception. Further, insertion of windows as depicted in the provided visuals show frames that would visibly cut across the arched windows, further disrupting the void. The building lit up at night would also work to harm this particular quality of the building.
- Breaking through the blank east wall to create new windows would disrupt the robust solidity of the building form, fracturing a surface that should be textured only by the materiality of the brick.
- This is also true of the proposed external stairwell and entrance lobby. These would be partly glazed, a material which would be incongruous in relation to the brick and concrete that comprises the current palette, and their addition will detract from the singular coherence of the building form.
- The insertion of a mezzanine level will mean that the stairwell space will be entirely altered. The light falling from above will be blocked off, and the imagery of the tower which is fundamental to the special interest of the structure will be completely lost from the interior.

Furthermore, conversion to a residence will mean that the public viewing platform will be lost, along with the overall permeability of the space. We find it regrettable that the turret is partly blocked off from public use, but although it is not currently accessible, the space can still be read as open. Conversion to a single private dwelling will see the space permanently withdrawn from the public realm, and altered in way that the Society considers to be unjustifiable, without bringing any public benefit. Although the walk way will remain accessible, the experience of walking through the space

would be detrimentally altered. The committee considered that there could be others ways to bring the space into active use so as to reduce the amount of anti-social behaviour and keep it publicly accessible, in a manner that is also sensitive to its architectural significance, and that alternative schemes should be sought.

The Society considers that these proposals are counter to the guidelines set out in the Barbican Conservation Management Plan which advises against piecemeal infill, and that they would constitute substantial harm to the Grade II listed building which makes up a key visual aspect of the Aldersgate Street frontage. Although eventually overturned on appeal, a similar scheme was turned down in 2008 on the grounds that it would substantially harm the architectural significance of the turret, and we urge that this decision is upheld. The Society strongly considers that the proposed works will detract substantially from the architectural interest of the turret, and recommend that the application is denied permission.

I trust that these comments are of use to you. Please do not hesitate to contact me if you have any further queries.

Yours sincerely,



Tess Pinto
Conservation Adviser
Twentieth Century Society

Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.

Hassall, Pam

From: Tess Pinto [REDACTED]
Sent: 13 December 2016 14:34
To: Linford, Catherine
Cc: PLN - Comments
Subject: 16/00768/FUL & 16/00770/LBC John Wesley Turret, Barbican

Dear Catherine Linford,

16/00773/FULL & 16/00774/LBC

The Twentieth Century Society is pleased that these applications, referred to as 'Option B' have been withdrawn.

16/00768/FUL & 16/00770/LBC

The Society wishes to sustain objection the above applications, referred to as 'Option A'. We object in principle to the conversion of the turret into a single residential unit for the reasons outlined in our letter of 17 August 2016.

We would like to take this opportunity to emphasise that this application is in contravention of the recommendation of the Barbican Conservation Management Plan (Paragraph 5.6 of the Barbican Listed Building Management Guidelines SPD – Vol.1, October 2009).

Furthermore, we consider that although consent for a similar scheme was granted on appeal in 2008, the understanding and appreciation of brutalist architecture has developed considerably since this time, as has the recognition of the significance of the Barbican in the context of post-war urban planning and housing.

Elain Harwood's 2011 monograph on Chamberlin, Powell and Bon for the Twentieth Century Society in partnership with the RIBA and Historic England is one key example of the sort of work which has been undertaken since 2008 that situates the Barbican as 'the greatest piece of combined urban planning and architecture in Britain in the Twentieth Century.' The decision to grant permission on appeal in 2008 is not necessarily one which would be taken today.

The Society considers that the application will cause substantial harm to a Grade II listed building, and that this harm will not be outweighed by public benefit; in fact, the conversion will result in loss of public space. Therefore, in line with the guidance of paragraph 133 of the NPPF, we again urge that permission is refused.

I trust that these comments are of use to you in your consideration. Please do not hesitate to contact me if you have any further queries.

Yours sincerely,

Tess Pinto

Conservation Adviser
The Twentieth Century Society
70 Cowcross Street
London EC1M 6EJ
Tel 020 7250 3857

tess@c20society.org.uk

Registered Charity No. 1110244

www.c20society.org.uk



Know the past – shape the future
Help us to save twentieth century architecture.
Join the Twentieth Century Society today.
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From: PLN - Comments
Sent: 04 August 2016 15:01
To: PLN - Comments
Subject: Comments for Planning Application 16/00770/LBC

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 3:00 PM on 04 Aug 2016 from Mr Russell Bell.

Application Summary

Address: From John Wesley Highwalk To Seddon Highwalk Thomas More Highwalk Barbican London

Proposal: Conversion of podium level and upper floors of Turret to form one two bedroom residential dwelling (Use Class C3), including the insertion of windows.

Case Officer: Catherine Linford

[Click for further information](#)

Customer Details

Name: Mr Russell Bell

Email:

Address: 222 Lauderdale Tower Barbican London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment: - Residential Amenity

Comments: I strongly object to the proposal to redevelop this much loved, quirky public space into (and I believe selfishly) a private residential space to be a purely speculative, money making venture. I don't recognise the picture of the Turret that Mackay + Partners describe as being troubled by criminal activity, strewn with beer cans, rough sleepers and a repository for urban waste. I have always found the area clean and tidy. It should be left as the original architects intended - a folly and a gatehouse for the Barbican.

I find it misleading and irresponsible of them to claim (in their application form, 10. Listed Buildings alterations) that the redevelopment would not include works to the exterior of the building, when part of their proposal is to knock several large holes in the eastern wall to allow windows to be fitted, the arrow slits to be glazed in and a proposed roof terrace (with glazed wall around). The larger windows and the roof terrace will certainly impact on the privacy of those living in Seddon and Thomas

More Houses and vice versa. The image on page 43 of the 'Internal Refurbishment document' shows just how drab, sad and uninteresting the building will look once the upper windows have been glazed in and domesticated with curtains etc, their proposal at street level is just as bad. The building will be bereft of the interest, character and dignity it once had. It's not clear to me from their application, whether or not the restaurant will be part of the redevelopment, but I believe it would be a real loss to the community to deny them the restaurant facility that currently occupies the ground and lower floors, and a loss of business to the restaurant operator.

My objections in a nutshell, are to the glazing of any the presently open aperture 'windows', the addition of any new windows and roof terrace and loss of an amenity (albeit presently closed to the public), all of which would severely ruin the aesthetic and integrity of the original building.

Comments for Planning Application 16/00768/FULL

Application Summary

Application Number: 16/00768/FULL

Address: From John Wesley Highwalk To Seddon Highwalk Thomas More Highwalk Barbican London EC2

Proposal: Change of use of podium level and upper floors of Turret to form one two bedroom residential dwelling (Use Class C3), including the insertion of windows.

Case Officer: Catherine Linford

Customer Details

Name: Mr Russell Bell

Address: 222 Lauderdale Tower Barbican

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I strongly object to the proposal to redevelop this much loved, quirky public space into (and I believe selfishly) a private residential space to be a purely speculative, money making venture. I don't recognise the picture of the Turret that Mackay + Partners describe as being troubled by criminal activity, strewn with beer cans, rough sleepers and a repository for urban waste. I have always found the area clean and tidy. It should be left as the original architects intended - a folly and a gatehouse for the Barbican.

I find it misleading and irresponsible of them to claim (in their application form, 10. Listed Buildings alterations) that the redevelopment would not include works to the exterior of the building, when part of their proposal is to knock several large holes in the eastern wall to allow windows to be fitted, the arrow slits to be glazed in and a proposed roof terrace (with glazed wall around). The larger windows and the roof terrace will certainly impact on the privacy of those living in Seddon and Thomas More Houses and vice versa. The image on page 43 of the 'Internal Refurbishment document' shows just how drab, sad and uninteresting the building will look once the upper windows have been glazed in and domesticated with curtains etc, their proposal at street level is just as bad. The building will be bereft of the interest, character and dignity it once had. It's not clear to me from their application, whether or not the restaurant will be part of the redevelopment, but I believe it would be a real loss to the community to deny them the restaurant facility that currently occupies the ground and lower floors, and a loss of business to the restaurant operator.

My objections in a nutshell, are to the glazing of any the presently open aperture 'windows', the addition of any new windows and roof terrace and loss of an amenity (albeit presently closed to

Sehmi, Amrith

From: PLN - Comments
Sent: 04 August 2016 13:03
To: PLN - Comments
Subject: Comments for Planning Application 16/00770/LBC

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 1:02 PM on 04 Aug 2016 from Mr Adrian Quan.

Application Summary

Address: From John Wesley Highwalk To Seddon Highwalk Thomas More Highwalk Barbican London

Proposal: Conversion of podium level and upper floors of Turret to form one two bedroom residential dwelling (Use Class C3), including the insertion of windows.

Case Officer: Catherine Linford

[Click for further information](#)

Customer Details

Name: Mr Adrian Quan

Email:

Address: Flat 361, Ben Jonson House Barbican London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment: - Traffic or Highways

Comments: The turret is an integral aesthetic feature of the Barbican. To open up window area and to glaze in the slits would ruin the appearance and symbolic meaning of the turret. The turret is an essential part of the architectural language of the Barbican (the fortress) and should not be altered. I strongly object to this application.

Sehmi, Amrith

From: PLN - Comments
Sent: 04 August 2016 14:22
To: PLN - Comments
Subject: Comments for Planning Application 16/00770/LBC

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 2:21 PM on 04 Aug 2016 from Mr Joseph Reeves.

Application Summary

Address: From John Wesley Highwalk To Seddon Highwalk Thomas More Highwalk Barbican London

Proposal: Conversion of podium level and upper floors of Turret to form one two bedroom residential dwelling (Use Class C3), including the insertion of windows.

Case Officer: Catherine Linford

[Click for further information](#)

Customer Details

Name: Mr Joseph Reeves

Email:

Address: 104 Mountjoy House Barbican London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:
- Noise
- Residential Amenity

Comments: The turret is an integral aesthetic feature of the Barbican. To open up window area and to glaze in the slits would ruin the appearance and symbolic meaning of the turret. The turret is an essential part of the architectural language of the Barbican (the fortress) and should not be altered.

I strongly object to this application.

From: PLN - Comments
Sent: 05 August 2016 18:11
To: PLN - Comments
Subject: Comments for Planning Application 16/00768/FULL

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 6:11 PM on 05 Aug 2016 from Ms Samantha Logan.

Application Summary

Address: From John Wesley Highwalk To Seddon Highwalk Thomas More Highwalk Barbican London EC2

Proposal: Change of use of podium level and upper floors of Turret to form one two bedroom residential dwelling (Use Class C3), including the insertion of windows.

Case Officer: Catherine Linford

[Click for further information](#)

Customer Details

Name: Ms Samantha Logan

Email:

Address: 519 Bunyan Court Barbican London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment: - Residential Amenity

Comments: My objections to this are on the grounds that these plans, as submitted before some years ago and dismissed then, will greatly diminish the original intention and aesthetic of the building (that of a folly and gatehouse for the Barbican). Podium level may be restricted and the overall aesthetic of the original plan compromised. Chipping away at the original aesthetic of The Barbican will absolutely diminish what is a masterpiece in Brutalist architecture.

From: PLN - Comments
Sent: 07 August 2016 17:06
To: PLN - Comments
Subject: Comments for Planning Application 16/00770/LBC

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 5:06 PM on 07 Aug 2016 from Mrs Julia Minton.

Application Summary

Address: From John Wesley Highwalk To Seddon Highwalk Thomas More Highwalk Barbican London

Proposal: Conversion of podium level and upper floors of Turret to form one two bedroom residential dwelling (Use Class C3), including the insertion of windows.

Case Officer: Catherine Linford

[Click for further information](#)

Customer Details

Name: Mrs Julia Minton

Email:

Address: 145 Andrewes House Barbican

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:
- Noise
- Residential Amenity

Comments: The turret is an integral aesthetic feature of the Barbican. To open up window area and to glaze in the slits would ruin the appearance and symbolic meaning of the turret. The turret is an essential part of the architectural language of the Barbican (the fortress) and should not be altered. I strongly object to this application

Sehmi, Amrith

From: PLN - Comments
Sent: 10 August 2016 22:25
To: PLN - Comments
Subject: Comments for Planning Application 16/00770/LBC

Planning Application comments have been made. A summary of the comments is provided below.
Comments were submitted at 10:24 PM on 10 Aug 2016 from Mr Ian Goggin.

Application Summary

Address: From John Wesley Highwalk To Seddon Highwalk Thomas More Highwalk Barbican London
Proposal: Conversion of podium level and upper floors of Turret to form one two bedroom residential dwelling (Use Class C3), including the insertion of windows.

Case Officer: Catherine Linford

[Click for further information](#)

Customer Details

Name: Mr Ian Goggin
Email:
Address: 16 Thomas More House London

Comments Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: As a regular user of this wonderfully quirky turret and a close neighbour, I strongly object to these proposals for three main reasons. 1. The scheme is completely unsympathetic to the architecture of the Barbican and the original intentions of Chamberlin, Powell & Bon. The windows proposed for the east elevation have no relation to the language of the Estate and the glass terrace will adversely alter the roofline and silhouette of the listed building. 2. Isolating this unique part of the estate into a private residence clearly goes against the original intention for the turret which was to be a public walkway / viewing point to be accessible to all. The only reason it is deemed redundant is because the upper level is locked shut so no-body can use it. I'm sure there are countless people, residents and public alike that would love to explore this space much like the other eccentric features such as the waterfall and sunken gardens. 3. There are flaws with the application and the justification for the proposal. The application says that there will be no works to the exterior of the building but 4 windows and a

balustrade are being added. Also, the scheme has been justified on the basis of the area being 'troubled by criminal activity', being used as a 'repository for urban waste', and a 'pissoir'. I have been living here for over a long time and use this staircase every day. It is absolutely spotless and to claim otherwise is an insult to the Estate staff. I hope the Corporation seriously considers the detriment this application will have on the estate. Sadly we need to live with other unsympathetic additions such as the Exhibition Halls tunnel and the roof over Brandon Mews, and I would not like to see another added.

Wells, Janet (Built Environment)

From: PLN - Comments
Subject: FW: Comments for Planning Application 16/00770/LBC

From: PLN - Comments
Sent: 20 August 2016 07:03
To: PLN - Comments
Subject: Comments for Planning Application 16/00770/LBC

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 7:03 AM on 20 Aug 2016 from Mr Brendan Barnes.

Application Summary

Address: From John Wesley Highwalk To Seddon Highwalk Thomas More Highwalk Barbican London

Proposal: Conversion of podium level and upper floors of Turret to form one two bedroom residential dwelling (Use Class C3), including the insertion of windows.

Case Officer: Catherine Linford

[Click for further information](#)

Customer Details

Name: Mr Brendan Barnes

Email:

Address: 59 Thomas More House Barbican London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: thank you for the opportunity to comment on this application. My objection is based on the negative impact that the development would have on the core architectural concept of the Barbican as a castle or fortress. I am particularly concerned by those aspects of the proposal that would affect the external appearance of the turret and would not accept that the suggestion that where these are "rear-facing", it diminishes the concern. I understand that objections on these points have already been made by the Corporation's own planning officers. finally, I would welcome some clarification regarding the management of conflict of interest since, although I agree with the comments made, it seems unsatisfactory that the Corporation should be assessing its own application.

Hassall, Pam

To: Hassall, Pam
Subject: FW: Comments for Planning Application 16/00768/FULL

Printed and tick removed

From: PLN - Comments
Sent: 22 August 2016 22:35
To: PLN - Comments
Subject: Comments for Planning Application 16/00768/FULL

Planning Application comments have been made. A summary of the comments is provided below.
Comments were submitted at 10:34 PM on 22 Aug 2016 from Mr Gordon Wise.

Application Summary

Address: From John Wesley Highwalk To Seddon
Highwalk Thomas More Highwalk Barbican
London EC2

Proposal: Change of use of podium level and upper
floors of Turret to form one two bedroom
residential dwelling (Use Class C3),
including the insertion of windows.

Case Officer: Catherine Linford

[Click for further information](#)

Customer Details

Name: Mr Gordon Wise

Email:

Address: 283 Cromwell Tower Barbican London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning
Application

Reasons for comment:

Comments: I write to object to this proposal. Firstly,
the plans are presented in a very confusing
fashion, although that is not the main
grounds for my objection. I disagree with
the principal of adopting the public realm
in terms of areas of the podium space into
a private residence, which is what this
scheme appears to do. But more
significantly, the substantial addition to the
rear with prominent glazing is clearly
contrary to listed building guidelines and
Barbican Estate listed building
management principles. While I may

favour intelligent re-use of this space - a key feature among the idiosyncrasies of the Barbican Estate - these plans to not show evidence of this in terms of a refurbishment that does not prejudice the adjacent areas or the prevailing listed building obligations. It is wearying that these things have to be pointed out and indeed applications like this be made when there is so much intelligent thought going into the presentation and refurbishment and maintenance of so many other areas of the Estate, and appreciation of its architectural ethos. This proposed scheme does not conform to either of these areas of consideration.

From Seddon House Group
307 Seddon House
Barbican
EC2Y 8BX

23 August 2016

Dear Sirs

Applications 16/00768/FULL and 16/00770/LBC

I am writing on behalf of Seddon House Group to OBJECT to the above applications for planning permission and listed building consent. Seddon House is immediately to the north of the turret, and its corner flats look out onto it.

Our objections are largely on listed building grounds. We have also commented on the alternative applications (16/00773/FULL and 16/00774/LBC).

Please note there was no pre-application consultation on these proposals. Given that the City planners urge developers to hold meaningful pre-application consultations with local stakeholders, it is regrettable that the City when acting as a developer itself should fail to follow best practice. This is especially so when the statutory application period falls in August, when many residents are away, and given that there are two applications each with three variants for the windows. Proper pre-application consultation might have allowed a more definitive application.

General comments

The design statement says "The existing Highwalk level has been troubled by criminal activity and used as a repository for urban waste, including beer cans & cigarette butts. Late night drinkers use the space as a 'pissoir'. Rough sleepers also use the upper gated levels of the space."

Rough sleepers used to use the upper levels of the space until it was gated off some years ago. There is very little criminal activity on the Highwalk; there is some rubbish deposited on the staircase, but regular and adequate cleaning deals with this. The committee should not think that this is a derelict no man's land. The route and the staircase is heavily used by residents, schoolgirls, and visitors, including residents returning home in late in the evening.

Nevertheless, we accept that the turret is underused and are not averse to the suggestion that it should be turned into a residence, with safeguards. However, that residence should respect the listed nature of the estate and specifically of the turret itself, with its references to being a bastion and a gatehouse.

Substantive objections

*16/00768/Full and 16/00770/LBC
Version with internal staircase*

Window types

The applicant is proposing 4 window types.

We object to the following window types offered for the new fenestration on the east elevation – box,

For the avoidance of doubt we would like a condition that the public lift and stairways continue to provide 24 hour access from the street to the podium. The City should also secure itself the right to any access necessary to repair or rebuild the lift.

The applicant should produce a design for consultation with neighbours and approval by the planners for the lighting to the public staircase, so that it is enhanced and improved. At present there is some daylight from the top of the turret to the staircase. If the application is approved that will go, and the podium itself will lose one open bay looking onto Aldersgate Street.

The roof terrace To avoid nuisance, no external lighting, heating, or amplified sound should be permitted on the terrace.

Yours faithfully

Jane Smith
Chair, Seddon House Group

Hassall, Pam

From: Pln - CC - Development Dc
Subject: FW: OBJECTION to application 16/00768/FULL and 16/00770/LBC COL:00970141

From: Cathryn Worrell [REDACTED]
Sent: 23 August 2016 13:38
To: PlanningQueue
Subject: OBJECTION to application 16/00768/FULL and 16/00770/LBC

I am writing to object to the above planning application which relates to the turret on the Aldersgate Street side of the Barbican Estate.

I object to the planning application on the grounds that the Barbican Estate is Grade II listed, and the proposed changes to the turret would change the character of the estate.

The turret was originally built for the enjoyment of the public and could continue to be made available to Barbican residents through the use of the locks and keys used on communal entrances and gates throughout the estate. I also question the architect's assertion that the highwalk is 'troubled by criminal activity'. There is no evidence on the police.uk website of any criminal activity in this particular part of the City.

Furthermore, I object to windows being installed on the east facing side of the turret, since this would increase light pollution and reduce privacy for residents of Thomas More and Mountjoy Houses. Also, the design of the windows is not in keeping with the requirements across the rest of the Barbican estate for wood framed windows set within the structure of the building.

I also object to the plans to create a roof terrace on the turret. Roof terraces in other parts of the City have resulted in noise and disturbance and this would be a particular concern for Barbican residents at this western side of the estate and residents of London House on Aldersgate Street.

I also object to this application on the grounds that there will be increased light pollution if lighting on the stairwell and podium are increased to compensate for the loss of natural light.

It concerns me that the City Corporation has approached an architect directly, without inviting bids from other potential parties, as is required by law. Furthermore, this planning application has been submitted without the usual consultation process that the City demands of other developers. As of 22nd August at least, no public notices have been displayed in the surrounding area about this proposed redevelopment, and the vast majority of local residents who would be affected by the development are unaware of it.

Yours Faithfully,
Cathryn Worrell
101 Mountjoy House
Barbican
London
EC2Y 8BP

ACKNOWLEDGED



Comments for Planning Application 16/00770/LBC

Application Summary

Application Number: 16/00770/LBC

Address: From John Wesley Highwalk To Seddon Highwalk Thomas More Highwalk Barbican London

Proposal: Conversion of podium level and upper floors of Turret to form one two bedroom residential dwelling (Use Class C3), including the insertion of windows.

Case Officer: Catherine Linford

Customer Details

Name: Ms Leila Smith

Address: 112 Thomas More House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: I strongly object to this application on the grounds of loss of privacy for myself and other residents of Thomas More House. This would result, cumulatively, from the addition of new windows in the, currently blind, west facing elevation, the addition of a new glass stairwell in the North-West corner (closest to Thomas More House) and the addition of a roof garden. The external roof garden, in particular, would be directly opposite my living room window, which would interfere with my privacy and quiet enjoyment of my home. There is a very real potential of noise from parties or other gatherings which would impact my peace and privacy very directly. Our homes have never before been overlooked on this aspect, and the roof garden would have a hugely negative impact, with the possibility of endless noise, intrusion and nuisance, especially in summer. Further, changing the use of "The Turret" in the manner proposed seems completely inappropriate in the context of it forming a feature of the Barbican Estate that has been enjoyed in its present form for very many years.

ence
ative Reference
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ation Validated
osa
osal

16/00766/FULL
PP-05339550
Fri 22 Jul 2016
Fri 22 Jul 2016

From John Wesley Highwalk To Seddon Highwalk Thomas More Highwalk Barbican London EC2
Change of use of podium level and upper floors of Turret to form one two bedroom residential dwelling (Use Class C3), including the insertion of windows.

August 2016

whom it may concern

sh to object to the above permission that is being sought. My objection is based on the facts that:
re will be light reduction.
re will be a loss of privacy for residents.
re will be a roof terrace visible and open to view and noise issues.
e listed building is being changed from its original status.
e design is meant to include open spaces – this planning request will take away those spaces that visitors come from overseas to see and enjoy.
s appears to be based on grabbing an available space to make money from it – not to preserve the brutalist design.

not wish for planning permission to be granted to the above request.

Yours sincerely
chele Cohen



3 Bunyan Court
rbican
idon
2Y 8DH

| PLANNING & TRANSPORTATION | | |
|---------------------------|-------------|-----|
| PSDD | CPO | PPD |
| TPD | 26 AUG 2016 | LTP |
| OM | | SSE |
| No | 121140 | PP |
| FILE | | DD |

Hassall, Pam

To:
Subject:

Hassall, Pam
FW: Comments for Planning Application 16/00768/FULL

From: PLN - Comments
Sent: 28 August 2016 18:14
To: PLN - Comments
Subject: Comments for Planning Application 16/00768/FULL

Planning Application comments have been made. A summary of the comments is provided below.
Comments were submitted at 6:14 PM on 28 Aug 2016 from Dr Andrew Ormsby.

Application Summary

Address: From John Wesley Highwalk To Seddon
Highwalk Thomas More Highwalk Barbican
London EC2

Proposal: Change of use of podium level and upper
floors of Turret to form one two bedroom
residential dwelling (Use Class C3),
including the insertion of windows.

Case Officer: Catherine Linford

[Click for further information](#)

Customer Details

Name: Dr Andrew Ormsby
Email:
Address: 102 Mountjoy House Barbican London

Comments Details

Commenter
Type: Neighbour

Stance: Customer objects to the Planning
Application

**Reasons for
comment:**

Comments: I wish to OBJECT to this planning
application.

The design being proposed here concerns
significant changes to a cited building but
its design does not appear to take this into
account. In particular, the style and design
of windows and other features is unlike
those elsewhere in the Barbican Estate.

The windows on the eastern elevation will
also introduce potential light pollution and
the roof terrace, light and noise.

Consultations with Barbican residents should have taken place in advance of this application being made. Once again, the City is attacking the integrity of the Barbican's unique architecture in an unnecessary and undesirable way.

Hassall, Pam

To: Hassall, Pam
Subject: FW: Comments for Planning Application 16/00770/LBC

From: PLN - Comments
Sent: 29 August 2016 20:14
To: PLN - Comments
Subject: Comments for Planning Application 16/00770/LBC

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 8:13 PM on 29 Aug 2016 from Mrs Susan Cox.

Application Summary

Address: From John Wesley Highwalk To Seddon
Highwalk Thomas More Highwalk Barbican
London

Proposal: Conversion of podium level and upper
floors of Turret to form one two bedroom
residential dwelling (Use Class C3),
including the insertion of windows.

Case Officer: Catherine Linford

[Click for further information](#)

Customer Details

Name: Mrs Susan Cox

Email:

Address: 343 Lauderdale Tower Barbican London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning
Application

Reasons for comment: - Residential Amenity

Comments: I strongly object to these applications
(16/00768 and 16/00770) on the grounds
of the proposed devt's appearance in the
context of the Grade II listed Barbican
structure & the potential loss of residential
amenity. I would also like to voice my
disappointment that the CoL has chosen to
submit these without any pre-application
discussions & just before the summer
holidays such that many people will find it
difficult to respond within the requisite
time frame. I would also like to ask how
the CoL, having submitted the proposals,

can be allowed to assess its own application.

1) Character & Appearance - in my opinion, these plans will significantly compromise the original intention of the structure as laid out in the Barbican Listed Building Mgt Guidelines, Vol IV. The turret is an integral feature of the Estate and was originally intended to provide a public walkway & viewing area. Separating this out into a private residence negatively impacts the core architectural concept of the Barbican. The only reason the space is deemed to be redundant is that the turret area above Podium level is locked as it is claimed in the application that the area has been, inter alia, "troubled by criminal activity". I have lived here since 2003 & have never seen any evidence of this & feel this is just an excuse for the CoL to monetise any unused areas, however unsuitable, it can find. I am also concerned that the proposal to glaze in the slits, to increase the number of windows & to construct a roof terrace would adversely affect the appearance of the turret.

2) Loss of Residential Amenity - the addition of windows in the west elevation & the external roof garden would clearly lead to the loss of privacy for nearby neighbours, particularly in Thomas More & Seddon House. So too the increased prospect of potential noise & light pollution. I am also concerned at the ongoing "land-grab" of vital and widely used public access spaces.

I strongly object to these proposals.

Roger Cheveley.
203. Mountjoy House. Barbican. EC2Y 8BP.
August 23/16.

Clive Cornwell
Dept. of Built Environment
City of London
P.O. Box 270
Guildhall
London EC2P 2EJ.

| PLANNING & TRANSPORTATION | |
|---------------------------|-----|
| ADD | PPD |
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23 AUG 2016
27406

Dear Sir,

Objections to application - 16/00773/ full
16/00774/ LBC.

I wish to object to the above proposed planning application related to the Barbican Estate turret, adjacent to Aldersgate St.

I object that these proposals show very little effort to conform with the Barbicans Grade II status.

Specifically, I object to the external staircase which is not in character with other features on the Estate. It will also add light pollution to the area.

I object to the variety & number of windows proposed especially -

(a) Those not using hard wood consistent with the residential blocks of the Estate.

(b) The addition of extra windows to the East facing facade of the Turret.

I object to the proposed roof terrace, a feature that will cause disturbance of nearby neighbours.

I also object that the lack of customary
pre-application discussions of these proposals
seems to contravene the City of London's
best practice protocols for development.

Yours faithfully,

A solid black rectangular box used to redact the signature of the sender.

30 August 2016

Planning applications 16/00768/FULL, 16/00773/FULL

Objection to the conversion of "The Turret", John Wesley Highwalk to residential use

I am writing with regard to the application to change the use and external appearance of "The Turret" at the above location, to convert it into a two-bedroom residential unit. Two applications for planning consent have been made; I give the reference numbers above.

Firstly, I believe the turret is not suitable to be a residential part of the Barbican. It is in constant use as an access point with a lift and stairs to the Barbican highwalk. It is frequently used by Barbican residents, visitors to the Museum of London, the pupils of the City of London School for Girls, and particularly by pedestrians with pushchairs, or handicapped people. Its conversion would involve a major disruption to these users, and there is no obvious alternative lift on the way to the Barbican station or Aldersgate Street.

A flat in the turret would not benefit from many of the original Barbican features, such as underground heating, original kitchen and garhcey. It would be isolated and would not be part of any tower or block, thus breaking the harmony and aesthetic of the Barbican development. Furthermore, the flat would be directly on top of a restaurant and stands immediately next to a busy road. Importantly, the turret has no provision of water, gas or electricity, which clearly indicates that the architects did not intend it to be a residential part of the estate. On a practical point, the proposed development seems not to contain a single right angle, which combined with the high levels of street noise, would hardly make it an attractive property.

Secondly, the turret is a reference to the a fortified tower, clearly exemplified by its arrow slits and spiral staircase. The arrow slits and the turret were clear references to the origin of the word Barbican as the barbican of a walled fortification. The proposed conversion involves changes to the arrow slits, and even more disruptively, to the insertion of large new windows into what is currently a blank wall. Although the architects refer to this wall as the rear of the property (presumably to minimise the impression of the visual changes they would produce), this wall is in fact extremely conspicuous - one of the best views of the turret is obtained from Thomas More highwalk, onto which this wall faces. I strongly believe that this alteration does not respect the character of the Barbican Estate, and also breaks the continuous visual appearance of the arrow slits as present in the highwalk around Lauderdale Tower. It furthermore sets a disturbing precedent for the permanent alteration of a Grade II listed structure. These concerns apply equally to the second application, which additionally contains a large unsightly external staircase, completely out of keeping with the architecture of the turret. These changes greatly diminish the essential character of the building.

Finally, I would like to express my concern that if this project is allowed, how many corners or interstices of the Barbican estate can be removed from the public domain to become private residences. While it is a shame that the higher levels of the turret have been closed to the public and Barbican residents during recent years, if this development is approved they will permanently be lost. Any future development of the space in keeping with the architects' intentions, such as a public viewing point or garden, would then become impossible.

Yours sincerely,

Charles Greffield.

Hassall, Pam

To:
Subject:

Hassall, Pam
FW: Comments for Planning Application 16/00768/FULL

From: PLN - Comments
Sent: 30 August 2016 13:04
To: PLN - Comments
Subject: Comments for Planning Application 16/00768/FULL

Planning Application comments have been made. A summary of the comments is provided below.
Comments were submitted at 1:03 PM on 30 Aug 2016 from Mr Charles Creffield.

Application Summary

Address: From John Wesley Highwalk To Seddon
Highwalk Thomas More Highwalk Barbican
London EC2

Proposal: Change of use of podium level and upper
floors of Turret to form one two bedroom
residential dwelling (Use Class C3),
including the insertion of windows.

Case Officer: Catherine Linford

[Click for further information](#)

Customer Details

Name: Mr Charles Creffield

Email:

Address: 158 Thomas More House Barbican London

Comments Details

**Commenter
Type:** Member of the Public

Stance: Customer objects to the Planning
Application

**Reasons for
comment:** - Residential Amenity

Comments: Firstly, I believe the turret is not suitable
to be a residential part of the Barbican. It
is in constant use as an access point with a
lift and stairs to the Barbican highwalk. It
is frequently used by Barbican residents,
visitors to the Museum of London, the
pupils of the City of London School for
Girls, and particularly by pedestrians with
pushchairs, or handicapped people. Its
conversion would involve a major
disruption to these users, and there is no
obvious alternative lift on the way to the
Barbican station or Aldersgate Street. On a

practical point, the proposed development seems not to contain any right-angles, which combined with the high levels of street noise, would hardly make it an attractive property.

Secondly, the turret is a reference to the word Barbican as the gate of a walled fortification. The proposed conversion involves glazing the arrow slits, and even more disruptively, to the insertion of large new windows into what is currently a blank wall. Although the architects refer to this wall as the rear of the property (presumably to minimise the impression of the visual changes they would produce), this wall is in fact extremely conspicuous - one of the best views of the turret is obtained from Thomas More highwalk, onto which this wall faces. I strongly believe that this alteration does not respect the character of the Barbican Estate, and also breaks the continuous visual appearance of the arrow slits as present in the highwalk around Lauderdale Tower. It furthermore sets a disturbing precedent for the permanent alteration of a Grade II listed structure. These changes greatly diminish the essential character and aesthetic of the building.

Hassall, Pam

To:
Subject:

Hassall, Pam
FW: Comments for Planning Application 16/00768/FULL

From: PLN - Comments
Sent: 30 August 2016 23:32
To: PLN - Comments
Subject: Comments for Planning Application 16/00768/FULL

Planning Application comments have been made. A summary of the comments is provided below.
Comments were submitted at 11:32 PM on 30 Aug 2016 from Mr Daniel Edwards.

Application Summary

Address: From John Wesley Highwalk To Seddon
Highwalk Thomas More Highwalk Barbican
London EC2

Proposal: Change of use of podium level and upper
floors of Turret to form one two bedroom
residential dwelling (Use Class C3),
including the insertion of windows.

Case Officer: Catherine Linford

[Click for further information](#)

Customer Details

Name: Mr Daniel Edwards
Email:
Address: 105 Seddon House Barbican London

Comments Details

Commenter
Type: Member of the Public

Stance: Customer objects to the Planning
Application

Reasons for
comment: - Residential Amenity

Comments: I OBJECT STRONGLY on the grounds that
the proposals would result in a degradation
of the integrity of the architecture and the
public spaces of the Grade II Listed
Barbican Estate.

The proposals have not had the public
consultation due to such a scheme; and it
is questionable whether the legal minimum
consultation has taken place given the lack
of direct contact with residents. The
statutory notice was placed behind
Lauderdale Tower, where it is not visible

from the street or by those who use the Turret to access Thomas More, Mountjoy or Seddon House.

The Turret has proven over many decades to be an extremely useful stairwell and lift serving car park, ground and podium levels. It is in constant use by residents and those passing through and there is no need for a new entrance to this part of the estate. Regular podium users know all too well that replacement lifts and escalators do not work as reliably as the original estate entrances.

The Turret is a prominent landmark expressing the idea of a barbican as the outer part of a fortified castle. It is obvious that the architects Chamberlin, Powell and Bon did not intend this space to be occupied. The design uses a careful balance of mass and void to achieve its effect and the City of London was generous in its allocation of public space toward these greater architectural goals. The Turret building is best left as it was intended - as a practical entrance and an architectural symbol. It is no more a wasted asset needing development than the space within the portico of St. Paul's Cathedral.

The Barbican Estate was listed to protect it for us and future generations. These proposals seem to be an attempt to maximise short term income in defiance of the listing.

105 Seddon House
Barbican
London EC2Y 8BX

18 December 2016

Dear City Planning Officer,

Re. revised proposals for:

16/00768/FULL From John Wesley Highwalk To Seddon Highwalk, Thomas More Highwalk, Barbican, London EC2. Change of use of podium level and upper floors of Turret to form one two bedroom residential dwelling (Use Class C3), including the insertion of windows; and

16/00770/LBC From John Wesley Highwalk To Seddon Highwalk, Thomas More Highwalk, Barbican, London, EC2. Conversion of podium level and upper floors of Turret to form one two bedroom residential dwelling (Use Class C3), including the insertion of windows.

I strongly object to the granting of both planning permission and listed building consent for the above applications in their revised forms.

The Aldersgate Turret is not a redundant space. It is a fully functioning entrance, complete with stairway and light-well, housed in a monumental landmark. I object to the proposed change of use for the reasons outlined in my comments on the initial proposals dated 30 August 2016.

Furthermore, the revised proposals would result in significant harm to the architectural integrity of a building in the listed Barbican Estate. It takes a public space permanently out of the public realm with no corresponding public benefit.

In particular, this proposal asymmetrically fills in the tripartite arches that form the main facade of the turret from Aldersgate Street. I believe the architects intended the deep shadows created by the arch voids to reference classical triumphal arches. Such monuments comprise a single large central arch flanked by two smaller ones in a symmetrical arrangement. By filling in the left hand arch and the top part of the central arch, the architectural balance is irrevocably destroyed. Similarly there would be a lop-sided aspect to the change of use: domestic on one side and civic on the other. This proposed asymmetry can be seen clearly in the photographic rendering in the Design and Access Statement Part 2 on page 46. The effect would be even more pronounced at night.

The insertion of a mezzanine floor into the building results in a very unfortunate truncating of the arches which further compromises the intended design. The mezzanine cuts across the top of the central arch in a seemingly random position bearing no relation to the spring of the arch. The arch feature is thus cut off in a very unpleasant way, highlighting the fact that this is an inappropriate development forced into an inappropriate space.

A significant problem with this kind of domestic infilling is that there can be no control over what is behind the floor-to-ceiling glazing once it is in private hands. It could very quickly become an untidy store for domestic items which would sit very uncomfortably with the building's status as a grand entrance to the estate.

Finally, it should be remembered that this entrance is currently not easily visible from all angles due to the hoardings on the other side of Aldersgate Street. Once the hoardings are down, this entrance again becomes a highly visible architectural statement of the ideas behind the Barbican Estate. The development of the Museum of London site will create an opportunity for a modest restoration of the turret, giving the south western ground level approach the dignity it deserves. The current proposals would make any such restoration impossible, as by then it would have been taken out of the public realm for ever.

I appreciate your attention to these observations and urge you to reject these applications in order to help preserve the architectural integrity of the Barbican Estate.

Yours sincerely,

Daniel Edwards

Hassall, Pam

To: Hassall, Pam
Subject: FW: Comments for Planning Application 16/00768/FULL

From: PLN - Comments
Sent: 30 August 2016 16:01
To: PLN - Comments
Subject: Comments for Planning Application 16/00768/FULL

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 4:01 PM on 30 Aug 2016 from Dr Angeles Rodriguez de Cara.

Application Summary

Address: From John Wesley Highwalk To Seddon
Highwalk Thomas More Highwalk Barbican
London EC2

Proposal: Change of use of podium level and upper
floors of Turret to form one two bedroom
residential dwelling (Use Class C3),
including the insertion of windows.

Case Officer: Catherine Linford

[Click for further information](#)

Customer Details

Name: Dr Angeles Rodriguez de Cara

Email:

Address: 158 Thomas More House, Barbican, London
EC2Y 8BU

Comments Details

**Commenter
Type:** Neighbour

Stance: Customer objects to the Planning
Application

**Reasons for
comment:** - Residential Amenity

Comments: I am extremely concerned with the
privatisation of public spaces. If this
proposal goes forward, it will set a
precedent to privatise other public domains
of the Barbican Estate or elsewhere in the
City of London. It is a shame that the
higher levels of The Turret have been
closed to the public without finding a
better use in line with the architects'
original conception of the Estate.

I believe the turret is not suitable to be a

residential part of the Barbican. The flat would be directly on top of a restaurant and stands immediately next to a busy road. It is an access point with a lift and stairs to the Barbican highwalk in constant use. Its conversion would cause major disruption and there is no nearby alternative.

The arrow slits and the turret were clear references to the origin of the word Barbican as the barbican of a walled fortification. The proposed conversion involves changes to the arrow slits, breaking the continuous appearance of the slits from the highwalk around Lauderdale Tower. It further adds a rooftop by adding an elevated glass structure, nowhere else seen in the Estate.

Even more disruptively, the proposal includes the insertion of windows into what is currently a blank wall highly conspicuous from the walkway. This would set a disturbing precedent for the permanent alteration of a Grade II listed structure. These changes greatly diminish the essential character of the building.

The proposal states that the location has been troubled "troubled by criminal activity and used as a repository for urban waste" and that rough sleepers use it. This is false. The windows proposed and the rooftop terrace in glass are not in line with the rest of the Estate, and would break the harmony and continuity of the appearance. Lastly, it is unclear why they need to make changes as noted in red on the plans at basement and street level on the facade of what is currently a restaurant.

These are strong issues that should be taken into account.

The Bursar

Mr Alan Bubbear MBA (Open)



**CITY OF LONDON
SCHOOL FOR GIRLS**

Telephone 020 7647 5524

Fax 020 7638 3212

Email bursar@cls.org.uk

Date: 30th August 2016

Mr M Kettle
Housing & Commercial Development Manager
Housing Property Services
Department of Community and Children's Services
City of London Corporation

Dear Mike

Further to our meeting on Monday 22 August, I can confirm that the School has no objections to the proposed conversion of the building at the end of the tennis courts into a residential dwelling.

Yours sincerely



Mr Alan Bubbear
Bursar



Representing the interests of Barbican Residents

Helen Kay
403 Willoughby House
Barbican
London EC2Y8BN

The City Planning Officer ☐
Department of Planning and Transportation
City of London ☐
PO Box 270,
Guildhall ☐
London EC2P 2EJ

31 August 2016

For the attention of Clive Cornwell

Re: Objection to application **16/00768/FULL** and 16/00770/LBC

Dear Sir/Madam,

I write on behalf of the Barbican Association, a Recognized Tenants' Association representing residents of the Barbican Estate, to object to elements of the application to develop the turret site on Aldersgate Street.

1. Some of the elements of the design of the development do not preserve the architectural integrity of the listed estate.

The Local Plan, policy DM12.1 requires a development to 'sustain and enhance heritage assets and to respect the character and scale of surrounding heritage assets' and the Core Strategic Policy CS10 promotes 'a high standard of design ensuring that the quality of materials and detailed design of buildings are appropriate to the setting of surrounding buildings and spaces'.

The proposed glazed external staircase and the fully glazed entrance both detract from the integrity of the design of the listed Barbican Estate.

The window types should be in character with the original design by Chamberlain, Powell and Bon - Namely, hardwood, rectangular and not protruding from the face of the building.

The glazed section of the staircase will also have the potential to cause light pollution to the overlooking apartments.

2. Residential amenity threatened by noise and disturbance

The Local Plan requires developments 'to demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout and design'.

The large roof terrace will allow a significant number of people to congregate and this gives

great potential for disturbance. At the meeting we were informed that there would be a green roof. A better design that would lower the potential for noise disturbance would be a smaller roof terrace with a section of green roof that would not enable people to gather. Environmental Health at CoL has much evidence of noise disturbance from a terrace on Moor Place that is close to a residential block. The management company in that building now has to permanently lock the doors to that terrace, as all other measures have been ineffective.

We therefore ask the City to reject this application as it stands or to suggest some improvements to the design.

There are a few questions I have for you.

There seems to have been a problem with communication on this application with the distribution of the notification letters and was there a reason for the normal planning process of the initial pre-planning consultation being ignored?

The Barbican Listed Building Management Guidelines state that planning applications submitted by the City Corporation have to be referred to the National Planning Casework Unit of CLG as a Local Planning Authority cannot determine its own application and it would seem that English Heritage also need to be consulted, again to 'prevent a Local Planning Authority from determining Listed Building Consent on its own buildings.' Can you confirm for us that you will be consulting with these two organisations?

Yours faithfully,

Helen Kay

☐ Chair, Barbican Association Planning Committee

31/8/16

Comments for Planning Application 16/00768/FULL

Application Summary

Application Number: 16/00768/FULL

Address: From John Wesley Highwalk To Seddon Highwalk Thomas More Highwalk Barbican London EC2

Proposal: Change of use of podium level and upper floors of Turret to form one two bedroom residential dwelling (Use Class C3), including the insertion of windows.

Case Officer: Catherine Linford

Customer Details

Name: Mr Christopher Makin

Address: 21 Speed House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I OBJECT primarily on the grounds of the removal of residential amenity by closing the viewing platform permanently, plus the proposed damage to a listed building and its position as an integral part of the Barbican Estate

1: Insertion of windows:

A: Looking at the plans I see no rationale whatsoever for punching holes in a Grade II listed wall. I agree with the pre-application advice from the City's Principal Planning Officer [section 5 of the application] which states that: "... the need for east facing windows at second floor level is questioned due to the size of the windows fronting Aldersgate Street."

+ One proposed new window is in the proposed 'Living Room' area that already has two very large windows overlooking Aldersgate Street. This window is not required and should be denied

+ Two proposed windows are in the proposed 'bedroom' area that already has one very large window overlooking Aldersgate Street. These windows are not required and should be denied

+ One proposed window is in the proposed 'bathroom' area. Barbican bathrooms do not have windows so this is not consistent with the rest of Estate and should be denied

B: Further, it is not acceptable to glaze over the arrow slits. The turret is a key part of the architectural language of the fortress that is the Barbican and its appearance should not be changed

Wells, Janet (Built Environment)

From: PLN - Comments
Subject: FW: Comments for Planning Application 16/00768/FULL

From: PLN - Comments
Sent: 25 November 2016 13:50
To: PLN - Comments
Subject: Comments for Planning Application 16/00768/FULL

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 1:50 PM on 25 Nov 2016 from Mr Christopher Makin .

Application Summary

Address: From John Wesley Highwalk To Seddon Highwalk Thomas More Highwalk Barbican London EC2

Proposal: Change of use of podium level and upper floors of Turret to form one two bedroom residential dwelling (Use Class C3), including the insertion of windows.

Case Officer: Catherine Linford

[Click for further information](#)

Customer Details

Name: Mr Christopher Makin

Email:

Address: 21 Speed House Barbican London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment: - Residential Amenity

Comments: I OBJECT primarily on the grounds of the removal of residential amenity by closing the viewing platform permanently, plus the proposed damage to a listed building and its position as an integral part of the Barbican Estate

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+ One proposed window is in the proposed 'bathroom' area. Barbican bathrooms do not have windows so this is not consistent with the rest of Estate and should be denied

B: Further, it is not acceptable to glaze over the arrow slits. The turret is a key part of the architectural language of the fortress that is the Barbican and its appearance should not be changed

2: Inaccurate rationale for the proposal

As a resident of the Barbican I do not recognise the architects negative characterisation of the current space. The Highwalk has low levels of crime and this well-used staircase is clean and well maintained by the City.

3: The Barbican Estate Listed Building Management Guidelines

Paragraph 5.60 highlights the value of 'the smaller building set around landscaped courts'. The Turret is a prime example of one of these buildings and its listed status should be respected

4: Public access

The turret should be reinstated as a public viewing platform and treated with respect as a Grade II listed building

Adjei, William

From: Paul Tilley [REDACTED]
Sent: 28 August 2016 18:32
To: PLN - Comments
Subject: 16/00768/FULL and 16/00770/LBC

Dear Sir,

I wish to object to the above numbered planning applications. I live in the Barbican Estate and the use of the proposed roof terrace, which is visible from my flat, is likely to create a nuisance. In addition the fenestration proposed on the eastern side of the building is out of keeping with the style of the Barbican Estate.

Yours truly,
Paul Tilley
118 Thomas More House,
Barbican
EC2Y 8BU



ACKNOWLEDGED

Adjei, William

From: [REDACTED]
Sent: 24 August 2016 15:07
To: PLN - Comments
Subject: Planning Applications

Follow Up Flag: Follow up
Flag Status: Flagged

16/00773/FULL and 16/00774/LBC
16/00768/FULL and 16/00770/LBC

I object to the above applications as follows:-

Alteration to a listed building - is this allowed?

An external staircase is out of keeping with the current architecture

Windows overlooking the tennis courts will affect privacy and do not appear to be in keeping with the present architecture

A roof terrace which could create a nuisance to overlooking properties

The current staircase by the public lift is already a dark spot and would become even more so with the loss of daylight

Pauline Pearson
150 Thomas More House
London EC2Y 8BU

ACKNOWLEDGED



Hassall, Pam

From: P Pearson <[REDACTED]>
Sent: 20 December 2016 07:51
To: PLN - Comments
Subject: Objection to 16/00768FULL + 16/00770/LBC Application for change of use of podium level and upper floors Turret to form one two bedroom dwelling

For the attention of Catherine Linford, Development Division

Dear Ms Linford

I wish to object to the above planning application.

I understood that "listing" was designed to protect certain iconic buildings from this kind of development. The Turret was never intended to be a residence and the necessary alterations to achieve this is unsympathetic to the original design.

The proposed filling in of one of the elevations onto Aldersgate Street will make the staircase even darker than it is now and will create a hazard.

Where is the fire escape?

A roof terrace is highly inappropriate.

Granting permission for this scheme does not augur well for the future of the estate and would create a precedence for even more unsuitable schemes elsewhere in the Barbican.

Yours sincerely

Pauline Pearson, 150 Thomas More House.

Comments for Planning Application 16/00768/FULL

Application Summary

Application Number: 16/00768/FULL

Address: From John Wesley Highwalk To Seddon Highwalk Thomas More Highwalk Barbican London EC2

Proposal: Change of use of podium level and upper floors of Turret to form one two bedroom residential dwelling (Use Class C3), including the insertion of windows.

Case Officer: Catherine Linford

Customer Details

Name: Mr Gareth Randell

Address: 402 Seddon House London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: I object on the following grounds:

1. Listed Building Status / Architecture. The historic estate overall, and this local landmark, should be protected not developed opportunistically and unsympathetically. Residential use is inappropriate to the nature / location of the building (there are other options for use more in keeping with the location and/or barbican area / cultural hub strategy). The Barbican Listed Building Management Guidelines appear to have been ignored.

2. Privacy / Overlooking. The proposed roof terrace is right outside our windows, and will erode our privacy and providing a source of noise / light pollution / nuisance unless usage restrictions are put in place

3. Lack of public consultation. As immediate neighbours we should have been consulted (I found out about this and the other applications by chance)

Attention Catherine Linford

Senior Planning Officer, Department of the Built Environment

APPLICATION 16/00768/FULL AND 16/00770/LBC – to convert the podium level and upper floors of the turret to form a two bedroom dwelling, including the insertion of windows.

I am writing on behalf of the Thomas More House Group **to object** to the above application (to be considered in conjunction with objections to application 16/00773/FULL and 16/00774/LBC). We object to both applications in their current form but are particularly opposed to the version with the external staircase.

The Planning process

This fell well short of good practice especially given the complexity of the proposals (this is one of two proposals, each with three variants on windows) and the fact that the City is the developer:

- there was no pre-planning consultation;
- the statutory application period was confined to August when many residents are away;
- the distribution public notices, and of notification letters to affected owners and occupiers, and, indeed, on the turret itself, was inadequate and inconsistent.

Design statement

This overstated the "criminal activity" currently present.

Substantive objections

- the three window types proposed for insertion in the East wall seem out of character with those on the rest of the Estate. (The architect has argued verbally that they provide contrast but they seem out of keeping with the original design of Chamberlain, Powell and Bon.) Moreover,, we would prefer that there to be no windows at all (not fully understanding why the ones on Aldersgate Street cannot be opened.);
- increased light pollution from these windows (which the architect has said cannot be minimised or controlled)
- the roof terrace appears large and we are concerned with potential for nuisance.

Other

A condition of the application must be improvement of lighting to the public staircase, given the loss of light which would occur if this development were to be approved.

Averil Baldwin, Chair Thomas More House Group

1 Thomas More House, Barbican, London EC2Y8BT

[Redacted signature block]

ROBERT B. BARKER, MPhil (RCA)

33 LAUDERDALE TOWER, BARBICAN, LONDON EC2Y 8BY

The City Planning Officer
Department of Planning and Transportation
City of London
PO Box 270
Guildhall
London EC2P 2EJ

16th December 2016

Dear Sirs,

Re:

From John Wesley Highwalk To Seddon Highwalk, Thomas More Highwalk, Barbican,
London EC2

16/00768/FULL

Change of use of podium level and upper floors of Turret to form one two bedroom
residential dwelling (Use Class C3), including the insertion of windows.

AND

From John Wesley Highwalk To Seddon Highwalk, Thomas More Highwalk, Barbican,
London, EC2

16/00770/LBC

Conversion of podium level and upper floors of Turret to form one two bedroom residential
dwelling (Use Class C3), including the insertion of windows.

INTERNAL STAIRCASE OPTION

REVISED DRAWINGS

**I WRITE TO OBJECT TO THE GRANTING OF BOTH PLANNING PERMISSION AND
LISTED BUILDING CONSENT FOR THE ABOVE.**

I write as somebody who has served on the working parties that have produced volumes I, II
and IV of the Barbican Listed Building Management Guidelines.

I have NO OBJECTION to the conversion of the uppermost section of the Aldersgate Turret
into residential accommodation.

These REVISED DRAWINGS are a great step forward and are most welcome. It is a relief that only the proposal with the internal staircase is now being taken forward and that the fenestration on the east side has been redesigned. Although the applicants make no reference to the volumes of the Barbican Listed Building Management Guidelines in their application, it is clear that both Planning Officers and the applicants have now taken on board the letter and spirit of the Barbican Listed Building Management Guidelines.

MY OBJECTIONS are such that I believe that they can be met by CAREFULLY CONDITIONING or MINOR AMENDMENTS. Some of these are, I believe, necessary due to lack of detail in the drawings.

Vol. IV of the Guidelines – section 2 – Good Practice –

2.1.4 The adoption of good practice applies equally to major works and to minor or routine repairs, whether or not these might be subject to Listed Building Consent. It is vital that future works conform to the original design intent or an agreed and approved alternative and take into consideration characteristic details and finishes across the estate, allowing for reintroduction of the original design wherever practicable and appropriate. Proposals must be developed in sufficient detail before implementation to be assessed for potential impact on the architectural character of the estate and the need for Listed Building Consent and/ or consideration within the Planning process. Registration of the Estate in the Register of Historic Parks and Gardens is a material consideration in the planning process (see in particular paragraph 132 of the NPPF).

MY OBJECTIONS ARE AS FOLLOWS:

- 1) Any new fenestration (including on the eastern façade) must either be in hardwood frames in keeping with the rest of the Barbican Residential Estate, or in metal frames, the colour of which must be in keeping with the palette of colours specified alongside the Barbican Listed Building Management Guidelines. There is insufficient detail in the drawings submitted. (This can be resolved by conditions and minor revisions to the drawings.)
- 2) The glazing of any new fenestration should NOT BE TINTED.
- 3) The drawings show a new ventilation unit at roof-top level. It is not clear whether this is associated with the proposed new residence or the existing Indian restaurant. If it is the latter, and if it is as a result of the flue being extended upwards from its current position, then care must be taken that appropriate filters are included (and can be serviced), so that smells etc from the restaurant do not cause a nuisance to the residents of Thomas More and Seddon Houses (both in the Barbican), immediately downwind. (This can be resolved by conditions.)
- 4) The ventilation unit must be finished in an appropriate colour. The colour should be in keeping with the palette of colours specified alongside the Barbican Listed Building Management Guidelines. (This can be resolved by conditions.)

- 5) The proposed new exterior of the residence on the podium-level first floor, including the timber frame and the painted metal frame door, along with the Painted metal lining as stair cladding, see drawing 585.15_1_504A, should be painted in a colour from the palette of colours specified alongside the Barbican Listed Building Management Guidelines. I say painted so as to exclude powder-coated finishes that look poor in contrast to hand-painted finishes in the Barbican context. (This can be resolved by conditions.)
- 6) I note that the pack of drawings includes 585.15_1_203_A labelled "FOURTH FLOOR ROOF TERRACE". The word terrace implies a large area to be used for relaxation or entertainment. This drawing also includes reference to a "Green Roof". There is also a drawing 585.15_1_401_A the key for which states "Roof balustrade removed 21.10.16", but the large staircase leading to the roof remains as previously proposed. This roof-top area would be the largest terrace of any single dwelling within the Barbican Residential Estate. There is significant potential for inconsiderate users of such a terrace to cause a nuisance to residents of Thomas More House, Mountjoy House, Seddon House, Lauderdale Tower (all in the Barbican); and London House on the west side of Aldersgate Street. So as to protect the Residential Amenity of those living nearby, it should be made unambiguously clear that this roof, in a residential area, is to be solely a "green roof" and not a roof top terrace for entertaining. (It may be possible to limit the use of the roof, to specify the type of green roof to be installed, to limit the use of the roof by number of people or hours of access, or to state that access is for maintenance only; resolving all of this by conditions.)
- 7) The plans show that the shaft for the PUBLIC LIFT between the street level and the upper level walkway continues past the levels occupied by the proposed "Second Floor", "Second Floor Mezz" and "Third Floor". Conditions should be applied to ensure that any residents of the tower are protected from noise and vibrations from this important public facility (the lift) so that in future complaints from residents of this tower do not result in the diminution of lift availability.
- 8) WORKS PHASE – So as to protect the Residential Amenity of those living in the Barbican there should be a Condition applied stating that during the Construction / Conversion works, there should be no works whatsoever on a Saturday. this is required so as to protect the Residential Amenity of residents of Thomas More House, Mountjoy House, Seddon House, Lauderdale Tower (all in the Barbican); and London House on the west side of Aldersgate Street. (This can be resolved by conditions.)

I thank you for your detailed attention to this complex matter,

Yours sincerely,

Robert B. Barker

ROBERT B. BARKER, MPhil (RCA)
33 LAUDERDALE TOWER, BARBICAN, LONDON EC2Y 8BY

The City Planning Officer
Department of Planning and Transportation
City of London
PO Box 270
Guildhall
London EC2P 2EJ

20th August 2016

Dear Sirs,

Re:

From John Wesley Highwalk To Seddon Highwalk, Thomas More Highwalk, Barbican,
London EC2

16/00768/FULL

Change of use of podium level and upper floors of Turret to form one two bedroom residential dwelling (Use Class C3), including the insertion of windows.

AND

From John Wesley Highwalk To Seddon Highwalk, Thomas More Highwalk, Barbican,
London, EC2

16/00770/LBC

Conversion of podium level and upper floors of Turret to form one two bedroom residential dwelling (Use Class C3), including the insertion of windows.

I WRITE TO OBJECT TO THE GRANTING OF BOTH PLANNING PERMISSION AND LISTED BUILDING CONSENT FOR THE ABOVE.

Page 140

ACKNOWLEDGED

I write as somebody who has served on the working parties that have produced volumes I, II and IV of the Barbican Listed Building Management Guidelines.

The applicants make no reference to the volumes of the Barbican Listed Building Management Guidelines in their application. In particular, as far as this external staircase option is concerned, the proposed staircase and proposed street-level entrance lobby are within the curtilage of the Listed estate. Vol IV, the Landscape vol of the Guide lines, tells us at paragraph 1.1.1 that:

"The Estate was listed Grade II in September 2001 for its special architectural and historic interest. It ... was entered at Grade II* in the Register of Historic Parks and Gardens by English Heritage for the special interest of its landscape in February 2003."

This turret, with its spiral staircase fitted with loopholes for internal illumination and its stark four-storey engineered brick eastern wall (facing the tennis courts) should be considered as part of the current Grade II* hard landscaping (Post application discussions reveal that the architect was not aware of this.)

INTERNAL REFURBISHMENT OPTION

Although at p. 6 the applicant illustrates a west-east slice across the estate, what would have been much more appropriate in this context would have been to show the north-south western façade of the estate where we have the YMCA/Blake Tower, then lower terrace blocks, a covered walkway (over Beech Street), then Lauderdale Tower then the Seddon House up to the junction with Thomas More House, then another covered walkway to the Aldersgate Turret. There is a deliberate rhythm to this western frontage to the estate.

See the Barbican Listed Building Management Guidelines, vol IV:

"1.5.67 The architectural rhythm of the western edge of the estate can be clearly seen in the 'up and down' nature of the buildings themselves, beginning with the tall former YMCA [Blake Tower / 2 Fann Street] building, the lower John Trundle House, the tall Lauderdale Tower, the lower Seddon House and the corner to the lower Thomas More House, then finishing with the Aldersgate Turret."

(It is totally unclear to me where the applicant's usage of the name "John Wesley Turret" has come from as my understanding is this has always been known as the Aldersgate Street Turret.)

I do not feel that "the constraints" section on p.6 which refer to "criminal activity" can be justified. This is irrelevant.

On p.7 the "MOL New Stair" is indeed a new staircase, but it is part of the unlisted Museum of London, not part of the Barbican Residential Estate. Indeed, the architecture of this new museum staircase would have been most alien to the museum's original architects.

I believe that with very significant modifications this proposal has more potential than the other external staircase proposal.

Vol. IV of the Guidelines – section 2 – Good Practice –

2.1.4 The adoption of good practice applies equally to major works and to minor or routine repairs, whether or not these might be subject to Listed Building Consent. It is vital that future works conform to the original design intent or an agreed and approved alternative and take into consideration characteristic details and finishes across the estate, allowing for reintroduction of the original design wherever practicable and appropriate. Proposals must be developed in sufficient detail before implementation to be assessed for potential impact on the architectural character of the estate and the need for Listed Building Consent and/ or consideration within the Planning process. Registration of the Estate in the Register of Historic Parks and Gardens is a material consideration in the planning process (see in particular paragraph 132 of the NPPF).

The large protruding east facing windows and Juliet balconies illustrated on pp 38 and 44 are alien to Chamberlin, Powell and Bon's design concepts and vocabulary. They give the impression of protruding for two storeys. I also find the alternative triangular type and flush type windows, as illustrated on p. 45, unacceptable. Again, they fail to draw on Chamberlin, Powell and Bon's carefully detailed fenestration.

The flush type illustrated on both pp. 46 and 47 in two pairs on two floors are acceptable, but to the northern end (the Thomas More House end) of this eastern façade overlooking the tennis courts) the applicant proposes a multi-floor glazed window unit, the height of which, make a total nonsense of any Roman or medieval design root for apertures in a defensive turret (please see also the arrow slits in the section of Seddon High Walk that wraps around the street side of Lauderdale Tower). As far as concerns the fenestration only the smaller windows, but not the large vertical slot(s), illustrated on p. 47 are more acceptable.

Careful consideration should be given to setting back any new windows and their frames from the line of the external brickwork.

Any new fenestration (including on the eastern façade) must be in hardwood frames in keeping with the rest of the Barbican Residential Estate. The glazing should be clear – not tinted.

Further careful reconsideration should be given to the walling and roof of the staircase that leads to the rooftop terrace. What appears to be an illuminated glass box, covering the new stairs to the roof-top terrace, above the current roofline is unacceptable and thought should be given to using materials and textures in line with those chosen by CP&B for the Barbican Residential Estate.

The rooftop terrace – fourth floor – this is best seen on pp. 35 and 36: What appears to be proposed would be the largest terrace of any single dwelling within the Barbican Residential Estate. There is significant potential for inconsiderate users of such a terrace to cause a nuisance to residents of Thomas More House, Mountjoy House, Seddon House, Lauderdale Tower, and possibly London House on the west side of Aldersgate Street. As proposed, it is just too large.

The plans on pp. 33 and 34 show that the shaft for the PUBLIC LIFT between the street level and the upper level walkway continues past the levels occupied by the proposed “Second Floor”, “Second Floor Mezz” and “Third Floor”. Conditions should be applied to ensure that any residents are protected from noise and vibrations from this important public facility (the lift) so that in future complaints from residents of this tower do not result in the diminution of lift availability.

I OBJECT to both Planning Permission and Listed Building Consent being granted for this application. This should be REFERED BACK TO THE APPLICANT FOR DETAILED REVISIONS, particularly to the fenestration on the eastern façade and the layout of the roof-top terrace,.

Yours sincerely,

Robert B. Barker

Adjei, William

From: COL - Contact Centre
Sent: 30 August 2016 13:21
To: Pln - CC - Development Dc
Subject: FW: PLN: Objection to applications 16/00768/FULL and 16/00770/LBC
COL:04358370

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

From: Jim Davies [[mailto:](#)]
Sent: 29 August 2016 00:56
To: PlanningQueue; Cornwell, Clive
Subject: Objection to applications 16/00768/FULL and 16/00770/LBC

Dear Sirs,

I object to application 16/00768/FULL with 16/00770/LBC. I object to the change of use as no attempt being made to return it to its use as a folly. I object to the green roof, as this needs to be looked after, and watered, but nothing on the plans suggests that this would even be possible. I object to a roof terrace as this would introduce a lot of noise to the area. I object to adding an extra floor as this would look really awful against the line of the arch. I object to damaging the brutalist feel of the east wall by cutting holes in it and adding windows.

I additionally object to the City not consulting the residents before the planning applications were submit. It is a terrible precedent for the City to set.

Many Thanks

Jim Davies

101 Mounjoy House

ACKNOWLEDGED



Adjei, William

From: Brian Parkes [REDACTED]
Sent: 01 September 2016 08:12
To: PLN - Comments
Subject: Re: 16/00768/FULL, 16/00770/LBC, 16/00773/FULL, 16/00774/LBC

From: Brian Parkes [REDACTED]
Sent: 28 August 2016 16:55
To: PLN - Comments
Subject: 16/00768/FULL, 16/00770/LBC, 16/00773/FULL, 16/00774/LBC

OBJECTION to the above:

I refer to the following applications:

16/00768/FULL, 16/00770/LBC, 16/00773/FULL, 16/00774/LBC

I write to OBJECT to the above four planning and listed building applications, on the grounds of the building's listed status and position as an integral part of the original Barbican Estate.

1: The rationale is inaccurate:

Being a resident of the Barbican, the architects' characterisation of the current space viz: *"The existing Highwalk level has been troubled by criminal activity and used as a repository for urban waste, including beer cans & cigarette butts. Late night drinkers use the space as a 'pissoir'."* I do not recognise this in relation to our existing Highwalks, which have low levels of crime and this well-used staircase is generally clean and well maintained by the City.

2: The Barbican Estate Listed Building Management Guidelines:

These emphasise (para. 5.60) the value of 'the smaller building set around landscaped courts'. The Turret is a prime example of one of these buildings and its listed status should be respected.

3: Alterations to a listed building:

Section 10 of the application says there will not be any works to the exterior of the building. This can only be incorrect given the insertion of windows/glazing and the addition of glazed walls around a roof terrace? It is not acceptable to punch holes in walls to create windows, nor is it acceptable to gaze over "arrow slits". The Turret is an element of the architectural language of the Estate'

4: Windows:

As designed, these are not consistent with windows elsewhere in the Estate, and as such should be rejected. The City's PPO has already stated *"These windows are excessive in size ... the need for east facing windows at second floor level is questioned due to the size of the windows fronting Aldersgate Street."*

5: Creation of a roof terrace is likely to lead to noise and light pollution to which will affect neighbouring buildings.

6: Addition of an external staircase (16/00773/FULL and 16/00774/LBC)

I OBJECT strongly to this proposal, and fully agree with the pre application advice from the City's Principal Planning Officer [section 5 of the application] regarding the effect of the external stair tower leading to a dilution of the character of the existing building.

7: Public Access:

The existing and well used public staircase and its adjacent public lift should continue to provide 24 hour access to the high walk from the street.

8: Lack of consultation:

One meeting with residents was latterly established for 4pm when most are at work. Further, there is no sign of the statutory notice at the site of the works - I am given understand it is behind Lauderdale Tower where it is invisible to most residents. This is unacceptable for such an important alteration to the existing structure.

9: I note that a similar application was rejected by the committee in 2008 and trust that this application will also be rejected.

Brian Parkes
Chair, Speed House Group

Adjei, William

From: [REDACTED]
Sent: 29 August 2016 16:07
To: PLN - Comments
Subject: OBJECTION-16/00768/FULL+16/00770/LBC

FAO Catherine Linford, Development Division

Dear Ms Linford,

APPLICATION 16/00768/FULL AND 16/00770/LBC – OPTION A - to convert the podium level and upper floors of the turret to form a two bedroom dwelling, including the insertion of windows.

OBJECTION

I wish to register my objection to this application.

I think that the proposed alterations are both unnecessary and undesirable.

Unnecessary because, for anyone who wants to live in the City there is already plenty of accommodation available – both on the Barbican Estate and around. There is no need to cram more into every available space.

It's undesirable because, apart from the noise and disruption caused by unnecessary building works and the additional light pollution from the proposed windows, one must consider the inappropriateness of this proposal in the context of the whole estate.

The Corporation and Mr Mackay speak about anti -social behavior in the region of the turret. I often come home that way, late at night, and I've never seen any. In fact from that point of view – amongst others – the Barbican Estate must be one of the most successful estates in the country. One reason being, I think, the excellence of its rather austere design.

The Corporation may want to realise some of its assets but I think it should consider retaining the most valuable. The Barbican Estate is a huge asset for the City of London and the country and I think it would be very unwise to compromise it for the sake of short term profit.

Larry Marden

108 Thomas More House

ACKNOWLEDGED

Hassall, Pam

From: larrymarden@
Sent: 19 December 2016 23:17
To: PLN - Comments
Subject: OBJECTION-16/00768/FULL+16/00770/LBC

To: PLNComments@cityoflondon.gov.uk

Title: OBJECTION-16/00768/FULL+16/00770/LBC

FAO Catherine Linford, Development Division

Dear Ms Linford,

APPLICATION 16/00768/FULL + 16/00770/LBC - change of use of podium level and upper floors Turret to form one two bedroom dwelling (Use Class C3), including the insertion of windows (REVISED DRAWINGS)

OBJECTION

I wish to register my objection to this application.

I think that the proposed alterations are still both unnecessary and undesirable.

Unnecessary because, for anyone who wants to live in the City there is already plenty of accommodation available – both on the Barbican Estate and around. There is no need to cram more into every available space.

It's undesirable because, apart from the noise and disruption caused by unnecessary building works and the additional light pollution from the proposed windows, one must consider the inappropriateness of this proposal in the context of the whole estate.

The Corporation and Mr Mackay speak about anti -social behavior in the region of the turret. I often come home that way, late at night, and I've never seen any. In fact from that point of view – amongst others – the Barbican Estate must be one of the most successful estates in the country. One reason being, I think, the excellence of its rather austere design.

The Corporation may want to realise some of its assets but I think it should consider retaining the most valuable. The Barbican Estate is a huge asset for the City of London and the country and I think it would be very unwise to compromise it for the sake of short term profit.

Larry Marden

108 Thomas More House

Adjei, William

From: COL - Contact Centre
Sent: 30 August 2016 13:11
To: Pln - CC - Development Dc
Subject: FW: PLN: 16/00768/FULL and 16/00770/LBC Barbican Turret, John Wesley High Walk COL:04358366

From: Peter Inskip [REDACTED]
Sent: 29 August 2016 22:32
To: PlanningQueue
Cc: Cornwell, Clive; Peter Inskip
Subject: FW: 16/00768/FULL and 16/00770/LBC Barbican Turret, John Wesley High Walk

Dear Sirs,

16/00768/FULL and 16/00770/LBC
Barbican Turret, John Wesley High Walk

I am an architect concerned with the historic built environment and am also a resident within the Barbican Estate.

I wish to object to the above applications for the conversion of the upper floors of the Barbican Turret into a residential dwelling.

The applications show that the podium at the Barbican has five entrances and that the Barbican Turret is one of them. However, they fail to recognise that it is the only entrance that is not just an accommodation stair, but the only one that is celebrated as a city gateway and relates the estate to a major frontage on a public highway. In every other case, the entrances are from side roads or hidden behind commercial developments. It should, therefore, be respected as a public monument that is of considerable significance to the City; it is a 20C parallel to Wren's Temple Bar. Its design is clearly influenced by the work of Le Corbusier and Louis Kahn, but its composition and scale are those of a Roman triumphal arch. Its cultural significance is reinforced by the presence of the remains of the Roman city wall that lies beyond to the east.

The Turret is a Grade II listed building that makes an important contribution to both Aldergate Street, where it stands proud as a freestanding monument that announces the Barbican Estate, and to John Wesley High Walk where the space is enriched by expanding into the Turret, forming an acknowledgement of the connection to the street.

It survives remarkably intact. The colonisation of the ground floor by a restaurant is unfortunate as it has reduced the street level portico, but those alterations, which occurred before listing, are reversible and the space could be reclaimed one day. The security fencing introduced to deny vagrants access to the upper floor can also be considered temporary.

Introducing a dwelling into the upper observation gallery should not be permitted as it changes the very nature of the public monument. It truncates the staircase and removes the glazed lantern from the public realm. Introducing glazing into the blank windows onto Aldersgate Street alters the elevation considerably, and piercing the east wall with new openings not only disrupts the blind elevation to the east, but also denies the play between the west elevation, with its large scale Diocletian openings, and the plain brick wall set diagonally behind it which would be harmed by the views of windows beyond. Dividing the principal window with a new floor will destroy the generosity of space that is present in views from the street. If an additional stair is constructed, it will impact severely on John Wesley High Walk and interfere with the architectural reading of the Turret being a composition of primary forms.

I object to the applications and urge members to refuse permission.

Yours faithfully,

Peter Inskip

Peter Inskip MBE, FSA, RIBA
263 Shakespeare Tower
London EC2Y 8DR

Peter Inskip + Peter Jenkins Architects
19 - 23 White Lion Street, London, N1 9PD
Tel: 020 7833 4002; Fax: 020 7278 5343
E-mail: [REDACTED] Web :<http://www.inskip-jenkins.co.uk/>

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Hassall, Pam

From: Peter Inskip [REDACTED]
Sent: 13 December 2016 08:41
To: PLN - Comments
Subject: re: 16/00768/FULL and 16/00770/LBC, 16/00773/FULL and 16/00774/LBC Barbican Turret, John Wesley High Walk

Dear Ms Linford

Barbican Turret, John Wesley Highwalk
16/00768/FULL and 16/00770/LBC

Further to my email sent a moment ago, I note that the current planning references appear to have changed from those below (16/00773/FULL and 16/00774/LBC)
Please note my objections against whichever scheme is currently being assessed and take them into consideration accordingly.

Yours faithfully

Peter Inskip MBE FSA RIBA

From: Peter Inskip [REDACTED]
Sent: 13 December 2016 08:29
To: PLNComments@cityoflondon.gov.uk
Cc: Peter Inskip
Subject: FW: 16/00773/FULL and 16/00774/LBC Barbican Turret, John Wesley High Walk

Dear Ms Linford

16/00773/FULL and 16/00774/LBC
Barbican Turret, John Wesley High Walk

Thank you for your letter regarding the Turret. I have studied the revised drawings and write to inform you that my OBJECTIONS to the conversion of the building and its change of use still stand.

The drawings make it even clearer that the introduction of domestic accommodation into the building would be a large mistake and I OBJECT to the Change of Use for the reasons stated in my email of 29 August. In addition, in terms of the listed building, the asymmetry of the glazing on the Aldersgate Street is unacceptable as it creates an inharmonious pattern of glazed apertures and voids; puncturing the east elevation with a pattern of slit windows is also unacceptable as it destroys the plain, uninterrupted mass of the brick elevation that is very handsome. The building should be seen as a series of voids that invite you in from the street while, in contrast, the east elevation should remain as a solid plane. Altering the elevations loses this an important aspect of the monument.

Please note that this reply and my previous email are objections to both the planning and listed building applications, 16/00773/FULL and 16/00774/LBC.

Looking at the web page, I see that my previous objection has only been recorded as a document in the planning application and it does not appear in the documents concerning the listed building application. My email was clear in its subject and heading that the OBJECTION related to BOTH APPLICATIONS and I would be grateful if you would correct this error and take the points into consideration on both.

Yours faithfully,

Peter Inskip MBE FSA RIBA

London EC2Y 8DR

Peter Inskip + Peter Jenkins Architects
19 - 23 White Lion Street, London, N1 9PD
Tel: 020 7833 4002; Fax: 020 7278 5343
E-mail: [REDACTED] Web : <http://www.inskip-jenkins.co.uk/>

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Adjei, William

From:

PLN - Comments

Subject:

FW: OBJECTION-16/00768/FULL+16/00770/LBC

[

Sent: 29 August 2016 13:52

To: PLN - Comments

Cc:

Subject: OBJECTION-16/00768/FULL+16/00770/LBC

FAO Catherine Linford, Development Division

ACKNOWLEDGED

Dear Ms Linford,

APPLICATION 16/00768/FULL AND 16/00770/LBC – OPTION A - to convert the podium level and upper floors of the turret to form a two bedroom dwelling, including the insertion of windows.

OBJECTION

I wish to register my objection to this application which will completely undermine the integrity of one of the Barbican Estate's landmark buildings.

OBJECTION IN PRINCIPLE

From information given at their meeting with residents on 17th August I understand that MacKay and Partners' proposal was directly commissioned by CoL officer Mike Kettle. Kettle noted that the primary justification for the commission was to deliver against CoL's policy of 'asset realisation' by achieving a capital sum, with the secondary benefit to CoL of transferring the costs of managing and maintaining the building to private leaseholder.

At that meeting both Kettle and MacKay demonstrated a complete lack of understanding of the Turret's architectural merit and significance. Kettle described it as 'dull, dreary and not very nice'. MacKay was scathing about what he called the Turret's 'castellation' and made much of the fact that its ground and basement level floors (not part of this application) were originally intended as a public lavatory and that at highwalk level it was built with the capacity to accommodate a notional bridge extension across Aldersgate Street.

To focus on these unrealised aspects of the Turret's original purpose is deliberately to ignore the building's prime function – demonstrated by the dramatically Palladian dark voids of its upper storey – as a powerful statement at the south west corner of the Barbican Estate, a folly eye-catcher doubling, as follies often do, as a vantage point. M+P say 'its function is almost secondary to its form' – yes, absolutely – that's the point!

Instead, M+P feel that what they admit to be intended as a 'powerful gesture' by 'Chamberlain Powell & Bon now needs 'reinvigoration and re-animation' – to be delivered by conversion to a domestic use. Both that conceit and the invasive detail of M+P's proposed designs (both Options A + C) reflect MacKay's disdain for this Grade II listed building, which is a key element of the Grade II listed Barbican Estate.

Listing is intended to prevent precisely the sort of undermining of architectural integrity embodied in this proposal and it is disappointing to see CoL actively reneging on its own responsibilities to protect and conserve the City's listed built heritage.

If this proposal is approved it will set a dangerous precedent. If CoL is willing to compromise even such a landmark structure as the Turret in the name of 'asset realisation', what other spaces across the Estate might it not find to be in sudden, lucrative need of 'reinvigoration and re-animation' with shanty town infilling?

SPECIFIC OBJECTIONS TO THE PROPOSAL + COMMENTS

Page 153

Social justification

- Kettle and M+P seek to justify the proposal for infilling the upper storeys of the Turret as making a contribution towards meeting problems of anti-social behaviour such as the dropping of cans and cigarette butts, rough sleeping and the use of the public stairway and highwalk as a urinal by late night drinkers. As a problem this is greatly overstated. In nearly 20 years of regularly using this entrance to the estate day and night my husband and I have never been troubled by anything more serious than the odd dropped crisp packet – and that very rarely.
- Kettle and M+P's argument is not valid. Even if it were the insertion of a private dwelling space into the upper storeys of the building is not a necessary or appropriate response. Alternatives should be sought that open up the viewing platform to public, or at least to residents', access and that retain the very fine view right up the staircase to the conical roof light – which is a fine example of one of the Barbican's many unexpected delights.

West elevation – facing Aldersgate St

- As clearly illustrated on p43 of the proposal document, the replacement of a rather random looking three of the Turret's six dark voids with glazed windows - and bright lighting and the clutter of domestic trivia behind them - will completely compromise the building's architectural integrity. M+P's proud claim that they will be using Barbican style timber frames for these windows is no mitigation.
- It should be noted that the inclusion in the proposal drawings of what might be seen as Barbican friendly replacement glazing at ground floor level for what is currently the restaurant space is a red herring. Neither this nor the proposed improved lighting of the public stairwell forms part of this application.

East elevation – facing Thomas More House, Mountjoy House and the highwalk that serves these and Seddon House

- Currently the Turret's east elevation has a monumental presence to be enjoyed by anyone walking west along the highwalk as well as all residents of Thomas More House and half of those in Mountjoy. The notion of cutting new windows into the seamless brick façade will be detrimental to that view and is a preposterously unsympathetic proposal from architects and a building owner supposedly respectful of the Barbican's architectural quality.
- All of proposed window patterns are unacceptable – with those that include any elements protruding from the façade (as illustrated on pp 44-45 of the proposal document) being obviously the worst.
- None of the designs proposed seek to reflect or respect the palette of materials applied by Chamberlain Powell & Bonn across the Estate. At the meeting with residents MacKay acknowledged that this is a deliberate attempt to 'modernise' – presumably rather in the way he added rusted steel etc to the entrance of his sub podium conversion of former Estate office space into a domestic space.
- The windows are large (according to MacKay when talking to residents, c.1m x 2.5m). They would allow residents of the Turret to overlook the living areas of most flats in Thomas More House and, by their proximity to TMH, will contribute very noticeably to light pollution.
- At the meeting with residents MacKay maintained that these east facing windows are essential for ventilation. If the proposal were to be approved and ventilation is what is required, vents of an identical design to those currently serving the lift shaft should be substituted for windows.

Roof terrace

- The proposed roof terrace would be a further major violation of the integrity of this building.
- At the resident's meeting MacKay suggested that the roof is currently poorly maintained. This does not appear to be the case, but any ongoing work required must surely be well within the capabilities of the Estate's management team.
- MacKay suggested that, while calling the space a roof terrace, M+P's proposal is in fact for a 'green roof' or similar with the substantial glass balustrade (and glass box entrance from the staircase) being there merely for safety during maintenance. He says he would not expect the terrace to be much used by the Turret residents, but somewhat in contradiction maintains that, anyway, the amount of outside space it provides is

proportionate to that currently enjoyed by e.g. TMH flat dwellers. This is disingenuous stuff. As proposed, the terrace is fully accessible and, again, will overlook TMH living areas. There is also potential for noise nuisance.

Long leaseholder responsibilities

- If the proposal were to go ahead, incoming leaseholders should be obliged to abide by all the restrictions currently placed on Barbican residents (very much for our own good!). That needs to apply not just to e.g. restricted hours for building work, but also to barbecues, pets, noise nuisance from either inside the residence or on the terrace, etc. etc.

Caroline Reed

108 Thomas More House, Barbican, London EC2Y 8BU

Caroline Reed

108 Thomas More House, Barbican, London EC2Y 8BU

Wells, Janet (Built Environment)

From: Caroline Reed [REDACTED]
Sent: 16 December 2016 15:09
To: PLN - Comments
Subject: OBJECTION to 16/00768/FULL + 16/00770/LBC

To: PLNComments@cityoflondon.gov.uk
Title: **OBJECTION to 16/00768/FULL + 16/00770/LBC**
FAO Catherine Linford, Development Division

Dear Ms Linford,

APPLICATION 16/00768/FULL + 16/00770/LBC - change of use of podium level and upper floors Turret to form one two bedroom dwelling (Use Class C3), including the insertion of windows (REVISED DRAWINGS)

OBJECTION

I wish to register my objection to this application which will completely undermine the integrity of one of the Barbican Estate's landmark buildings.

OBJECTION IN PRINCIPLE

I understand from discussion of the earlier application under this reference number made in summer 2016 that MacKay and Partners' proposal was directly commissioned by CoL officer Mike Kettle. At a meeting with residents, Kettle noted that the primary justification for the commission was to deliver against CoL's policy of 'asset realisation' by achieving a capital sum, with the secondary benefit to CoL 'of transferring the costs of managing and maintaining the building to a private leaseholder'.

I object in principle to the infilling of what CoL might choose to consider as redundant spaces on the listed Barbican estate for the purposes of asset realisation. Part of the joy of the estate – and one of the reasons why it is constantly visited by students and admirers of Modernist architecture – lies in its careful contrasting of intensively used residential buildings with peacefully vacant public transition spaces – walkways, gardens and void structures like the Turret.

In discussing the earlier proposal with residents, both Kettle and MacKay demonstrated a woeful lack of understanding of the Turret's architectural merit and significance. Kettle described it as 'dull, dreary and not very nice'. MacKay was scathing about what he called the Turret's 'castellation' and made much of the fact that its ground and basement level floors (not part of the application) were originally intended as a public lavatory - and that at Highwalk level the Turret was built with the capacity to accommodate a notional bridge extension across Aldersgate Street.

To focus on these unrealised aspects of the Turret's original purpose is deliberately to ignore the building's prime function – demonstrated by the dramatically Palladian dark voids of its upper storey – as a powerful statement at the south west corner of the Barbican Estate, a folly doubling, as follies often do, as a vantage point. M+P say 'its function is almost secondary to its form' – yes, absolutely – that's the point!

It is interesting to note that the Turret was one of the first buildings to be completed when the site was being built – demonstrating its intention by the architects as an eye-catcher.

M+P feel that the Turret needs 'reinvigoration and re-animation' – to be delivered by conversion to a domestic use – i.e. replacing three of the six dark voids of the western façade with windows onto lit interiors spaces; blocking off and completely obscuring the wonderful three storey sweep of the staircase from public view; puncturing the dramatically austere eastern façade with more lit windows; and providing access to a roof terrace. The whole conceit reflects MacKay's disdain for this Grade II listed building, which by contrast I see as a key element of the Grade II listed Barbican Estate.

Listing is intended to prevent precisely the sort of undermining of architectural integrity embodied in this proposal and it is disappointing to see CoL actively reneging on its own responsibilities to protect and conserve the City's listed built heritage.

If this proposal is approved it will set a dangerous precedent. If CoL is willing to compromise even such a landmark structure as the Turret in the name of 'asset realisation', what other spaces across the Estate might it not find to be in sudden, lucrative, need of 'reinvigoration and re-animation' with similar shanty-town style infilling?

SPECIFIC OBJECTIONS TO THE PROPOSAL + COMMENTS

Social justification

- Kettle and M+P claim that infilling the upper storeys of the Turret will make a contribution towards meeting problems of anti-social behaviour such as the dropping of cans and cigarette butts, rough sleeping and the use of the public stairway and Highwalk as a urinal by late night drinkers. As a problem this is greatly overstated. In nearly 20 years of regularly using this entrance to the estate day and night my husband and I have seldom been troubled by anything more serious than the odd dropped crisp packet – and that very rarely.
- Kettle and M+P's argument is not valid. Even if it were, the insertion of a private dwelling space into the upper storeys of the building is not a necessary or appropriate response. Alternatives should be sought that open up the viewing platform to public or at least to residents' access and that retain the very fine view right up the staircase to the conical roof light – which is an important example of one of the Barbican's many unexpected delights.

West elevation – facing Aldersgate St

- As is clearly illustrated on p38 of the proposal document, the replacement of a rather random looking three of the Turret's six dark voids with glazed windows - and bright lighting and the clutter of domestic trivia behind them - will completely compromise the building's architectural intent. M+P's proud claim that they will be using Barbican style timber frames for these windows is no mitigation.

East elevation – facing Thomas More House, Mountjoy House and the highwalk that serves these and Seddon House

- Currently the Turret's east elevation has a monumental presence to be enjoyed by anyone walking west along the Highwalk as well as all residents of Thomas More House and half of those in Mountjoy. The notion of cutting new windows into the seamless brick façade will be detrimental to that view and is a preposterously unsympathetic proposal from architects and a building owner supposedly respectful of the Barbican's architectural quality.
- Even the new style slit windows shown in the revised drawings are unacceptable.
- The windows will allow residents of the Turret to overlook the living areas of most flats in Thomas More House and, because of their very close proximity to TMH, will contribute to light pollution for existing residents.
- At the meeting with residents MacKay maintained that these east facing windows are essential for ventilation. If the proposal were to be approved and ventilation is what is required, vents of an identical design to those currently serving the lift shaft should be substituted for windows.

Roof terrace

- Even without the high glass balustrade of the original proposal, the roof terrace (clearly shown as such in the drawing on p37) would be a further violation of the integrity of this building as well as being detrimental to neighbours' enjoyment of their own properties.
- As proposed, the terrace is fully accessible via a staircase with glass balustrade and, like the windows, will overlook TMH living areas. There is also potential for noise nuisance.
- At the residents meeting MacKay suggested that one justification for the proposed green roof/roof terrace was that the roof is currently poorly maintained. Looking directly at it from my window, this does not appear to be the case, but, if it were, any ongoing work required must surely be well within the capabilities of the Estate's management team.

Long leaseholder responsibilities

- Finally, if the proposal were to go ahead, incoming leaseholders must be obliged to abide by all the restrictions currently placed on Barbican residents (very much for our own good!). That needs to apply not just to e.g. restricted hours for building work, but also to barbecues, pets, noise nuisance from either inside the residence or on the terrace, etc. etc.

Yours,

Caroline Reed

108 Thomas More House, Barbican, London EC2Y 8BU

Mr. Andrew Walker

831 factor

16/00773/fulk 16/00774/USG

Barbican

16/00768/fulk 16/770/USG

30.08.2016

Dear Sir

I register my objection
to the change of use
as PA, the attached
minutes.

I want the Barbican
to retain its multi
purpose concept not
become a dormitory
for adjacent offices.

We need to retain the
original concept and
not be involved in
planning creep.

We want more
restaurants, bars, not less.
There has already been
a huge shift in the
appearance of the Isle
perhaps it's time for a
change.
Yours faithfully
John Wache

Wells, Janet (Built Environment)

From: PLN - Comments
Subject: FW: Comments for Planning Application 16/00770/LBC

From: PLN - Comments
Sent: 25 November 2016 08:49
To: PLN - Comments
Subject: Comments for Planning Application 16/00770/LBC

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 8:48 AM on 25 Nov 2016 from Mrs Helen Hudson.

Application Summary

Address: From John Wesley Highwalk To Seddon Highwalk Thomas More Highwalk Barbican London

Proposal: Conversion of podium level and upper floors of Turret to form one two bedroom residential dwelling (Use Class C3), including the insertion of windows.

Case Officer: Catherine Linford

[Click for further information](#)

Customer Details

Name: Mrs Helen Hudson

Email:

Address: 15 Defoe House Barbican London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:
- Residential Amenity
- Traffic or Highways

Comments: I strongly object.
1. I use these stairs a lot
2. It is a lie that this is a criminal area with urban waste
3. The restructuring of the wall with the windows not acceptable under grade 2 listing
4. Cultural Hub review not complete so no decisions should be made before that review and restructure happens... the entrance and walkways may be vital here
5. You have locked it off for years to us residents... it should re-belong to us and the general public, as it was originally designed

From: PLN - Comments
Sent: 28 November 2016 11:09
To: PLN - Comments
Subject: Comments for Planning Application 16/00768/FULL

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 11:08 AM on 28 Nov 2016 from Mr Lee Mallett.

Application Summary

Address: From John Wesley Highwalk To Seddon Highwalk Thomas More Highwalk Barbican London EC2

Proposal: Change of use of podium level and upper floors of Turret to form one two bedroom residential dwelling (Use Class C3), including the insertion of windows.

Case Officer: Catherine Linford

[Click for further information](#)

Customer Details

Name: Mr Lee Mallett

Email:

Address: 317 Willoughby House Barbican London

Comments Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Reasons for comment: - Residential Amenity

Comments: It is a sensible use of what is currently unused and apparently unloved space, and appears to be well-designed, in a way that will not diminish the original form and design of the Turret. Unless there is an alternative public use proposed - which there could be if the local authority had wished it, but which seems unlikely to be forthcoming - I strongly support this proposal.

Adjei, William

From: John McLean [REDACTED]
Sent: 29 August 2016 14:27
To: PLN - Comments
Subject: OBJECTION-16/00768/FULL+16/00770/LBC

Title: OBJECTION-16/00768/FULL+16/00770/LBC

FAO Catherine Linford, Development Division

Dear Ms Linford,

APPLICATION 16/00768/FULL AND 16/00770/LBC – OPTION A - to convert the podium level and upper floors of the turret to form a two bedroom dwelling, including the insertion of windows.

I object to all the options proposed for the Turret. As it stands it is a strikingly good building. Its excellence depends on subtle proportions which get lost in the planned conversion. With buildings as good as this you cannot tinker with the fenestration without spoiling the whole edifice.

For example, take the elevation to Aldersgate Street. The three looming voids with arched tops have a dramatic impact that will be ruined by the insertion of windows. As it stands the building declares the scale of the whole Barbican scheme. It has a generosity that is echoed throughout the Estate. The planned new windows will trivialise the building making it look finicky.

One of the most thrilling views in the Barbican is looking up the tower from car-park level, right up the stairway uninterrupted to the faceted conical roofline. Spoiling this would be an unforgivable act of vandalism.

The Corporation needs to realise that proposals like this detract from the overall value of the built fabric of the Barbican. To optimise the value of the scheme there is a need above all for enlightened conservation.

PS As for the roof terrace – you must be joking.

John and Jan McLean

704 Mountjoy House, Barbican, London EC2Y 8BP

[REDACTED]

ACKNOWLEDGED

Hassall, Pam

From: John McLean [REDACTED]
Sent: 19 December 2018 21:24
To: PLN - Comments
Subject: OBJECTION - 16/00768/FULL+16/00770/LBC

OBJECTION - 16/00768/FULL+16/00770/LBC

FAO Catherine Linford, Development Division

Dear Ms Linford,

APPLICATION 16/00768/FULL + 16/00770/LBC - change of use of podium level and upper floors of the Turret to form one two bedroom dwelling (Use Class C3), including the insertion of windows (REVISED DRAWINGS)

We object to this proposal for change of use of the Turret.

Excited by reading for the first time about the Barbican scheme in the press I visited the site in the early 1960s. There was nothing much to see, just a vast building site. As far as I could discern, the only finished work was the Turret with its obvious response to a historic barbican and also, as I learnt later, the work of Louis Kahn.

Its monumental simplicity gave it an unusual significance. It seemed to portend great things for the estate, a magnificent statement of intent.

The whole idea of re-developing the building is wrong. As it stands the Turret is a strikingly good building. Its excellence depends on subtle proportions which get lost in the planned conversion. With buildings as good as this you cannot tinker with the fenestration without spoiling the whole edifice.

For example, take the elevation to Aldersgate Street. The three looming voids with arched tops have a dramatic impact that will be ruined by the insertion of windows. As it stands the building declares the scale of the whole Barbican scheme. It has a generosity that is echoed throughout the Estate. The planned new windows will trivialise the building making it look finicky.

One of the most thrilling views in the Barbican is looking up the tower from car-park level, right up the stairway uninterruptedly to the faceted conical roofline. Spoiling this would be an unforgiveable act of vandalism.

The Corporation needs to realise that proposals like this detract from the overall value of the built fabric of the Barbican. To optimise the value of the scheme there is a need above all for enlightened conservation.

John and Jan McLean

704 Mountjoy House, Barbican, London EC2Y 8BP

Department of the Built Environment,
PO Box 270,
Guildhall,
London, EC2P 2EJ.

| PLANNING & TRANSPORTATION | | |
|---------------------------|-------------|-----|
| PSDD | CPO | PPD |
| TPD | 21 DEC 2016 | LTP |
| OM | | SSE |
| No | 128002 | PP |
| FILE | | DD |

D.A Rogers
151, Thomas More House,
Barbican,
EC2Y 8BU

For the attention of Catherine Linford.

19th December 2016

Dear Sir / Madam,

From John Wesley Highwalk to Seddon Highwalk Thomas More Highwalk Barbican London
Your refs 16/00768/FULL and 16/00770/LBC

I OBJECT to the application to convert the Turret into a residential unit and to the application for a change in Listed Building Consent.

My objections are :

- it would materially conflict with the original design concept and listed buildings status and it would be incongruous with the architecture of the Barbican Estate.
- encroachment on to the Podium and the in filling of windows and the upper floors would result in significant loss of natural light for the public and residents using the Turret as a main entrance to the west side of the Estate. This could constitute a security risk.
- conversion of the roof space to a terrace would result in a potential noise nuisance and the use of such terrace could not (by their own admission) be controlled by the Planning Authority. Any furniture retained on the roof would be an eyesore to residents overlooking the Turret.
- the plans submitted show no provision for a fire escape to the proposed residence. When designed, this would either have to involve some external addition to the structure or to the internal configuration of the Turret.
- it is noted (Design OBS- CC 28/11/2016) that. " Matters which were of concern to the Planning Authority regarding windows on both elevations, front door, roof terrace and vent have been satisfactorily addressed and revised proposals submitted." However, no additional documents appear to have been added online to support this statement and it has to be queried whether full information has been supplied on these Applications.

In the circumstances, it is recommended that these Applications are refused.

Yours faithfully,


D.A. Rogers

From: PLN - Comments
Subject: FW: Comments for Planning Application 16/00768/FULL

From: PLN - Comments
Sent: 15 January 2017 19:06
To: PLN - Comments
Subject: Comments for Planning Application 16/00768/FULL

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 7:06 PM on 15 Jan 2017 from Mr PJ Jansen van Vuuren.

Application Summary

Address: From John Wesley Highwalk To Seddon Highwalk Thomas More Highwalk Barbican London EC2

Proposal: Change of use of podium level and upper floors of Turret to form one two bedroom residential dwelling (Use Class C3), including the insertion of windows. (REVISED DRAWINGS). The proposals include the rescission of part of the City Walkway.

Case Officer: Catherine Linford

[Click for further information](#)

Customer Details

Name: Mr PJ Jansen van Vuuren

Email:

Address: 212 Seddon House Barbican London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: It will result in the space losing its natural light

More Houses and vice versa. The image on page 43 of the 'Internal Refurbishment document' shows just how drab, sad and uninteresting the building will look once the upper windows have been glazed in and domesticated with curtains etc, their proposal at street level is just as bad. The building will be bereft of the interest, character and dignity it once had. It's not clear to me from their application, whether or not the restaurant will be part of the redevelopment, but I believe it would be a real loss to the community to deny them the restaurant facility that currently occupies the ground and lower floors, and a loss of business to the restaurant operator.

My objections in a nutshell, are to the glazing of any the presently open aperture 'windows', the addition of any new windows and roof terrace and loss of an amenity (albeit presently closed to the public), all of which would severely ruin the aesthetic and integrity of the original building.

| | | |
|--|-----------------------------|---------------------|
| Committee(s): | Date(s): | Item no. |
| Planning and Transportation Committee | 21 st March 2017 | |
| Subject: Leadenhall Market – draft Supplementary Planning Document | | Public |
| Report of: The Chief Planning Officer | | For Decision |
| <p style="text-align: center;"><u>Summary</u></p> <p>A Leadenhall Market Supplementary Planning Document (SPD) has been prepared to provide guidance on the Leadenhall Market conservation area and the management of the Market as a grade II* listed building. The proposed SPD is in two parts:</p> <ul style="list-style-type: none"> - Part One: draft Leadenhall Market Conservation Area Character Summary and Management Strategy. This analyses the special architectural and historic interest of the Leadenhall Market conservation area and sets out existing policies and guidance relating to its management (Appendix A); - Part Two: draft Leadenhall Market Listed Building Management Guidelines. These are a tool for the management of the Market as a listed building and working market, providing clarity on permissions and consent requirements and guidance on best practice for works (Appendix B). <p>Members are asked to agree both parts of the draft Leadenhall Market SPD, and agree to them being made available for public consultation as part of the process of adoption as a Supplementary Planning Document (SPD).</p> <p>Recommendations</p> <ul style="list-style-type: none"> • Members approve the draft text of the Leadenhall Market SPD and agree to it being issued for public consultation for six weeks during April and May 2017. | | |

Main Report

Background

1. Section 71 (1) of the Planning (Listed Building and Conservation Areas) Act 1990 requires the local planning authority to "*formulate and publish proposals for the preservation and enhancement of any parts of their area which are Conservation Areas.*"
2. The National Planning Policy Framework 2012 (NPPF) requires local planning authorities to set out a "*positive strategy for the conservation and enjoyment of the historic environment*" (para 126). It encourages assessment of the significance of designated heritage assets in advance of proposals for change.
3. The London Plan, adopted March 2015, encourages the identification and recording of heritage assets through character appraisals or conservation plans.
4. The City Corporation has prepared character summaries for conservation areas, under the umbrella document '*Conservation Areas in the City: A General Introduction to Their Character*' (1994). Combined character summary and management strategy Supplementary Planning Documents (SPDs) have been adopted for 17 conservation areas and will be prepared for the remainder.
5. The Local Development Scheme (LDS) sets out the planning policy documents to be prepared and the timetable for preparing them. The most recent update of the LDS was approved by your Committee in December 2015 and includes a programme to complete character summaries and management strategies for the remaining conservation areas which have no document, and to revise and update existing character summaries. These are being prepared in line with current Historic England guidance on the appraisal and management of conservation areas.
6. The City Corporation has produced listed building management guidelines for other listed buildings, the Barbican (2012) and Golden Lane Estates (2013).
7. The City Corporation's Local Plan was adopted by Court of Common Council in January 2015. Policy CS12: 'Historic Environment' seeks to preserve and enhance the distinctive character and appearance of the City's conservation areas, while allowing sympathetic

development within them. The policy seeks to safeguard the City's listed buildings and their settings, while allowing appropriate adaptation and new uses. The draft SPD is consistent with the approach outlined in the Local Plan.

Current Position

8. The draft Leadenhall Market SPD is attached to this report – see Appendices A and B.
9. The new draft Conservation Area Character Summary and Management Strategy (part one of the SPD) updates the previous statement (published in 2006) and is itself divided into two main sections. The character summary defines the special interest of the conservation area by analysing its historical, spatial and architectural character. The management strategy sets out existing policies and guidance relating to the preservation and enhancement of the conservation area.
10. The new draft Listed Building Management Guidelines (part two of the SPD) has been produced in consultation with the City Surveyor. The guidelines define the special architectural and historical interest of the Market and are designed to facilitate the timely planning and implementation of proposed maintenance, repair and alterations. They encourage long-term consistency in the management of the Market in listed building terms and to support its use as a working market.
11. SPDs must be prepared in accordance with procedures set out in relevant regulations and public consultation must be in accordance with the City's Statement of Community Involvement (SCI), adopted in 2012. The draft SPD has been prepared having regard to the matters specified in Section 19 of the Planning and Compulsory Purchase Act 2004 and prescribed in Regulations 8 and 10 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
12. It is proposed that the draft SPD will be the subject of public consultation for a six week period in April and May 2017 in line with the relevant Regulations and the City's SCI. This involves publishing a draft version of the SPD together with a consultation statement (setting out the persons consulted when preparing the draft SPD, a summary of the main issues raised and how those issues have been addressed in the SPD) and carrying out public consultation.

13. At the end of the formal consultation period I will report back to your Committee on any comments received and how these have been taken into account in the final version of the SPD recommended for adoption.

Corporate & Strategic Implications

14. The Leadenhall Market SPD supports the Strategic aims of the Departmental Business Plan, relating to the protection and enhancement of the City's built environment and the sustainable design of the streets and spaces. These aims are met by promoting the conservation and enhancement of the special architectural and historic character of Leadenhall Market and the surrounding conservation area.
15. An Equality Impact Assessment has been carried out for the draft SPD and no equality issues were identified. This can be found in Appendix C.
16. A Sustainability Appraisal Screening Report has been carried out for the draft SPD, which has concluded that a full Sustainability Appraisal / Strategic Environmental Assessment is not required, subject to statutory consultees' confirmation. This can be found in Appendix D.

Implications

17. There are no financial, risk, legal, property or HR implications arising from the proposed SPD consultation and adoption process.

Conclusion

18. Members are asked to agree the draft text of the Leadenhall Market SPD for public consultation in April and May 2017.

Appendices

- Appendix A – Leadenhall Market draft SPD part one: Conservation Area Character Summary and Management Strategy
- Appendix B – Leadenhall Market draft SPD part two: Listed Building Management Guidelines
- Appendix C – Leadenhall Market draft SPD Equality Impact Assessment
- Appendix D – Leadenhall Market draft SPD Sustainability Appraisal Screening Report

Contact:

Tom Nancollas

Planning Officer (Historic Environment)

0207 332 3692

Tom.Nancollas@cityoflondon.gov.uk

Leadenhall Market SPD

- 1. Conservation Area Character Summary
and Management Strategy**
- 2. Listed Building Management Guidelines**

Draft March 2017





Leadenhall Market, detail of east entrance

Introduction

1. Conservation Area Character Summary and Management Strategy

Character Summary

- 1. Location and context**
- 2. Designation history**
- 3. Summary of character**
- 4. Historical development**

Early history

Medieval

Nineteenth century

Twentieth century

- 5. Spatial analysis**

Layout and plan form

Building plots

Building heights

Views and vistas

- 6. Character analysis**

- 7. Land uses and related activity**

- 8. Architectural character**

Architects, styles and influences

Building ages

- 9. Local details**

Shopfronts and signage

Architectural Sculpture

Public statuary and other features

- 10. Building materials**

- 11. Public realm**

- 12. Cultural associations**

Management Strategy

- 13. Planning policy**
- 14. Environmental Enhancement**
- 15. Transport**
- 16. Management of open spaces and trees**
- 17. Archaeology**
- 18. Enforcement**
- 19. Condition of the conservation area**

Further Reading and References

Designated heritage assets

Contacts

2. Listed Building Management Guidelines

- 1. Introduction + key partners**
- 2. How Leadenhall Market operates**
- 3. Leadenhall Market – listed grade II***
- 4. Permissions & Consents for work**
- 5. How to use these guidelines**
- 6. Index of works**
 - Appendix 1 Plan of permitted tables and chairs**
 - Appendix 2 Shopfront and signage template**

Introduction

The Leadenhall Market SPD comes in two parts.

Conservation Area Character Summary and Management Strategy (part 1)

The present urban form and character of the City of London has evolved over many centuries and reflects numerous influences and interventions: the character and sense of place is hence unique to that area, contributing at the same time to the wider character of London.

This character summary and management strategy provides an understanding of the significance of the conservation area by identifying and analysing its principal characteristics. It does not include specific detail about every building and feature within the area, and any omission from the text should not be interpreted as an indication of lesser significance. The character summary and management strategy has been prepared in line with the Historic England document *Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1* (2016).

This document is proposed to be adopted as a Supplementary Planning Document to the City of London's Local Plan. It should be read in conjunction with relevant policies of the NPPF (2012), London Plan (2015) and other guidance, including *Conservation Areas in the City of London, A General Introduction to their Character* (1994) which has more information on the history and character of the City.

Listed Building Management Guidelines (part 2)

Relating solely to the Market buildings, the listed building management guidelines are intended to be a tool for the positive, proactive management of Leadenhall Market as a listed building and guide to future change. They provide a structured framework from which informed decisions can be made. They offer guidance on the special architectural and historic interest of the Market, the types of changes that may or may not require Listed Building Consent, and the conditions in which these may be acceptable.

1. Location and context

Leadenhall Market Conservation Area lies to the eastern side of Gracechurch Street.

The area is bound by Gracechurch Street, Ship Tavern Passage, Fenchurch Street, Cullum Street and Leadenhall Place, with the market buildings forming the northern boundary.

Leadenhall Market conservation area is in the Wards of Lime Street and Langbourn. It covers an area of 1.68 hectares.

The area immediately adjoins Bank Conservation Area on Gracechurch Street.

Boundary

The conservation area boundary is tightly drawn and is defined in several instances by the interaction between traditional building heights and forms and larger modern development. This is particularly noticeable around Lime Street and Leadenhall Place, where the Victorian eclecticism of the Market sharply contrasts with the hi-tech Lloyds building (grade I listed) and the newer buildings beyond.

The Market's relationship with neighbouring tall buildings is only one characteristic of its setting. There are a number of lower-rise modern buildings in the vicinity that mitigate the impact of these and provide variety on the local skyline.



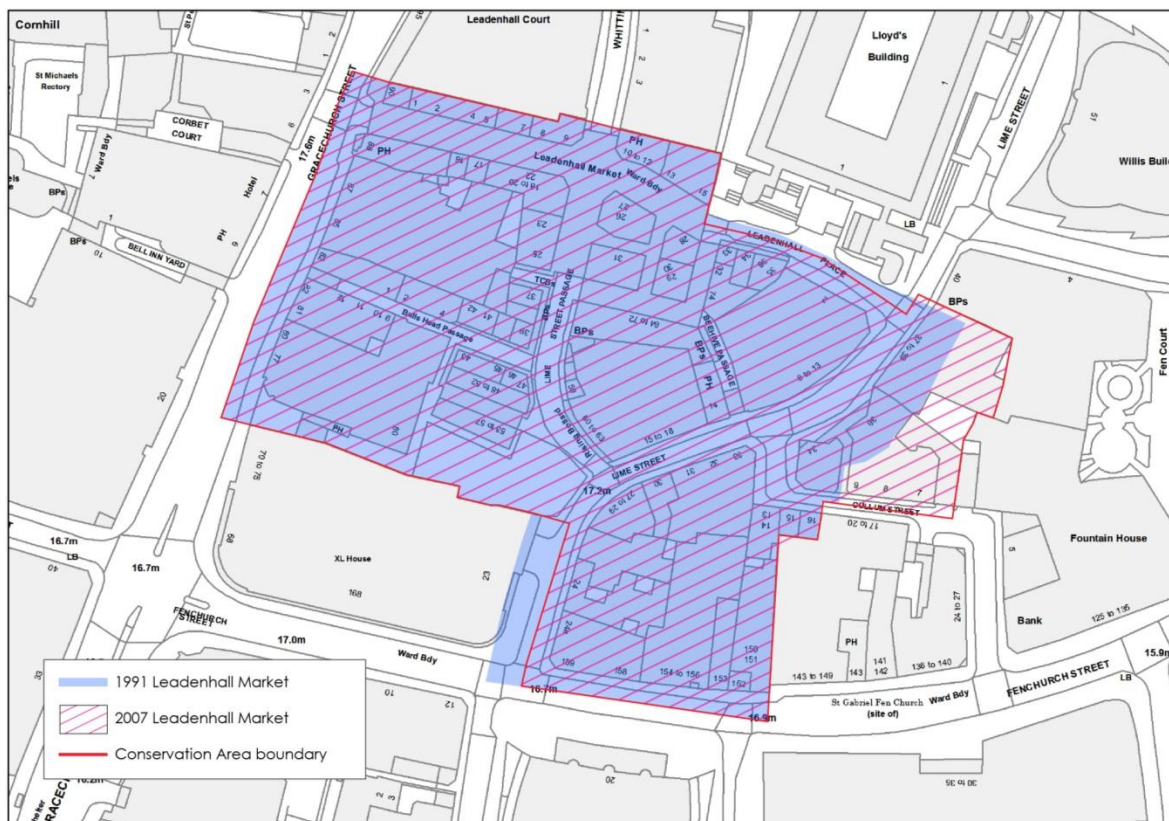
2. Designation history

16 May 1991

Designation of conservation area

14 June 2007

Re-designation to include the entire site of 37-39 Lime Street and 34-36 Lime Street/Cullum Street and exclude areas of street space of Lime Street and Leadenhall Place.

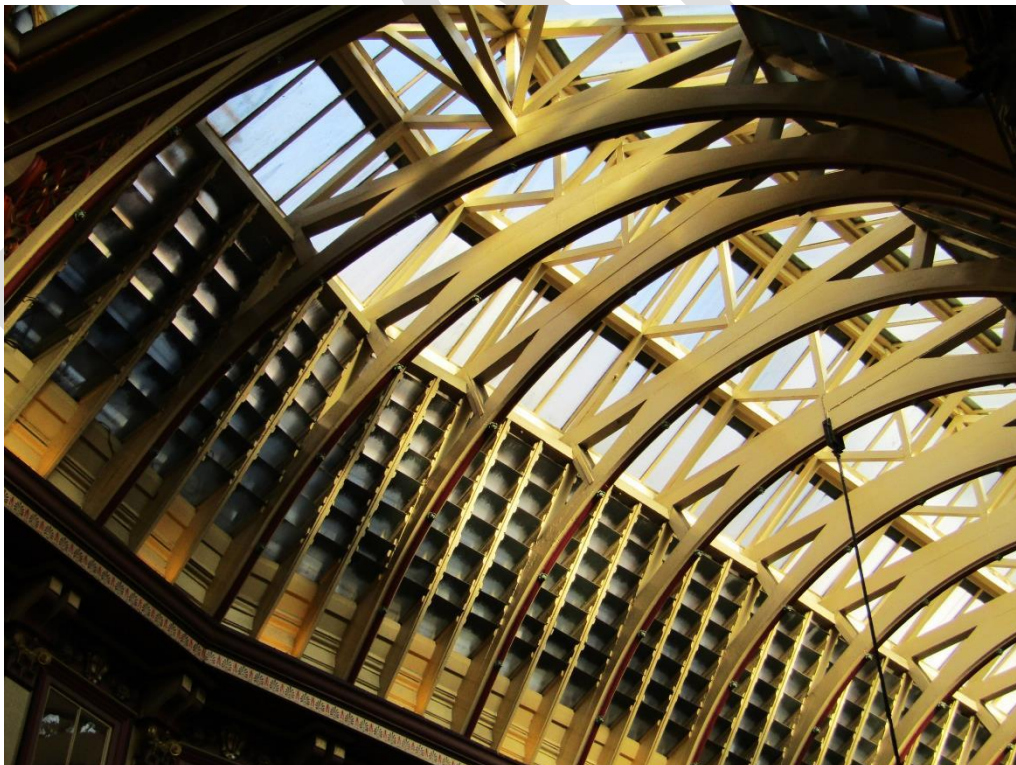


Designations map

3. Summary of Character

The characteristics which contribute to the special interest of Leadenhall Market Conservation Area can be summarised as follows:

- The grade II* listed Victorian buildings of Leadenhall Market are an outstanding example of a Victorian market and offer a remarkably cohesive and immersive experience;
- A vibrant mix of uses and activity, strongly complimenting the predominantly financial and insurance activities in the area
- Highly significant archaeological remains relating to the 1st Century Basilica Forum and medieval Leaden Hall;
- A place where the predominant scale of buildings, streets and spaces contrasts greatly with those in its immediate setting, resulting in dramatic townscape views;
- Preservation of the medieval street plan within the 19th century market buildings, offering an intricately layered plan form and retained historic thoroughfares;
- An area which is increasingly experienced from higher level view points and where the appearance of its roofscape is of special importance.



Leadenhall Market roof detail

4. Historical Development

Early history

Leadenhall Market Conservation Area stands east of Cornhill at the heart of Roman London. The area of high ground, on the east of the Walbrook river valley, was one of the first areas settled by the Romans in London. They established the first Basilica and Forum in the vicinity of modern-day Gracechurch Street, later replacing it in c.100 AD by a larger aisled basilica building and forum between Fenchurch Street and Cornhill. It was the largest basilica forum built north of the Alps and lay at the centre of the road network connected to the first London Bridge (just downstream of the present bridge), aligned on Fish Street Hill and Gracechurch Street. Roman roads are still apparent in places in the modern street plan, for example, Bishopsgate, Cheapside and Leadenhall Street.

In the early 2nd century the Forum-Basilica was rebuilt in this area following the revival of London as a Roman centre under Emperor Vespasian from AD70; the city was at the peak of its prosperity at this time, reflected in the enlargement of its civic centre. The east-west axis of the Basilica cuts across the north side of Leadenhall Market. The remains of a pier base survive in the basement of No.90 Gracechurch Street. The Forum-Basilica's function was primarily that of civic administration, but it was also used as a market place, originating the mercantile use that continues today.

The later phases of Roman London saw the transformation of governance away from the previous civic model. In the late 3rd century the Forum-Basilica was dismantled; following the withdrawal of the Roman administration in c.410, there is little evidence that the area within the city walls continued to be occupied. It was not until the Saxon and Norman periods of the tenth and eleventh centuries that settlement activity returned to this area of London. It was this period that created the distinctive pattern of streets, alleyways and courts that largely survives today.

Medieval

By 1270 Lime Street, Fenchurch Street and Cornhill had sprung from the Roman north-south route centred on Gracechurch Street, creating the general form of the conservation area as it is today. Lime Street is so named for the lime burners and sellers once living and working here; Fenchurch Street is thought either to derive from a reference to *faenum* (hay) or from the fen-like ground by the banks of the Langbourn River.

In the immediate vicinity four churches were established in the 11th and 12th centuries, of which only one, St Peter Cornhill (recorded by 1040), survives today. St Dionis Backchurch (1098) stood on the corner of Fenchurch Street and Lime Street, dedicated to the French patron saint and named because of its location behind a row of shops and houses. It was rebuilt in 1674 by Sir Christopher Wren following damage in the Great Fire and ultimately demolished in 1878.

Established by 1125, St Gabriel Fenchurch stood on an island site in the middle of Fenchurch Street (commemorated by a blue plaque on Plantation Place). It was lost in the Fire but a portion of its churchyard remains in Fen Court, including three table tombs. The parish was united with St Margaret Pattens after 1666. St Benet

Gracechurch was established on the corner of Gracechurch Street and Fenchurch Street by 1181, rebuilt after the Great Fire by Wren and eventually demolished in the 1860s.

Leadenhall was one of the most important markets in medieval London and should be considered in the context of other markets operating throughout the City. For meat and poultry Leadenhall took precedence over Smithfield, which was until the 19th century chiefly a livestock market. There were other markets at Eastcheap (meat), Cheapside (poultry), Woolchurch (wool), Stocks (meat and fish) and Newgate Street (meat), while Billingsgate was the primary fish market.

The Leaden Hall was a 13th century lead-roofed mansion owned by Sir Hugh Neville and a market was first recorded in its grounds in 1321. It stood in approximately the north-west quadrant of the existing market site. 'Foreigners' – as traders from outside the City were then termed – began to operate their stalls at the Leaden Hall as business overflowed from the recognised poultry market at Cheapside (which was wound up by the 16th century). In 1377 'foreigners' were given additional rights to sell cheese and butter here.

The City Corporation acquired the Lordship of the Manor in 1411 as a gift from Lord Mayor Richard Whittington and proceeded to develop the property as a 'garner' or grain store with a courtyard to contain the market in 1439. These works were largely funded by Simon Eyre, Lord Mayor (1445-6), completed in 1455, and the expenditure indicates the importance of the market to the City Corporation. The new market complex was declared a general market for poultry, victuals, grain, eggs, butter, cheese and other comestibles.



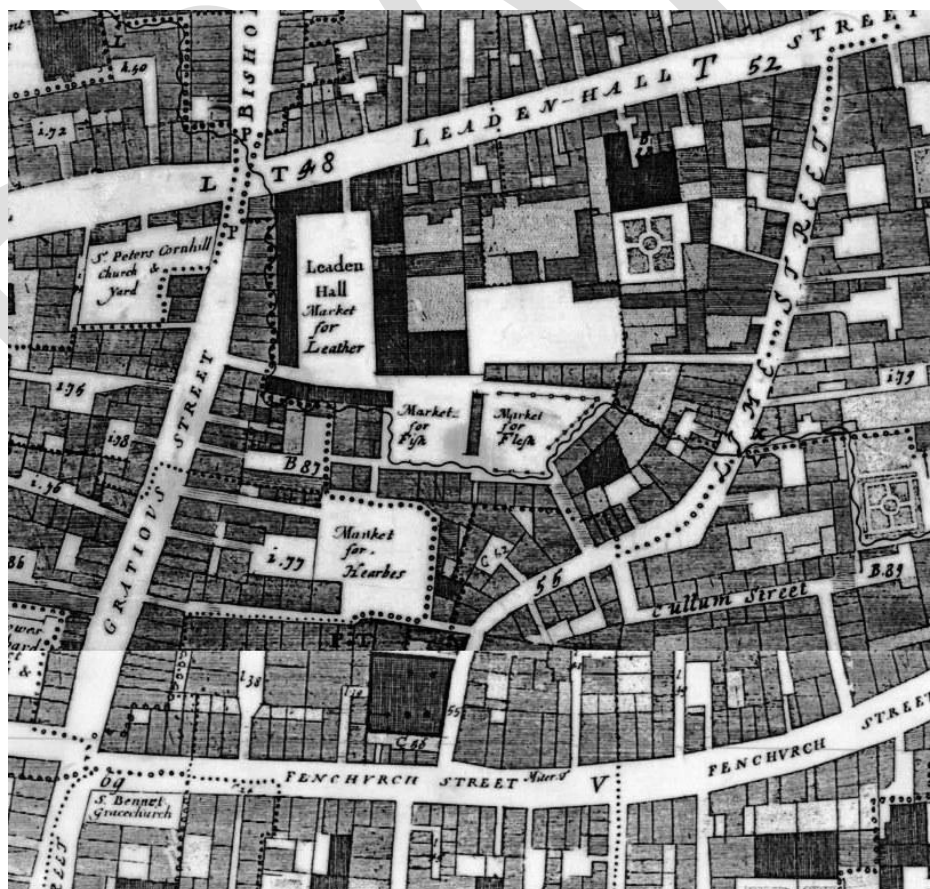
'Agas' map of c.1570

Seventeenth and eighteenth centuries

In the Tudor and Stuart periods Leadenhall was one of the show places of London and its prosperity became a spectacle for visiting tourists. In the 17th century the Spanish ambassador remarked during a visit that more meat was sold at Leadenhall than in all of Spain. With success came demand for space that exceeded supply, to the point where one member of the Common Council found Leadenhall Street to be "so thronged that common passage is hindered".

The Great Fire of 1666 consumed only part of the area, halting at the southern portion of the market. Named from landowner Sir Thomas Cullum, Cullum Street was laid out during the rebuilding of the City while St Dionis Backchurch (demolished in the 19th century) was one of the first City churches to be rebuilt to designs by Sir Christopher Wren.

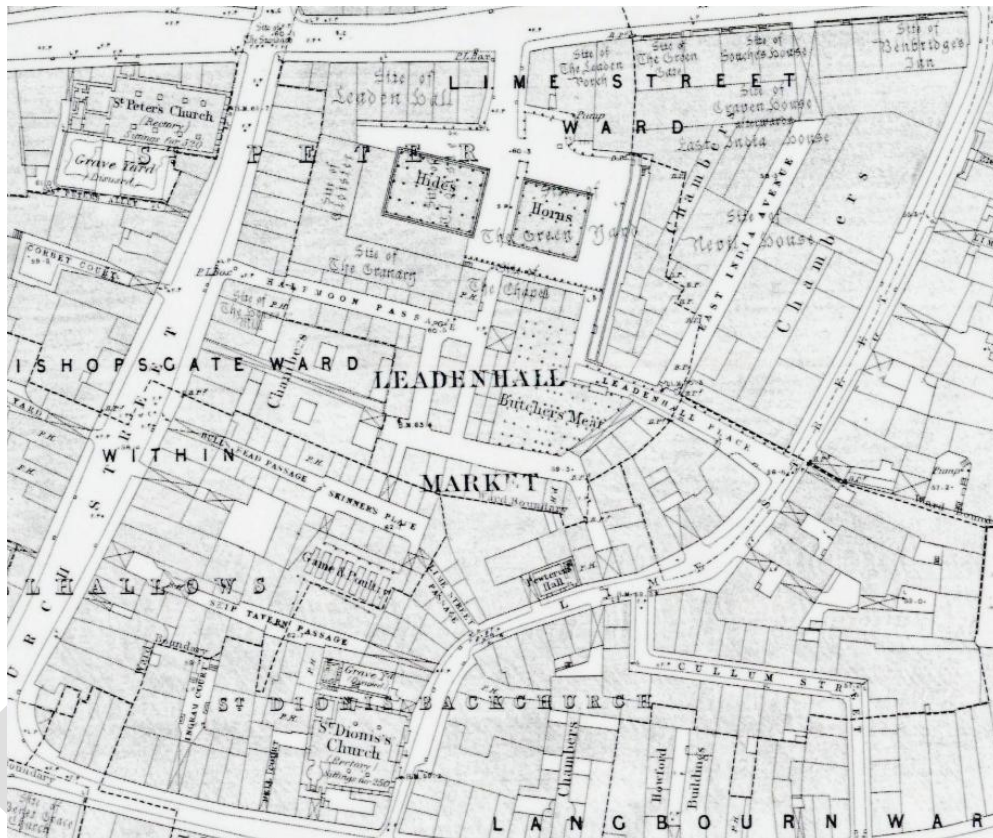
Only partially burned in the Fire, the 14th century hall and 15th century market buildings were reconstructed. Seizing the opportunity to introduce some order to the sprawling medieval arrangements, the City Corporation laid out the remaining space around three large courtyards. The first held the beef market where leather, wool and raw hides were sold. The second yard was intended for veal, mutton and lamb but the stalls of fishmongers, poulterers and cheesemongers were located here too. The third yard held the herb market for fruit and vegetables. The Ogilby and Morgan map of 1676 shows the layout in detail, including the narrow entranceways from Gracechurch Street that remain unaltered to the present day.



Ogilby and Morgan, 1676

Towards the end of the 18th century, the market for poultry grew at the expense of that for meat and there was no room for the considerable hide market regularly held there. Between 1794 and 1812 the majority of the market complex, excluding the west and south walls, had been demolished to make way for new buildings by Dance the Younger. These were roofed buildings supported by open colonnades. The plan form of the old market was altered but the narrow entrances along Lime Street and Gracechurch Street remained.

Nineteenth century



O/S 1875

Leadenhall Market maintained its importance and success into the 19th century, but suffered from increasingly negative perceptions on the part of City merchants and financiers, who considered the crowded and unruly stalls inappropriate for their central location. Eventually bowing to this pressure, the City Corporation secured Parliamentary powers to abandon the hide and meat markets. From the 1860s onwards the main focus of the meat trade began to shift to Smithfield following the construction of new market buildings there.

Fresh from his work at Smithfield (1867) and Billingsgate (1878) Sir Horace Jones, the City Surveyor, was instructed to re-house the market for poultry in a new arcade. His work at Leadenhall differed from the others in that the buildings here took their plan form from the medieval street pattern, rather than being superimposed over it. Jones' ornate glass-roofed market building was constructed in 1881. Its design was influenced by Mangoni's Great Galleria in Milan (1875-77) which addressed a

comparable context by siting a formal arrangement within an irregular historic street plan.

The market's main elevation to Gracechurch Street was built in a Queen Anne Revival style with a wide entrance, frontispiece and gable, supported to each side by what have been described as Dutch-style houses. Secondary entrances were created at each end of the north-south avenue with similarly ornate features on a smaller scale. Each arcade was built to house a series of commercial shops with a uniform design, comprising a basement and ground floor retail space with office or storage space above. Individual internal spiral staircases linked the ground and first floors. At the centre of the market is an octagonal crossing with a pitched roof and lantern supported by giant Ionic cast-iron columns with dragons over the capitals.

The cost of the building was £99,000, and the creation of suitable approaches to such a congested area was a further £148,000. The new market buildings were built over a series of established rights of way, explaining the Market's crooked cruciform plan and its use as a thoroughfare by people not having immediate business there. The rationalisation of the market created a smarter, more regulated commercial environment; the new designs removed the itinerant salesmen who were now unable to rent the new, permanent stands. Though the character and atmosphere of the new market diverged from its previous incarnations it enjoyed a similar level of success. This resulted in a necessity for additional space, with simpler brick extensions made to both side of Lime Street Passage, and new glazed passages in the south-west quadrant, both in 1885.

In the 1860s and 1870s St Dionis Backchurch and St Benet Gracechurch were demolished for road-widening schemes.



Twentieth and twenty-first centuries

During the inter-war years, the majority of the market's wholesale trade moved to the Poultry Market at Smithfield, but other retail activities increased enormously to take its place. In the 1970s around fifty tons of poultry per week passed through the market, with the amount becoming unquantifiable over the festive period. Contemporary allocation plans show most of the units occupied by butchers, poulterers, fishmongers and grocers. The sites of the Lamb Tavern, Half Moon and Grapes public houses have all functioned as such since the market buildings were completed.

During the late 20th and 21st centuries the market would become better known for having restaurants, bars and shops instead of wholesale produce. Today, it remains a trading community and provides one of the main concentrations of retail activity in the City as one of its five Principal Shopping Centres. In recent decades there has been a programme of improvements to the market designed to recover its opulent Victorian character. The most dramatic improvement to the buildings was the redecoration scheme implemented in 1990-91, which transformed the market's appearance by implementing an authentic decorative scheme based on historic research and, enhancing historic features such as decorative panels and restoring lost elements such as lighting. The character and appearance of the market established in the 1990s restoration project has been maintained and has proved adaptable to the changing requirements of occupiers.

Along Lime Street in the early 20th century offices were developed for insurance and shipping businesses seeking proximity to Lloyd's. With 17th century origins, the firm moved to this locality in the early 20th century, with offices at 12 Leadenhall Street and then at 51 Lime Street before the current building designed by the Richard Rogers Partnership was opened in 1986.

Outside the market, the area has continued to support a mixture of office and retail uses appropriate to the scale and historic nature of the building stock. The retail focus of the market, including restaurants, cafes and coffee shops, is complementary to, and meets the requirements of, the large-scale offices and financial institutions that operate in this part of the City, and ensures that the area remains vibrant throughout the week. Leadenhall Market's role in this respect will intensify with the imminent expansion and occupation of the Easter Cluster of tall buildings located to the north. This will expose the Market to a new audience and intensify its significance.

5. Spatial analysis

Layout and Plan form

The layered form of street and spaces within the conservation area is the result of numerous changes and additions over several centuries. The combination of irregularly aligned medieval streets and narrow alleys leading from Gracechurch Street, overlaid with the cruciform Victorian market complex creates a complex layout unique to this part of the City. When the market was constructed it was designed to incorporate a series of historic routes and rights of way. The resulting pattern of narrow passageways within the conservation area has remained largely unaltered and continues to provide pedestrian permeability. The historic street layout and tight urban grain of the conservation area contributes greatly to its character.

Building plots

Building plots in the conservation area relate to the form and alignment of each street. The intricate historic street pattern surrounding Leadenhall Market has resulted in a series of irregular building plots in the area of Lime Street and Cullum Street, whilst buildings facing Gracechurch Street and Fenchurch Street are more formal and regular in their alignment. The majority of building plots have been amalgamated at different times to create larger footprints, with historic maps demonstrating the much finer urban grain that existed before the 19th and 20th centuries. Lime Street, Ship Tavern Passage, Beehive Passage and Bulls Head Passage illustrate the historic scale of earlier buildings in the area.

Within the market the shop units are arranged with a great degree of uniformity, resulting in a series of largely regular building plots. The relationship between these and the neighbouring buildings provides a clear distinction between different phases of development in the area.

Building heights

Building heights are relatively consistent across the conservation area, and the predominant scale of the historic area makes it clearly distinguishable amidst the larger developments located at its perimeter.

The buildings of the market are of two or three storeys, rising to the height of three storeys at the entrances, arcades and central crossing. Despite the grandeur of the buildings their scale is essentially domestic.

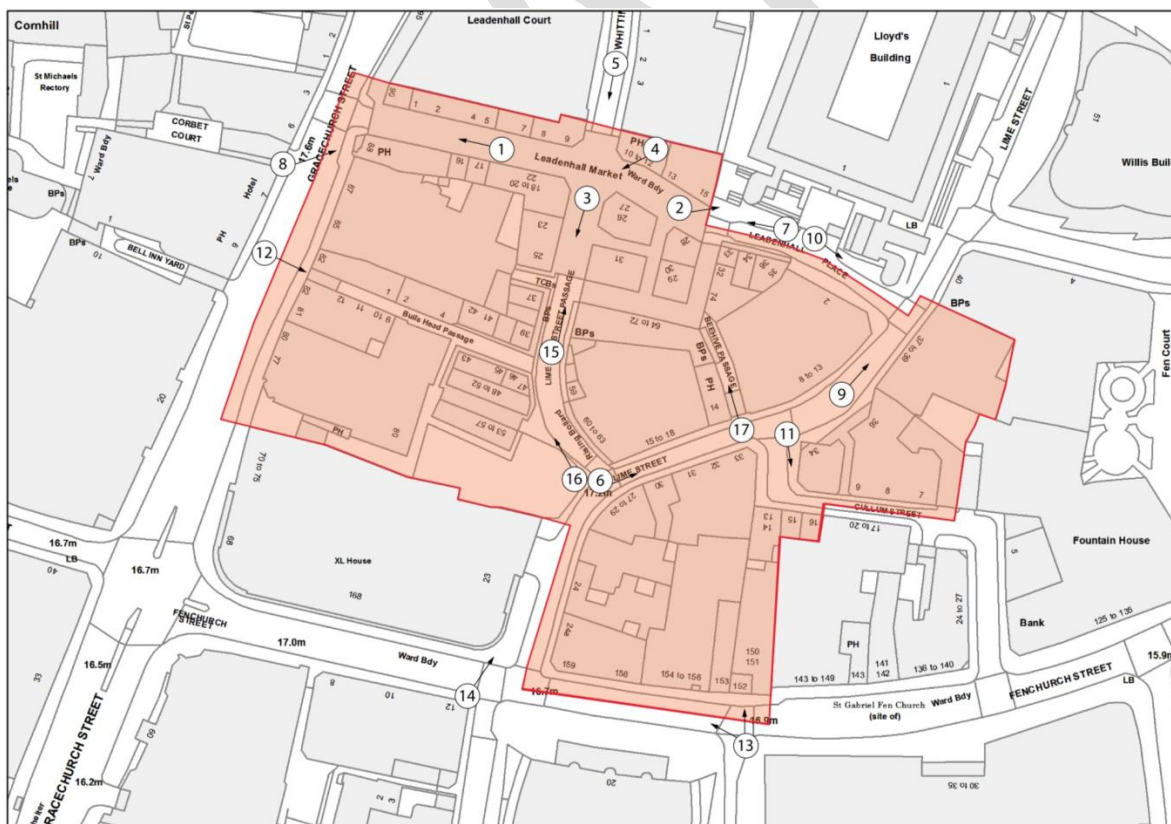
Buildings elsewhere in the conservation area predominantly rise to a height of between four and six storeys, with a number incorporating additional set back upper floors that are often concealed from street level views.

Views and vistas

Distant and local views make a strong contribution to the character of the conservation area. The cruciform pattern of the market building and its approaches allows for important local views into and out of the market. The facades of listed buildings at 147 Leadenhall Street, 7-12 Gracechurch Street and 37-9 Lime Street terminate three of the 'framed' vistas out of the Market. Other surrounding buildings make an important contribution to the setting of the conservation area, particularly those which align and help to define the narrow approaches to the market.

The following illustrates the range of distant and local views which exist in Leadenhall Market. This list is not comprehensive, and the area provides further opportunities to capture long, short and kinetic views.

1. View from within the market to Gracechurch Street
2. View of Lloyd's Building from within market to Leadenhall Place
3. View from within the market along Lime Street Passage
4. View from inside the Lamb Tavern of the centre of the market
5. View along Whittington Avenue of north market entrance
6. View east from junction of Lime Street and Lime Street Passage with Lloyd's building at the rear
7. View west through market from Leadenhall Place
8. View from Corbet Court to Gracechurch Street market entrance.
9. North east up Lime Street towards Willis Building
10. East along Leadenhall Place towards 37-39 Lime Street
11. View south from Lime Street towards 13-16 Cullum Street
12. View from Gracechurch Street into Bulls Head Passage
13. View of Nos. 150-159 Fenchurch Street from the top of Rood Lane
14. View into the conservation area from Fenchurch Street
15. View of the south market entrance from Lime Street Passage
16. View of Bull's Head Passage from Lime Street
17. View into the market along Beehive Passage



Views map

6. Character analysis

The conservation area boundary is tightly drawn around the market buildings and the historic streets which provide its townscape setting. The scale of market and surrounding buildings is smaller than the area's office blocks and towers and those buildings on Gracechurch Street, Lime Street and Leadenhall Street. This interplay of scales defines the conservation area's immediate backdrop, particularly the variation in building heights that create a dynamic setting.



Southern entrance



Central crossing



Southern shopfronts

Leadenhall Market

The arcades of the market form an enclosed environment with a unique character distinct from the surrounding area. Upon entering one of the market's pedimented entranceways, the buildings are of a consistently domestic scale and the environment is almost entirely pedestrianized. The glazed roof shields pedestrians and enhances the sense of enclosure. When approaching the exits from within the market a number of townscape views can be captured, including those to buildings outside the conservation area, which often combine to form striking vistas. These are enhanced by the repetition of columns and roof trusses that create a rippling effect. Horace Jones adapted his new structure to the existing irregular medieval plan form, rather than superimposing over it. Consequently there is a characterful irregularity of plan resulting in different views from each quarter.

The richness of the market's decorative scheme is key to its character. Crowning the many entrances are elaborate stone pediments carved with dragons, swags, shields and other devices, with a particular emphasis on City heraldry. They are variously sized to reflect the hierarchy of entrances, and the larger ones have the market's name and date inscribed upon them. Throughout the market are columns on plinths bearing the City Corporation arms with angled Ionic capitals. The more prominent of these have intricate dragons playing a pseudo-structural role. An abundance of floriate and foliate detail covers the walls of the cruciform section. This detailing is enhanced by a bold colour scheme executed in the 1990s, drawing upon archival research undertaken by the City Corporation. An immersive opulence is the chief effect of all of this, indicating the intentions of Jones and the City Corporation at the time and enhancing the market to this day.



South market parade



Beehive passage entrance

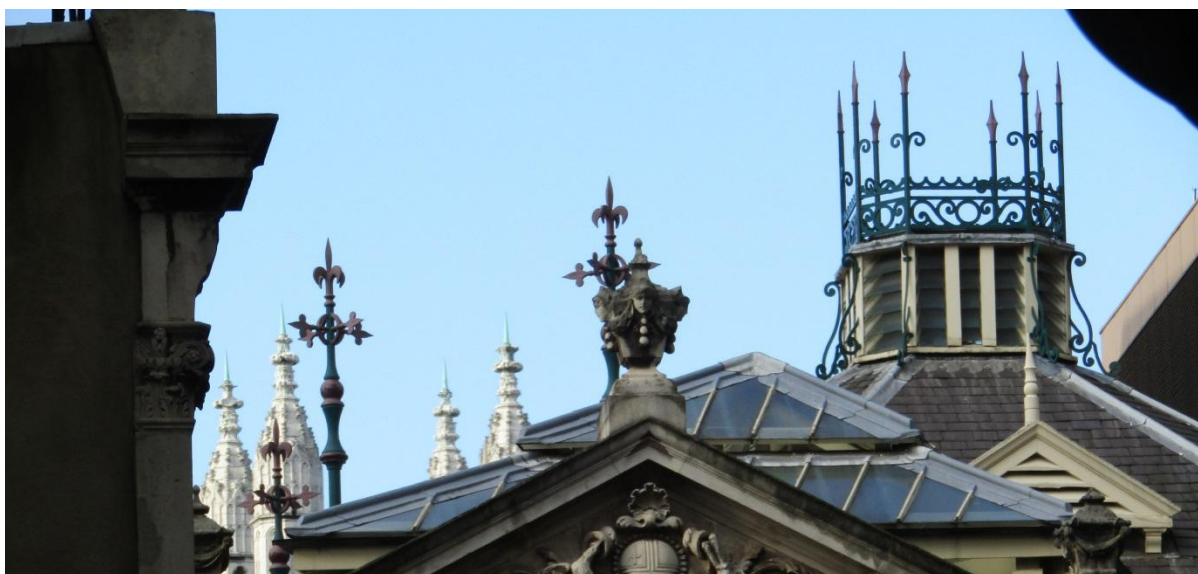


Detail of central dome

The main entrance to Leadenhall Market is on Gracechurch Street. Recessed from the building line, it is a major architectural focal point on the street as well as the entrance to the network of arcades and lanes to the east. The double height entrance is flanked by tall, narrow gabled red brick and Portland stone blocks in a C17th-century Queen Anne Revival style. Above it sits a giant, decorated Dutch gable with the name of the market inscribed underneath. The adjacent buildings to the south have a continuous retail frontage which is punctuated by entrances to pedestrian ways (Bulls Head Passage and Ship Tavern Passage) into the Market and the heart of the conservation area. Other market entrances are from Whittington Avenue, Leadenhall Place and Lime Street Passage. These are crowned by carved Portland stone pediments, ornamented according to their prominence.

The decorative scheme frames the activities contained within the shop units and arcades, producing a particularly vibrant atmosphere. The aesthetic is fundamentally sympathetic to the listed buildings, with only temporary reversible elements such as internal shop fittings and furniture being in a contemporary style. It is the policy of the City Corporation to maintain and enhance this consistently Victorian appearance, preserving original features like the iron racks for hanging game, as part of its general duty to preserve and enhance grade II* listed buildings.

Despite later additions of plant and other servicing the market's sequence of traditional pitched roofs is intact and is an interesting and important visual element in its own right, particularly when seen with the spires and gables of other historic buildings nearby. Increasingly, public viewing galleries are being proposed for new buildings near the market. The market's external roof structure will become an important element in views from these galleries and its appearance will be managed accordingly.



Leadenhall Market roofscape seen from the east, with the turrets of St Peter Cornhill in the background

Gracechurch Street



Nos. 85-87

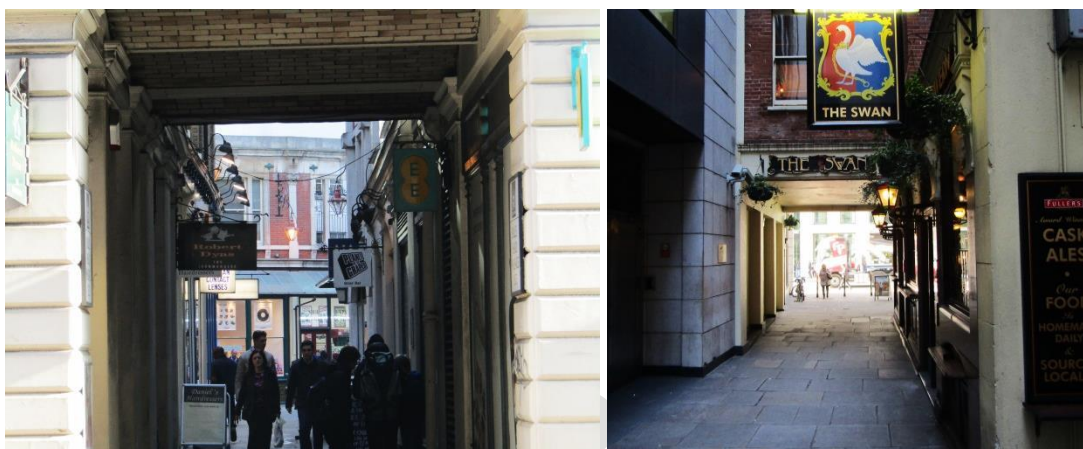


Nos. 81-82

Buildings on Gracechurch Street within Leadenhall Market conservation area relate closely to those on the opposite side of the street within Bank Conservation Area. Together they form a grand sequence of buildings lining the main north-south thoroughfare, sharing common characteristics in terms of scale, materials and architectural character. For the Gracechurch Street elevation of the market, see **Leadenhall Market** above.

The Gracechurch Street frontage of the conservation area terminates at its southern end with the Swan public house (1898, E.B L'Anson) that is constructed in red brick and set back from the main building line, forming an important adjunct to its neighbours. **No. 77** Gracechurch Street dates from 1983-6 and is a Portland stone postmodern office building that relates to the conservation area in terms of its general scale and style, but despite some strong modelling lacks convincing detail and has an awkward curved corner and incorporates a splayed entrance. **Nos. 81-82** (grade II listed) is an Italianate Portland stone building, dating to 1874, rich in features that include round headed windows, channelled piers and rustication.

Dating to the 1930s, **Nos. 85-87** has a far simpler Portland stone street elevation with minimal surface decoration save for Greek detailing and a strong central granite entrance with prominent keystone. The building has been sympathetically remodelled at street and first floor levels to provide a symmetrical retail frontage.



Permeability in the conservation area: entrance to Bull's Head Passage (L) and view of Gracechurch Street from the Swan public house.

Bulls Head Passage

A piece of earlier townscape (predating Leadenhall Market) is embedded in Bulls Head Passage and relates strongly in character to the alleys of Bank conservation area directly to the west. Buildings to both sides are domestic in scale and are generally brick with timber shopfronts with recessed storm porches, timber sash windows, restrained signage, lighting and other traditional features. Those to the north were built for the Skinner's Company in 1841. The restrained character and surviving features of the passage relate closely to the adjacent market buildings.

Nos. 1-4 date from 1841 and have refined double height arched recesses around small-paned tripartite sash windows. A feature of the buildings is the elegant curved corner on the eastern end which is emphasised in the shopfront fanlight by a decorative glass panel. **Nos. 9-12** and those opposite are the rear flanks of **Nos-81-82** Gracechurch Street and form a transition in materials and scale with buildings to the east.

Lime Street



Looking NE



Nos. 27-29 from Lime Street Passage

Lime Street was established by 1187. Its curving alignment and the narrowness of the adjoining streets restrict views within the area and help to achieve an intimacy and human scale in a close-knit townscape. The effect is to evoke a more labyrinthine City. It remains linked to the market and is still intimate in character despite some post-war erosion, with the narrow building plot widths surviving on the south-west side. The small shops and pubs along its length complement and extend the commercial activity of the Market into the immediate surroundings.

The southern end of the street comprises a sequence of largely pre-war buildings, which display a range of architectural styles and materials yet are united by a broadly consistent scale reinforced by consistent building heights and proportions. The scale and character of buildings on Lime Street forms an important transition between the listed market and those grander or more imposing buildings.

The relatively small scale, narrow building plots, continuous retail frontage and vitality in the elevational design are characteristic of much of Lime Street. These are perpetuated for a short distance along the neighbouring Cullum Street and Fenchurch Street. Here, the two corner buildings are particularly important as pivotal buildings, allowing the shared character to flow from Lime Street to the adjoining frontages. Many of the buildings in these streets have richly detailed characterful elevations and some have been much altered behind original facades, preserving the character and appearance of the area.

Nos. 8-13 Lime Street is a recent building incorporating numerous characteristics appropriate to its context including Portland stone elevations with deep modelling and tall vertical elements that reflect the pilasters of **Nos. 37-39** opposite, as well as bronze coloured spandrel panels and window frames. Its flank elevation to Beehive Passage is appropriately composed of yellow brick with stone dressings. **No. 14** is a distinctive late-19th century building which includes the archway to Beehive Passage. Its sandstone narrow façade sits above a red granite ground floor, with timber sash windows accounting for a large proportion of the frontage. It is otherwise rich in classical detailing and forms a striking pivot between its two

substantial neighbours. **Nos. 15-18** has a broad Portland stone elevation of seven bays with minimal modelling and depth, punctuated by a prominent central pediment over the entrance, with a deep cornice at roof level. It has slim, dark metal window frames within shallow reveals, breaking with the consistently deep reveals elsewhere on the street.

No. 21 Lime Street is under construction at the time of writing. Planning permission was granted in 2015 for an eight storey, stone-clad building with regular window openings and glazed uppermost levels.

No. 24a Lime Street (and 158-159 Fenchurch Street) was completed in 1910 to designs by Sylvester Sullivan who designed other notable buildings in the area. It has a prominent presence on the corner of Lime Street and Fenchurch Street with grey granite elevations punctuated by rich classical detailing including vertical elements linked by carved swags. The building has a strong hierarchy to each storey, with the roofline featuring a dome on the corner. The dome remains a prominent feature of the roofscape and acts as a pivot point between Lime Street and Fenchurch Street, where there is currently an appropriate transition in scale. **No. 24** Lime Street is an early 20th century building with ornate classical features including brown /red granite pilasters supporting Portland stone framing divided by grey granite pilasters with distinctive red sandstone capitals. This kind of stone ornamentation is found on a number of buildings on Lime Street and greatly enriches the townscape. The decorative attic storey adds notable interest to the roofline.



Fenchurch Street/Lime Street



No. 24 Lime Street

Nos. 25-26 is a simple building in Clipsham stone with slim vertical elements separating buff brick panels and tall windows. These elements are echoes of those expressed more forcefully in the conservation area, and as such have townscape value. Despite its narrow façade, the building incorporates two former entrance openings, adding intricacy to the street scene.

No. 27 is a grade II listed former public house dating to 1837, designed by Robert Davidson, surveyor to Truman's Brewery. It has a well-proportioned yellow brick façade embellished with refined Greek Revival details in stucco or painted stone that convey an almost domestic vernacular. The building has a high quality historic shopfront that relates well to the proportions and features of the upper storeys. There is an opportunity to improve the appearance of the extended flank wall.

The rooflines between No. 24a and No. 27 gradually step down in scale, appropriately reflecting the transition between Fenchurch Street and Lime Street.

Nos. 28-30 is a striking Gothic Revival Victorian commercial building with a strong presence on the street. Its broad Portland stone façade is richly modelled with pointed arches over bipartite sash windows that create rhythm on the frontage. The ground floor frontage is composed of timber shopfronts with a recurring quatrefoil motif on the stallriser, separated by stone columns with slim iron colonnettes between. The building incorporates a former entrance to a yard, now gated.

Asia House, **Nos. 31-33** Lime Street is a high quality Edwardian building designed in 1912-13 by architects Fair and Myer. It has crisp elevations of white faience with a wealth of classical details that create depth and visual interest, with the chamfered corner providing a prominent focal point on the irregular historic street plan. The contrast between the rich classical detailing of Asia House and the Gothic features of **Nos. 28-30** exemplifies the range of architectural styles on Lime Street, with buildings otherwise unified by the characteristics identified above.

Nos. 34-36 Lime Street is a remodelled late-20th-century building in sandstone with an unusual form that incorporates 'wings' with ground floor retail units projecting either side of a set-back central office entrance, which has a canopy over with timber soffit. The design of the building has a particularly horizontal emphasis which is uncharacteristic of the conservation area. It incorporates a pedestrian route through to Cullum Street, a valuable increase in the permeability of the street network.

Nos. 37-39 is a Grade II listed building designed by Sylvester Sullivan dating to 1929. Its streamlined Portland stone façade is notable for the use of full height pilasters above ground floor level which give a clean modern form, dividing the bronze window frames and spandrel panels, with Greek detailing adding flourishes of decoration at the upper and lower levels.

Cullum Street



Bolton House

Cullum Street links Fenchurch Street and Lime Street in a distinctive angled form which lies partially within the conservation area. Nos. 13-14, Bolton House, is the retained façade of a building designed in 1901 and signed *AISELBY ARCHT.* notable for its green and blue tiled elevation and striking Art Nouveau detailing. The frontage's styling and materials are rarely found in the City and strike a flamboyant note among the more restrained stone elevations of Lime Street. The building was incorporated into the site of 154-156 Fenchurch Street in the late 20th century, at which time a crude and unsympathetic two storey slate extension with rooflights was added at roof level.

Just outside the conservation area boundary, the rear elevation of Sackville House (Fenchurch Street) neighbours Bolton House. It is of a simple Georgian vernacular, stone at the ground floor with brick upper levels and regular sash window openings with flat arches. It forms a sympathetic setting for the buildings in the conservation area.

Fenchurch Street

The section of Fenchurch Street within the conservation area has a varied townscape of predominantly 20th century developments, interspersed with the elements of earlier buildings, all of a consistent scale with prominent vertical detailing. It is an important southerly approach to the conservation area and therefore a key part of its setting. Nos. 150-151 is a distinctive remnant of an 1865 building with tall narrow round-headed windows and features in an Italian Renaissance style. No. 152 has a highly distinctive 1970s street elevation of bronze

tinted glass screwed over a rendered frontage referencing the preceding Georgian building on the site. The stone ground floor and elevational edge treatment is shared with the neighbouring building and was designed to unify the contrasting facades.



Nos. 150-3



Detail, No. 150-1



Nos. 158-159

No. 153 is a narrow late 19th century Queen Anne Revival building faced in high quality red brick, displaying a wealth of details to its symmetrical facade including pediments and pilasters that are carried through to the painted timber shopfront. Timber sash windows with small paned top sashes are integral to the design of the building. Nos. 155 (including 154 and 156) is a late 20th century office building comprising a dark frame enclosing Portland stone panels and shopfront surround, with a full height metal framed entrance bay to its right hand side. The building lacks some of the more refined detailing that characterises other parts of the conservation area.

Though outside the conservation area boundary, Nos. 136 to 149 Fenchurch Street have a scale and plan form that reinforces the character of the conservation area. Sackville House (No. 143-149, built 1932) has particular sympathy with the conservation area it immediately neighbours by having a stone frontage of strong verticality and faintly Baroque detailing over the main entrance.

The southern boundary at this location adjoins 20 Fenchurch Street, which because of its height and form looms over the conservation area. In this regard it could be considered detrimental to local townscape views. Aerial views of the conservation area are afforded from its publicly accessible viewing gallery.

7. Land uses and related activity

Leadenhall Market is a focal point for retail activity in the eastern part of the City and its covered, pedestrianized environment provides an attractive place for a variety of activities throughout the week. As such, a vibrant atmosphere is created by the facilities and the people making use of them. The market is one of the City's Principal Shopping Centres (PSC) for which there are policies in the Local Plan.

The retail-based economy in the area, which includes cafes, bars, restaurants and shops, spreads beyond the Victorian market to buildings across the conservation area, particularly on Bulls Head Passage and Lime Street. These smaller establishments create a vitality and mix of uses key to the centuries-old bustling character of the conservation area. Alongside these uses are offices of different types and sizes, being generally in line with, or complimentary to, the financial services industry which is a prevalent identity in this part of the City. There are a small number of properties in residential use.

The upper floors of some historic buildings, including specifically those in the Market, are in some instances vacant. Examples exist where these upper floors have been sensitively integrated into the use of the retail unit below, or else reused for other commercial purposes.

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8. Architectural character



Detail of Market entrance on Gracechurch Street



Detail of No. 40 Lime Street

Architects, styles and influences

Buildings in Leadenhall Market conservation area encompass a broad variety of architectural styles, with classical details and proportions being a common theme. The market itself makes use of a characteristic Victorian 'Free Classical' style of architecture, which utilises a range of classical precedents and features in an eclectic manner. Parts of the Market, for example the Gracechurch Street entrance building, have been described as Dutch or Queen Anne Revival in style owing to their use of prominent gables and red brick with stone detailing.

Sir Horace Jones, the market architect, was the City Surveyor and was responsible for a number of noteworthy buildings in the City. Among them are Smithfield Market and Billingsgate Market, both of which are a similar fusion of classically derived architecture and spatial pragmatism.

The architect Sylvester Sullivan is particularly well represented in the conservation area, and he also designed buildings in Gracechurch Street and Fenchurch Street. His buildings characteristically make use of classical details on buildings that are otherwise wholly modern in style. For example, Nos. 37-39 Lime Street has pilasters and other classical features that are arranged in an unorthodox manner with those above ground floor level stretched upwards to the parapet with clean modern lines.

Lime Street illustrates other popular architectural styles of the 19th century, including Gothic Revival at Nos. 31-33 and Greek Revival at No. 29. It is the scale, materials and proportions of these buildings that provide a common theme and coherent townscape in the area.

Building ages

Buildings in the conservation area largely date from the second half of the 19th century with further notable examples from the early 20th century through to the present day. The market, which occupies approximately one third of the area, forms one of the City's most significant complexes of Victorian buildings. Slightly pre-dating the market (mid-19th century or earlier), 2-4 Bulls Head Passage is an example of an

earlier survival in the area, being more Georgian and domestic in scale and character. The earliest structural element in the conservation area is the remains of the Roman Basilica-Forum preserved in the basement of 90 Gracechurch Street, a scheduled ancient monument. A collapsed 1st-century AD fresco was discovered on the site of 21 Lime Street.

Building roofscape

A mix of roof heights and structures across the conservation area creates an interesting roofscape when viewed from low, medium and high-rise vantages. This 'fifth elevation' of the City is increasingly appreciated and will only increase in visibility as new tall buildings on the fringes of the conservation area create new views.

At the heart of the roofscape are the distinctive roof structures of Leadenhall Market. Clearly discernible are the traditional hipped and pitched slate roofs with lead flashings and glazed openings, with an octagonal lantern at the centre. The proliferation of small roof structures express the multiplicity of market units below, allowing the ground plan of the Market to be understood even from this high vantage.

More traditional roof forms, including slated mansards and dormer windows, are to be found on buildings on Lime Street, particularly Nos. 26-30. Buildings on Lime Street appropriately step down in scale from Fenchurch Street, reflecting the different hierarchy of streets.

Traditional roof forms contribute to the special interest of the conservation area in the same way as other elevations of historic buildings within the area boundary. The increasing prominence of the City's roofscape means roof level works will be scrutinised in the same way as those on other elevations. Requirements for plant and M&E are one area in particular where early discussion with the City Corporation is encouraged.

9. Local details

Signage and shopfronts

Shopfronts in the conservation area are of a consistently high quality and make a strong contribution to its character, as well as the appearance of individual buildings. The uniform shopfronts of Leadenhall Market have a consistent original design including some open and some enclosed examples on Lime Street and Bulls Head Passage. Since the scheme of redecoration in the 1990s the City Corporation has successfully operated a policy of reinstating these shopfronts where they had been lost.



A typical shopfront in Leadenhall Market

The predominant form of shopfronts across the area is traditional, with a painted timber frame incorporating pilasters, panelled stallriser (or a decorative iron grille in the market), and glazing divided by mullions and transoms. Level access between shopfront and street is an essential aspect of the design. Examples on Bulls Head Passage retain the recessed storm porch which has the entrance set back from the street in a traditional format. This is an essential characteristic of a number of older shops and its loss can be detrimental to the area's appearance.

Signage in the conservation area is similarly restrained in terms of scale and method of illumination. Shop signage in the market is of a consistent style and format that is carefully controlled (see appendix), while elsewhere it is generally limited to one projecting sign and one fascia sign per elevation.

Architectural sculpture

The market arcades are richly decorated. Above the shops are classical panels depicting fruit trees, with an enriched frieze running at the upper level below the roof structure, separated by ornate capitals and corbels. The most opulent decorative elements are focused on the market crossing and entrances, with a series of City of London dragons in painted iron appearing to support the structure above. The Gracechurch Street elevation makes a grand display of carved stone panels and ornamentation as an integral part of Horace Jones's architectural treatment.

Elsewhere in the conservation area, Asia House has finely detailed Oriental figures cast in white faience.

10. Building materials

Building materials in the conservation area are generally a traditional palette of brick and stone. The market buildings are distinctive for their warm red brick elevations, accented with Portland stone features, painted iron arcades, timber shopfronts, metal grilles and timber sash windows. On adjoining streets buildings are predominantly of Portland stone or lime stone to the main thoroughfares or brick on secondary streets such as Bulls Head Passage, or where older buildings remain. Asia House on Lime Street is a distinctive example in the area of a faience building, while the coloured faience front elevation of Bolton House on Cullum Street exhibits one of the area's most striking use of materials, being notable in the area and rare in the City.

11. Public realm

The public realm in the conservation area is largely traditional in form and materials. Outside the Market the main thoroughfares, including Gracechurch Street, Leadenhall Street and Lime Street, comprise a York stone or asphalt footway with a granite kerb. A number of 19th and 20th century City of London bollards survive on the north side of Lime Street, continuing along the west side of Leadenhall Place.

The public realm of the Market itself has a carriageway of granite setts laid in the 1990s with Yorkstone footways and granite kerbs replicating the earlier surfaces. In a number of locations there are surviving black and terracotta tiles against the edge of the shop units. City of London bollards at the entrances to the Market are painted in the same colour scheme as the market buildings. A number of temporary stalls, tables and chairs populate the public areas of the Market during opening hours. These are carefully controlled and monitored to ensure they are appropriate to the historic location, and more successful examples have been sensitively designed to avoid visual clutter. Opportunities are sought to improve level access to the Market and to create through routes favouring the smooth footways instead of uneven cobbles.

Public realm enhancement works in the area of Cullum Street were completed in 2013/2014, including the creation of a new public space with feature paving and greenery (see Management Strategy).

12. Cultural associations

In the fifteenth century the market was bequeathed to the City by Richard 'Dick' Whittington, the celebrated Mayor of the City, merchant and philanthropist.

A well-known resident was 'Old Tom', a gander who evaded slaughter and became a kind of local fixture at the market. He died in 1835 at the age of 35 and was buried on site, commemorated by a plaque near the south entrance.

The location is used for filming and has appeared in films such as Harry Potter and the Philosopher's Stone.

Management strategy

The management strategy sets out the position regarding the wider policies and guidance concerning the conservation and enhancement of Leadenhall Market Conservation Area. Future development schemes and enhancement projects will need to take account of these policies in relation to the special architectural and historic interest of the conservation area, as detailed in the above character summary. Significant characteristics of Leadenhall Market conservation area include the grade II* listed complex of 19th century market buildings and the historic network of streets, lanes and alleys east of Gracechurch Street.

Documents produced by the City Corporation are available on the website www.cityoflondon.gov.uk

13. Planning policy

National policy

The Civic Amenities Act 1967 gave local authorities the power to designate conservation areas, and these powers are now contained in the Planning (Listed Buildings and Conservation Areas) Act 1990. The Act (section 69 (1) (a)) defines a conservation area as an area: *"of special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance"*. Section 71 (1) of the Act requires the local planning authority to *"...formulate and publish proposals for the preservation and enhancement of any parts of their area which are Conservation Areas."* See www.legislation.gov.uk.

The Government's planning policies are contained within the National Planning Policy Framework (NPPF), which came into force on 27 March 2012. Historic environment policies are detailed in chapter 12 which sets out the requirements for local authorities and applicants in relation to the conservation of heritage assets, including conservation areas. See www.communities.gov.uk. The Department for Communities and Local Government have published Planning Practice Guidance for the NPPF, of which the section 'Conserving and enhancing the historic environment' is particularly relevant. See <http://planningguidance.planningportal.gov.uk/>.

NPPF historic environment policies are supported by Historic Environment Good Practice Advice notes 1-3, produced by Historic England. See <https://www.historicengland.org.uk/>.

London-wide policy

The London Plan (2015) forms part of the statutory development plan for the City of London Corporation and needs to be taken into account when considering development within the Conservation Area. Key policies to consider are: policies 7.8 Heritage assets and archaeology and 7.9 Heritage-led regeneration. See www.london.gov.uk/thelondonplan.

City of London policy

Planning policy for the City of London is contained within the Local Plan, which was adopted in January 2015. See www.cityoflondon.gov.uk for more information. Development proposals within the Leadenhall Market Conservation Area have to be considered in the context of the policies of the Local Plan. Within this framework, particular account will need to be taken of Core Strategic Policies CS10 'Design', CS12 'Historic Environment', CS13 'Protected Views', CS19 'Open Spaces and Recreation', CS20 'Retailing', and CS21 'Housing'.

In addition to policy CS10 Design, attention should also be paid to Local Plan policy DM10.6 Advertisements. This policy seeks to encourage a high standard of design and a restrained amount of advertising, in keeping with the character of the City, and to resist excessive or obtrusive advertising, inappropriate illuminated signs and the display of advertisements above ground level. See also clauses 3.10.35 to 3.10.39 for further details. Other key policies in the Local Plan are: DM12.1 'Managing change affecting all heritage assets and spaces'; DM12.2 'Development in conservation areas', DM12.3 'Listed Buildings' and DM10.5 'Shopfronts'.

Protected views

The above character summary identifies a number of distant and local views that contribute to the character of the conservation area (see Spatial analysis: views and vistas). Proposals will be assessed for their potential effect on these and other views of significant individual buildings, townscapes or skylines.

Sustainability and climate change

The City Corporation is committed to being at the forefront of action in response to climate change and other sustainability challenges that face high density urban environments. In adapting to meet these challenges, it is important that sustainable development is sensitive to the historic environment. In particular, areas will need to be resilient to warmer wetter winters, hotter drier summers and more frequent extreme weather events.

Issues specifically relevant to the Leadenhall Market conservation area include:

- In order to minimise the risks of flooding elsewhere in the City, new development schemes will be expected to make use of appropriate rainwater attenuation measures such as the Sustainable Urban Drainage Systems (SUDS) and green roofs.
- The City is an air quality management area for fine particulates and oxides of nitrogen. It is therefore essential that development does not exacerbate existing air quality issues, particularly around sites of particular vulnerability.

The Local Plan policy CS15 provides guidance on sustainable development and climate change and policy CS18 on SUDS supplemented by more detailed Development Management policies. The City has produced a *Climate Change Adaption Strategy* (revised and updated January 2010).

14. Environmental enhancement

The work is underpinned by the City Public Realm Supplementary Planning Document 2016. This promotes high quality design and set the highest standards

for every element that contributes to our experience of the City's streets. There are ten overarching aims that support all interventions in the City's public realm:

- A high standard of design
- Understanding context and character
- Simpler, more spacious and less cluttered streets and spaces
- Better coordination of design and more consistency
- Protecting heritage and ensuring continuity
- More sustainable streets and spaces
- Supporting and encouraging good health, wellbeing and healthy lifestyles
- Creating and maintaining exceptional streets and spaces
- Better connected and more inclusive streets and spaces
- Release the potential of the City's public realm to support commerce, culture and art.
-

These aims, along with detailed guidance, and history and evolution of streets and spaces in the City are set out in detail in the SPD.

Completed schemes in Leadenhall Market Conservation Area include:

- Section 106 funded enhancements to Cullum Street on the junction with Lime Street, including the provision of new seating and trees. New paving with a floral motif representing a 2nd century Roman detail discovered in Lime Street has been incorporated into the scheme.

15. Management of transport

The character of the conservation area is considerably influenced by the street pattern within it and the nature and volume of traffic using those streets.

Gracechurch Street and Fenchurch Street are local distributor roads. These are streets that are designed to provide defined routes for motor vehicle traffic into the local area and that have unrestricted access for frontagers. Gracechurch Street forms part of the Transport for London road network and is managed by that authority via red route controls, which provide greater priority for through traffic by prohibiting kerbside access. The City Corporation considers that there is potential to alter the traffic balance on Gracechurch Street to ensure that the character and appearance of the conservation area and the wider area is not adversely affected by unnecessary volumes of motor vehicle through traffic.

All other streets in the conservation area are local access streets, which cater for motor vehicle traffic serving the immediate locality.

Central Avenue within Leadenhall Market and the central ends of Whittington Avenue, Leadenhall Place and Lime Street Passage form a pedestrian zone into which the only vehicles permitted are those driven by permit holders and goods vehicles that require access for loading and/or unloading. No vehicles are permitted between 10 a.m. and 11 p.m. from Monday to Friday and vehicles other than goods vehicles, including cycles, are prohibited at all times.

Further details about transport proposals, including the City of London Local Implementation Plan, Cycle Plan, and Rail Strategy are available on the website. See www.cityoflondon.gov.uk

16. Management of trees

The City of London's *Tree Strategy* SPD (2012) sets out how trees will be protected and maintained and how further tree planting will be encouraged. Part 1 of the Tree Strategy contains policy and guidance on the planting, preservation and management of trees in the City and was adopted as a SPD in May 2012. Part 2 provides additional detailed guidance and information on the implementation of part 1. See www.cityoflondon.gov.uk

All trees in conservation areas are protected under section 211 of the Town and Country Planning Act 1990 (as amended) subject to a few exceptions. Anyone proposing to carry out works to a tree in a conservation area must give six weeks' notice of their intention to do so before works begin. There are no Tree Preservation Orders in the Leadenhall Conservation Area.

17. Archaeology

The City of London is the historic centre of London and has a rich history with monuments and archaeological remains surviving from all periods. It is an historic landscape which has shaped and influenced the modern townscape. There has been almost continuous occupation of the City from the initial Roman settlement and there is some evidence of earlier occupation. The development of the City is contained in the visible and buried monuments and archaeological remains. The history of settlement has led to the build-up and development of a very complex, and in some areas, deep archaeological sequence. Later building development and basement construction has partly eroded the archaeological evidence, and in some areas remains have been lost with no record or an incomplete record of only part of a site.

Due to the complex layering of remains above and below ground, the entire City is considered to have archaeological potential unless it can be demonstrated that archaeological remains have been lost, due to basement construction or other ground works.

Where developments are proposed which involve new groundworks an historic environment assessment, including an assessment of the archaeological potential and impact of the proposals will be required as part of the planning application. Where significant remains survive, consideration will be given to amendments to the proposals to ensure that disturbance to archaeological remains is minimised or reduced.

The City Corporation will indicate the potential of a site, its relative importance and the likely impact to a developer at an early stage so that the appropriate assessment and design development can be undertaken. Developers should refer to *Planning Advice Note 3: Archaeology in the City of London, and Conservation Areas*

in the City of London: A General Introduction to their Character_for further information.

There is high archaeological potential in Leadenhall Market Conservation Area, including:

- Remains of the late 1st century Roman basilica, earlier Roman buildings and Roman roads
- Remains of the medieval Leaden Hall, medieval buildings and street pattern

18. Enforcement

Breaches of planning control are investigated in accordance with the City of London Planning Enforcement Service Standards. This sets out the manner and timescales in which breaches will be investigated. A new Planning Enforcement Policy document is in preparation. See www.cityoflondon.gov.uk.

19. Condition of the conservation area

The buildings and public realm of the Leadenhall Market conservation area are generally in good condition and maintained to a high standard. The adaption, upgrading, repair, conservation, or redevelopment of buildings is managed to have a minimum effect on neighbouring buildings, the highway and the amenity of the area.

Potential pressures in the conservation area have been identified as new development (including in the area's setting) and utilities replacement works, although these do not threaten its character. The condition of the conservation area is judged to have improved in recent years, and is expected to further improve in coming years.

Planning applications will be judged against the local, regional and national policies and guidance identified above, and the loss of buildings and features that contribute to the character of the area will be resisted accordingly.

The section of Roman wall in the basement of 90 Gracechurch Street is currently classified as a Scheduled Monument at Risk by Historic England and is included on their 2015 Heritage at Risk register for London.

Further Reading and references

Bradley, Simon, and Pevsner, Nikolaus, *The Buildings of England London 1: The City of London* (1997).

Historic England publications:

Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment (2008).

Understanding Place: Conservation Area Designation, Appraisal and Management (2011)

Seeing the History in the View (2011)

The Setting of heritage assets (2011)

Available at **www.historicengland.org.uk**. Guidance on climate change and for homeowners is available under the 'Advice' tab.

Freeman, Jennifer (editor) *Save the City: a Conservation Study of the City of London* (1979).

Huelin, Gordon, *Vanished Churches of the City of London* (1996).

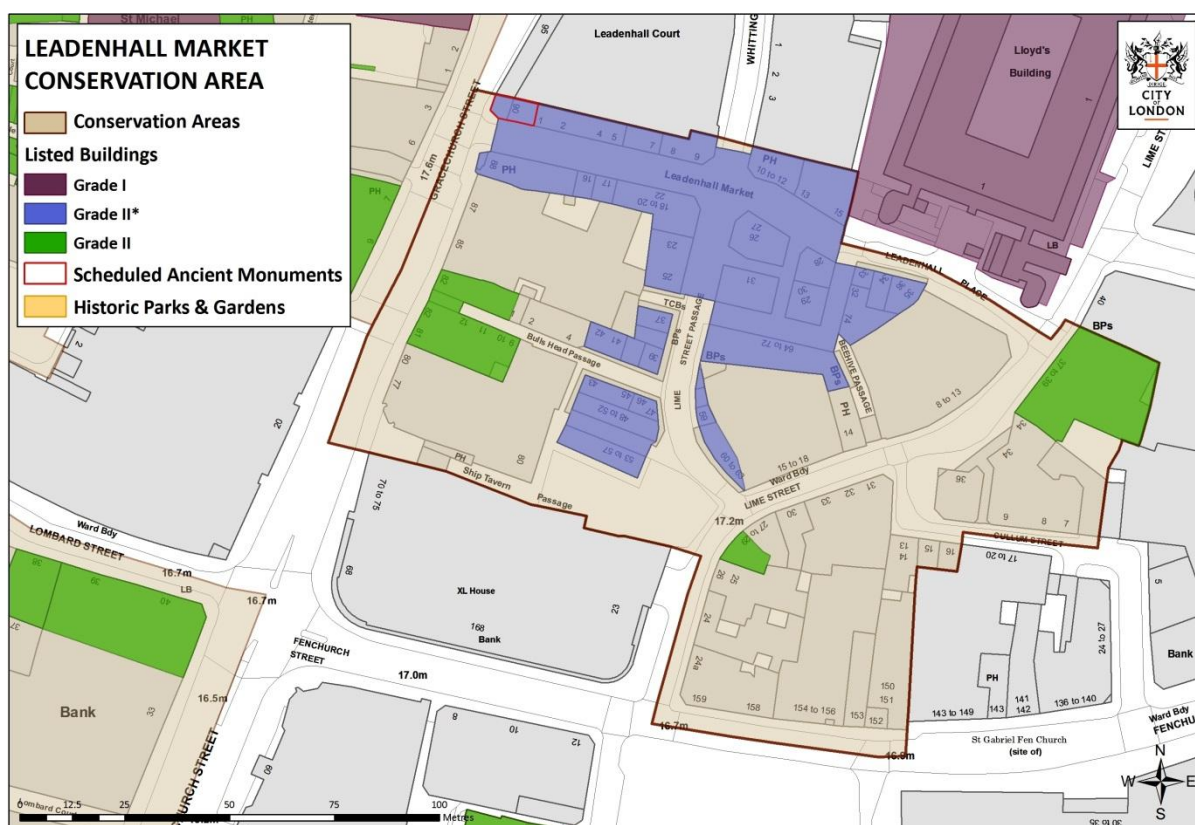
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Designated heritage assets



Scheduled Ancient Monument

Roman wall in basement of 90 Gracechurch Street.

Listed Buildings

| Street | Number/name | Grade of listing |
|--------------------|--|------------------|
| Gracechurch Street | 81 & 82 | II |
| Lime Street | The Ship Tavern, No.27 | II |
| | 37-39 | II |
| Leadenhall Market | 1-36, 37-42, 43-57, 58-63, 64-74 Leadenhall Market, 89 & 90 Gracechurch Street | II* |

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Leadenhall Market SPD

Part 2: Listed Building Management Guidelines

Draft March 2017



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Column base detail

1. Introduction + key partners

Leadenhall Market is a grade II* listed Victorian Market in the City of London designed by Sir Horace Jones, the City Surveyor, and completed in 1881. The Market is a retail centre and is owned and managed by the City of London Corporation.

These Listed Building Management Guidelines are intended to be a tool for the positive, proactive management of Leadenhall Market as a listed building and working market. They provide a structured framework within which informed decisions can be made. They offer guidance on the special architectural and historic interest of the Market, the types of changes that may or may not require Listed Building Consent, and the conditions in which these may be acceptable.

These guidelines are intended as a reference tool and are not intended to replace consultation with the Development Division of the City of London Corporation.

One of the key functions of Listed Building Management Guidelines is to provide clarification as to what types of change may or may not require Listed Building Consent. Section 7 of the Planning (Listed Buildings and Conservation Areas) Act 1990 means that Listed Building Management Guidelines cannot remove the need to obtain Listed Building Consent for works of alteration which affect the character of a building of special architectural or historic interest. These Guidelines provide an assessment of the balance to be sought in preserving the character and special interest of the listed buildings against the pressure for change and offer advice on the responsible stewardship of heritage assets.

Listed Building Management Guidelines provide an opportunity to explore and articulate the special architectural and historic interest of the building and its setting, something that the description in the list entry is not intended to provide. The result should be an informed understanding of the building and the aspects which contribute to its special architectural or historic interest and which should be safeguarded during the management of change.

Listed Building Management Guidelines can only be an informal consensus between stakeholders on the acceptability of change within the building. Section 7 of the 1990 Act provides that Listed Building Consent will be required where works will affect the character of a listed building, irrespective of any agreements between parties regarding the acceptability of the proposals.

Given that guidelines are an informal consensus between stakeholders but can have weight when adopted as a planning policy document, appropriate consultation is a key to their success. The views expressed should represent a consensus reached by all those involved in the production of the document including consultees. The document should also be reviewed on a regular basis.

It is intended that these Guidelines will have the status of a Supplementary Planning Document within the Local Development Framework. They have been prepared in conformity with the Local Plan policies detailed in the Management Strategy in Part One of this SPD.

Key contacts for the Market are as follows:

| Role | Organisation | Contact | Queries about |
|----------------------------------|---|--|---|
| Freeholder | CoL / City Surveyors | Jennifer Lewis Jennifer.Lewis@cityoflondon.gov.uk | Asset management – leases, tenants, projects, licence for alterations |
| Market Office (Building Manager) | CoL / City Surveyors | Sarah Goddard (Complex Manager) Sarah.goddard@cityoflondon.gov.uk Bryony Andrews (Building Manager) Bryony.andrews@cityoflondon.gov.uk | Day-to-day Market operation (repairs and maintenance) |
| Local Planning Authority | CoL / Department of the Built Environment | Tony Newman / Development Division Tony.Newman@cityoflondon.gov.uk | Development management, permissions and consent requirements |
| | CoL / Department of the Built Environment | Tom Nancollas / Development Division Tom.Nancollas@cityoflondon.gov.uk | Listed Buildings, historical research |
| Statutory Consultee | Historic England | Jane Cook / London Office Jane.Cook@historicengland.org.uk | LBC consultee |

As of February 2017

2. How Leadenhall Market operates

Leadenhall Market is a flagship investment asset for the City of London. The Market is home to nearly 50 modern occupiers, predominantly retail and food use, in addition to some bars, pubs, and offices. As well as the quality of its historic environment, the special interest of the Market derives from the fine grain of smaller units and kiosks that provide a diversity and vitality that enhances the bustling commercial character.

It is the City's objective to promote a thriving environment that respects and enhances Leadenhall's unique and special environment and architecture. Indeed, the Market is a long standing retail hub that historically serves to cater to its local businesses, workers and residents, which in turn attract tourists and visitors. With the completion of new tall buildings in the neighbouring Eastern Cluster to the north and predicted increase in the number of office workers, the local area is changing and improving and maintaining Leadenhall Market's special interest and character is a particular priority for the City.

One of the key challenges facing the Market is balancing modern occupational requirements against preserving and enhancing the character of the listed building, such as the requirements for air conditioning, plant and associated infrastructure. Another challenge for the ongoing commercial viability of the Market is the cost of maintaining the building in comparison to that of a modern purpose built development. For example, the Market has ongoing operational requirements, such as the phased cyclical painting and maintenance works that take place throughout the Market every year between January and March.

Leadenhall Market's appearance and atmosphere is vital in ensuring Leadenhall remains a thriving retail destination; however, finding sensible solutions to adapt the Market for commercial requirements is equally important, in order for retailers to flourish in an increasingly challenging commercial environment and choose Leadenhall as a destination of choice – as opposed to local modern developments that are purpose built for the modern occupiers.

3. Leadenhall Market – listed grade II*

Text from the [National Heritage List for England](#): (administered by Historic England):

"Including Nos 89 and 90 Gracechurch Street. 1881, by Sir Horace Jones. Complex of roofed footways with 3 detached portions to south, lined with open fronted shops. External architecture of red brick and Portland stone in thin, classical style. Interior more robust with order of giant Corinthian columns etc apparently all in cast iron with elaboration to octagonal crossing. Simple, arched roof of timber and glass. Main elevation to Gracechurch Street with pair of ornamented 4 storeyed pavilions topped by shaped gables and turrets. Wide entrance with windows over and wide, shaped gable. Other entrances with City arms carved in Portland stone pediment supported on cast iron structure. Modern canopy of glass and iron to shops standing in open.

Listing NGR: TQ3307881055"

Listing

Leadenhall Market is listed for its special architectural and historic interest under the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended). Its management is subject to policies within the National Planning Policy Framework 2012.

The Market is listed at **grade II***, meaning it is classed as a particularly important building of more than special interest.

Extent of listing

The Market's listed status applies to the whole of the building, inside and out, and includes all fixtures and fittings, even modern ones.

Quoted above, the list entry gives only a general description of the building, for official identification purposes. It is not a guide to what is listed and what is not.

Listed Building Consent (LBC)

The Market was listed on 5th June 1972. Listed building consent (LBC) is required for any changes that affect its character as a building of special architectural or historic interest.

LBC ensures the Market's special interest is taken into account when developing proposals for alteration. Consultation with the public, Historic England and other relevant parties is part of the process.

Since 2004 all LBC applications relating to the Market have been approved, following negotiation between parties to develop satisfactory proposals before submission.

Applying for LBC

In the first instance, please contact the Development Division in the Department of the Built Environment for an initial discussion about the proposals. Details of making LBC applications can be found at the following website:

[Submitting listed building consent applications](#)

Leadenhall Market's special interest

A definition of the Market's special interest is given below. Any works to the Market must maintain and enhance this special interest.

There has been a Market on the site since 1321, initially in the courtyard of the 'Leaden Hall', a mansion that became City of London property in 1411. The existing Market is physical evidence of this 695-year commercial tradition (**historical, evidential, communal**) and retail activity continues. Commerce goes even further back to the Roman period, when the site was occupied by the Forum-Basilica (the administrative and commercial heart of Londinium), of which a scheduled fragment is preserved in the basement of one of the Market properties (**historical, evidential**). The ornamental architecture of the existing buildings survives unaltered and give a strong flavour of the civic pride and prosperity of the Victorian City and Britain more widely (**aesthetic, historical**). The designs are an important work by a significant architect, Sir Horace Jones, who had specific associations with the Corporation in his role as City Surveyor (**historical**). Compared with Jones' other Markets at Smithfield or Billingsgate, Leadenhall is unique because it is the only one fitted specially to the existing historic street pattern, a fact betrayed by the crooked cruciform plan (**aesthetic, evidential**). The City Corporation's 1990 scheme of redecoration was based on extensive historical research, provides a consistent visitor experience and greatly enhances the original architecture (**aesthetic, evidential**).

The **Values** are taken from Historic England's *Conservation Principles* (2008), the official framework for defining "special interest". This is the collective term for the sum of all the heritage values explained below.

Evidential value is how much evidence a place can give us about the way people did things in the past

Historical value is how far a place connects us with particular historical people, events and aspects of life

Aesthetic value is how much a place stimulates the senses and the intellect

Communal value is how far a place holds meanings for people and figures in their collective experience or memory

4. Permissions & Consents for work

Listed building consent

Required for any works to the Market that affects its character as a building of special architectural or historic interest.

Planning permission

May be required for change of use and any works that affect the external appearance of the Market, including temporary installations.

Advertisement consent

Will be required for any new advertisements beyond the agreed templates outlined in the guidelines below.

Scheduled Monument Consent

Will be required for any works affecting the scheduled ancient monument in the basement of No. 90 Gracechurch Street

All applications are processed in accordance with the National Planning Policy Framework, London Plan, City of London Local Plan and any other material considerations. The policy framework is set out in the accompanying draft Leadenhall Market Character Summary and Management Strategy SPD.

Public access and accessibility

Opportunities will be sought to obtain public benefits from developments in the vicinity, such as archaeological interpretation or public access to currently hidden areas. Works that preserve and enhance the special interest of the Market will be favourably considered, e.g. reintroduction of original features such as the wood block floor.

Unauthorised works

Information on breaches of planning control can be found at the [Planning Enforcement](#) pages on the City Corporation's website.

Consent requirements are indicated in the guidelines below.

5. How to use these guidelines

Detailed guidance on types of work is given through the 'traffic light' system laid out below, with examples of work that would require no authorisation (green); works where an enquiry should be made before proceeding (amber); works that would require Listed Building Consent (red) but which may be granted where they do not impact on the building's character; and finally works for which an LBC application would be required, which would have an impact on the significance of the Market and could cause substantial/less than substantial harm or loss (black).

Any additional requirement for planning permission is indicated in the column to the right, though the 'traffic light' colours relate only to listed building consent.

Examples of work types and best practice guidance are intended to provide more insight into the reasoning.

If there is any doubt, or the proposal does not appear within the guidelines, please contact the Development Division for advice.

| Work type | LBC? | Planning? |
|-----------|------|-----------|
|-----------|------|-----------|

Green

| | | |
|---|-----------------|----|
| Works that will not require an LBC application | No | No |
| Examples <ul style="list-style-type: none"> | Guidance | |

Amber

| | | |
|--|-----------------|---------|
| Works where advice should be sought to determine LBC requirements | Enquire | Enquire |
| Examples <ul style="list-style-type: none"> | Guidance | |

Red

| | | |
|---|-----------------|---------|
| Works that will require an LBC application | Yes | Enquire |
| Examples <ul style="list-style-type: none"> | Guidance | |

Black

| | | |
|---|-----------------|---------|
| Works that will require an LBC application (possible substantial/less than substantial harm or loss) | Yes | Enquire |
| Examples <ul style="list-style-type: none"> | Guidance | |

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Maintenance of scheme [departure from existing]
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Lighting
Basement works
Basement extension
Alterations to original features
Alterations to plan form and/or unit volume [minor]
Alterations to plan form and/or unit volume [major]

6.1 Market exterior

6.1.1 Street elevations and pediments

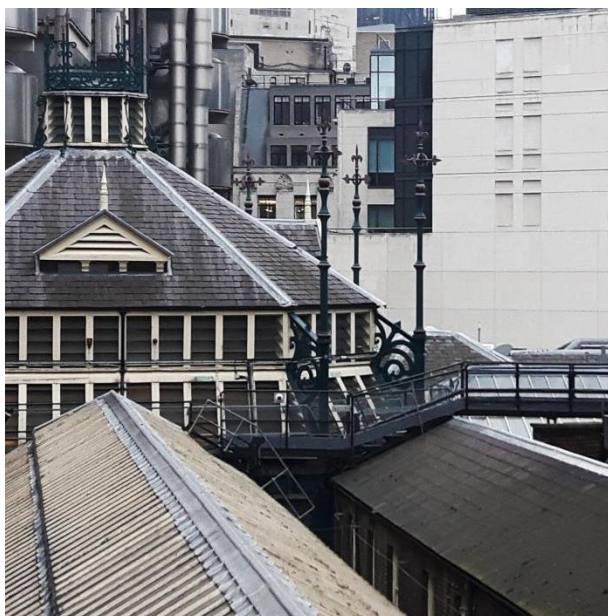


| Work type | LBC? | Planning? |
|---|---------|-----------|
| Repair [like for like] <div> <p>Examples</p> <ul style="list-style-type: none"> Repointing of brickwork in lime mortar Stone repairs to match existing </div> | No | No |
| <p>Guidance</p> <p>Repairs should follow conservation best practice and involve the use of appropriate materials, which should be an exact match (i.e. Portland stone, lime mortar, brickwork). Lime mortar mixes should be based on analysis of the existing mortar composition. Where a deviation from the exact specification is proposed, please refer to Repair [departure from existing] below. If there are any doubts please contact the Development Division.</p> | | |
| Decoration [like for like] <div> <p>Examples</p> <ul style="list-style-type: none"> Repainting or regilding </div> | No | No |
| <p>Guidance</p> <p>For BS/RAL details of the paints used in the Market please contact the Market Office and the Development Division.</p> | | |
| Building cleaning <div> <p>Examples</p> <ul style="list-style-type: none"> Masonry or brickwork using steam or abrasive clean </div> | Enquire | No |
| <p>Guidance</p> <p>Cleaning systems should achieve a balance between removing areas of heavy staining (which may have a detrimental effect) and preserving patina accumulated over time, which adds to the Market's character. The Development Division can provide advice on appropriate systems.</p> | | |

Street elevations and pediments (cont.)

| | | | |
|--|--|--|---------|
| Repair [departure from existing] | | Enquire | Enquire |
| Examples <ul style="list-style-type: none"> Use of different stone in pediment repair | | Guidance <p>A change in materials could materially affect the external appearance of the building. Variation in material will normally only be acceptable if it replaces an inappropriate, non-original intervention where removal does not cause further damage e.g. substituting cementitious mortar for lime mortar.</p> | |
| Alterations [minor] | | Yes | Enquire |
| Examples <ul style="list-style-type: none"> Formation of small openings for servicing Replacing iron rainwater goods with PVC | | Guidance <p>Horace Jones' original designs survive and contribute to the special architectural and historical interest of the Market. Minor alterations should preserve and enhance this special interest.</p> | |
| Alterations [major] | | Yes | Yes |
| Examples <ul style="list-style-type: none"> Demolition New openings in external walls Changes to design of pediments | | Guidance <p>Horace Jones' original designs survive and contribute to the special architectural and historical interest of the Market. Alterations to them will detract from this special interest and are likely to cause harm and will be scrutinised accordingly.</p> | |

6.1.2 Roofscape



| Work type | LBC? | Planning? |
|--|---|-----------|
| Repair [like for like] | No | No |
| Examples <ul style="list-style-type: none"> Re-slating to match existing Replacement glass panels to match existing | Guidance Repairs should follow conservation best practice and involve the use of appropriate materials e.g. Welsh slate. | |
| Repair [departure from existing] | Enquire | Enquire |
| Examples <ul style="list-style-type: none"> Differently sourced slates New types of flashing | Guidance A change in materials could materially affect the external appearance of the building. Variation in material will normally only be acceptable if it replaces an inappropriate, non-original intervention e.g. substituting Welsh slates for asphalt. | |
| Repair [structural elements] | Enquire | No |
| Examples <ul style="list-style-type: none"> Repairs to timber struts and framework | Guidance Repairs to the roof structure should be sensitively designed and minimise the loss of historic fabric. Please contact the Development Division for advice. | |
| Decoration | Enquire | No |
| Examples <ul style="list-style-type: none"> New colour scheme to lantern | Guidance Decoration of the roof should aim to preserve and enhance its existing character. | |

Roofscape (cont.)

| Plant [like for like replacement] | Enquire | No |
|---|--|----|
| Examples <ul style="list-style-type: none"> Replacement of extractor fan with unit of dimensions and appearance to match existing | Guidance The dimensions and appearance of replacement plant should conform to that which is permitted. Opportunities for sharing plant services between tenants should be explored to minimise plant at roof level and create a more sustainable solution. Please contact the Development Division for advice. | |

| Plant [new] | Yes | Yes |
|--|--|-----|
| Examples <ul style="list-style-type: none"> Installation of extractor fan, associated ductwork and openings through roof | Guidance Proposals should keep interventions to a minimum, have the minimum possible impact on sensitive areas e.g. detailing and should aim for the maximum discretion. Concealment in existing voids should be the first option. Louvered plant enclosures can be useful ways of concealing unsightly units. Opportunities for sharing plant services between tenants should be explored to minimise plant at roof level and create a more sustainable solution. Please contact the Development Division for advice. | |

| Alterations [minor] | Yes | Yes |
|---|---|-----|
| Examples <ul style="list-style-type: none"> Installation/upgrade of fall safe system Formation of small openings for servicing | Guidance The Victorian profile and design of the roof contributes to the special architectural and historic interest of the Market. Minor alterations should be designed to preserve and enhance this special interest. | |

| Alterations [major] | Yes | Yes |
|--|---|-----|
| Examples <ul style="list-style-type: none"> Roof extensions Changes to layout | Guidance The Victorian profile and design of the roof contributes to the special architectural and historic interest of the Market. Alterations that depart from the existing arrangement are likely to cause harm and will be scrutinised accordingly. | |

| Advertising | Yes | Yes |
|--|--|-----|
| Examples <ul style="list-style-type: none"> Any advertisement material | Guidance Advertisement material above ground floor level is contrary to Local Plan policy DM10.6 and is likely to cause harm to the Market's character, appearance and special interest. | |

| | |
|--|---|
| | Advertisement consent will be required. |
|--|---|

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6.2 Windows



| Work type | LBC? | Planning? |
|--|---------|-----------|
| Repair [like for like] <div> Examples <ul style="list-style-type: none"> Timber repair to sash windows Replacement glazing to match existing </div> | No | No |
| Guidance <p>These should follow conservation best practice and aim to avoid discordancy. Localised decay in timber windows does not necessarily mean that the whole unit requires replacement. Localised repair should always be the first option.</p> | | |
| Repair [departure from existing] <div> Examples <ul style="list-style-type: none"> Repair with different materials Substitution of different glazing </div> | Enquire | Enquire |
| Guidance <p>Variation in material will normally only be acceptable if it replaces an inappropriate, non-original substitute e.g. replacing uPVC with timber sashes.</p> | | |
| Alterations <div> Examples <ul style="list-style-type: none"> New glazing bar profiles New openings for air conditioning units </div> | Yes | Yes |
| Guidance <p>Any alterations should avoid compromising the coherence of the windows as a group and should respect their traditional form and detailing. Where original windows survive and remain sound these should be retained. Where these have failed and repair or replacement is necessary these should replicate the original design like-for-like.</p> | | |

Windows (cont.)

| Double-glazing [slim line] | | Yes | Enquire |
|--|--|--|---------|
| Examples <ul style="list-style-type: none"> Replacement of single paned glazing with 'slim line' double glazed units | | Guidance <p>A 'slim line' style is most appropriate for a listed building like the Market. Proposals must replicate the reflective character of the existing windows, achieve seamless spacer bars and match other details including beading and horns.</p> | |

| Double-glazing [other] | | Yes | Yes |
|---|--|---|-----|
| Examples <ul style="list-style-type: none"> Replacement of single paned glazing with thicker uPVC double glazed units | | Guidance <p>Proposals that involve the need for thicker glazing bars or heavier frames are likely to cause harm and will be scrutinised accordingly.</p> | |

6.3 Market frontages and common areas

6.3.1 Shopfronts



| Work type | LBC? | Planning? |
|--|---|-----------|
| Repair [like for like] | No | No |
| Examples <ul style="list-style-type: none"> Replacement glazing Repainting Cast iron repair Timber repair | Guidance Repairs should follow conservation best practice and involve the use of traditional materials. BS/RAL paint specification is held by the Market Office and the Development Division. | |
| Repair [departure from existing] | Enquire | Enquire |
| Examples <ul style="list-style-type: none"> Different type of glazing Use of new materials | Guidance Variation in material will normally only be acceptable if it replaces an inappropriate, non-original substitute e.g. plexiglass with glass. | |

Shopfronts (cont.)

| | | | |
|--|--|---|-----|
| Alterations to existing shopfronts Installation of new shopfronts (to match existing) | | Yes | Yes |
| <p>Examples</p> <ul style="list-style-type: none"> ▪ Removal of butchers' hooks or other original features ▪ Reconfiguration of openings e.g. removal of glazing bars ▪ Removal of existing shutters ▪ New colour scheme ▪ Installation of new shopfronts to match existing template | | <p>Guidance</p> <p>Shopfronts at the Market follow a cohesive design and colour scheme established during restoration works of the 1990s. Proposals to restore anomalous shopfronts to this design template will be supported. Original features like the butchers' hooks contribute to the Market's special interest and should be retained. Proposals should incorporate enhancements to access where appropriate.</p> | |
| New shopfront designs | | Yes | Yes |
| <p>Examples</p> <ul style="list-style-type: none"> ▪ Wholly glazed units | | <p>Guidance</p> <p>Proposals for shopfronts that depart from the adopted template will detract from the special interest of the Market and are likely to cause harm.</p> | |

6.3.2 Advertisements & signage



| Work type | LBC? | Planning? |
|---|------|-----------|
| New fascia or finger signs to match Examples <ul style="list-style-type: none"> New fascia signs in Market alphabet | No | No |
| Guidance Signage for new operators should follow the existing Market template, comprising a fascia sign in the correct alphabet (see image above) and small projecting sign if required in the agreed format. Specifics can be found in appendix two . Please contact the Development Division for more information. | | |
| Maintenance of existing historic plaques Examples <ul style="list-style-type: none"> Repairs Cleaning | No | No |
| Guidance Maintenance should follow conservation best practice and involve the use of traditional materials. | | |
| Information signs outside the Market boundary Examples <ul style="list-style-type: none"> Wayfinding signage | No | No |
| Guidance Any new signage should respect the existing character of the Market and existing colour scheme. New information signs should seek to minimise clutter and avoid becoming visual and physical obstructions. | | |

Advertisements & Signage (cont.)

| | | | |
|---|--|---------|---------|
| A-boards and freestanding advertising | | No | No |
| Examples <ul style="list-style-type: none"> Display of A-boards outside shop units | Guidance <p>These types of advertisement obstruct the free movement of pedestrians through the Market and can have a particular impact on those with ambulant and visual disabilities. They should not be displayed without the express permission of the City Surveyor (as Landlord) and/or the Market Manager. Any approved signs should be sited so as to minimise any potential obstruction.</p> | | |
| Signage within shopfront windows | | Enquire | Enquire |
| Examples <ul style="list-style-type: none"> Vinyl signs applied to the inner face of the glass Signs hung against the inner face of the window | Guidance <p>The fascia should be the primary means of denoting the tenant of a unit. Additional signage within the glazing must defer to the overall character of the Market and be no more prominent than the existing fascia sign. Vinyl signage can obscure architectural features of interest and undermine the lively interchange between activity inside the unit and outside in the common areas. Proposals for vinyl signage should be the minimum required and will be carefully scrutinised. LED-based signage will have an even greater impact on the character of the Market and will be scrutinised accordingly.</p> | | |
| New plaques and fixed information signs | | Yes | Yes |
| Examples <ul style="list-style-type: none"> Plaques bearing historical information Fixed wayfinding signage | Guidance <p>New plaques and signs should be designed to respect the special architectural and historical interest of the Market.</p> | | |
| New fixed advertisements outside template | | Yes | Yes |
| Examples <ul style="list-style-type: none"> New projecting signage in a different design Projecting signage at a different height | Guidance <p>Advertisement consent may be required. New fixed advertisements beyond the template in appendix two will conflict with the City's advertising policies and may cause harm to the character of the Market.</p> | | |
| Flags | | Yes | Yes |
| Examples <ul style="list-style-type: none"> Installation of flags to advertise unit tenant | Guidance <p>Except where used for ceremonial purposes, flags are contrary to City of London Corporation advertising policies and will be</p> | | |

| | |
|--|-----------|
| | resisted. |
|--|-----------|

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6.3.3 Market decoration



| Work type | | LBC? | Planning? |
|--|--|---------|-----------|
| Maintenance of existing scheme | | No | No |
| Examples <ul style="list-style-type: none"> Repainting in specified colours Like-for-like repair to mouldings or other elements | Guidance <p>Maintenance and repair should follow conservation best practice. Where appropriate, an assessment should be made of whether accumulated paint layers have detracted from an appreciation of the fine details. Please contact the Development Division for a specification of the Market's decorative scheme, including paint numbers.</p> | | |
| Maintenance of scheme [departure from existing] | | Enquire | Enquire |
| Examples <ul style="list-style-type: none"> Use of new materials for repair e.g. fibreglass instead of wood for detailing repairs Minor departures from paint specification | Guidance <p>Maintenance and repair should follow the existing materials and paint specifications; any deviation from these will need to be adequately justified.</p> | | |
| Alterations to existing decorative scheme | | Yes | Yes |
| Examples <ul style="list-style-type: none"> Different paint colours New detailing New graphic design | Guidance <p>The Market's decorative scheme incorporates original Victorian detailing and a sympathetic colour scheme introduced in the 1990s. The scheme is considered part of the special interest of the Market. Proposals to deviate from it could cause harm and will be scrutinised accordingly.</p> | | |

6.3.4 Lighting



| Work type | LBC? | Planning? |
|---|--|-----------|
| Maintenance of existing lighting scheme | No | No |
| Examples <ul style="list-style-type: none"> Replacing a lightbulb | Guidance The Market should not be over-lit, but should continue to sparkle and enhance its special interest. Consideration should be given to the potential impact of unit interior lighting on the Market lighting within the common areas. | |
| Alterations to existing lighting scheme | Enquire | Enquire |
| Examples <ul style="list-style-type: none"> New luminaire specification New casing for luminaire | Guidance The existing swan neck cowl lights provide both feature and task lighting for the retail units whilst the traditional lanterns provide the ambient light and this hierarchy should not be challenged. Modern lighting technology can be adaptable, easily maintained and sustainable, but can be intrusive and glaring when misapplied. | |
| Installation of new lighting scheme | Yes | Yes |
| Examples <ul style="list-style-type: none"> Installation of a scheme of modern light fittings. | Guidance The Market's lighting scheme should respect its Victorian character and draw inspiration from the traditional 19 th century style of cast iron fitting currently in use. The overarching colour temperature of the Market is a golden and warm yellow/orange probably in the range of between 2500-3000k. Modern, clinical white/blue light (3000-4000k>) would potentially clash with the overarching ambient light and detract from | |

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| | <p>its traditional glow. Examples which could cause harm include new luminaires, internal unit lighting schemes and the installation of LED screen which would detract from this ambience. New lighting scheme should confine themselves to the shop unit, avoiding spill into the common areas, should not be excessive or of a strikingly different colour temperature. All new light should be diffused and should avoid visibility of naked diodes. Heritage LED fittings are available in traditional less incongruous forms and should be utilised.</p> |
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6.3.5 Works in common areas



| Work type | LBC? | Planning? |
|---|------|-----------|
| Maintenance of existing CCTV Examples <ul style="list-style-type: none"> Replacement of existing cameras and fixings on a like-for-like basis | No | No |
| Guidance Any replacement items should be no larger than the existing units and should be coloured appropriately for their location to minimise any visual impacts. | | |
| Unfixed items excluding tables and chairs Examples <ul style="list-style-type: none"> Planters Art installations | No | Enquire |
| Guidance Planning permission may be required for new unfixed items within the Market. Clutter should be minimised within the common areas. | | |
| Fixed items Examples <ul style="list-style-type: none"> CCTV cameras Artwork | Yes | Enquire |
| Guidance Depending on the proposal, new fixed items should be of discreet proportions and design and avoid conflicting with the Victorian character of the Market. | | |

Works in common areas (cont.)

| Installation of unfixed tables and chairs | | No | Yes |
|---|--|--|-----|
| <p>Examples</p> <ul style="list-style-type: none"> Seating areas outside A4 uses | | <p>Guidance</p> <p>The provision of seating areas within the Market is subject to the requirement for planning permission. There should be a coherent strategy for outdoor seating areas across the Market in order to avoid clutter and obstruction of the common parts. Those areas that already benefit from planning permission are indicated in appendix one. Please contact the Market Office and Development Division for advice.</p> | |
| Alterations to ground surface | | Yes | Yes |
| <p>Examples</p> <ul style="list-style-type: none"> Damp proofing works Replacement of cobbles with another paving material Raised carriageway | | <p>Guidance</p> <p>Though installed in the 1990s, the cobbled surface of the Market is Victorian in character and contributes to the special interest of the Market, as does the traditional form and profile of the kerb and carriageway. Alterations to this appearance should conform to this existing character.</p> | |
| Bollards | | Yes | Yes |
| <p>Examples</p> <ul style="list-style-type: none"> Alterations to or removal of existing bollards Installation of retractable bollards to control traffic flow | | <p>Guidance</p> <p>Bollards are clutter and they should not be installed unless there is a demonstrable highways requirement. For works to existing bollards, please contact the Development Division for advice.</p> | |

6.4 Unit interiors



| Work type | LBC? | Planning? |
|---|---------|-----------|
| Decoration Examples <ul style="list-style-type: none"> Repair or maintenance of existing decoration Installation of new decorative scheme | No | No |
| Guidance It is desirable for units to be fitted out to sympathise with the Market's Victorian character; however, in modernised units there is scope for a more contemporary approach. | | |
| Repair [like for like] Examples <ul style="list-style-type: none"> Replacement glazing Repainting Like for like repair of original features | No | No |
| Guidance TBC | | |
| Repair [departure from existing] Examples <ul style="list-style-type: none"> Different type of glazing Use of new materials e.g. fibreglass instead of ironmongery | Enquire | Enquire |
| Guidance Modernised interiors have more scope for the use of modern materials. Surviving original features should be repaired on a like-for-like basis. | | |

Unit interiors (cont.)

| | | |
|--|---|---------|
| Minor alterations [servicing] | Enquire | Enquire |
| Examples <ul style="list-style-type: none"> Openings for cabling | Guidance Servicing installations should avoid alterations to any surviving original features. | |

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|--|--|---------|
| Lighting | Enquire | Enquire |
| Examples <ul style="list-style-type: none"> Installation of internal lighting scheme | Guidance Internal lighting schemes, particularly if near the shopfront, can have an adverse impact on the character of the wider Market if inappropriately designed. | |

| | | |
|---|--|---------|
| Basement works | Enquire | Enquire |
| Examples <ul style="list-style-type: none"> New drainage/groundworks below slab Damp proofing Refurbishment | Guidance Any groundworks in the basements will have archaeological implications – please contact the Development Division for advice. Proposals that increase the intensity of use can have implications for climatic conditions and subsequently heating/cooling, moisture levels and movement of soluble salts, which would need to be considered. Where appropriate, public access to previously hidden areas will be encouraged. | |

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|---|---|-----|
| Basement extension | Yes | Yes |
| Examples <ul style="list-style-type: none"> Lateral or downward extension of basement units | Guidance Basement extensions will have archaeological implications and would also affect the original fabric of the Market's basement structure and foundation. Please contact the Development Division for advice. | |

| | | |
|--|---|---------|
| Alterations to original features | Yes | Enquire |
| Examples <ul style="list-style-type: none"> Relocation of cast iron stair Removal of partitions | Guidance Relocation or removal of original features will harm the special interest of the Market and will require adequate justification. | |

| | | |
|---|---|---------|
| Alterations to plan form and/or unit volume [minor] | Yes | Enquire |
| Examples <ul style="list-style-type: none"> Subdivision of units Installation of mezzanines Installation of suspended ceilings Installation of bulkheads | Guidance Except where previously altered, the existing arrangement of the units reflects the Market's Victorian origins and is part of the Market's special interest. Interventions will need to minimise the impact on the existing unit volume and allow for an understanding | |

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| | of the original proportions of the space. Mezzanines or suspended ceilings should be recessed from the shopfront. Where possible the re-exposure of original fabric will be encouraged where it can be shown it will not accelerate decay. |
|--|--|

| Alterations to plan form and/or unit volume [major] | Yes | Yes |
|---|--|-----|
| Examples <ul style="list-style-type: none"> Amalgamation of units Amalgamation of floors | Guidance Except where previously altered, the existing arrangement of the units reflects the Market's Victorian origins and is part of the Market's special interest. Amalgamation of units or floor levels, or other major spatial changes, are likely to cause harm, affect the diversity of the tenant mix and will be scrutinised accordingly. | |

| Works affecting the scheduled ancient monument in basement of No. 90 Gracechurch St | Scheduled Monument Consent |
|---|--|
| Examples <ul style="list-style-type: none"> Basement alterations Damp-proofing | Guidance Please contact the Development Division and Historic England regarding any proposals for the Scheduled Ancient Monument in the basement of No. 90 Gracechurch Street. |

Appendix one: plan of permitted tables and chairs

In production; to be added prior to adoption and publication

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Appendix two: shopfront and signage template

The uniform shopfronts of Leadenhall Market are of a consistently high quality and make a strong contribution to its character. They have a consistent original design including some open and some enclosed examples on Lime Street and Bulls Head Passage. Since the scheme of redecoration in the 1990s the City Corporation has successfully operated a policy of reinstating these shopfronts where they have been lost.



A typical shopfront in Leadenhall Market

A typical example is illustrated above. It comprises a painted timber frame (A) incorporating pilasters (B), a decorative iron stallriser (C) and cornice (D) and glazing divided by wooden mullions and transoms (E). A painted fascia board advertises the occupant of the unit in a standardised typeface (F). Level access between shopfront and street is an essential aspect of the design. Examples on Bulls Head Passage retain the recessed storm porch which has the entrance set back from the street in a traditional format. This is an essential characteristic of a number of older shops and its loss can be detrimental to the area's appearance.

The RAL numbers of the paint colours and specifications for the fascia typeface can be obtained from the Market office and/or the Development Division.



In addition to the fascia, the unit tenant can be identified by a small projecting sign with a curved corner.

For further information about the composition of the shopfronts please contact the Development Division.

TEST OF RELEVANCE: EQUALITY ANALYSIS (EA)

The screening process of using the Test of Relevance template aims to assist in determining whether a full Equality Analysis (EA) is required. The EA template and guidance plus information on the Equality Act and the Public Sector Equality Duty (PSED) can be found on Colnet at: <http://colnet/Departments/Pages/News/Equality-and-Diversity.aspx>

Introduction

The Public Sector Equality Duty (PSED) is set out in the Equality Act 2010 (s.149). This requires public authorities, in the exercise of their functions, to have ‘due regard’ to the need to:

- Eliminate discrimination, harassment and victimisation
- Advance equality of opportunity between people who share a protected characteristic and those who do not, and
- Foster good relations between people who share a protected characteristic and those who do not

The characteristics protected by the Equality Act 2010 are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership.
- Pregnancy and maternity
- Race
- Religion or belief
- Sex (gender)
- Sexual orientation

What is due regard?

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- It involves considering the aims of the duty in a way that is proportionate to the issue at hand
- Ensuring that real consideration is given to the aims and the impact of policies with rigour and with an open mind in such a way that it influences the final decision
- Due regard should be given before and during policy formation and when a decision is taken including cross cutting ones as the impact can be cumulative.

The general equality duty does not specify how public authorities should analyse the effect of their business activities on different groups of people. However, case law has established that equality analysis is an important way public authorities can demonstrate that they are meeting the requirements.

Even in cases where it is considered that there are no implications of proposed policy and decision making on the PSED it is good practice to record the reasons why and to include these in reports to committees where decisions are being taken.

It is also good practice to consider the duty in relation to current policies, services and procedures, even if there is no plan to change them.

How to demonstrate compliance

Case law has established the following principles apply to the PSED:

- **Knowledge** – the need to be aware of the requirements of the Equality Duty with a conscious approach and state of mind.
- **Sufficient Information** – must be made available to the decision maker
- **Timeliness** – the Duty must be complied with before and at the time that a particular policy is under consideration or decision is taken not after it has been taken.
- **Real consideration** – consideration must form an integral part of the decision-making process. It is not a matter of box-ticking; it must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.
- **Sufficient information** – the decision maker must consider what information he or she has and what further information may be needed in order to give proper consideration to the Equality Duty
- **No delegation** - public bodies are responsible for ensuring that any third parties which exercise functions on their behalf are capable of complying with the Equality Duty, are required to comply with it, and that they do so in practice. It is a duty that cannot be delegated.
- **Review** – the duty is continuing applying when a policy is developed and decided upon, but also when it is implemented and reviewed.

However there is no requirement to:

- Produce equality analysis or an equality impact assessment
- Indiscriminately collect diversity data where equalities issues are not significant

- Publish lengthy documents to show compliance
- Treat everyone the same. Rather, it requires public bodies to think about people's different needs and how these can be met
- Make services homogeneous or to try to remove or ignore differences between people.

The key points about demonstrating compliance with the duty are to:

- Collate sufficient evidence to determine whether changes being considered will have a potential impact on different groups
- Ensure decision makers are aware of the analysis that has been undertaken and what conclusions have been reached on the possible implications
- Keep adequate records of the full decision making process

Test of Relevance screening

The Test of Relevance screening is a short exercise that involves looking at the overall proposal and deciding if it is relevant to the PSED.

Note: If the proposal is of a significant nature and it is apparent from the outset that a full equality analysis will be required, then it is not necessary to complete the Test of Relevance screening template and the full equality analysis and be completed.

The questions in the Test of Relevance Screening Template to help decide if the proposal is equality relevant and whether a detailed equality analysis is required. The key question is whether the proposal is likely to be relevant to any of the protected characteristics.

Quite often, the answer may not be so obvious and service-user or provider information will need to be considered to make a preliminary judgment. For example, in considering licensing arrangements, the location of the premises in question and the demographics of the area could affect whether section 149 considerations come into play.

There is no one size fits all approach but the screening process is designed to help fully consider the circumstances.

What to do

In general, the following questions all feed into whether an equality analysis is required:

- How many people is the proposal likely to affect?
- How significant is its impact?
- Does it relate to an area where there are known inequalities?

At this initial screening stage, the point is to try to assess obvious negative or positive impact.

If a negative/adverse impact has been identified (actual or potential) during completion of the screening tool, a full equality analysis must be undertaken.

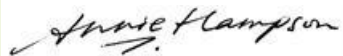
If no negative / adverse impacts arising from the proposal it is not necessary to undertake a full equality analysis.

On completion of the Test of Relevance screening, officers should:

- Ensure they have fully completed and the Director has signed off the Test of Relevance Screening Template.
- Store the screening template safely so that it can be retrieved if for example, Members request to see it, or there is a freedom of information request or there is a legal challenge.
- If the outcome of the Test of Relevance Screening identifies no or minimal impact refer to it in the Implications section of the report and include reference to it in Background Papers when reporting to Committee or other decision making process.

| 1. Proposal / Project Title: Leadenhall Market draft SPD: CACharacter Summary and Management Strategy & draft LB Management Guidelines | | | | |
|--|-------------------------------------|---|---|--|
| 2. Brief summary (include main aims, proposed outcomes, recommendations / decisions sought): The draft Leadenhall Market SPD is in two parts: <ol style="list-style-type: none"> Conservation Area Character Summary and Management Strategy - analyses the significance of the conservation area and sets out policies for its preservation and enhancement. Listed Building Management Guidelines set out the significance of the Market as a listed building and contains advice and guidance on proposals for alteration. | | | | |
| 3. Considering the equality aims (eliminate unlawful discrimination; advance equality of opportunity; foster good relations), indicate for each protected group whether there may be a positive impact, negative (adverse) impact or no impact arising from the proposal: | | | | |
| Protected Characteristic (Equality Group) <input checked="" type="checkbox"/> | Positive Impact | Negative Impact | No Impact | Briefly explain your answer. Consider evidence, data and any consultation. |
| Age | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | The proposed documents have no relevant content |
| Disability | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Where appropriate, the documents encourage enhancements to access |
| Gender Reassignment | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | The proposed documents have no relevant content |
| Marriage and Civil Partnership | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | The proposed documents have no relevant content |
| Pregnancy and Maternity | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | The proposed documents have no relevant content |
| Race | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | The proposed documents have no relevant content |
| Religion or Belief | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | The proposed documents have no relevant content |
| Sex (i.e gender) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | The proposed documents have no relevant content |
| Sexual Orientation | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | The proposed documents have no relevant content |
| 4. There are no negative/adverse impact(s) Please briefly explain and provide evidence to support this decision: | | The documents touch on equalities issues only where access to the buildings/streetscape/public realm is concerned. They encourage enhancements to access where appropriate. | | |
| 5. Are there positive impacts of the proposal on any equality groups? Please briefly explain how these are in line with the equality aims: | | Please see above. | | |
| 6. As a result of this screening, is a full EA necessary? (Please check appropriate box using <input type="checkbox"/>) | Yes | No | Briefly explain your answer: The proposed documents are neutral in equalities terms aside from the positive aspect referred to above. | |
| | <input type="checkbox"/> | <input checked="" type="checkbox"/> | | |
| 7. Name of Lead Officer: Tom Nancollas | | Job title: Planning Officer (Historic Environment) | | Date of completion: 07 February 2017 |

Signed off by Department
Director :



Name: Annie Hampson

Date: 07 March 2017

Screening Statement

On the determination of the need for a Strategic Environmental Assessment (SEA) in accordance with the *Environmental Assessment of Plans and Programmes Regulations 2004* and *European Directive 2001/42/EC* of the:

Draft Leadenhall Market Conservation Area
Character Summary and Management Strategy SPD and
Listed Building Management Guidelines

24/02/17



Sustainability Appraisal/Strategic Environmental Assessment Screening for:
Leadenhall Market Conservation Area Character Summary and Management Strategy and Listed Building Management Guidelines SPD

1. Purpose of Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA)
 - 1.1. The SEA Directive identifies the purpose of SEA as " to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development" (Directive 2001/EC/42)
 - 1.2. Sustainability Appraisal (SA) is the process by which this Directive is applied to Local Plan documents. SA aims to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of plans.
 - 1.3. The City's Local Plan is subject to Sustainability Appraisal. However the 2008 Planning Act allows for Supplementary Planning Documents to be prepared without a full SA as long as they are screened to establish whether they will result in significant effects as defined by the SEA Directive.
 - 1.4. The SEA Directive exempts plans and programmes from assessment *"When they determine the use of small areas at local level or are minor modifications to the above plans or programmes..."* and states that *"they should be assessed only where Member States determine that they are likely to have significant effects on the environment."*
 - 1.5. The criteria for determining the significance of effects are taken from schedule 1 (9 (2) (a) and 10 (4) (a) of the Environmental Assessment of Plans and Programmes Regulations 2004 and are defined in appendix 1. These can be split into the criteria related to (i) the scope and influence of the document (ii) the type of impact and area likely to be affected
2. Purpose of the Leadenhall Market SPD
 - 2.1. The key objective of part 1 of this strategy is to provide an understanding of the significance of the conservation area by identifying and analysing its principal characteristics. Part 2 provides guidance as to the types of changes that may or may not require Listed Building Consent.
 - 2.2. This strategy is a Supplementary Planning Document which provides guidance regarding the City's Local Plan policies for the historic environment, heritage assets conservation areas and listed buildings.
 - 2.3. The London Plan and City of London Local Plan have been evaluated through the SA and Habitats Regulation Assessment (HRA) screening process, which incorporates the requirements of the SEA Directive, and have been found to be sound. This document provides details of how the City will apply the London Plan and Local Plan policies associated with the historic environment.
3. SEA Screening Procedure

- 3.1. The Responsible Authority (the City of London Corporation) must determine whether the plan or program under assessment is likely to have significant environmental effects. This assessment must be made taking account of the criteria set out in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004 (see appendix 1), and in consultation with the Environment Agency, Historic England and Natural England.
- 3.2. Where the Responsible Authority determines that the plan or programme is unlikely to have significant environmental effects, and therefore does not need to be subject to full Strategic Environmental Assessment, it must prepare a statement showing the reasons for this determination.
- 3.3. Appendix 1 shows the results of this screening process for the Leadenhall Market SPD.
4. Screening and Consultation Outcome
 - 4.1. This screening demonstrates that the Leadenhall Market SPD is unlikely to have significant effects on the environment. Therefore it will not be necessary to carry out a full SA/SEA on this document.
 - 4.2. Each of the statutory consultees has been consulted on this initial screening statement and their responses are summarised below:

| Consultee | Response |
|--------------------|-------------------------------|
| Environment Agency | Insert consultation responses |
| Natural England | |
| English Heritage | |

5. Determination: The Leadenhall Market Conservation Area Character Summary and Management Strategy SPD is unlikely to have significant effects on the wider environment since it provides guidance on the implementation of Local Plan policies which will have largely positive impacts. Therefore it will not be necessary to carry out a Strategic Environmental Assessment on this SPD

Appendix 1 Criteria for determining the likely significance of effects on the environment

1. Characteristics of the Leadenhall Market SPD having particular regard to:

| SEA Directive Criteria Schedule 1 Environmental Assessment of Plans and Programmes Regulations 2004 | Summary of significant effects |
|---|---|
| (a) The degree to which the SPD sets out a framework for projects and other activities, either with regard to the location, nature, size or operating conditions or by allocating resources | The Leadenhall Market SPD will provide guidance to supplement the Local Plan which is the overarching framework for development in the City. It will not allocate resources but will provide additional guidance to assist in development management in the Leadenhall Market conservation area, making sure that the historic significance of the area and its listed buildings are conserved. |
| (b) The degree to which the SPD influences other plans and programmes including those in a hierarchy | This SPD should influence the implementation of individual schemes within the Leadenhall Market Conservation Area. However this will be in line with policy in the Local Plan which was subject to full sustainability appraisal |
| (c) The relevance of the SPD for the integration of environmental considerations in particular with a view to promoting sustainable development | The Leadenhall Market Conservation Area SPD is in line with Policy CS 12 of the Local Plan and the Management Strategy provides additional guidance on the issues of environmental enhancement, sustainability and climate change, flood risk, transport, open spaces, trees, soft landscaping and archaeology, which support the Local Plan approach to these issues. The Planning Inspector's report of the Local Plan examination stated that the Local Plan has taken account of the sustainability appraisal which was adequate. |
| (d) Environmental problems relevant to the SPD | The Leadenhall Market Conservation Area SPD Management Strategy and Listed Building Management Guidelines provide guidance on the implementation of the Local Plan's policies regarding sustainability and climate change identifying particular issues which affect the Leadenhall Market area, including open spaces and trees, SuDS and rainwater attenuation, air quality and transport impacts. |
| (e) The relevance of the SPD for the implementation of Community legislation on the environment (for example plans and programmes related to waste management or water protection) | The SPD will have a positive impact in line with Community legislation regarding climate change, energy, air quality and flood risk and will therefore contribute to local implementation of this legislation. |

2 Characteristics of the effects and area likely to be affected having particular regard to:

| SEA Directive criteria Schedule 1 Environmental Assessment of Plans and Programmes Regulations 2004 | Summary of significant effects |
|---|---|
| (a)The probability, duration, frequency and reversibility of the effects | The aim of the Leadenhall Market Conservation Area SPD is to identify the historically important features of the area with a view to ensuring their conservation and enhancement in line with Policy CS12. Therefore any sustainability effects of this SPD are likely to be positive, in line with the findings of the SA of Policy CS12 |
| (b)The cumulative nature of the effects of the SPD | The impact of this SPD is likely to be positive, affecting a small area at local level, therefore it is anticipated that any cumulative impacts will tend to be positive |
| (c)The trans boundary nature of the effects of the SPD | This SPD will cover a relatively small area at local level therefore it is unlikely to have any trans boundary effects |
| (d)The risks to human health or the environment (e.g. due to accident) | There are no perceived risks to human health from this SPD |
| (e)The magnitude and spatial extent of the effects (geographic area and size of the population likely to be affected) by the SPD | This SPD covers a small area and will only have local impacts. The area has a low residential population but a significant number of people either work in the area or pass through it daily. The conservation of the historic environment in this area will not adversely affect these populations. |
| (f)The value and vulnerability of the area likely to be affected by the SPD due to: Special natural characteristics or cultural heritage Exceeded environmental quality standards or limit values Intensive land use | This SPD applies to the Leadenhall Market conservation area, the historic and cultural characteristics of which it aims to identify and enhance. |
| (g)The effects of the SPD on areas or landscapes which have recognised national Community or international protected status | No national, Community or international protected sites will be affected by this SPD since it covers a small area of the City which does not contain any nationally designated sites. This SPD aims to conserve and enhance the historic landscape including protection of historic views. |

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|---|---------------------|
| Committee: | Date: |
| Planning and Transportation | 21 March 2017 |
| Port Health and Environmental Services | 9 May 2017 |
| Subject: | Public |
| Construction Site Noise Monitoring | |
| Ward: All | For Decision |
| Report of: | |
| Director of Markets and Consumer Protection and the Chief Planning Officer | |

Summary

In December 2016 in a Question to Court of Common Council, an Alderman enquired whether developers could be asked to pay for on-site specialist staff to help monitor construction impacts and control adverse impacts. The Chairman of Planning and Transportation undertook that this would be investigated. This report recommends next steps following that investigation.

In January 2017 a new Noise Strategy 2016-2026 was approved together with a Draft Code of Practice for Deconstruction and Construction Sites ("Draft Code"), which was approved for consultation.

Further to the investigation in response to the noise monitoring question, it is recommended that the Draft Code approved for consultation be modified to include provision for monitoring contributions to be payable by developers to fund more proactive monitoring of construction impacts from development sites.

This should improve noise and other environmental impacts from development for adjoining occupiers but will increase development costs in the City.

Recommendation

Subject to comments received from your Committees:

The Planning and Transportation Committee are requested to:

1. Agree the necessary amendments to the Draft Code to make provision for monitoring payments to be payable by developers to fund more proactive monitoring of construction impacts on development sites and the revised Draft Code be issued for consultation amongst relevant stakeholders

2. Following consultation, instruct officers to report back with recommendations for the Draft Code to be adopted, and to make any necessary changes to conditions.

Main Report

Introduction

1. In December 2016 in a Question to Court of Common Council, an Alderman enquired whether developers could be asked to pay for on-site specialist staff to help monitor noise, dust and vibration from construction sites and help mitigate and control adverse construction impacts. The Chairman of Planning and Transportation undertook that this would be investigated. The Question and Answer is Appendix 1 of this report.
2. In January 2017 a new Noise Strategy 2016-2026 was approved together with a Draft Code of Practice for Deconstruction and Construction Sites ("Draft Code"), which was approved for consultation. However, in the course of investigation regarding enhanced construction site monitoring arrangements, it became apparent that any changes to current arrangements should be incorporated by way of further draft modifications to the Code issued for consultation. The consultation on these documents were briefly deferred pending consideration of this report.

Investigation

3. As noted in the recently approved Noise Strategy 2016-2026, the high level of intensive development in the City can have significant environmental impacts on occupiers of nearby noise sensitive premises. At present, appropriate site-specific arrangements are secured through planning conditions which require submission of and compliance with a Code of Practice for Deconstruction and Construction Sites. This is a bespoke document prepared for most development sites, based on the approved Code prepared by the Pollution Control team.
4. There is generally a good level of compliance, but the density of development, high level of activity, and conflicting needs of different communities occupying an extremely limited area mean that the impacts of non-compliance can be particularly severe. Therefore more proactive monitoring would contribute to better long term noise management and help mitigate adverse construction impacts more effectively.
5. It is not considered that full time attendance at development sites by City of London officers or agents/consultants is proportionate or appropriate, due both to good levels of compliance, and to the importance of ensuring the officers undertaking the monitoring are centrally based and able to work as part of a City team, and are not perceived as "subsumed" within the developer's site team.

6. The estimated staffing requirement to provide such monitoring is 3 additional staff, and the resource and costs are set out in Appendices 2 and 3 “Analysis of Site Sizes and Staffing Requirements”. As can be seen, if sought from developers, such costs would break down as follows:
 - Large Sites: £53,820 for the 1st year; £46,460 for each subsequent year
 - Medium Sites: £30,935 for the 1st year; £25,760 for each subsequent year
 - Small Sites: £5,060 in total.
7. Provisions for the payment of contributions to reflect the above sums could be incorporated into the Code of Practice for the relevant development, and secured through planning conditions.
8. There is a risk that the introduction of these additional charges for provisions could be regarded as running counter to the “light touch” Better Regulation approach advocated by central government. However, if the measures were introduced, officers would continue to fulfil their role supportively, with the aim of managing environmental issues for the benefit both of neighbouring occupiers, and for the smooth and neighbourly completion of developments. It will in addition impose a small costs increase on deconstruction and construction in the City including a more rigorous reporting regime which may be offset by the reduction in controls that need to be imposed by the City in responding to local nuisance.

Proposals

9. In order to justify planning requirements, they should be soundly based on relevant policies and procedures which have been adopted after appropriate stakeholder consultation. It is recommended that the proposed new provisions be incorporated in the Draft Code to be issued for consultation. This will enable the views of stakeholders to be obtained and considered. Once this has taken place the outcome of the consultation and recommendations for the final form of document to be adopted will be reported back to your Committees, together with any recommended changes to establishment which may be required to implement enhanced construction site monitoring.
10. These requirements would be in line with Policy DM15.7(3): Noise and Light Pollution and would be further referenced in the current Local Plan Review.
11. In the meantime, the Draft Code will provide interim guidance. The Draft Code will inform discussions with developers in relation to new

developments in the City and will be used to seek agreement in accordance with the Draft Code until the Draft Code has been approved.

Legal Implications

12. Planning Policy Guidance advises that no payment of money can be positively required by condition when granting planning permission. However, it may be possible to use a negatively worded condition (a “Grampian” condition) to prohibit development until a specified action has been taken.
13. Planning conditions relating to charges may only be imposed where there is a statutory basis for charging. The statutory basis for charges for the noise monitoring service on construction sites is conferred where the party making the payment has agreed to the provision of the service (S.3(2) Localism Act 2011).
14. Therefore a Grampian condition prohibiting commencement of development until the Deconstruction and Construction Plan for the Site has been approved, and any agreed pre-commencement measures under the Plan have been taken (including payment of an agreed monitoring contribution) may be lawfully attached to a planning permission.

Conclusion

15. The introduction of the modified Draft Code, approved for consultation, will include provision for contributions to be payable by developers to fund more pro-active monitoring of construction impacts from development sites. This will be done through the imposition of planning conditions requiring adherence to the Code of Practice. This should reduce noise and other environmental impacts from development for adjoining occupiers but will increase slightly direct development costs in the City which may be offset by the reduction in controls that need to be imposed by the City in responding to local nuisance

Appendices

Appendix 1: Question and Answer to Court of Common Council December 2016

Appendix 2: Outline for charging for environmental protection relating to construction and deconstruction

Appendix 3- Analysis of Site Sizes and Staffing Requirements

ITEM 14(iii)

Question to the Chairman of the Planning & Transportation Committee from Alderman Anstee – Court of Common Council, 8 December 2016

“The City is experiencing a very substantial redevelopment programme resulting in a large number of construction sites. Whilst this is a very welcome indication of developer investment and occupier commitment to the City and thereby its ability to meet growing demand for floor space it can lead to construction noise and disturbance which is detrimental to other City occupiers and residents in particular. Would it be possible for the City to require Developers to secure a levy or provide an undertaking that they will fund on-site specialist staff, to liaise with the pollution control team and provide an immediate contact for the local community, able to prevent and stop instances of unacceptable behaviour occurring?”

My Lord Mayor, my thanks to the Alderman for giving me notice of his question. The redevelopment of the City of course attracts complaints about noise, and in the last financial year there were 469 concerning construction or demolition activity. This is despite considerable discussion to allow 1151 variations to agreed hours of work, as well as the examination of some 1726 licensing, planning and construction works applications to try and minimise potential noise disturbance. A 24 hour / 364 days service is provided to investigate complaints and the target response time is one hour, but we are usually able to respond to complaints within 30 minutes.

The City produces a Code of Practice for Construction and Deconstruction which is currently being reviewed for its 8th edition. This sets out clearly the expectations and standards for developers and their contractors to minimise the impact of noisy works on business and residential neighbours. Overall, this works well, and the City Corporation’s Pollution Control Team endeavours to secure a balance between enabling developments to occur and preventing disturbance to other properties in the vicinity.

However, the way sites are operated can vary with changes in management, time and financial pressures, and this can lead to complaints about inappropriate working practices. Whilst sites are monitored closely, we very much support the principle that those creating noise pay, especially where there are resource limitations due to budget cuts, so the Alderman’s proposal is both timely and welcome.

Public infrastructure projects in the City, such as Thames Tideway Tunnel and Bank Station, have previously funded posts in the Pollution Control team to enable their schemes to focus on better outcomes, with fewer delays. The Alderman’s proposal could be helpful to developers, as well businesses and residents which could be disturbed by noise from construction sites. At a time when there are financial pressures, independent, fully accountable staff could provide useful support to the Pollution Control team.

An investigation will be undertaken to determine how this could be best delivered in relation to the scale of project, either through the planning process through the imposition of conditions linked to a code of practice or undertakings set out in a S106 agreement or linked to the Considerate Contractors Scheme.

I am confident that we can find a way forward which is effective for sites, as well as protecting the City's environment and minimising disturbance to residents and businesses for the duration of demolition and construction until practical completion.

My Lord Mayor.

Outline Proposal for charging for environmental protection services related to construction and de-construction activities.

February 2017

Introduction.

In answer to a Question by Alderman Anstee to the Chairman of the Planning and Transportation Committee, at Court of Common Council on 8 December 2016, the Chairman undertook that the City officers would investigate whether and how funding for greater on-site regulation of noise emanating from development sites might be achieved. The full question and answer is included in Appendix 1.

The current policy in dealing with developers is to become involved at an early stage of the planning process to give advice on environmental requirements, especially about noise control. Other than in known 'hot spots', monitoring of sites is currently done with a 'light touch' to avoid complaints by the industry of heavy-handed over-regulation and formal enforcement action is normally only taken after a number of substantiated complaints have been made against a contractor. There are upwards of 475 complaints related to construction and demolition noise per year across the City.

Whilst most developers within the City abide by the guidelines set out in the City's Noise Strategy and the Code of Construction and Deconstruction, especially around 'quiet hours', there is evidence that some residential areas of the City, especially the Barbican area where the residents consider that more could be done to minimise the degree of noise pollution. It has been proposed by the Alderman that the City should take an even more strongly pro-active stance with developers and have more active monitoring of individual sites.

Aim.

This paper sets out an outline proposal intended to instigate discussions on the services and activities that would require funding and the feasibility and mechanisms that may be available.

Assumptions.

The level of service has been devised as an estimate, benchmarked with current practice in neighbouring local authorities. This could be adjusted if more or less is considered appropriate.

The costs set out are based on worst case estimates of time spent on services. The charges show hourly rates for different elements. The actual charge would be based on costs incurred. Where sums paid on account are not spent they would be repaid to applicants.

Development Pipeline

An analysis of schemes based on the commencement date for construction works has been carried out between 2011 and 2022 as this are the criteria that trigger commencement of the relevant S106 payments.

Commencements in the last 5 years have been at a high level. This is unlikely to be sustained in the near future. Thus when comparing data relating to Commencements in the period 2011/12 to 2015/16 (118 large and medium size office schemes) with that of schemes projected to commence 2017/18 to 2021/22 (28 large and medium size schemes) there is a large reduction in scale.

The data set for both housing and non-housing schemes are included in appendix 2.

Workforce Requirement

Based on the projected Development Pipeline, Appendix 3 gives an analysis of the estimated staff workload/cost for the three different scales of development. In a nutshell these are: *(Appendix 3 has been removed from this document and is Appendix 3 to the Noise report)*

- Category 1 – Major development: £54k for the first year and £47k for each subsequent year.
- Category 2 – Medium scale development: £31k for the first year and £26k for each subsequent year.
- Category 3 – Minor development. On average, £5k per year.

To undertake the level of proactive work requested it is estimated it would require an additional three Environmental Health Officers.

Potential mechanisms to achieve the required level of funding

There are three current mechanisms for charging via the planning process and one further future potential.

a. Section 106 agreement. Planning Obligations are used to mitigate the impact of unacceptable development in order to make it acceptable in planning terms. The National Planning Policy Framework (NPPF) paragraph 204 sets out three statutory tests for the use of planning obligations.

“A planning Obligation may only constitute a reason for granting planning permission for the development if the obligation is –
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”

b. Community Infrastructure Levy (CIL). The City has a schedule of charges contained with the CIL charging schedule 2014 in attached link. Office developments currently have a CIL rate of £75 per square metre.

<https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-policy/Documents/city-of-london-cil-charging-schedule-2014.pdf>

Planning condition. The City currently controls the environmental impact of development by the use of conditions i.e. construction logistics plans, noise and dust conditions. Previous advice has been that where matters can be dealt with by condition they should be rather than in the section 106 agreement.

The proposal would be to impose a condition on the planning application to restrict development until the developer has signed up to the Code of Construction Practice which could include an annex detailing fees which would then be a legally binding agreement.

c. Planning Performance Agreements. A paper was presented to the Planning and Transportation Committee on the 24th May 2016 introducing the concept of Planning Performance Agreements (PPA).

PPAs could be a means of enabling development management to assist in offsetting its costs in providing its non-statutory functions whilst ensuring that the standard of service is maintained and enhanced at less cost to the Corporation and in line with the cost cutting review. PPAs are a collaborative process between the Local Planning Authority (LPA) and the Developer.

Further detail here -

<http://democracy.cityoflondon.gov.uk/documents/s64731/Introduction%20of%20Planning%20Performance%20Agreements%20v2.pdf>

From an analysis of options to fund the additional staff subsequent to discussion with Department of Built Environment Development Control, Comptrollers and City Solicitor's and the City Planning Advisory Team., it appears that the most effective way of achieving an additional revenue stream to provide funding the additional would be by using planning conditions.

Risks

There are risks associated with this model that will require further investigation.

- The approach is in some conflict with the current Better Regulation Agenda and the current light touch approach that the Pollution Control Team utilises to mitigate the effects of the environmental impacts of construction and demolition and may be resisted by developers and contractors. This risk would be mitigated by the supportive role the officers would take to enable construction professionals to plan, cost and manage the environmental issues

that frequently arise in the industry and potentially enable extended hours working.

- The income is directly linked to the number of developments being permitted and then that permission being implemented. As events such as Brexit negotiations unfold these may have a large impact on the rate of development and developers' appetite for additional charges. The workforce employed to undertake these duties would be employed on fixed term contracts to mitigate any risks associated with needing a flexible workforce to meet the expansion and potential contraction in the construction sector.
- It should be acknowledged that there is an existing structure of personnel on development sites who have responsibility for compliance and liaison with the City and other stakeholders. This usually includes a site manager, environmental manager and a contracted specialist environmental consultant responsible for the collection and analysis of data. The role of this regulatory service must be complementary and distinct from these to enable impartiality and robust enforcement when required.

Recommendation

From an analysis of options to fund additional staff and subsequent to discussions between Markets and Consumer Protection, Department of Built Environment Development Control, Comptrollers and City Solicitor's and the City Planning Advisory Team, it appears that the most effective way of achieving an additional revenue stream would be using planning conditions. It is therefore recommended that

1. The consultation on the draft Code of Practice for Deconstruction and Construction (8th edition) include the proposal to levy these charges
2. The consultation result and the suggested changes to the Code of Practice are brought back to the relevant Committees (Port Health and Environmental Services and Planning and Transportation) for agreement incorporating Members views.

Conclusions

There is pressure from elected Members for the Environmental Health (Pollution Control) department to be more pro-active in monitoring and controlling Noise Pollution from development sites.

Analysis of the projected development pipeline and the amount of additional work required for more pro-active noise management with development sites indicates that an additional 3 Environmental Health Officers would be required.

A more stringent enforcement regime could be considered by the industry to be excessive and could conflict with the Government's Better Regulation policy of reducing regulation and enforcement. It would require a positive change of current Policy by elected Members.

**Question to the Chairman of the Planning & Transportation Committee from
Alderman Anstee – Court of Common Council, 8 December 2016**

“The City is experiencing a very substantial redevelopment programme resulting in a large number of construction sites. Whilst this is a very welcome indication of developer investment and occupier commitment to the City and thereby its ability to meet growing demand for floor space it can lead to construction noise and disturbance which is detrimental to other City occupiers and residents in particular. Would it be possible for the City to require Developers to secure a levy or provide an undertaking that they will fund on-site specialist staff, to liaise with the pollution control team and provide an immediate contact for the local community, able to prevent and stop instances of unacceptable behaviour occurring?”

My Lord Mayor, my thanks to the Alderman for giving me notice of his question.

The redevelopment of the City of course attracts complaints about noise, and in the last financial year there were 469 concerning construction or demolition activity. This is despite considerable discussion to allow 1151 variations to agreed hours of work, as well as the examination of some 1726 licensing, planning and construction works applications to try and minimise potential noise disturbance. A 24 hour / 364 days service is provided to investigate complaints and the target response time is one hour, but we are usually able to respond to complaints within 30 minutes.

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However, the way sites are operated can vary with changes in management, time and financial pressures, and this can lead to complaints about inappropriate working practices. Whilst sites are monitored closely, we very much support the principle that those creating noise pay, especially where there are resource limitations due to budget cuts, so the Alderman's proposal is both timely and welcome.

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An investigation will be undertaken to determine how this could be best delivered in relation to the scale of project, either through the planning process through the imposition of conditions linked to a code of practice or undertakings set out in a S106 agreement or linked to the Considerate Contractors Scheme.

I am confident that we can find a way forward which is effective for sites, as well as protecting the City's environment and minimising disturbance to residents and businesses for the duration of demolition and construction until practical completion.

My Lord Mayor.

APPENDIX 2

Schemes based on the date of the commencement of construction works

| <u>Development</u> | <u>Size of Scheme</u> | <u>Commenced period 2011/12/ to 2015/16</u> | | <u>Projected to Commence 2017/18 to 2021/22</u> | |
|---|-----------------------|---|--------------------------|---|--------------------------|
| <u>Housing Development (units)</u> | | <u>Number of Units</u> | <u>Number of Schemes</u> | <u>Number of Units</u> | <u>Number of Schemes</u> |
| Large Scale Major | >= 200 | 226 | 1 | 506 | 1 |
| Medium Scale Major | >= 10 and <200 | 887 | 15 | 140 | 2 |
| Minor | <10 | 264 | 57 | 31 | 9 |
| Total | | 1,377 | 73 | 677 | 12 |
| For detail of schemes See Tab | | Housing Commenced | | Housing Proposed | |
| <u>For Non-Housing Uses (Floor space)</u> | | <u>Floor space</u> | <u>Number of Schemes</u> | <u>Floor space</u> | <u>Number of Schemes</u> |
| Large Scale Major | >=10,000 | 1,515,716 | 42 | 660,303 | 16 |
| Medium Scale Major | >= 1,000 and < 10,000 | 288,949 | 76 | 52,625 | 11 |
| Minor | <1,000 | 71,516 | 313 | 881 | 1 |
| Total | | 1,876,181 | 431 | 713,809 | 28 |
| For detail of schemes See Tab | | Non Housing Commenced | | Non Housing Proposed | |

Note of caution: for Minor schemes it is difficult to predict future as they tend to developed immediately on permission. Large scale projections fine, for Medium > 25,000 floor space fine but schemes below 25,000 tend to be quickly developed.

Floor space in Gross Internal Area (GIA) Square Metres

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APPENDIX 2

ANALYSIS OF SITE SIZES AND STAFFING REQUIREMENTS

Size of the development

Large scale Major Developments

- Residential - 200 or more units
- Industrial, commercial or retail floor space -10,000 square metres.

Medium Scale Major Developments

- Residential between 10 and 199 (inclusive) units.
- For all other uses – floor space between 1,000 square metres and 9,999 square metres or where the site area is between 0.5 hectare and less than 2 hectares.

Minor Developments

- Residential - Between 1 and 9 (inclusive) units.
- For all other uses - floor space of less than 1,000 square metres or where the site area is less than 1 hectare.

| Category of Site | Services required | Costs |
|--|--|---|
| | | Based on hourly rates (£115 per hour). |
| Category 1 Site (site example: construction and or deconstruction sites) | Advice to applicants relating to environmental requirements e.g. full scheme of protective works including noise and dust mitigation measures. | 10 meetings and follow up correspondence. Average £5750 for first year site set up only or as phases of development progress e.g. demolition and ground works to construction. |
| | Review of draft scheme of protective works. | 14 hours Average £1610 for first year site set up only or as phases of development progress e.g. demolition and ground works to construction. |
| | Site visits to assess compliance with agreed requirements. | Twice a week over the duration of the developments. £230 per visit. Average £23,920 / year. |

| | | |
|--|--|--|
| | Complaints investigation and follow up. | Approximately 80 hours per annum. Average £9200 |
| | Attendance at Community Liaison events to include initial consultation and on-going events | 4 per annum Average £1380 / annum |
| | Review and approval of Site Hours Variation Requests. | Approximately 1 hour per week. Average £5980 / year. |
| | Review of noise, dust and complaint monitoring data. | Approximately 1 hour per week. Average £5980 / year. |
| | Cost estimate for Category 1 site: | £53,820 for first year of project. £46,460 for each year thereafter. |
| Category of Site | Services required | Costs Based on hourly rates (£115 per hour). |
| Category 2 Site (site example: retainment of façade with internal works) | Advice to applicants relating to environmental requirements e.g. full scheme of protective works including noise and dust mitigation measures. | 7 meetings and follow up correspondence. Average £4025 for first year site set up only or as phases of development progress e.g. demolition and ground works to construction. |
| | Review of draft scheme of protective works. | 10 hours Average £1150 for first year site set up only or as phases of development progress e.g. demolition and ground works to construction. |

| | | |
|--|--|---|
| | Site visits to assess compliance with agreed requirements. | Once a week over the duration of the developments. £230 per visit. Average £11,960 / year. |
| | Complaints investigation and follow up | Approximately 60 hours per annum. Average £6900 |
| | Attendance at Community Liaison events to include initial consultation and on-going events | 4 per annum Average £1380 / annum |
| | Review and approval of Site Hours Variation Requests. | Approximately 2 hours per month. Average £2760 / year. |
| | Review of noise, dust and complaint monitoring data. | Approximately 2 hours per month. Average £2760 / year. |
| | Cost estimate for Category 2 site: | £30,935 for first year of project. £25,760 for each year thereafter. |
| Category 3 Site (site example: involving a refurbishment only) | Complaints investigation and follow up. | Approximately 20 hours per annum. Average £2300 |
| | Review and approval of Site Hours Variation Requests. | Approximately 2 hours per month. Average £2760 / year. |
| | Cost estimate for Category 3 site: | £5,060 |

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| Committee(s) | Dated: |
| Planning and Transportation Committee | 21/03/2017 |
| Subject: 15 Trinity Square Unauthorised Short Term Letting- Enforcement Report | Public |
| Report Of: Chief Planning Officer and Development Director | For Information |
| Report author: Sue Bacon | |

Summary

Further to Committee authorising enforcement action, in respect of the unauthorised use of flats 6, 9 and 15, 15 Trinity Square as short term lets, interested parties were advised of the proposed Enforcement Notices in accordance with the draft Enforcement Plan. They have advised that the unauthorised uses have ceased and will not be recommenced. As the breaches have been remedied (and assurances given), it would not be expedient or in accordance with the draft Enforcement Plan to serve Enforcement Notices. The position will be monitored and Enforcement Notices served if required.

Recommendation(s)

Members are asked to note the contents of this report.

Main Report

Background

1. On the 13 December 2016, it was reported that it appeared that there had been a breach of planning control involving the unauthorised use of flats 6, 9 and 15, 15 Trinity Square as short term lets.
2. Having regard to the provisions of the Development Plan and the material considerations, Members considered it expedient to take enforcement action under section 172 of the Town and Country Planning Act 1990 to remedy the breach of planning control and Members authorised Officers to:
 - 1) issue Enforcement Notices in respect of flats 6, 9 and 15, 15 Trinity Square to secure the cessation of the unauthorised short term let use; and
 - 2) instruct the Comptroller and City Solicitor to serve copies on the owners and occupiers and any other persons having an interest in the land materially affected by the Notice.

Interested Parties Response

3. Paragraph 3.16 of the draft Enforcement Plan SPD states that 'where the service of an Enforcement or other Notice has been authorised those with an interest in the land will be advised of the decision. Prior to the service of the Notice an opportunity will be given to remedy the breach within a reasonable period. Normally only one letter of notification will be sent prior to action being taken.....'
4. In accordance with paragraph 3.16 interested parties were notified of the decision and this prompted the following responses:

Flats 6 and 15, 15 Trinity Lane

5. The leaseholder advised that it is his intention to proceed to the sale of one of the flats and have a regular long term let for the second flat. He advised that it may take a while to make the switch and that he assumed that he would not be in breach of planning if the short term letting during 2017 did not exceed 90 nights per flat starting from either 1 January 2017 or 22 January 2017.

Flats 9, 15 Trinity Lane

6. The leaseholders confirmed that they are now in compliance with the planning regulations as from 1 January 2017 and will continue to act in accordance with the City of London Corporation's advice.
7. The Greater London Council (General Powers) Act 1973 (as amended) permits short term letting subject to conditions, including a condition limiting use as temporary sleeping accommodation to a maximum of 90 nights in any one calendar year. Therefore should interested parties choose to let their premises as short term lets for 90 nights during 2017 this would not constitute a breach of planning subject to compliance with the relevant terms and conditions.
8. As the breaches have been remedied (and assurances given), it is not considered that it would be expedient, or in accordance with the draft Enforcement Plan to enforce. The leaseholders of the 3 flats and the

complainants, (i.e. those who are contactable), were so advised and that the matter would be reported to the Planning and Transportation Committee for information.

9. The leaseholders have been asked to confirm if and when they exercise their right to use the premises for 90 nights of short term lets. In the meantime a number of checks have been carried out including searching the web which has not been conclusive and cold calls which have resulted in no responses. It is anticipated that should there be any long term short term letting complainants will notify the Corporation.
10. Since the matter was reported to your committee one operator Airbnb's systems automatically limit entire home listings in Greater London to 90 nights a year unless the hosts confirm they have planning permission. Guidance is provided by Airbnb (see www.airbnb.co.uk/help/article/1379/responsible-hosting-in-the-united-kingdom).
11. The City's website has been updated to provide guidance and information about the 90 night limit, with the aim of aiding compliance. In order to monitor the situation spot checks will be carried out of relevant websites and occasional visits made.

Background Papers

Enforcement Report - 15 Trinity Square Unauthorised Short Term Letting
Planning and Transportation Committee dated 13/12/2016

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| | |
|---|------------------------|
| Committee: | Date: |
| Planning & Transportation | 21/03/2017 |
| Subject: Preparation of Planning Technical Guidelines for Development in the City | Public |
| Report of: Chief Planning Officer | For Information |
| <p style="text-align: center;">Summary</p> <p>It is necessary for the City of London Corporation as local planning authority to take into account environmental impacts arising from major schemes. It is proposed that the City Corporation introduces Planning Technical Guidelines for developers so as to clarify what is required of them when instructing third party experts thus simplifying the planning process and ensure consistency between projects.</p> | |
| <p>Recommendation</p> <p>Members are asked to note this report</p> | |

Main Report

Current position

1. When major developments are under consideration in the City of London it is necessary for the City of London Corporation, as Local Planning Authority, to take into account a considerable number of environmental impacts. These often require Applicants to appoint specialists early on in the development process to inform their schemes and for us as Local Planning Authority (LPA) to appoint independent specialists to assess the veracity of the submitted documents to ensure that the public interest is safeguarded.

Proposals

2. In order to ensure that this process is as straightforward as possible and that there is a consistency of approach across projects and so that Applicants are clearly informed as to what is required it is proposed to use Planning Technical Guidelines in relation to a number of such matters.
3. In some of these areas there are a limited number of specialists who regularly contribute to projects in the City and the adoption of these proposed Guidelines would soon ensure an 'industry standard' approach that would assist developers and ourselves.

4. The proposed planning technical guidelines will operate within the policy context set by the City Local Plan 2015, particularly Core Strategic Policy CS10:Design and policy DM10.1: New development.
5. These Planning Technical Guidelines would not have the status of Supplementary Planning Guidance but would be available on the City of London website and would be drawn to the attention of Applicants at the pre-application stage.
6. Subject to you approving them, they will be placed as draft documents on the website.
7. Consultation on the Guidelines will be undertaken with individuals and organisations on the Department's consultee database for a period of 4 weeks, in accordance with the requirements of the City Corporation's Statement of Community Involvement.
8. If no comments are received they will become the City's Planning Technical Guidelines and if any significant comments are received I will report back to your Committee.
9. The Planning Technical Guidelines in preparation for consideration by the Planning & Transportation Committee 2 May 2017 are:
 - a) Solar Irradiance Planning Guidelines
 - b) Solar Glare Planning Guidelines
 - c) Sunlight in the Public Realm Planning Guidelines
 - d) Wind Planning Guidelines

Corporate & Strategic Implications

None

Background Papers:

None

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| Committee(s) | Dated: |
| Planning and Transportation Committee – For decision Streets and Walkways Committee - For Information Police Committee – For information Health and Wellbeing Committee - For Information | March 21 st May 3 rd May 18 th June 16 th |
| Subject: Road Danger Reduction Programme 2017/18 | Public |
| Report of: Director of the Department of Built Environment City of London Police Commissioner | For Decision/ For Information |
| Report author: Rory McMullan, Road Danger Reduction and Behaviour Change Manager | |

Road Danger Reduction Work Programme

Summary

This report advises Members that the various engineering, educational and enforcement measures taken over recent years have achieved a reduction in the risk of being injured on the City's streets. This is particularly true for cyclists. However, the City's casualty targets are not based on reducing risk but rather on absolute numbers. This report advises Members that these absolute targets, set in compliance with the Mayor's Transport Strategy, will not be met by the target year 2020. This is unlike most London Boroughs, which have seen a sizable reduction in absolute casualty numbers over the last 5 - 6 years **(see Appendix 1)**.

There may be a number of reasons for this and this report advises that officers will be conducting a number of fact finding visits over the next few months including a number of visits to TfL and the highest performing Boroughs to see what lessons might be learnt.

In addition to the above, officers are proposing a wide range of measures aimed at reducing casualties further, these include:-

- Physical Engineering Measures
- Closer working with City businesses to target messages to City workers
- A broad range of Education Training and Promotion (ETP) including schools but particularly focused towards City workers
- Targeted enforcement by the City of London Police (CoLP)

It is expected that all of the above measures will contribute to reducing casualties on City Streets; but analysis of casualties over the last year makes it clear that one of the biggest issue to address is 'inattention'. It is proposed that 17/18 will see a particular focus on addressing inattention by all road users. To assist in this the Road Danger Reduction Partnership (RDRP) has developed a detailed communication strategy. The report explains that this strategy will have a dual focus; firstly on communicating road danger and safety messages to all road users (City workers in particular), and secondly in promoting awareness of the programme of work the City Corporation is doing in its efforts to reduce casualties in the Square Mile.

Promoting awareness of the work the City Corporation is doing to reduce casualties on City streets is particularly important in addressing one of the corporate Red Risks, which is: “The City’s Reputation and credibility is adversely impacted with businesses and the public considering that the Corporation is not taking sufficient action to protect vulnerable road users; adverse coverage on national and local media.”

Recommendation(s)

Members are requested to agree the following:

- The 2017/18 Road Danger Reduction Work Programme
- Agree the introduction of City Mark as part of the Considerate Contractors Scheme (CCS)
- Including Road Danger Reduction requirements(at Appendix 5) within Corporate contracts (subject to the agreement of the Finance Committee)
- Approve the Communications Strategy

Main Report

Background

1. The City Corporation has agreed clear targets for reducing casualties on its streets. These are set out in the City of London Local Implementation Plan (LIP) 2011 and the targets are designed to be consistent with the Mayor of London’s Transport Policy.

The current targets require the City Corporation:

- to reduce the total number of persons injured in road traffic collisions to 30% below the 2004–2008 annual average by 2020, i.e., to a three-year rolling average of 258.0 casualties per annum by 2020.
 - to reduce the number of persons killed or seriously injured in road traffic collisions to 50% below the 2004–2008 annual average by 2020, i.e., to a three-year rolling average of 24.7 casualties per annum by 2020.
2. To put these figures into context the latest three year rolling average figures from 2013-2015 is a total of 374 casualties per annum and 53 KSI (Killed or Seriously Injured) per annum.
 3. The casualty totals remain high, but when evaluated against the number of vulnerable road users suggests that relative risk of casualty on City streets has declined.
 - From 2013 – 2015 there has been an estimated 14% increase in employment in the Square Mile.
 - In 2012 there was one injury for every 948 employees, in 2014 one injury for every 1060, and in 2016 one for every 1190 employees.
 - The fall in risk is most notable in cycling. From 2014 – 2016 there has been an estimated 19% increase in cycling numbers (now almost 25% of vehicular trips in the City and over 50% of traffic at peak times). The

number of cyclist KSI has meanwhile declined from 23 in 2014 to 11 in 2015 and an estimated 13 in 2016.

4. Whilst relative risk has decreased, it is still too high, and due to the predicted increase in commuters when Crossrail opens, there is no room for complacency, and reducing road danger remains a high priority.
5. Major projects such as Bank Junction and Aldgate will significantly improve road safety; for example officers believe a 50-60% casualty saving is achievable at Bank junction (on average between 11 and 13 casualties a year saved). Works such as the two-way cycling routes and Quietways aim to shift cyclists onto less busy routes, which should assist in a further reduction in cyclist casualties.
6. The impacts of the various measures carried out in recent years arguably led to the decrease of -22% in KSI casualties seen in the City in 2015, compared to a reduction of 3% in Greater London as a whole. However, provisional figures for 2016 show a rise of 14%, which demonstrates that a year on year trend of reduced casualties is not yet established.
7. Determining the factors responsible for delivering reduced casualty numbers requires research, but the introduction of 20mph speed limit, major works such as Holborn Circus, targeted police enforcement, extensive educational work on the dangers of blind spots for large good vehicles through FORS (Fleet Operators Recognition Scheme) and the development of Cycle Super Highways will have all contributed to improved cyclists' safety.

Current City casualty analysis

8. In considering casualties it is important to be aware of the current profile of casualties in the City by mode.

(See Appendix 2 All CoL Road Casualty Data 2014/15)

Summary:

The data can be broadly summarised as follows:

KSI injuries occur across all vulnerable user modes.

By relative risk;

- Motor-cyclists are the most likely to be injured, followed by pedal cyclists and pedestrians the least likely.

By total number;

- Pedestrians have the highest incidence of fatal or serious injuries; followed by pedal cycles and Powered 2 Wheelers (P2W).

Measured by vehicle involved;

- All vehicle types are involved in collisions with vulnerable road users; Goods Vehicles are disproportionately responsible for serious or fatal injuries, while cars and taxis also have a high incidence of causing injury to vulnerable road users.

Other items to note:

- There were 20 recorded injuries to Public Service Vehicle occupants (bus passengers) in 2015, of which 3 were serious. Evidence has shown that this is due to passengers falling over due to sharp acceleration or deceleration. This is an improvement from the 2012 – 2014 rolling average of 23.3 injuries, which may be partially attributable to the introduction of the 20 mph limit.

Note: This data in Appendix 2, which has been used to prepare the above summary, does not show causational factors. Pedestrian inattention is the most common cited causational factor in City casualties as recorded by CoLP investigating officers.

9. When measured by time of day, peak times and lunch time are the most common time of day for collisions that cause injury. This is when the highest numbers of vulnerable users are on the streets, and therefore is not a measure of proportional risk, but does guide us when to focus efforts.
10. It is proposed that for the development of the RDR and Active Travel Strategy 2018-23, a full study of the recent Police 'Stats 19' Causational Factors for collisions between different modes is undertaken. This will assist in identifying any new collision trends and in turn help inform the behaviour change needed and the engineering interventions required to reduce collisions in the Square Mile.

Update on the delivery of the 2016/17 Work Programme

11. In 2016/17 a full programme of Education Training and Promotion (ETP) measures has been delivered by the DBE Road Danger Reduction Team (RDRT) and the City of London Police (CoLP). A list of some of the successes delivered are listed below:
 - The development and launch of the Active City Network
 - The development of the City Mark Pilot scheme to improve compliance to the Construction Logistics and Community Safety scheme for goods vehicles.
 - Monthly Exchanging Places events as part of Operation Atrium training cyclists in relation to the dangers of blind spots
 - 30 road shows at businesses and on street promoting safer behaviours to City Workers
 - City wide Road Safety campaign delivered in partnership with the CoLP – covered in London media
 - 2 x professional seminars hosted by City businesses

- Pedestrian training, cycle training and Youth Travel Ambassador development for the five schools in the City.
- Adult Cycle Training delivered to 162 City workers and residents
- Road Safety participation at major events including: Ride London, Lord Mayors Show and St. Patricks Day parade
- Campaigns – ‘Light Angels’, ‘taxi and bikes looking out for each other’, and launch of the ‘Direct Vision Lorry’ and ‘Active City Network’ were covered in local London media outlets. (London Standard, City Matters, BBC London and London Live).

Current TfL guidance

12. In 2017, according to their Business Plan, TfL are adopting a ‘Vision Zero’ approach to road safety. The long-term vision is to see London’s roads free from death and ‘preventable’ serious injury. TfL’s Vision Zero means reducing the dominance of vehicles on our streets to minimise the risks they pose to vulnerable road users.
13. This is part of their Healthy Streets approach, whereby a ‘whole-street’ approach is needed to make streets more inviting for walking and cycling. Less traffic is proposed to make streets safer and more attractive for walking, cycling and using public transport.
14. Over the next 5 years TfL will implement new safety standards for buses, enhance conditions for vulnerable road users by tackling their highest risk junctions, and oversee the introduction of more 20mph limits.

The City’s 2017/18 Road Danger Reduction Programme

15. It is proposed that the 2017/18 work programme undertake the following work-streams:
 - Engineering measures to target the most dangerous junctions
 - Business engagement – working with City employers to influence behaviour of City workers.
 - Working with the freight sector to improve driving and vehicle design
 - Behavioural change to target the factors that lead to collisions
 - Continued targeted enforcement by the City of London Police
 - Research to develop the City’s 2018 – 2023 Road Danger Reduction and Active Travel Strategy

A short summary of what these activities will include is as follows:

Engineering measures

16. Background:

Engineering measures can deliver real reductions in casualties; however the City Corporation has now tackled or is tackling the worst junctions for safety; such as Holborn Circus, Aldgate and Bank. The next worst junction is Newgate Street where improvements are likely to deliver no more than a

saving of 3 casualties a year. However, such engineering measures should be continued as we move towards a Vision Zero City.

17. Proposal:

A list of engineering measures that support RDR has been compiled for the 2017/18 Work Programme. This can be seen in Appendix 3 Engineering Work Programme 2017/18

18. Business Engagement – Active City Network (ACN)

Background:

To support effective engagement with City workers, in 2016 we established an Active City Network of employers that support our objectives in making the City a safer and more pleasant place to commute.

Employers are the destination point for the estimated 400,000 plus City workers. Working in partnership with employers will therefore be one of the most effective ways to get road safety messages across. Businesses have a clear interest in reducing casualties involving their staff. Businesses increasingly recognise this, and we now have over 70 businesses engaged in the Active City Network, with over 120 delegates attending our last seminar.

Proposal:

It is proposed that efforts are made to expand the reach of the Active City Network, and work in partnership with employers to develop behavioural campaigns to encourage safer behaviours while travelling on City streets. We propose hosting a major ACN event at Guildhall in June where the newly appointed Walking and Cycling Czar, Dr. Will Norman will keynote.

Through the ACN we propose to develop best practice guides for employers, showing what the best employers can achieve reducing numbers of deliveries and better trained drivers, and cyclists.

We propose to organise networking seminars and offer incentives for employers to train their staff on safer more considerate cycling, driving and engage with staff on pedestrian inattention. We will also approach businesses to support the network by hosting best practice seminars.

It is also envisaged that through this network we will be able to introduce elements of safer deliveries through 'Van Smart' which is a newly developed part of Fleet Operators Recognition Scheme (FORS), to improve driver training, monitor vehicle safety features.

19. Working with the Freight Sector to improve Work Related Road Safety

Background:

Goods vehicles have been disproportionately represented in the KSI and all casualty statistics for a number of years. As the largest vehicles on the streets, they input the most danger onto the network and therefore sit near the top of our Work Plan.

The City Corporation is one of the leading organisations in managing safer freight deliveries. We are registered as Gold status in the Fleet Operators Recognition Scheme (FORS) and are a Construction Logistics and Community Safety (CLOCS) Champion. The City Corporation have been working with TfL and leading manufacturers on development of safer direct vision goods vehicles, the use of which will be promoted through the City Mark scheme.

The City of London Police also support the compliance of goods vehicles and drivers to road safety legislation through the activities of the commercial vehicles unit which stopped over 1200 goods vehicles in 2016.

Proposal

We are proposing two new initiatives that aim to improve the safety of freight movements within the Square Mile and which, if approved, will run throughout 2017/18

20. City Mark rollout – extension to Considerate Contractors Scheme (CCS)

21. Adding Road Danger Reduction requirements within Corporate contracts

20. City Mark rollout

In 2016/17 the City Mark pilot scheme developed focus groups of leading fleet operators, contractors and developers to progress a scheme which will reward the contractors, sub-contractors, drivers and banks men for focusing on the safety of the goods vehicles making deliveries to and from the sites. This has been integrated into the City Corporation's Considerate Contractors Scheme (CCS).

- As part of the pilot we have identified a list of criteria to rank sites in terms of compliance to CLOCS and FORS. Interviews with twelve development sites in the Square Mile have been carried out to determine levels of compliance with CLOCS. This data will be used to reward the best Contractors, Fleet operators and Construction Logistics to be awarded at the 2017 CCS Awards scheme.
- One of the key outputs is the development of a Work Related Road Safety sign to be fixed to site hoardings alongside the Site Safety signs which will advertise to the public the commitment of contractors / developers to road safety. This will be a visual representation of what the contractors are

delivering in terms of road safety. (See Appendix 4)

- It is proposed that the City Mark pilot scheme be adopted by the Corporation and rolled out to all development sites in the Square Mile in 2017/18

21. Adding RDR clauses to City Corporation Procurement:

In order to support the City Corporation's Road Danger Reduction Plan, it is proposed that road safety requirements be included in relevant contracts for the delivery of goods, services or works during the next financial year. This will help ensure safer drivers and vehicles supplying the City, and is in line with the City's Responsible Procurement Strategy. It is also an agreed mitigation measure to address the Corporate Risk (currently red) referred to in paragraph 25 below.

22. The City Corporation will use procurement and contractual mechanisms to ensure that all relevant contractors take active steps to address the safety of construction vehicles used in the execution of their contracts. This would include hiring/ leasing/ buying/ retrofitting vehicles with relevant safety features or working towards compliance with initiatives such as the FORS, the CLOCS Standard and/or TfL's Work Related Road Risk (WRRR) requirements.

23. By making FORS a requirement for deliveries made by suppliers to the City Corporation, we will demonstrate continued leadership in the management of safer goods vehicles in London. The City Corporation will be following a number of our key stakeholders, such as TfL, neighbouring Boroughs and Crossrail in implementing this change. The City Corporation is recognised as a leader in the field of work related road safety, it is a CLOCS Champion, and has FORS Gold Accreditation. This measure will further support our status in this field.

24. The Road Danger Reduction team will support contractors in terms of advice and providing or referring them to relevant training. We propose to provide internal staff training on how to undertake spot checks to make sure requirements are being implemented. The Road Danger Reduction team can also provide colleagues throughout the City Corporation with advice on working with contractors to support them achieving FORS recognition.

25. The detail of the proposed requirements to be added to the terms and conditions of relevant contracts and also to be referred to in the 'Invitation to Tender' guidance are outlined in Appendix 5. Whilst it is considered unlikely that this requirement will have any financial implications this matter will, if approved, be referred to the Finance Committee for their consideration prior to implementation.

26. Behavioural interventions – RDR Communications Strategy

Background:

The restructuring of the City Transportation section in 2016 boosted the Behaviour Change capabilities of the Road Safety team. The aims of this work stream are to increase the awareness of all road users to road danger and in

particular to the dangerous behaviours that lead to collisions which cause injury. An example of a behaviour that can be targeted in this is 'Inattention' which the City of London Police estimate is a factor in more than 50% of collisions which cause injury.

Proposal:

It is proposed that a series of high profile events, campaigns and communications be organised in 2017/18 following the approach outlined in the RDR Communications Strategy. (See Appendix 6) The Strategy was developed through the Road Danger Reduction Partnership (RDRP) Board with input from the City Corporation and City Police Communication teams.

27. The purpose is to agree an overall approach for communications that supports and enhances the activity of the RDRP; specifically communications activity undertaken by the RDRT and The City of London Police. This is to directly address the Red Risk for the Corporation as regards road safety.

The Red Risk effect is identified as: "The City's Reputation and credibility is adversely impacted with businesses and the public considering that the Corporation is not taking sufficient action to protect vulnerable road users; adverse coverage on national and local media."

28. The Communications Strategy provides a structure to support officers in working towards a key aim of making our roads safer for all users and the strategy covers the following approaches:-
- a. *Building on the success* of the current plan and taking inspiration and learning from notable road safety campaigns from across the UK and elsewhere
 - b. *Focusing on the twin aims* of increased awareness leading to behaviour change by road user groups and increased awareness and profile for the work the partnership is undertaking, so key stakeholders are engaged and supportive of road danger reduction initiatives
 - c. *Creating consensus and buy-in* from the interest groups for all road users by promoting and agreeing a set of key principles to underpin all our communications
 - d. *Creating a brand model* that allows all communications campaigns from the RDRP to sit under a single public-facing brand platform, with an overarching, positive message. We recommend that this platform is 'Safer in the City', which is already in use by the team
 - e. *Developing and implementing* a series of campaigns built on creative hooks (interesting angle which draws attention) with the twin aims of raised awareness and behaviour change amongst road users, and increased awareness and profile with stakeholder and broader public audiences
29. The Communications Principles that feed into this are:
- o Equal but different - In our communications, we treat all road users as having equal rights but different experiences and levels of

responsibility. The larger your vehicle, the greater your responsibility to travel with care and look out for other road users

- Safer and better - Our ambition is to reduce harm and create a more pleasant street environment for all users. It is not about zero harm on its own and our communications needs to reflect this twin ambition
- We are all in this together - When we encourage road users to change their behaviour, we encourage the change in all road users, not singling out one group
- Using the power of We – We can't effectively engage all our road users directly, so we will prioritise encouraging and supporting stakeholders to communicate our messages to their audiences, starting from the members of the RDRP and the Active City Network working out through other key influencers and leaders in the City and the surrounding London area. We will use their authority and authenticity to increase the reach and impact of our message
- Evidence based – All of the communication we produce, for both behaviour change and awareness raising campaigns, is based on a solid, robust evidence base. This base will include our own stats and insights supplemented by those from analogous places, contexts and campaigns
- Focus on what works – We learn from successful behaviour change and awareness raising campaigns
- Raise awareness not fear – The City of London is a very safe place to travel through and around, whatever type of road user you are. Based on numbers of vulnerable road users, by relative risk, the City is safer than most outer Boroughs for walking and cycling. The balance of our communications will encourage road users to change their behaviour without increasing their fears around safety

30. The DBE Road Danger Reduction Team Action Plan - ETP Events and Roadshows

Background:

The City Corporation provides Education Training and Promotion (ETP) safety training for school children, for City workers and residents. In 2017/18 the budget for the Department of the Built Environment (DBE) Road Danger Reduction Team (RDRT) ETP programme to be funded from the TfL Local Implementation Plan (LIP) budget has been increased from £70K to £120K.

Proposal:

It is proposed that the work programme for the Department of the Built Environment's Road Danger Reduction Team (DBE RDRT) be focussed on the engagement with City workers through road-shows and events. We propose the team continues to support major events such as Nocturne, launch of new safer infrastructure such as the Quietways and Bank, and work with business networks to promote awareness of road danger reduction within the City worker community through the Active City Network.

It is proposed that the team support delivery of a communications strategy and of the Work Related Road Risk activities including supporting changes to include RDR in procurement and the roll-out of City Mark

It is also proposed that the team deliver a communications campaign focussed on inattention.

A prioritised list showing items where TfL LIP funding will be allocated for ETP activities to be delivered by the Road Danger Reduction Team in 2017/18 is included at Appendix 7. It should be noted that any underspend on those items shown as funded will be directed toward delivery of the Priority 2 items listed as will any other funding from TfL or the private sector that becomes available.

Targeted Enforcement

31. Background:

The CoLP support the delivery of the Road Danger Reduction Plan through regular enforcement campaigns, which are supported by Education, Training and Promotion delivered by the City Corporation.

In 2016 the CoLP Commercial Vehicles Unit stopped and checked 1229 Goods vehicles in 2016. Of these 815 were found to be non-compliant with a total of 1828 recorded offences. This supports the educational and promotional work the City Corporation is delivering through City Mark.

A full programme of targeted enforcement activities in 2016/17 can be seen in Appendix 8

32. Proposal

It is proposed in the 2017/18 work programme that the CoLP continue to work in partnership with the RDRP to deliver effective enforcement of road offences, 20 mph limit enforcement, HGV, driver distraction and cyclist misbehaviour.

A coordinated programme of ETP and enforcement activities is proposed to maximize the effectiveness of enforcement campaigns.

A full programme of joint activities delivered in partnership between the CoLP and DBE RDRT can be seen in Appendix 9

Research - Road Danger Reduction and Active Travel Strategy 2018 – 2023

33. Background:

While a comprehensive programme of RDR activities over recent have had an impact on relative risk, total casualties are too high.

Since the 2013 RDR Plan there have been major changes. The street network has changed after the introduction of the Cycle Super Highways, two-way cycle network and the Quietways. Driver behaviour has modified with the introduction of the 20mph limit. Changes have also been seen in the make-up of the traffic with a surge in numbers of pedestrians and cyclists. Finally, a new administration in City Hall has adopted Healthy Streets and Vision Zero approaches.

34. Proposal:

It is proposed that due to the many changes since 2013 an updated RDR and Active Travel Strategy be developed to cover 2018-2023.

The aim will be to fully research the latest best practice, understand the real and perceived dangers in the Square Mile, to develop a comprehensive approach which will see significant impacts on safety in the City. It is anticipated that an initial draft for Member consultation will be prepared in July 2017.

35. Research and Surveys: As part of the development of the Strategy and to assist development of a targeted behaviour change programme, surveys and research will be commissioned to understand the situation both in terms of attitudes towards travel and perception of danger.

36. Reviewing and learning from the successes of others

This would include visits to central London Boroughs and TfL and establishing international links with cities such as New York to learn from best practice in terms of delivering a Vision Zero policy as outlined in the RDR Plan and recently adopted by TfL.

Conclusions

37. The City has challenging casualty reduction targets, which when considered against the fast rising number of vulnerable users will require a collaborative and ambitious approach to achieve.
38. The opportunity for engineering solutions on City streets to achieve major impact on casualties is becoming more limited as we improve the design of key hot-spots. Casualties are spread across the City streets and 41% (latest 2015 figures) are on TfL controlled routes (TRLN) where the City Corporation have limited powers to deliver engineering solutions.
39. In addition to the importance of casualty reduction the City also has a Red Risk which is, "damage to the Reputation to the Corporation as not being seen to be doing enough on Road Danger". This report therefore recommends adoption of a new Communications Strategy which it is hoped will deliver a high profile programme to raise awareness of Road Danger Reduction activities with the City's community and change behaviour and

attitudes towards risk. It is proposed that delivery of this strategy begin in 2017/18

40. To counter the threat posed by Goods Vehicles we propose continued working with the developers in the City to increase the compliance of their supply chains of safer Freight through City Mark, and changing our own procurement to include FORS requirements.
41. We propose that to influence the behaviour of their employees on the commute and encourage adoption of safer freight policies on deliveries; working with employers in the City will be effective. The Active City Network has been established, and it is proposed that a focus should be on growing the reach and activities of this body.
42. Due to the complexity of the issues faced, it is proposed that a programme of research is undertaken from neighbouring authorities, and wider afield, to input into the development of a Road Danger Reduction and Active Travel Strategy 2019 – 2024. Active Travel (walking and cycling) represents the majority of trips made in the City and both cycling and walking rates are seeing significant growth, therefore it is proposed that protecting these vulnerable users should be our focus.
43. Change in policy from key partners such as GLA and TfL, (Vision Zero to Road Safety, and Healthy Streets for Active Travel), new infrastructural developments such as the Quietways and Cycle Super Highways, are changing the landscape. It is proposed that the development of new Road Danger and Active Travel Strategy is required to make a long term impact on Road Danger. It is proposed that this strategy be reported on later in the year with a view to adopting it for 2018 – 2023
44. The full programme of measures to be delivered by the partners of the Road Danger Reduction Partnership is set out in the Appendices 3 (Engineering), 6 (DBE ETP Programme) & 8 (Joint ETP Programme with the CoLP)

Appendix 1 Central London Authorities performance by KSI 2020 targets over baseline

| Borough name | Borough baseline period | Borough baseline KSIs | Borough long term (LIP) Target Year | Borough forecast KSI casualties in 2020 and % change* | 2015 KSIs | % change in 2015 over borough baseline |
|-----------------|-------------------------|-----------------------|-------------------------------------|---|-----------|--|
| City of London | 2004-08 | 49 | 2020 | 25 (-50%) | 43 | -13% |
| Westminster # | 2006-08 | 284 | 2018-20 | 171 (-40%) | 135 | -52% |
| Camden # | 2007-09 | 123 | 2018-20 | 92 (-25%) | 76 | -38% |
| Islington | 2006-08 | 89 | 2020 | 55 (-38%) | 89 | 0% |
| Hackney | 2007-09 | 131 | 2030 | 80 (-39%) | 82 | -37% |
| Tower Hamlets # | 2007-09 | 134 | 2018-20 | 85 (-37%) | 68 | -49% |
| Greenwich # | 2004-08 | 120 | 2020 | 89 (-26%) | 54 | -55% |
| Lewisham # | 2007-09 | 116 | 2018-20 | 97 (-17%) | 53 | -54% |
| Southwark # | 2004-08 | 140 | 2018-20 | 93 (-34%) | 89 | -36% |
| Lambeth # | 2004-08 | 175 | 2020 | 118 (-32%) | 99 | -43% |

Appendix 2: All Road Casualty data for the City of London 2014 - 2015

| CLASSIFICATION | January to December 2015 | | | | January to December 2014 | | | |
|------------------|--------------------------|------|--------|-------|--------------------------|------|--------|-------|
| | FATAL | SER. | SLIGHT | TOTAL | FATAL | SER. | SLIGHT | TOTAL |
| PEDESTRIANS | | 23 | 93 | 116 | 1 | 18 | 98 | 117 |
| PEDAL CYCLES | 1 | 10 | 128 | 139 | 3 | 20 | 115 | 138 |
| POWERED 2 WHEEL | | 6 | 45 | 51 | | 8 | 71 | 79 |
| CAR OR TAXI | | 1 | 50 | 51 | | 2 | 27 | 29 |
| P.S.V. | | 3 | 17 | 20 | | 2 | 21 | 23 |
| GOODS | | | 9 | 9 | | 1 | 3 | 4 |
| OTHER | | | | 0 | | | 1 | 1 |
| Total Casualties | 1 | 43 | 342 | 386 | 4 | 51 | 336 | 391 |

Appendix 3: Proposed 2017/18 RDR Engineering schemes and activities

| Scheme location & description | Expected output | Anticipated delivery date |
|--|---|---------------------------|
| City-wide. Analysis of collisions at hotspots across the City's highway network. This also includes consideration of potential engineering measures to improve road safety. | Collision trends (if any) and potential engineering measures identified. Provide feedback to inform other road safety activities | Mar-18 |
| Newgate Street/Warwick Lane junction. | Implementation of a signalised junction. Expected to save an average of 2.6 collisions per year. | Summer 2017 |

| | | |
|---|---|--------|
| Puddle Dock/Queen Victoria Street. Detailed options, design and enabling works to reduce collisions | Detailed options evaluated, measures designed and approved for implementation. Commence enabling works | Mar-18 |
| City-wide. Design & implement measures to reduce collisions. Potential sites include: Holborn Viaduct/Snow Hill Cheapside, London Wall, Cannon Street & West Smithfield | Locations and RDR engineering measures evaluated. Designs approved and implemented where possible. More complex measures for further development in 2018/19 | Mar-18 |
| Cycle Quietways Phase 2 | Routes identified & outline options approved | Mar-18 |
| Other cycling improvement measures | Improvement measures identified & delivered | Mar-18 |
| Facilitation of TfL's North - South Cycle Superhighway Phase 2 | TfL delivers their N-S Phase 2 Cycle Superhighway. Measures which benefit the City is incorporated | Mar-18 |

Appendix 4: City Mark example Road Safety sign for building site hoardings

CityMark
Hoarding Panel
With QR Code
Blue and yellow icons.
Green title with
red footer bar.
This design is
proportionate to
1220 x 1500mm
landscape format.



Appendix 5 - Road Danger Reduction within Corporate contracts

| Contracts in scope: | | Vehicles in Scope | Contract duration | Requirement | Deadline |
|--|---|----------------------|---------------------|--|--|
| Contracts involving the delivery of goods and services £250k and above | Works contracts valued at £400k and above | 3.5 tonnes and above | 6 months and longer | Contractors are required to register with the Fleet Operator Recognition Scheme (FORS) and to have achieved Bronze accreditation or scheme, which in the reasonable opinion of the corporation, is an acceptable equivalent to FORS. The requirement must be cascaded to any relevant sub-contractors. | Within 3 months of the start of the contract. |
| | | | 3 years and longer | Contractors are required to progress to Silver accreditation under the FORS or a scheme, which in the reasonable opinion of the City Corporation, is an acceptable equivalent to FORS. The requirement must be cascaded to any relevant sub-contractors. | Within 18 months of the start of the contract. |

Appendix 6

Road Danger Reduction Communications Strategy – See separate document

Appendix 7 – DBE Road Danger Reduction Team – Action plan 2017/18

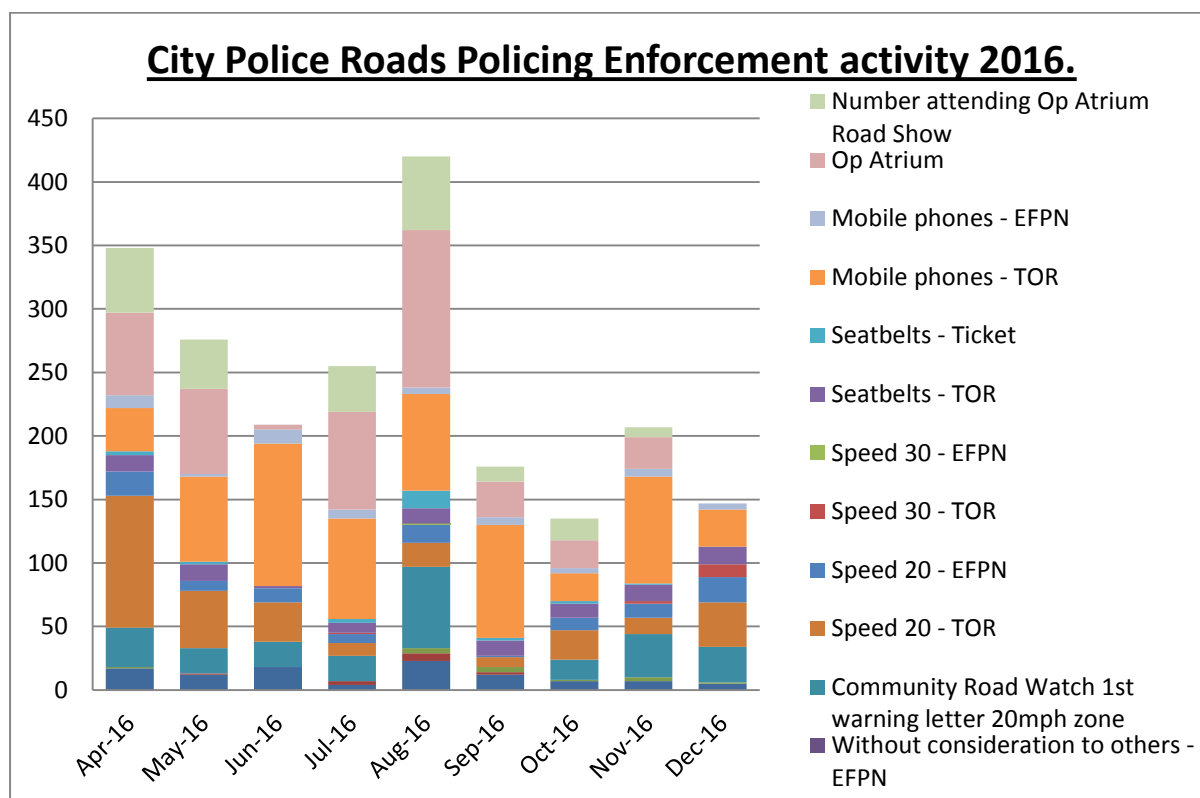
| TOP PRIORITY ITEMS – which can be funded from current LIP Allocation | | | |
|--|--|---|-------------------|
| Priority | Activity | Partnerships | Cost |
| 1 | Road Danger Reduction and Active Travel Strategy – Consultation with members, key stakeholders, experts and practitioners | Planning and Transportation Committee Streets and Walkways Committee Road Danger Reduction Partnership Active City Network | £5K |
| 1 | Research to input into Strategy and to inform Work Programme delivery – Attitudinal Surveys, Stake-holder meetings, desk-top study, consultation with academics and senior practitioners. | TfL, City Police, RDRP | £10K |
| 1 | Business Engagement - Active City Network – expand engagement with City employers to provide channel for communications about road danger. Organise seminars and networking events for businesses, Produce Best Practice Guide for businesses Promote the Active City Network, expand membership Develop package of support for businesses – induction for new staff, cycle training, management of freight deliveries | RDRP City Employers City Police | £25K |
| 1 | Community Engagement – promote road danger reduction through activities at major events. (Nocturne, Ride London, Lord Mayors Show, Open House, St. Patricks Day) | Multi-partnership | £5K |
| 1 | City Mark – Work with developers, fleet operators, contractors to increase compliance with Construction Logistics Community Safety and Fleet Operators Recognition Scheme to improve safety of supply chain | Developers, TfL, Highways team, CCS | £45K |
| 1 | Support City procurement in implementing Fleet Operators Recognition Scheme (FORS) for deliveries on all new contracts – develop engagement, e-learning and workshops for departments and suppliers affected | City Procurement – essential to allow influencing of other employers | £5K |
| 1 | Communications Plan delivery – City Wide Campaign – Targeting all road users to ‘Make Eye Contact’ | Launch a targeted campaign with on street events, press releases, engagement | £25K |
| 1 | Driver Assessments for all City of London Corporation drivers develop e-learning and assessments for all City drivers | All Departments – led by Transportation and Cleansing | £0 (cost neutral) |
| Total Cost High Priority items | | | £120K |

Appendix 7 – DBE Road Danger Reduction Team – Action plan 2017/18

Second & Third Priority Items – dependent on funding being secured from Sponsorship or TfL grants

| | | | |
|---|---|---|--------------|
| 1 (but high level of difficulty) | Multi-channel marketing campaign on Road Danger Reduction. Launch at a major event as part of the European Mobility Week in September. Envisaging part of the City without traffic, combined with cultural events. Propose at Bank or Eastern Cluster. Coordinate with Open House, City Cultural teams, Guildhall School of Music, Lord Mayors Appeal, Active City Network. | All City departments, GLA, TfL, European Cities, Open City, Mainstream media, Barbican, Guildhall School of Music | £100K |
| 1 (funding being sought) | Cycling campaign – Launch and Promotion of Quietways – encourage cyclists to use the Quietways as a safer route to work – launch event at Guildhall coordination with Nocturne, City Cultural hub | All departments | £35K |
| 2 | Motorcyclists – Safer riding campaign in spring – promote safer motorcycling training – engage with delivery riders | City Police | £5K |
| 2 | Pedestrian Campaign – As part of Make Eye Contact develop a campaign to target pedestrians through distribution of branded umbrellas outside of main train stations | Active City Network – Living Streets (Pedestrian Association) | £5K |
| 2 | Operation Atrium – Changing Places – support with roadshow giveaway items | City Police | £5K |
| 3 | Continue the campaign on improving taxi driver behaviour (avoid U-turns, giving cyclists room, look for cyclists before opening doors) – extension to Uber and Addison Lee | LTDA | £5K |
| 3 | Promotion of 20mph Awareness | Active City Network | £5K |
| Items with no financial cost – staff time only | | | |
| 1 | Bank Junction - Support the promotion of the changes during the Experimental Traffic Order | Major projects | £0K |
| 2 | Schools – Work with schools to deliver pedestrian training, awareness of sustainable modes of travel, Youth Travel Ambassadors. | Schools | £0K |
| 2 | Better Air Quality promotion - Support the air quality initiatives around the LEN | Air quality team | £0K |
| 1 | Data and seasonal led activities –monitor data and seasonal trends to develop appropriate interventions | RDRP | £0K |
| 1 | Deliver Road Safety Audits to review the safety of new projects from design phase through to completion | Major Projects Network performance | £0K |
| 2 | Highway Monitoring – constant review of existing roads for safety | Highways | £0K |
| BUDGET shortfall | To be made up through applications of grants and sponsorship | | £160K |

Appendix 8 CoLP Roads Policing Enforcement Activity 2016/17



Commercial Vehicles Enforcement Activity 2016/17

| | | Cvu Ops Per Month | Vehicles Stopped | Number with Offences | Number of Offences |
|-----------|--|-------------------|------------------|----------------------|--------------------|
| January | | 16 | 111 | 62 | 92 |
| February | | 10 | 87 | 63 | 110 |
| March | | 12 | 117 | 89 | 167 |
| April | | 11 | 83 | 58 | 136 |
| May | | 11 | 116 | 74 | 189 |
| June | | 16 | 136 | 79 | 209 |
| July | | 13 | 121 | 89 | 222 |
| August | | 8 | 70 | 49 | 117 |
| September | | 14 | 91 | 63 | 122 |
| October | | 12 | 91 | 60 | 105 |
| November | | 15 | 105 | 69 | 165 |
| December | | 14 | 101 | 60 | 194 |
| | | | | | |
| | | | | | |
| Total | | 152 | 1229 | 815 | 1828 |

Appendix 9 Department of Built Environment Road Danger Reduction Team in partnership with the City of London Police Work Programme 2017/18

Notes:

1. DBE - RDRT is City Corporation, Department of Built Environment Road Danger Reduction 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

Generic Activities

| Activity Location | Period | Lead | Stakeholder / Location |
|---|--|----------------------------------|--------------------------------|
| Operation Atrium | Once every other month. Typically educate/promote for 2 weeks beforehand | CoL Police | DBE - RDRT |
| Exchanging Places | Typically monthly | CoL Police | London Fire brigade, DBE - RST |
| Highways Monitoring | Throughout each month | DBE - RDRT | Actions by CoL, DBE and Police |
| National TISPOL 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 DBE - RST | |
| Safety Audits | TBA – varies (most months) | DBE - RDRT | |
| | | | |
| Business Exhibitions | TBA – typically each month | DBE - RDRT | |

Medium Term Activities

| Activity Location | Period | Lead | Stakeholder / Location |
|--|---|---------------------------|------------------------------|
| Active City Network meetings and activities | TBA – typically monthly June and September for seminars | DBE – RDRT | User Groups, CoL, CoL Police |
| Safer City Partnership meeting | As scheduled | DBE – RDRT and CoL Police | |
| Capital City Cycle Safe Campaign | Every other month – complements Operation Atrium inc cycle and vehicle driver behaviour | CoL Police | DBE – RDRT |
| Bikability Cycle Training for children and adults | All year subject to demand | DBE – RDRT | |
| 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 | DBE – RDRT |
| Bike Safe – bike registering | TBA | COL Police | |
| Bus and Trucks – TISPOL | Jul, Oct | | |
| Speed Campaign – TISPOL | Apr and Aug | CoL Police | |
| Seatbelts – TISPOL | March and Sept | CoL Police | |
| Drink/Drug drive TISPOL | June And September | CoL Police | |
| Carrying Dangerous Goods | Feb, Apr, Dec | CoL Police | |
| 'Happy Feet' Pedestrian Training | Jan & Feb | DBE – RDRT | |
| Make Eye contact Campaign | September - December | DBE – RDRT | CoL Police |

Major Events supported by the Road Danger Reduction partnership

| | | | |
|--------------------------|-----------|------------|------------|
| National Bike Week | June | DBE – RDRT | CoL Police |
| Nocturne cycling event | June | DBE – RDRT | CoL Police |
| Quietways Launch | June | DBE – RDRT | CoL Police |
| Ride London | July | DBE – RDRT | CoL Police |
| Open House | September | DBE – RDRT | CoL Police |
| European Mobility Week | September | DBE – RDRT | CoL Police |
| Lord Mayor's Show | November | DBE – RDRT | CoL Police |
| BRAKE (Road Safety week) | November | DBE – RDRT | CoL Police |
| St. Patricks Day Parade | March | DBE – RDRT | |

Road Danger Reduction Communications Strategy

**Produced by the City of London
Corporation on behalf of the Road
Danger Reduction Partnership**

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1. Key aims

- To help address the current red-risk, which is the perception that the City of London Corporation is not taking enough proactive, positive action to reduce road danger in the City. We will do this by raising the profile of Road Danger Reduction activities being carried out by the City Corporation among all stakeholders
- Encourage positive behavior change among all road users, prioritising those who pose the greatest risk, by raising awareness of risky behavior and what people can do to reduce risk
- Proactively engage businesses across the City to have a positive influence on employees and suppliers to raise awareness about road danger and encourage safe and respectful road behaviours
- Engage stakeholders from across the City, including road-user groups, businesses, and media to support and participate in the activities of the Road Danger Reduction Partnership

2. Key communications principals

- **Equal but different:** We treat all road users as having equal rights but different experiences and levels of responsibility. The larger your vehicle, the greater your responsibility to travel with care and look out for other road users
- **Safer and better:** Our priority is to reduce life changing injuries and deaths, but our ambition is to reduce harm at all levels and create a more pleasant street environment for all users.

- **We are all in this together:** We can't effectively engage all our road users directly, so we will prioritise encouraging and supporting stakeholders, particularly businesses, to communicate our messages to their audiences
- **Evidence-based:** All communications are based on a solid, robust evidence base. This base will include our own statistics and insights and be supplemented by learnings from other best practice road danger reduction initiatives from around the world
- **Raise awareness not fear:** The balance of our communications will encourage road users to change their behaviour to reduce risk without increasing their fears around safety or creating an inaccurate perception of danger

3. Communications challenges

3.1 Proactive, high-profile activities can bring criticism

In order to address the current red risk, we need to raise awareness among all stakeholders about the positive work the City Corporation is doing to reduce road danger. This will require proactive, high-profile campaigns and activities that are attention grabbing, interesting and memorable. Without proactive, high-profile activity we risk creating a communications vacuum that can be filled by negative voices.

Challenge: By putting our work in the spotlight, we open ourselves up to questions.

Solution: Our strategy and thinking behind what we do needs to be sound and understood by the whole Road Danger Reduction Partnership and we need to have media-trained, confident spokespeople who can talk about this

Challenge: We will be open to criticism from those who disagree with our strategy.

Solution: *Because we are working in collaborative way with stakeholders from across the media, business and all road user groups, our critics will be in the minority, but vocal minorities can feel oppressive. We need to be ready with clear arguments in favour of our strategy and have a media-trained team ready to respond to any negative publicity.*

3.2 Behaviour change takes time

Communications alone cannot make people make long-term changes to their behaviour, but it is a crucial factor. The role of communications is usually to get people to 'Identify' the issue by raising awareness, and then to understand its relevance

to them and to 'Prepare' to change by seeking information. However a significant shift in even the first stage of 'Identification' of the problem can take years. We need to recognise that investment in behavior change campaigns needs to be integrated across all communications activities over a number of years, with regular evaluation to track change.

Challenge: unrealistic expectations from stakeholders about the level of behaviour change that can be achieved in a short time

Solution: *Set realistic goals with clear metrics around the level of change expected and plan activities that can be built on year-on-year to move audiences along the behaviour change journey.*

4. Target audiences

Figure 1



5. Implementation

- Use attention-grabbing, memorable and relevant communications to raise awareness of the issues and build profile for the City Corporation. Examples could include public-facing street events, media stunts and photo opportunities, refreshed business networks and targeted communications for specific road-user groups
- Engage stakeholders in the development and delivery of communications to both enhance behaviour change, by influencing their direct audience groups (e.g. club members, employees etc) and to build support for our activities and mitigate potential negative feedback.
- Create consensus and buy-in from the interest groups for all road users by promoting our principals and asking for sign-up and agreement of them from these groups
- Create a strong and recognisable brand for all communications campaigns, developing the current 'Safer in the City' brand for this purpose
- Develop and implement a series of campaigns to deliver against the twin aims of raised awareness and behaviour change amongst road users, and increased awareness and profile with stakeholder and broader public audiences
- Support partner initiatives with the Safer in City brand, such as promotion of new safer infrastructure developed by the City of London and partners such as TfL, promotion of enforcement campaigns by the City Police such as speed awareness (20mph), focus on new safer driving training by partners etc.
- Develop communications approaches specific to the target audience to meet the objectives in terms of behaviour change, using 'think, feel and do' methodology (see Appendix XX for detailed suggestions for each target audience)
- Track and evaluate all communications work. Metrics such as number of views, attendees at events and column inches in press will be outputs; analysis of change of attitudes will be assessed through surveys and the road casualty statistics will be gathered to show impacts on outcomes (see evaluation matrix on pages 22 to 24 for details)
- The communications plan for Road Danger Reduction will be implemented over a period of two years starting in April 2017 with annual reports submitted on progress to enable continuous shaping and improvement.



1

The context for this strategy

The City of London Corporation has a strong commitment to keeping all workers and residents safe while they are in the Square Mile. The Road Danger Reduction Plan was drafted and approved in 2013, with a target of reducing casualties with particular emphasis on Vulnerable Road Users (pedestrians and cyclists), who account for over 80% of casualties.

There has been some significant success since the publication of this plan. While the number of cyclists in the Square Mile has increased by 19% since 2014, the number of cyclists killed and seriously injured (KSI) dropped by over

half between 2014 and 2015. However, we cannot be complacent as the number of pedestrian casualties has risen, and cycling casualties could potentially increase again without continued focus (Table 1):

Table 1: KSI performance against target

| Road user | 2017 Target* | 2016 | 2015 | 2014 | 2013 |
|--------------------|-------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| Cyclists | 96 Casualties 11 KSI | 145 Casualties 13 KSI | 139 Casualties 11 KSI | 138 Casualties 23KSI | 125 Casualties 20 KSI |
| Pedestrians | 85 Casualties 20 KSI | 109 Casualties 25 KSI | 116 Casualties 23 KSI | 117 Casualties 19 KSI | 91 Casualties 20 KSI |

1.1 Building on the success of the current plan

The Road Danger Reduction Team has been working to deliver the current plan across a number of areas and this communications strategy builds on that work, taking learnings from the successful activity to date, the impact of which is summarised below:

Reaching road users by engaging city employers:

The Road Danger Reduction Team continues to prioritise business engagement. In 2016 the Road Danger Reduction Team delivered over 30 Road Shows, Road Safety Training and Road Safety Events and continued to build business relationships, exceeding targets compared to previous years.

“The event was incredibly well received, and feedback has been excellent. Your engagement with staff who posed questions and stopped by for a chat was brilliant. The services and resources you offer certainly attract in a large amount of staff, and I am sure that many of them went away with a safer mind-set with regards to moving around within the city.”

Peter Griffin, National Account Manager, Wilson James

To build on this work the Road Danger Reduction Team has developed the Active City Network, with the aim to give employees the opportunity to provide input into the Road Danger Reduction Partnership and work together to reduce danger presented to their active travellers on the City streets.

* RORY – City Police have questioned the use of the word target here – obviously this a maximum acceptable, our real target would be zero. Please advise how best to express this.

Since the development of the Active City Network, the team has established a board of 12 founding members and has held two high profile events, hosted by international law firm Fieldfisher in September and Nomura Bank in November 2016, which attracted over 200 delegates representing over 80 organisations.

Working in partnership to change cyclist behaviour: Working with the City of London Police and City of London Corporation Communications team the 'Light Angels' Campaign to raise awareness of the need for cycle lights during winter has had an excellent level of engagement so far, with over 800 lights distributed to bike users over two evenings.

Partnering with schools to reach the next generation of road users: The Road Danger Reduction Team continue to work with all five City of London schools to implement pedestrian and cycling training for children.

Tackling Work Related Road Safety

Large Goods Vehicles (LGV's), Heavy Goods Vehicles (HGV's) and delivery vehicles (usually vans) have been disproportionately represented in KSI statistics for a number of years. In the City one of the biggest risks to Vulnerable Road Users comes from the construction and supply chain vehicles that support over 63 active development sites. As a result the Road Danger Reduction Team are piloting 'City Mark', an initiative which will support the existing Work Related Road Safety activities. This scheme is being delivered as part of the Considerate Contractors Scheme, of which all construction sites in the City are members.

1.2 The experience of road users

A busy and growing city

Roads in the Square Mile are as busy as ever. Congestion remains a challenge for the City of London Corporation due to the high number of developments taking place. Against this backdrop there has been a continued rise in the number of commuters entering the City, with a sharp rise in the number choosing to commute by bicycle.

To support smooth travel through periods of change, we need all road users to be fully present and aware of their surroundings and to be respectful of other road users. As a result the communications strategy should focus on supporting behaviour change amongst all road users, while acknowledging a hierarchy of communications which shapes different messages for those who present the most significant risk (i.e. large or fast vehicles) and those who are the most vulnerable (i.e. pedestrians).

Opportunities for communications around infrastructure change

Where infrastructure changes present specific new risks or opportunities, these can be highlighted to audiences through our communications. We will also work with businesses and local wards to ensure communications from all stakeholders in consistent and aligned.

Perception versus reality

In addition, constant change and a swelling road-user population can lead to a perception that our city roads are more dangerous than the reality. It can also contribute to stressful experiences, which, while not resulting in increased casualties, can make people feel unsafe and make use of our streets less pleasant than we would like. Our strategy therefore needs to address perceptions about road danger as well as the reality.

2

Strategy and communication goals

2.1 The overall strategy will help address the following aims:

a) Make our roads safer for all users by:

- Reducing the number of people injured in road traffic collisions
- Reducing the number of people killed and seriously injured, prioritising reducing deaths and life-changing injuries.

b) Improve awareness and understanding

among all stakeholders about effective strategies and work being delivered by the Road Danger Reduction Partnership to reduce road danger and increase positive road behaviour by all road users.

2.2 The specific communications goals that will support the Road Danger Reduction Partnership's core aims are:

a) Deliver campaigns and activities to support road danger reduction

in the City by positively influencing the behavior of road users

c) Create a culture of respect and responsibility

among all roads users and improve perceptions about safety when using streets in the City

b) Raise awareness about the work being done by the Road Danger Reduction Partnership and build a collaborative community of stakeholders working constructively together

d) Ensure communications delivered are best practice, grounded in evidence and developed in consultation with experts, stakeholders and interest groups



3

Strategic approach

3.1 Overview

This strategy aims to give all delivery teams and partners clear guidelines for developing communications activities around Road Danger Reduction. All activities planned should deliver against the two key areas for communications outlined in section 2.1:

- Adhering to our principles
- Using recognised models to develop ideas that either influence attitudes and behaviour or raise awareness to prompt a positive action
- Adhering to our brand hierarchy (see section 3, page 17)

- Using our evaluation model to track, measure and report on success (see section 4, page 22 to 24)
- Using the latest evidence and data reflecting the current reality of behaviours and risks to inform our planning and activity
- Generating increased awareness and engagement with stakeholder and public audiences through positive profile raising

By ensuring that all activities meet these key criteria, delivery will remain cohesive, consistent and true to our communications goals.

3.2 The Road Danger Reduction Partnership

The Road Danger Reduction Partnership is a working group of public sector organisations that has a vested interest improving road safety and reducing the number of road casualties in the City. The shared expertise, experience and resources allow for a Safe Systems Approach to reducing casualties; encouraging safer behaviour, enforcing the law and targeting the factors which cause collisions.

Our partners:

- City of London Department for the Built Environment
- City of London Police
- Greater London Authority
- London Fire Brigade
- Transport for London

3.3 Our communications principles

We have developed a set of principles to underpin all of the communications activity and ensure consistency in approach and message when communicating about all the road danger reduction initiatives. We believe these principles can help to maximise the impact and engagement we generate through activity and mitigate against any potential criticism of that activity by interest groups and influencers for different road user groups. Our principles are:

- **Equal but different:** We treat all road users as having equal rights but different experiences and levels of responsibility.

The larger your vehicle, the greater your responsibility to travel with care and look out for other road users

- **Safer and better:** Our priority is to reduce life changing injuries and deaths, but our ambition is to reduce harm at all levels and create a more pleasant street environment for all users.
- **We are all in this together:** We can't effectively engage all our road users directly, so we will prioritise encouraging and supporting stakeholders, particularly businesses, to communicate our messages to their audiences

- **Evidence-based:** All communications are based on a solid, robust evidence base. This base will include our own statistics and insights and be supplemented by learnings from other best practice road danger reduction initiatives from around the world
- **Raise awareness not fear:** The balance of our communications will encourage road users to change their behaviour to reduce risk without increasing their fears around safety or creating an inaccurate perception of danger

3.4 Behaviour change

The following models should be used to develop activities that aim to influence personal behaviour.

Factors that influence behaviour

Consider the following influences on audience behaviour and ensure your plan of activity covers each of these influence areas:

Figure 2



Relevance

- Personal identification
- Emotional association
- Understand competition for audience attention
- Insight and audience led

Ease

- Defaults (timely, easy access)
- Norms
- Identify and remove barriers (knowledge, skills, resources, tools)
- Incentives

Community

- Build active community participation
- Public commitment encourages consistency
- Prominent/visible
- People like me

Trust

- The right messenger (who and what?)
- Credible brand or voice
- Involving

Value

- Clear exchange
- Positive cost-benefit
- Rewards
- Feel better about self

The behaviour change journey

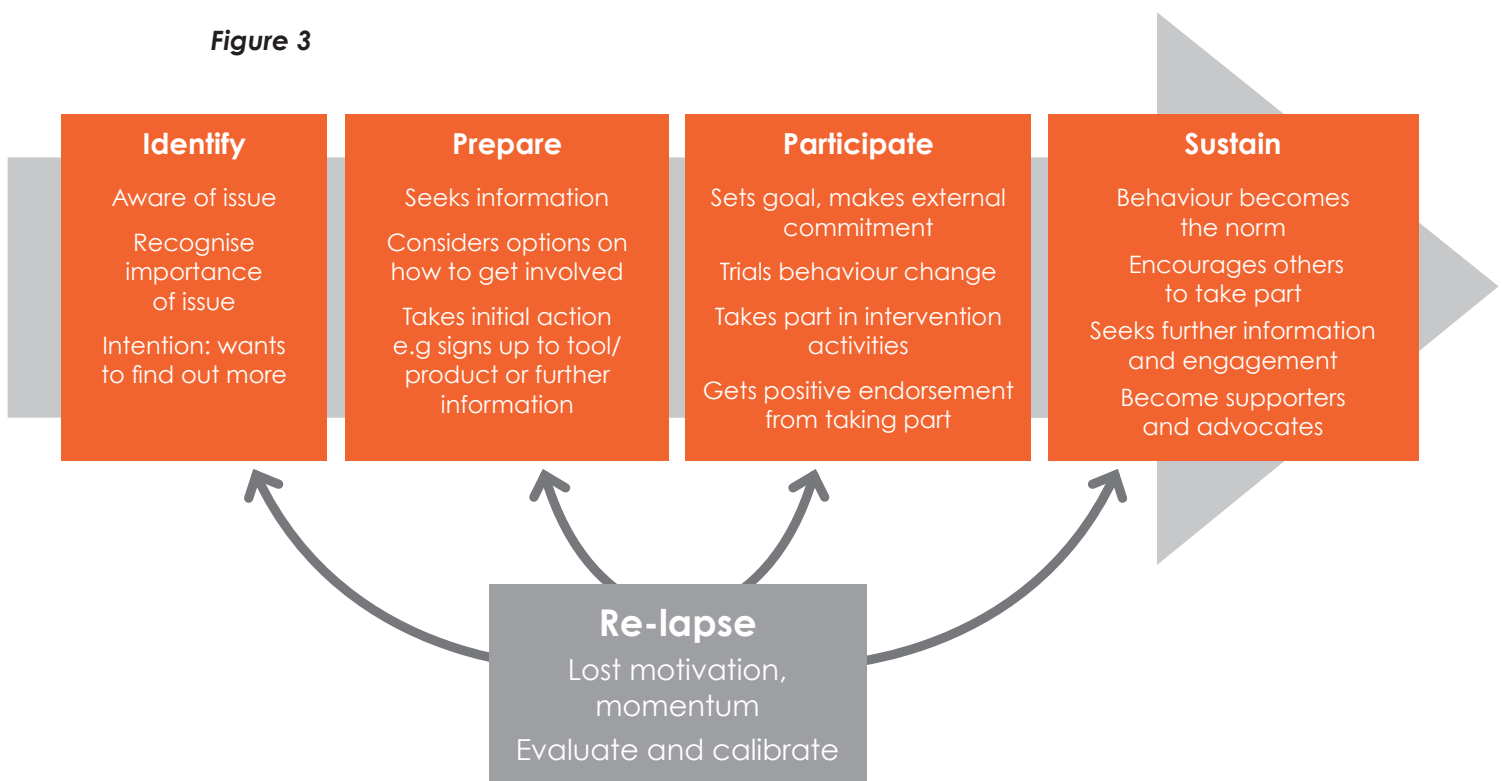
Creating long-term behaviour change among all road-users is central to our strategy. The City is investing in infrastructure change to reduce danger through practical measures, such as increased dedicated space for pedestrians and cyclists. But a real reduction in road danger will only happen if all road-users also behave in a safe and appropriate way.

Our initial focus will be on those road-users who present the most risk: motorists and especially those using large and fast vehicles.

We must also recognise that behaviour change takes time. It can take years for people to create a habit of safe behaviour. However, investment in behaviour change campaigns now means we start that journey.

We will be using the following model to develop our communications activities. Communications usually focuses primarily on the 'Identify' and 'Prepare' elements of the journey. Further practical interventions will help people to move towards the 'Participate' and 'Sustain' part of the behaviour change journey.

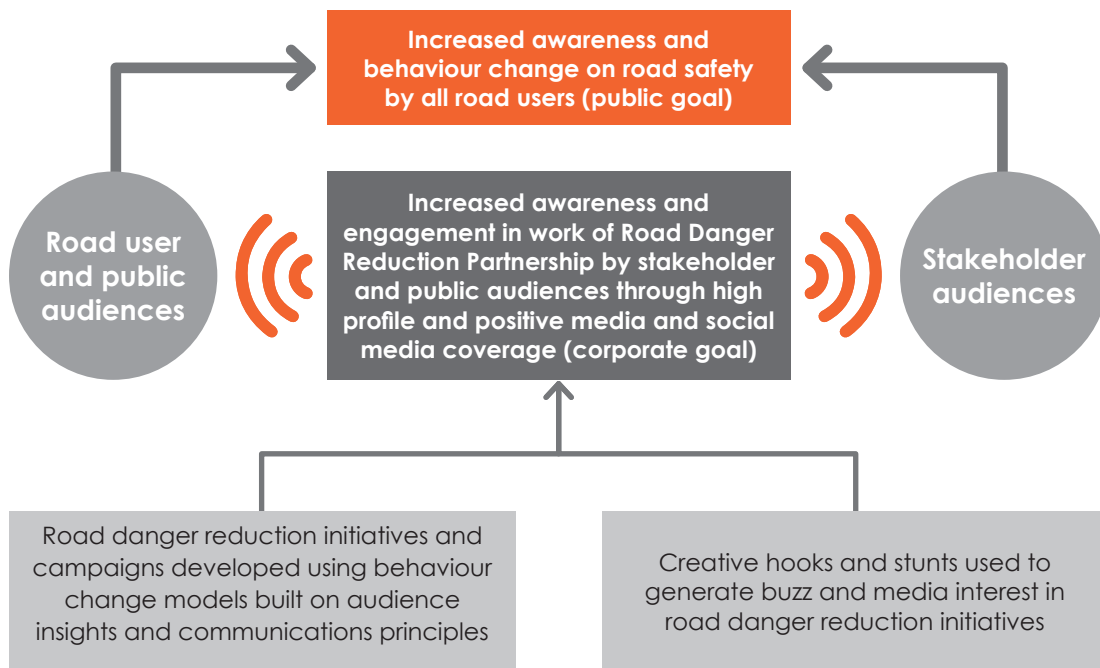
Figure 3



3.5 Suggested strategy framework

Building on the core communications principles and behaviour change models we have outlined, we will use the following strategic framework to support communications delivery.

Figure 4

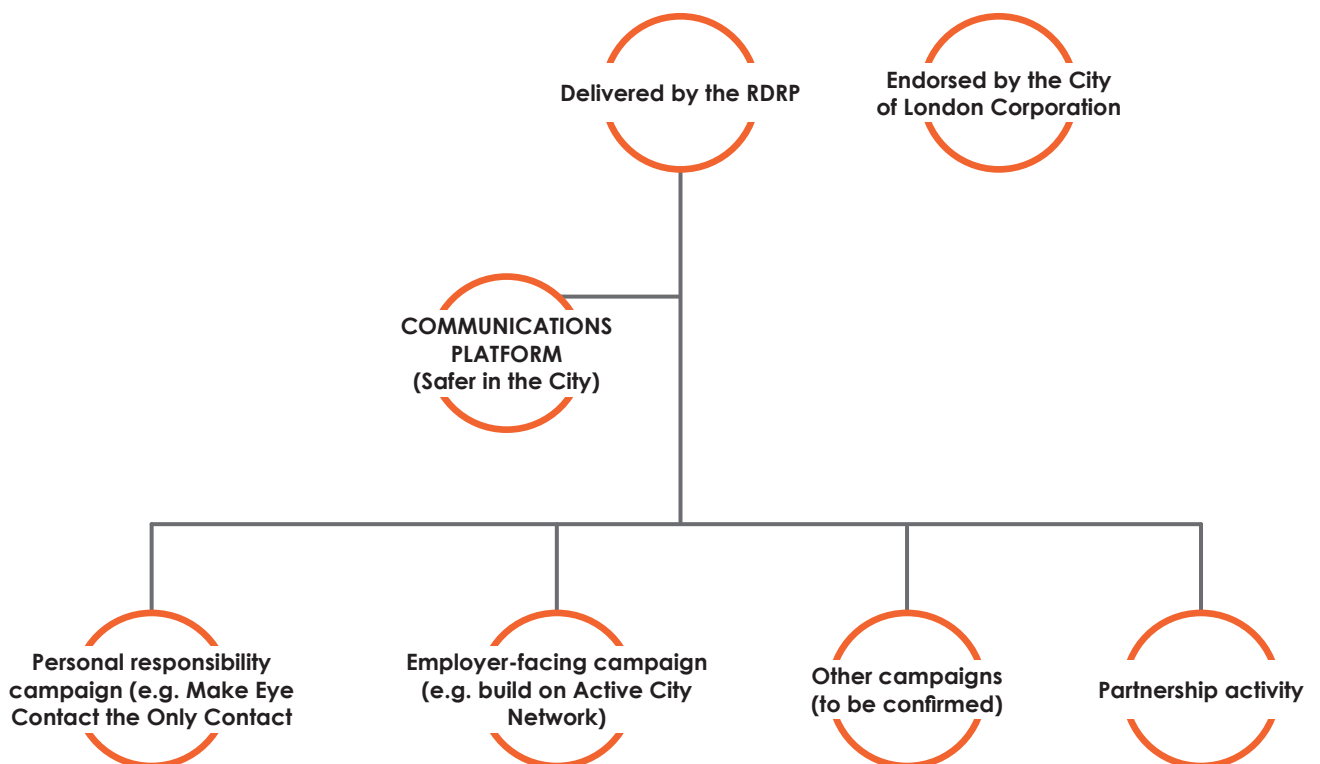


3.6 Brand approach

We will develop a clear brand model to ensure high visibility of the City of London Corporation and the Road Danger Reduction Partnership in all of our communications activities. This approach will also deliver a consistent message to all audiences and clear, cohesive approach that all delivery partners can use.

The model below shows how all communications campaigns from the Road Danger Reduction Partnership should come under a single public-facing brand platform, with an overarching, positive message. We recommend that this platform is a development of the current 'Safer in the City' brand. The overall brand style and tone will always begin with 'Safer in the City', but through the production of full brand guidance, we can offer flexibility for individual campaigns to work within.

Figure 5



Indicative costs for developing the 'Safer in the City' brand – £10k

3.7 Example activity

We recommend a campaign to launch Safer in the City to all stakeholders. This will have the dual purpose of:

- Highlighting the positive step forward the new Road Danger Reduction Partnership strategy represents, through its collaborative, cohesive approach
- Inviting both internal and external stakeholders to get involved and take part and find out how they can use Safer in the City through their campaigns and communications

We have carried out initial ideas development for an integrated behaviour change campaign, focusing on encouraging awareness and vigilance for all road users: Make Eye Contact the Only Contact.

Creative execution ideas

a) *"Their eyes met and...."*

Eye contact can be a very powerful moment as it humanises whoever we are making eye contact with. It is a cliché of a thousand trashy romantic novels and films to put huge significance on the first moment for the protagonists when their eyes meet. We can use that cliché as a light hearted way of encouraging all road users to seek out eye contact around the concept of "their eyes met and...."

For example, a series of spoof posters featuring, across the top half, a diverse range of road users featured in a faux romantic split screen image showing the moment their eyes met. This would be captioned with:

"Their eyes met and...."

This would be followed in the bottom half by another split screen image showing how it changed their behaviour in terms of road use, e.g. a car driver slowing down to allow pedestrians to cross, and a pedestrian pausing and looking both ways before crossing the road. This would be captioned with

"....they looked out for each other on their journey."

Make eye contact and help make our roads and pavements safer for all."

This concept would be particularly effective for video, but it can be made to work across a range of media.

b) Seeing eye to eye

The City of London's roads, like most of the roads in central London, can get very congested, especially during peak times, and this often creates conflict and resentment between people using different transport modes of transport – drivers, motorcyclists, pedestrians and cyclists. We can use the potential double meaning of the concept of "seeing eye to eye" to both highlight the safety benefits of making eye contact with other road users while encouraging all to look beyond the label of "cyclist", "driver", "motorcyclist" and "pedestrian" and see the person and create a stronger sense of empathy.

For example, we can develop a series of posters that show people using different modes of transport united by a series of shared interests, opinions or moods, for example:

"Tim's a passionate West Ham fan, and so are Harry and Tabitha. We share a lot with the people we share our roads with – seeing eye to eye with other road users can help keep us all safer in the city."

"Zeba is a Taurean, and so are Bill and Mo. We share a lot with the people we share our roads with – seeing eye to eye with other road users can help keep us all safer in the city."

The final agreed creative route would be used to produce a piece of core collateral, such as film or impactful series of images, primarily aimed at helping to generate media coverage and sharing on social media.

Exposure – mainstream and social media campaigning

The RDRP will host a series of events to directly engage road users, disseminating relevant materials for each user group. Existing materials can be used for this.

There is potential to reach a greater number of people in our target audience through media and digital channels. That means we need to produce a piece of content that will grab the attention of the media and be striking enough to encourage people to share on social media. People tend to share two types of content when it comes to road safety – the very shocking and visceral, or the creative and thought-provoking. In the case of this campaign, we don't feel that shocking or visceral is a route to go down. Tonally, they can be difficult to get right and might lead to accusations of scare-mongering or victim blaming. As a result, we recommend looking at the creative or thought-provoking route. Shareable content of this type tends to come in two forms – a video clip or an impact fun image or series of images. The ideas outlined above are starting points for the direction of this content. A social media dissemination plan will be developed to maximise this content and ensure targeted audience reach.

We are also keen to explore how we can make the most existing events that are planned, ensuring any events managed by RDRP members support and amplify the key messages we are looking to get across to our target audiences and also help us generate the right media coverage. The RDRP communications team will work collaboratively to develop the concept to work with existing event opportunities.

In terms of target media, we recommend focusing on reaching pedestrians and public transport users through commuter titles, which means aiming for the Evening Standard and City AM in particular. This would be supplemented by seeking coverage on drivetime radio slots for London stations, so we can hit drivers at the right time, and then looking at all digital London news channels and social media with digital coverage – including local papers in the main areas city of London workers commute in from.

We will need to consider how we can generate some news value, to increase our chances of getting coverage and increase the profile of the coverage we gain. We don't have provision in the budget for this but, as we have previously recommended in relation to video, it is definitely worth us spending time with the team developing some ideas and tactics. For example, we could do a survey via members to ask them to rate the importance of road safety in the city for their organisations.

As part of developing the media plan, we will develop a long list of both these ideas and recommendations for the launch events, so they work together to help us increase the reach and impact of the campaign and its message.

Table 4: Indicative costs for

| | |
|---|-------------|
| Media launch (venue and visual stunt) | £5k to £10k |
| Stakeholder launch (venue and invites) | £5k to £10k |
| Launch materials, e.g. video / stakeholders packs | £15k |

3.8 Planned activities for 2017

There are number of already scheduled events that will give us a good opportunity to promote our 'Safer in the City' messages to a range of audiences:

June 2017

- Initial launch of **Safer in the City** to stakeholder groups
- **Nocturne** www.londonnocturne.com
 - Family zone organised by the Road Danger Reduction Partnership provides an opportunity for public-facing, family friendly safety messages
- **Bike Week** <http://bikeweek.org.uk>
 - Quietways, working with Bike Week stakeholders is an opportunity to engage with the cycling community
 - Stakeholder networking event

September 2017

- **European mobility week:** This year European mobility week will be held under the banner of 'Smart and sustainable mobility', so is the perfect opportunity for cities like London to demonstrate the case for smart, sustainable transport solutions. The City of London Corporation can capitalise on this opportunity, with an integrated campaign developed by the Road Danger Reduction Partnership to raise awareness, provide a sense of pride for businesses, residents and workers and to encourage positive behaviour change.
 - Engagement with businesses (Specially developed materials to help businesses engage their employees and run events throughout the week; events for business leaders) – Public facing campaign (e.g. extended pedestrian and cycle zones; sustainable transport awareness learning opportunities)

November/ December 2017

- **Winter safety campaigns**
 - Targeted campaigns for different road users, highlighting the road risks that are enhanced during winter (e.g. bike lights and high-vis awareness for cyclists; visibility awareness and extra speed caution for motorists)
 - Winter safety packs for our employer networks

Costs for the development of each campaign phase will be confirmed in line with delivery outputs, but are likely to be similar to the costs outlined on the previous page.

4

Monitoring and evaluation

Communications will position the Road Danger Reduction Partnership and all of its stakeholders as proactively taking measures to reduce danger on the roads, working collaboratively with stakeholders across the City.

All communications will focus on the Road Danger Reduction Partnership's clear objectives (see section 2).

We recommend using the audience-based model of Think, Feel, Do to set targets, agree metrics and track success.

Examples of reach, engagement and action for each group have been given below. Suggested metrics for measurement are in italics.

This is an organic tool that will be expanded and adapted as specific communications campaigns and deliverables are finalised.

Table 5:

| | REACH | ENGAGEMENT | ACTION |
|--|---|--|---|
| | What did the audience see? | How did the audience get involved? | What did the audience do? |
| Internal CoLC and RDRP delivery teams | Set-up new RDRP Steering Group <i>Group established formally</i> | Regular meeting of Steering Group <i>Minuted actions and responsibilities</i> | Data and information sharing across team <i>Evidence of sharing across intranet, notice boards etc</i> <i>Jointly organised events at Guildhall</i> |
| Road users (all – for specific suggestions see Communicating with target audiences) | Targeted campaigns for each user group: <ul style="list-style-type: none"> • Face-to-face contact via events. <i>Attendance numbers</i> • Social media content <i>Analytics data</i> • Traditional media-feature articles and news stories <i>Readership</i> • Information packs / advice <i>Number given out, e.g. at events, packs sent to employers</i> • Simple single-message awareness raising collateral (e.g. branded high-vis giveaways for cyclists) <i>Number of items given away</i> | Attend information / training events (e.g. via existing events like Bike Week, employer events or via member group events). <i>Attendance numbers</i> Engaging with teams at events (e.g. collecting giveaways and chatting with staff) <i>Manually gathered numbers</i> Click throughs to information sections of websites / other online content <i>Analytics data</i> Sharing messages via social media <i>Analytics data: likes, engagements; re-tweets etc</i> Response to surveys <i>Response numbers</i> | Measured stated changes in: <ul style="list-style-type: none"> • Attitude • Knowledge • Behaviour <i>Measure via surveys/focus groups</i> Recorded reductions in injuries and incidents. <i>Collected data</i> |

| | REACH | ENGAGEMENT | ACTION |
|---|--|---|--|
| Employers | <ul style="list-style-type: none"> • Via Facilities / HR managers • Via CEO's / Senior management <i>Establish relationships; up to date contact database</i> <i>Attendance at events</i> Direct invitations to participate <i>Information disseminated</i> Active City Network Membership | Events and Roadshows (bespoke or part of larger events) <i>Attendance numbers</i> Dissemination of materials to employees <i>Requests for info</i> Active City Network <i>Attendance at events; engagement in communications, e.g. surveys responses, click-through from e-updates etc</i> Events and Roadshows (bespoke or part of larger events) <i>Attendance numbers</i> <i>Active participation (e.g. case study sharing / presentation etc)</i> | Proactive action <ul style="list-style-type: none"> • Reported roll-out of info to employees • Evaluation of impact on employees • Policy change <i>Data recorded and shared by employer</i> <i>Response to surveys from RDRP</i> |
| Associations / Member Groups / Regulatory bodies | Direct invitations to participate <i>Information disseminated</i> Features, news articles and information to share with members <i>Information disseminated</i> | Events and Roadshows (bespoke or part of larger events) <i>Attendance numbers</i> Development of supporting materials <i>Requests for support</i> <i>Take-up of proactively offered support</i> Features, news articles and information to share with members <i>Information published / shared via member networks</i> | Proactive action <ul style="list-style-type: none"> • Reported roll-out to members / stakeholders • Evaluation of impact on members / stakeholders <i>Data recorded and shared by organisation</i> <i>Response to surveys from RDRP</i> Statement of support for RDRP principals and strategy <i>Published statement of support</i> |

| | REACH | ENGAGEMENT | ACTION |
|---|---|---|---|
| Media | Press releases <i>Number disseminated</i> Events / photo opps etc <i>Information disseminated</i> Advertorials / sponsored content <i>Number placed</i> | Planned articles and features; by-lines <i>Number agreed; content reflecting our goals</i> Relationships with journalists <i>Up to date contact database</i> <i>Number of contact meetings</i> Events / photo opps etc <i>Attendance numbers</i> Spokes people <i>Number of interviews</i> | Placement of content <i>To be measured by:</i> <ul style="list-style-type: none"> • Relevance • Positive story • Accurate quotes / info • Use of spokes people • Use of approved images / film etc • Length of story • Prominence of story <i>Literal column inches are not a recommended measure of success</i> Proactive contacts/ requests for relevant info from journalists <i>Number of contacts</i> Better deals for advertorials / sponsored content <i>& saved</i> |
| Members, Councillors, Executives | <ul style="list-style-type: none"> • Updates of activity • Invitations to events <i>Information disseminated</i> | Responses to information <i>Attendance at events</i> | Accurate dissemination of messages at ward level <i>Messages recorded in ward communications / info</i> Active participation in events <i>Presentations, speeches etc</i> |
| Residents | Neighbourhood Partnerships <ul style="list-style-type: none"> • Direct invitation to participate • Information disseminated City Resident magazine / ward-level comms <i>Information disseminated</i> <i>Pieces placed</i> London City events <i>Attendance by RDRP teams</i> | Neighbourhood Partnerships <ul style="list-style-type: none"> • Relationships established • Contact database • Participation in residents meetings London City events <ul style="list-style-type: none"> • Prominent position available for RDRP / involvement in event organisation • Direct contact with residents | Measured stated changes in: <ul style="list-style-type: none"> • Attitude • Knowledge • Behaviour <i>Measure via surveys / focus groups</i> Recorded reductions in injuries and incidents. <i>Collected data</i> |

5

Communicating with target audiences

4.1 Delivery of campaigns and activities to improve road safety

Different communications methods will be used to reach different groups. In each case, campaigns should consider what it wants its target audiences to **think, feel and do**.

The table below considers 'think, feel and do' for each audience groups, along with suggested channels and tactics that could be used to communicate with these audiences.

Table 6: Road user audiences

| Audience group | Think... | Feel... | Do... | Channels and tactics |
|----------------------------|---|---|--|--|
| Internal CoLC teams | <p>The RDR strategy is a priority to deliver.</p> <p>I clearly understand the aims of the strategy and my role on delivering on them.</p> | <p>Passionate about keeping all roads users in the city safe.</p> <p>Confident that all road users and other stakeholders can change their behavior and take action to reduce road danger.</p> <p>Confident that the strategic approach will have an impact on RDR.</p> | <p>Consider opportunities to include RDRP in planned activities.</p> <p>Use the strategy to plan any activity for RDR (use the specific models for planning and evaluation provided).</p> <p>Use the brand approach outlined, to ensure consistency of message.</p> <p>Include RDR Partners in activity for consultation, delivery support and evaluation, as appropriate.</p> | <p>New Steering group to be established with reps from across all RDR delivery and comms to share information, updates and ideas.</p> <p>Core data and information will be available on shared servers where possible. Furthermore campaigns and events can be shared via City of London Intranet, notice boards and events held at guildhall.</p> |
| RDRP delivery teams | <p>The RDR strategy is a priority to deliver.</p> <p>I clearly understand the aims of the strategy and my role on delivering on them.</p> | <p>Passionate about keeping all roads users in the city safe.</p> <p>Confident that all road users and other stakeholders can change their behavior and take action to reduce road danger.</p> <p>Confident that the strategic approach will have an impact on RDR.</p> | <p>Be proactive in contributing ideas, feedback and resources to CoL team to help deliver the strategy.</p> <p>Use the strategy to plan any activity for RDR (use the specific models for planning and evaluation provided).</p> <p>Use the brand approach outlined, to ensure consistency of message.</p> | <p>New Steering group to be established with reps from across all RDR delivery and comms to share information, updates and ideas.</p> <p>Core data and information will be available on shared servers where possible.</p> |

| Audience group | Think... | Feel... | Do... | Channels and tactics |
|-----------------------|--|---|--|--|
| All road users | <p>I am responsible for my own safety and that of other road users.</p> <p>Roads are a shared space between all road users – no one has more or less right to use the road than another group.</p> <p>City roads are busy. I need to be fully aware of my surroundings and of other road users to stay safe.</p> <p>The laws of the road (e.g. keeping to speed limits, stopping at lights, respecting designated sections, such as bus and cycle lanes) are there to keep me and other road users safe.</p> <p>Respecting road etiquette (e.g. looking and making eye contact before I cross the road, make a turn) will help to keep me and other road users safe.</p> | <p>Safe when I am using the road in the city.</p> <p>Respectful of other road users – they have as much right to use the road as me.</p> <p>Confident that I understand road law and how it applies to my mode of transport.</p> <p>Calm when roads are busy and traffic is congested. I understand that the City is a busy place and I need to be patient / allow more time for my journey at busy time.</p> | <p>Avoid aggressive behavior and stay calm.</p> <p>Always be aware what's going on around me; looking carefully and making eye contact.</p> | <p>OOH materials: Bus stops. Bus dressing ads. Police / traffic officers on roadside. Giveaways – appropriate for mode of transport (e.g. umbrellas for pedestrians, bag covers for cyclists, car stickers for taxis). These act as reminders for the owner and as branded advertising for other road users. PR via London media. Social media. Employers (see below employer section).</p> |
| Pedestrians | | | <p>Looking carefully and making eye contact when crossing the road.</p> <p>Avoid using my phone / other devices that distract my vision and hearing when crossing the road.</p> <p>Use pedestrian and zebra crossings where possible.</p> <p>Avoid crossing between stationary or slow moving traffic.</p> | <p>'All road users' channels plus: Pedestrian groups, e.g. Living Streets. Free print media available at train / tube stations (PR and ad opportunities). Station and inside transport advertising (bus/train/tube). Info hubs / giveaways outside stations.</p> |

| Audience group | Think... | Feel... | Do... | Channels and tactics |
|---------------------------|--|---------|--|--|
| Cyclists | | | <p>Looking carefully and making eye contact when changing lanes, turning, using junctions.</p> <p>Always signal clearly when manoeuvring.</p> <p>Slow down when approaching crossings or moving through slow-moving traffic.</p> <p>Adhere to road law (e.g. stopping at red lights and giving way).</p> | <p>'All road users' channels plus:</p> <p>Cycling groups (LCC, British Cycling, Cycling UK).</p> <p>Bus sides and backs.</p> <p>In-vehicle stickers (viewing not using).</p> <p>Cycling kit giveaways with key messages (high-vis vests, bag covers etc).</p> |
| Civilian motorists | <p>Pedestrians and cyclists are more vulnerable than me and more likely to be killed or seriously injured if there is a collision, so should take extra care to look out for them, even when I am keeping to the laws of the road.</p> | | <p>Looking carefully and making eye contact when changing lanes, turning, using junctions.</p> <p>Slow down when approaching crossings.</p> <p>Adhere to road law (e.g. do not use cycle / bus lanes, enter box junctions).</p> | <p>Bus sides and backs.</p> <p>In-vehicle stickers.</p> |
| Motor-cyclists | | | <p>Looking carefully and making eye contact when changing lanes, turning, using junctions.</p> <p>Always signal clearly when manoeuvring.</p> <p>Slow down when approaching crossings or moving through slow-moving traffic.</p> <p>Adhere to road law (e.g. do not use cycle lanes / boxes).</p> | <p>Motorcycling groups</p> <p>Bus sides and backs</p> <p>MC kit giveaways (high-vis vests, bag covers etc)</p> |

| Audience group | Think... | Feel... | Do... | Channels and tactics |
|---|----------|---------|--|---|
| Black cabs | | | <p>Looking carefully and making eye contact when changing lanes, turning, using junctions.</p> <p>Slow down when approaching crossings.</p> <p>Adhere to road law (e.g. do not use cycle/ bus lanes, enter box junctions).</p> | <p>LTDA, LTCC and associated magazines; messages to new drivers through tests (examiners are message conduit).</p> <p>Bus sides and backs.</p> <p>In-vehicle stickers.</p> |
| Private hire taxis /delivery drivers | | | | <p>Employers (e.g. training, info packs etc provided).</p> <p>Clients (noted some companies will have safety in their contractual agreements with private hire companies).</p> <p>Messages to new drivers through tests/ assessments for employment / inductions.</p> <p>Bus sides and backs.</p> <p>In-vehicle stickers.</p> |
| Bus drivers | | | <p>Looking carefully and making eye contact when changing lanes, turning, using junctions.</p> <p>Be conscious of cyclists / motorcyclists.</p> <p>Always signal clearly when manoeuvring.</p> | <p>Employers (e.g. training, info packs etc provided) – TfL, bus operators.</p> <p>At-station / depot posters (i.e. before you start your shift messaging).</p> <p>Bus sides and backs.</p> <p>In-vehicle stickers.</p> |

| Audience group | Think... | Feel... | Do... | Channels and tactics |
|---------------------|---|--|---|---|
| HGV / Fleet drivers | | | <p>Looking carefully and making eye contact when changing lanes, turning, using junctions.</p> <p>Be conscious of cyclists / motorcyclists.</p> <p>Slow down when approaching crossings.</p> <p>Adhere to road law (e.g. do not use cycle / bus lanes, enter box junctions).</p> | <p>Employers (e.g. training, info packs etc provided).</p> <p>CLOCS and FORS, partnership with TfL and Secbe.</p> <p>At-depot posters (i.e. before you start your shift messaging).</p> <p>Bus sides and backs.</p> <p>In-vehicle stickers.</p> <p>City Mark pilot to be reviewed and action considered.</p> |
| Employers | <p>Communicating RDR campaigns to my employees is a priority.</p> <p>RDR campaigns align with my company's policies and help me run a safe and efficient business.</p> <p>It is my responsibility to make my employees aware of the RDR messages.</p> | <p>Confident about the role my company and employees play in the RDR strategy.</p> <p>Responsible for the behavior of my employees.</p> <p>Supported by the RDR to implement ideas and communicate messages to my employees – I have all the info and materials I need to do this.</p> | <p>Take up training programmes / attend events offered by the RDR.</p> <p>Disseminate employee-facing info and materials provided by the RDR.</p> <p>Implement a clear plan for ensuring all employees are aware, capable and motivated to behave safely.</p> <p>Make clear to employees that safety is sacrosanct (above productivity / margin etc).</p> | <p>Key to build relationships: Facilities Managers are a tried and tested audience; CEOs / Directors to be targeted via members/ Senior RDRP Partners.</p> <p>Events and Roadshows (either bespoke for larger orgs or in groups).</p> <p>Direct invitations to participate.</p> <p>Development of employee-facing supporting materials (Facilities Managers tried and tested point of contact).</p> <p>Review and refinement of Active City Network activity.</p> |

| Audience group | Think... | Feel... | Do... | Channels and tactics |
|-------------------------------------|--|--|--|--|
| Associations / member groups | <p>The RDRP wants to protect our members and respects their right to use the road safely.</p> <p>The RDRP wants to work with us and respects our view and that of our members.</p> <p>Communicating RDR campaigns will help keep our members safe.</p> <p>RDR campaigns align with our aims and we can achieve more by working together.</p> | <p>Confident about the role our organisation plays in the RDR strategy.</p> <p>Positive about the aims of the strategy and working with the RDR to achieve them.</p> <p>Supported by the RDR to implement ideas and communicate messages to our members.</p> | <p>Consult with the RDR to help develop communications for our members and other road users.</p> <p>Take up training programmes / attend events offered by the RDRP.</p> <p>Disseminate info and materials provided by the RDRP to members.</p> | <p>Key to positive, reciprocal build relationships.</p> <p>Events (transport mode specific or mixed with shared topic).</p> <p>Direct invitations to participate.</p> <p>Development of supporting materials.</p> <p>'Ready to go' news, articles and information to support PR.</p> |
| Regulatory bodies | <p>Communicating RDR campaigns to our stakeholders is a priority.</p> <p>RDR campaigns align with our strategy and help us meet our own goals.</p> <p>We benefit from partnership and collaboration with RDRP.</p> | <p>Confident about the role we play in the RDR strategy.</p> <p>Supported by the RDR to implement ideas and communicate messages to our stakeholders. I have all the info and materials I need to do this.</p> | <p>Attend events offered by the RDRP.</p> <p>Consult and collaborate on strategy development and activity.</p> <p>Disseminate info and materials provided by the RDRP.</p> <p>Build a positive relationship with the RDRP sharing information and best practice.</p> | <p>Key to positive, reciprocal build relationships.</p> <p>Events.</p> <p>Direct invitations to collaborate.</p> <p>Development of supporting materials.</p> <p>Regular sharing of information, evaluations and best practice.</p> |

| Audience group | Think... | Feel... | Do... | Channels and tactics |
|--|---|--|--|---|
| Developers (63 major development sites) | <p>My development affects safety on the road around the site.</p> <p>Communicating RDR campaigns to my employees and suppliers is a priority.</p> <p>RDR campaigns align with my company's policies and help me run a safe and efficient business.</p> <p>It is my responsibility to make all employees and suppliers aware of the RDR messages.</p> <p>It is my responsibility to take measures to protect public safety at my site.</p> | <p>Confident about the role my company and employees play in the RDR strategy.</p> <p>Responsible for the behavior of my employees and suppliers.</p> <p>Supported by the RDR to implement ideas and communicate messages to my employees and suppliers – I have all the info and materials I need to do this.</p> | <p>Take up training programmes / attend events offered by the RDRP.</p> <p>Disseminate employee and supplier facing info and materials provided by the RDRP.</p> <p>Implement a clear plan for ensuring all employees are aware, capable and motivated to behave safely.</p> <p>Make clear to employees that safety is sacrosanct (above productivity / margin etc).</p> | <p>Direct invitations to participate through Considerate Contractors Scheme (City Mark targets developer sites and working with the Considerate Contractors Scheme will have its own communications strategy, which will feed into the Road Danger Reduction Communications Plan.</p> <p>Events.</p> <p>Development supporting material / training.</p> |
| Media | <p>The RDRP is running positive campaigns and activities to make road users safe.</p> | <p>I want to cover positive stories about RDRP campaign, as these are good news for my audience.</p> <p>I have a positive relationship with RDR comms team and know I can rely on them to make statements and provide information for my story. I know who the key spokespeople are.</p> <p>I am confident I have the right contacts for all the RDRP Partner organisations for quotes / statements etc.</p> | <p>Cover positive stories about RDRP campaigns.</p> <p>Attend events and opportunities, such as campaign launches.</p> <p>Maintain positive relationships with the RDR Comms team and contact them for statements and info when preparing a story (especially in the case of a road collision / accident).</p> | <p>Press releases.</p> <p>Media friendly events (launches / photocalls etc).</p> <p>Building positive relationships with individual journalists.</p> <p>Features and by-lines.</p> <p>Advertising / sponsorship.</p> |

Table 7: Stakeholder audiences

| Audience group | Think... | Feel... | Do... | Channels |
|----------------|--|---|--|--|
| Media | <p>The City of London Corporation takes the safety of all road users extremely seriously and is prioritising reducing deaths and injuries on the road.</p> <p>The RDRP has a clear strategy in place to improve safety on roads in the Square Mile.</p> <p>The RDRP is working collaboratively together, and with other stakeholders to be effective.</p> <p>The number of serious injuries and deaths has not increased significantly since 2013, but we are aiming for zero.</p> <p>The RDRP is fully aware of how major developments and road infrastructure can affect safety and is prepared.</p> <p>The RDRP takes learnings from best practice from around the world to develop its strategy.</p> | <p>The RDRP have a clear safety strategy and this is positive story for London residents, workers and businesses.</p> <p>I have a positive relationship with RDR comms team and know I can rely on them to make statements and provide information for my story. I know who the key spokespeople are.</p> <p>I am confident I have the right contacts for all the RDRP Partner organisations for quotes / statements etc.</p> | <p>Cover positive stories about RDRP campaigns.</p> <p>Attend events and opportunities, such as campaign launches.</p> <p>Maintain positive relationships with the RDR Comms team and contact them for statements and info when preparing a story (especially in the case of a road collision / accident).</p> | <p>Press briefings around launch of strategy and individual campaigns.</p> <p>Events / photo opps etc.</p> <p>Regular personal contacts with journalists to build relationships.</p> <p>Press releases and statements.</p> <p>Provide interesting content: Film, images, stats and info etc.</p> <p>Consider ad spend / opportunities for advertorials.</p> <p>Feature pieces / editorial / bylines – think beyond news.</p> <p>Develop and regularly update core media resources: latest facts and stats, info on key initiatives taking place, evidence of success, case studies, media trained spokespeople matrix.</p> |

| Audience group | Think... | Feel... | Do... | Channels |
|---|--|--|---|--|
| City of London (internal) Members Councillors Executives | <p>Road Danger Reduction is a priority for The City of London Corporation.</p> <p>The RDRP has a clear strategy in place to improve safety on roads in the Square Mile.</p> <p>The RDRP takes learnings from best practice from around the world to develop its strategy.</p> <p>The RDRP is working collaboratively together, and with other stakeholders to be effective.</p> <p>The RDRP has a clear crisis comms process to deal with incidents (such as a KSI).</p> | <p>Confident that the RDRP strategy is answering the needs and concerns of key city stakeholders.</p> <p>Proud of the initiatives delivered by the RDRP and happy to publicly support them.</p> <p>Confident that spokespeople for RDR are media trained and resources are available to support them as needed.</p> <p>Confident that initiatives are being evaluated effectively, so that I can trust the results and understand the ongoing decision-making process.</p> | <p>Support the RDRP strategy by raising awareness of the work being done to protect the City Community, raise awareness of the risks and how to minimise these with all road users.</p> | <p>Internal RDRP Comms Steering Group will be developed to share activity.</p> <p>Regular updates to members / invitations to events – can cascade info down at ward level.</p> |
| Residents | <p>RDRP taking positive action to keep the streets where I live safe – my safety is their priority.</p> <p>RDRP is aware of how changes in infrastructure could effect me and provide information about this.</p> <p>RDRP is working in partnership with other local stakeholders to make RDRP activities effective</p> | <p>RDRP cares about my experience and my view as a resident.</p> <p>I know where to go for information.</p> <p>I feel confident that when there are infrastructure changes, there will be safe measures in place.</p> | <p>Engage with information disseminated.</p> <p>Share experiences / provide feedback about street safety concerns via surveys events.</p> | <p>Work with local neighbourhood partnerships (e.g. currency working with low emissions neighbourhood).</p> <p>City Resident magazine and ward-level comms.</p> <p>Development companies' neighbourhood comms around infrastructure changes – partner to disseminate street safety info.</p> <p>Amplify our presence at key London an City events, e.g. Sky Ride, Ride London etc.</p> |

| Audience group | Think... | Feel... | Do... | Channels |
|------------------------------|---|--|--|---|
| City Business Leaders | <p>By supporting and collaborating with RDR I am showing leadership and best practice around employee engagement.</p> <p>RDR campaigns align with my company's policies and help me run a safe and efficient business.</p> <p>It is my responsibility to make my employees aware of the RDR messages.</p> | <p>Confident about the role my company can play in the RDR strategy.</p> <p>Responsible for the behavior of my employees and the reputation of my business through other factors, such as supply chain / contractors.</p> <p>Supported by the RDR to implement ideas and communicate messages to my employees – I have all the info and materials I need to do this.</p> | <p>Attend events offered by the RDR.</p> <p>Support RDRP activities by appointing champions within my company.</p> <p>Implement a clear plan for ensuring all employees are aware, capable and motivated to behave safely.</p> <p>Make clear to employees that safety is sacrosanct (above productivity / margin etc).</p> | <p>Cheapside Business Alliance, Active City Network and City Matters are all effective networks for companies that want to take part.</p> <p>Mobilise our members to communicate with Executives – clear and specific ask.</p> <p>Note: Current outreach work so far has seemed effective however there needs to be data present to challenge misconceptions.</p> |

6

Appendix

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|---|--|---------------------|
| Committees: Planning and Transportation Projects Sub Culture, Heritage and Libraries (for information) | Dates: 21 March 2017 Urgency Urgency | |
| Subject: Cultural Hub Public Realm Temporary Projects 2017: 'Quick Wins' | Gateway 1/2/3/4 | Public |
| Report of: Director of the Built Environment | | For Decision |

Summary

Dashboard

- **Project Status:** Green
- **Timeline:** Projects to be delivered between July 2017 and December 2018
- **Total Estimated Cost:** £190k- £570k
- **Overall Project Risk:** Low

This report recommends Members initiate a programme of events, temporary art installations, new street furniture, and greening for the Cultural Hub area of the City (see Appendix A). The programme would commence in 2017, as a set of 'Quick Wins' that can be introduced into the public realm. The purpose of the installations and events is to indicate something of the change to come in the Cultural Hub area in the future as longer-term changes are realised. The timing of the 'Quick Wins' would largely coincide with major milestones, such as the launch of the brand and new name for the Cultural Hub in July 2017, the start of Simon Rattle's tenure with the London Symphony Orchestra in September 2017 and the opening of the central section of Crossrail stations in December 2018. However, it will be important to continue the programme of 'Quick Wins' after these dates to maintain the profile of the cultural hub as the longer term projects, such as the relocation of the Museum of London, are progressing. The first phase of this 'Quick Wins' project is proposed to conclude in December 2018.

The 'Quick Wins' project was requested by the Cultural Hub Member Working Party and the accompanying indicative programme was endorsed by the Working Party on 1 February 2017 and the Programme Board on 7 March 2017. The majority of the installations and events proposed are intended to be temporary in nature and the project will provide the opportunity for the wider community to give feedback on which installations are preferred with the option for popular installations to be retained for a longer period. However, those installations that are less popular can be removed. Prior to the implementation of temporary installations the project managers will ensure that, where relevant, Barbican residents and other key stakeholders are consulted following the agreed corporate process.

In order to deliver some initial 'Quick Wins' by July 2017 and support this major

milestone, officers will need to procure an arts programmer or curator (which could be obtained through a cultural hub partner) for this programme, seek necessary consents including event licences, road closures and planning permissions and instruct fabrication of installations or finalisation of events. This will not be possible were this report approved at the next scheduled meeting of all the relevant Committees. The Town Clerk has also provided advice on the Gateway Procedure and recommends this report be submitted to the Committees as a Gateway 1-4 report. Once the detailed programme is confirmed, including timings, cost and funding source, a Gateway 5 report will be submitted to the relevant Committees for their approval. A first phase of installations will be delivered in July 2017 together with an agreed programme of what is to follow over the subsequent months.

At the conclusion of this programme in December 2018, a report will be submitted to Members to evaluate the success of the programme and ascertain Members' appetite for further temporary interventions.

Financial Implications

In order to develop the detailed programme ready for Member consideration at Gateway 5, approval of £60k is now sought to be allocated according to the table below.

| Item | Funds/ Source of Funding | Cost (£) |
|-------------|--------------------------|----------------|
| Fees | Cultural Hub budget | £30,000 |
| Staff Costs | Cultural Hub budget | £30,000 |
| | Total | £60,000 |

Recommendations

It is recommended that Members approve:

1. Initiation of a programme of 'Quick Wins', comprising events, installations and greening in the public realm in support of the Cultural Hub, and
2. Funding of £60,000 (as detailed in Section 20 of this report) to develop the project to the next Gateway.

| | | | | |
|---|---|--------|--------------------------|----------|
| 1. Approval track and next Gateway | Approval track: 3. Light Next Gateway: Gateway 5 - Authority to Start Work (Light) | | | |
| 2. Resource requirements to reach next Gateway | Item | Reason | Funds/ Source of Funding | Cost (£) |

| | | | | |
|----------------------|---|--|---------------------|----------------|
| | Fees | External consultant to curate the programme. Costs at this stage include production of a full draft programme of events/ interventions. | Cultural Hub budget | £30,000 |
| | Staff Costs | Project management for the programme will be provided by the CPR team. This will include report writing, managing the procurement process, managing liaison with other City departments. | Cultural Hub budget | £30,000 |
| | | Total | | £60,000 |
| 3. Next steps | <ul style="list-style-type: none"> • <u>March 2017</u> : Funding approved and released for next stage • <u>March – April 2017</u> : Appoint project curator/ programmer • <u>April 2017</u>: Development of detailed programme and key stakeholder consultation • <u>May 2017</u>: Gateway 5 reports for specific projects and any permissions or consents sought • <u>June 2017</u>: Installations fabricated; events finalised • <u>July 2017– March 2018</u>: Installations delivered on-site • <u>Jan - April 2018</u>: Evaluation of programme • <u>May 2018</u>: Update report to Members | | | |

Project Summary

| | |
|-------------------|--|
| 4. Context | <p>The City is currently developing a new Cultural Hub that aims to be an internationally renowned, vibrant and welcoming centre of arts, heritage and learning. This area is going through a transformation with the new brand and identity of the Hub to be launched this summer, Sir Simon Rattle to arrive at the LSO in September 2017, the new Crossrail stations opening in December 2018, and the proposed move of the Museum of London to West Smithfield. In addition, the City, alongside the Mayor of London, has agreed to support a series of low-emission initiatives in the area that should dramatically improve air quality.</p> |
|-------------------|--|

| | |
|--|---|
| | <p>To coordinate all the changes in the public realm in the Cultural Hub, Members approved in October 2016 that a “Look and Feel Strategy” be developed, that will be presented to Members for adoption at the end of 2017. However, with the new brand to be launched in the summer, it is proposed to deliver installations to coincide with the launch date that will signal the change that is to come. The press and the public will therefore see that the new Hub is not a name alone: it will be demonstrably a new destination for London.</p> <p>The City is also working on a series of projects related to improving air quality in the area as part of the Low Emission Neighbourhood (L.E.N.) project. It is the intention that the ‘Quick Wins’ programme be coordinated alongside the L.E.N., with joint projects being commissioned where possible.</p> |
| 5. Brief description of project | <p>It is proposed to carry out a series of temporary installations and cultural activities within the Public Realm that will initiate the changes that are to come in the Cultural Hub. They form a programme of ‘Quick Wins’ that can be delivered within the Cultural Hub area (or leading to it) that could be delivered starting in 2017.</p> <p>The projects include:</p> <ul style="list-style-type: none"> - trials and experiments with signage and wayfinding; new ways for the public to understand the area via digital formats/platforms and public information panels; - greening projects undertaken with local schoolchildren as part of the Low Emission Neighbourhood education programme; - new hoardings: working with owners of new building developments to design announcements about the Cultural Hub and its partners; - commissioning consultants (e.g. Playable City) to design interactive ways that the public can ‘play’ in the City and tell about the history through heritage trails; - installation of temporary street furniture, cycle racks and improved pedestrian connections; - temporary sites for performance venues; - artistic commissions to be a part of local high-profile design and architecture festivals and artistic lighting schemes. <p>It is proposed to deliver these installations using a collaborative approach with the many City departments and partners already working on the Cultural Hub, including the Barbican, the Museum of London, Town Clerk, City Transportation, LEN and others. The initiatives will therefore draw upon the existing expertise within each of the City’s departments.</p> |

| | |
|--|--|
| | <p>It is proposed that these installations are grouped under one programme to provide a joint and coherent approach, and to feed into the development of the Look and Feel Strategy for the Cultural Hub.</p> <p>The programme will be subject to relevant permissions and consents and key stakeholders will be consulted prior to implementation of the project.</p> |
| 6. Consequences if project not approved | The City will lose the opportunity to announce future changes in the area in time for the major milestone of the launch of the new name and brand for the Cultural Hub, inform and prepare people about the new Cultural Hub. This is also a way to engage and consult with local residents, occupiers and visitors about their aspirations for the area following the agreed corporate process. |
| 7. Success criteria | A well-received programme of events and installations delivered for the public realm in the Cultural Hub area that begins the process of transforming the area into a key cultural destination and attracting new visitors. |
| 8. Key Benefits | <p>The vision for the area is for the Cultural Hub to be welcoming to all, where talent is encouraged and nurtured, and that understands the place to be one of excellence in art, performance, design. Our proposals will start to make this vision visible at the street level: attracting people, marking the area as dynamic, lively, greener and indicating that the area will be transformed.</p> <p>The area around the Barbican and Smithfield with the new Museum of London will have new public amenities that will look more attractive to users, and will have improved air quality.</p> <p>The benefits of the future 'Cultural Hub' area will be signalled to the public through a series of interventions and installations in the public realm that reflect the new vision for the area.</p> |
| 9. Notable exclusions | n/a |
| 10. Governance arrangements | <p>Spending Committee: Planning and Transportation Committee</p> <p>Senior Responsible Officer: Director of the Built Environment</p> <p>Project Board: No</p> |

Prioritisation

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| 11. Link to Strategic Aims | 3. To provide valued services, such as education, employment, culture and leisure, to London and the nation. |
| 12. Links to existing strategies, programmes and projects | The project would be a key contribution to the Cultural Hub, the development of which is an important strategic priority for the City. |
| 13. Project category | 5. Other priority developments |
| 14. Project priority | C. Desirable |

Options Appraisal

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| 15. Overview of options | <p>The indicative list of installations endorsed by the Cultural Hub Working Party on 1 February 2017 and Programme Board on 7 March 2017 have been given a 'high' or 'medium' priority based on the following criteria:</p> <ul style="list-style-type: none"> - Feasibility: how possible it would be to complete the project given the short timescales involved, the project's complexity, and any dependence on external factors that may cause delays - Positive impact: the extent to which the completed project would achieve the stated aims of transforming a public space; indicating a change to come; making the area more enjoyable for the public; and providing new cultural amenities; demonstrating the benefits of the cultural hub to come - Cost: an estimated cost range has been given for each project; in many cases low-cost items have been given a higher priority, as they might provide better value at this stage. <p>Each individual installation is optional at this stage. It is proposed to develop a detailed programme for the next Gateway that includes the 'high' priority items, however there may be an opportunity for 'medium' priority items to be included in the programme where it is considered that these items align with the overall theme for the 'Quick Wins' programme.</p> <p>It is proposed to coordinate the first installations with other activities such as marketing, communications and partnership events supporting the launch of the Cultural Hub name and brand in July 2017.</p> |
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Project Planning

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| 16. Programme and key dates | <p>Overall programme: through 2017 and early 2018</p> <p>Key dates:</p> <ul style="list-style-type: none"> - First installations to be in place for July 2017 to be linked to launch of Cultural Hub brand/ identity - Commencement of Simon Rattle tenure at LSO in September 2017 - Cultural partners' Spring programmes in 2018 - Crossrail opening in December 2018 <p><i>See also item 3</i></p> |
| 17. Risk implications | <p>Overall project risk: Amber</p> <ul style="list-style-type: none"> - Insufficient budget for implementation of the programme - Delays to the programme, resulting in the missing of major milestones caused by procurement and consents processes or unforeseen difficulties during implementation |
| 18. Stakeholders and consultees | <p>The project will require collaborative working with many of the Cultural Hub partners:</p> <ul style="list-style-type: none"> - Barbican - Guildhall School - Museum of London - Open Spaces - City Transportation - Town Clerk's - Low Emission Neighbourhood - London Symphony Orchestra <p>Some specific projects within the programme will require public consultation.</p> |

Resource Implications

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| 19. Total estimated cost | <p>Likely cost range:</p> <p>1. Under £250k, or, 2. £250k to £5m</p> <p>Costs will depend on the projects chosen for the programme; it is estimated that individual interventions will cost on average £25-50k.</p> <p>Costs will be finalised at the Gateway 5, as specific projects will be recommended for Member approval and funding at that stage.</p> |
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| | <p>The costs to Gateway 5 include:</p> <ul style="list-style-type: none"> • Fees for an external consultant to curate the programme. Costs at this stage include production of a full draft programme of events/ interventions. Estimated at £30,000. • Staff Costs for the project management of the programme, provided by the CPR team. This will include report writing, managing the procurement process, managing liaison with other City departments. Estimated at £30,000. | | |
| 20. Funding strategy | Partial funding confirmed | Mixture - some internal and some external funding | |
| | Sources of Funding for Design and Evaluation | | |
| | Cultural Hub budget | £60,000 | |
| | Funding for implementation of the programme will be sought from allocated cultural hub budgets, Low Emission Neighbourhood budgets or other appropriate source to be agreed by Members at Gateway 5. | | |
| 21. On-going revenue implications | It is intended that the majority of projects will be temporary in nature, therefore no ongoing revenue implications are anticipated. | | |
| 22. Procurement strategy/Route to Market | All corporate procurement procedures will be followed | | |
| 23. Traffic implications | Depending of the final location of the individual installations, some temporary road closures may be required. This would be undertaken with all correct necessary approvals. In the event that temporary closures take place, the opportunities to monitor air quality, network impact and structural investigation and maintenance pertinent to either the Cultural Hub or Low Emissions Neighbourhood will also be sought. | | |
| 24. Sustainability and energy implications | A key theme of the projects will be greening, air quality and sustainability. The projects with the Low Emissions Neighbourhood project will aim to produce improved air quality for people in the City. | | |
| 25. Equality Impact Assessment | An equality impact assessment will be undertaken | | |

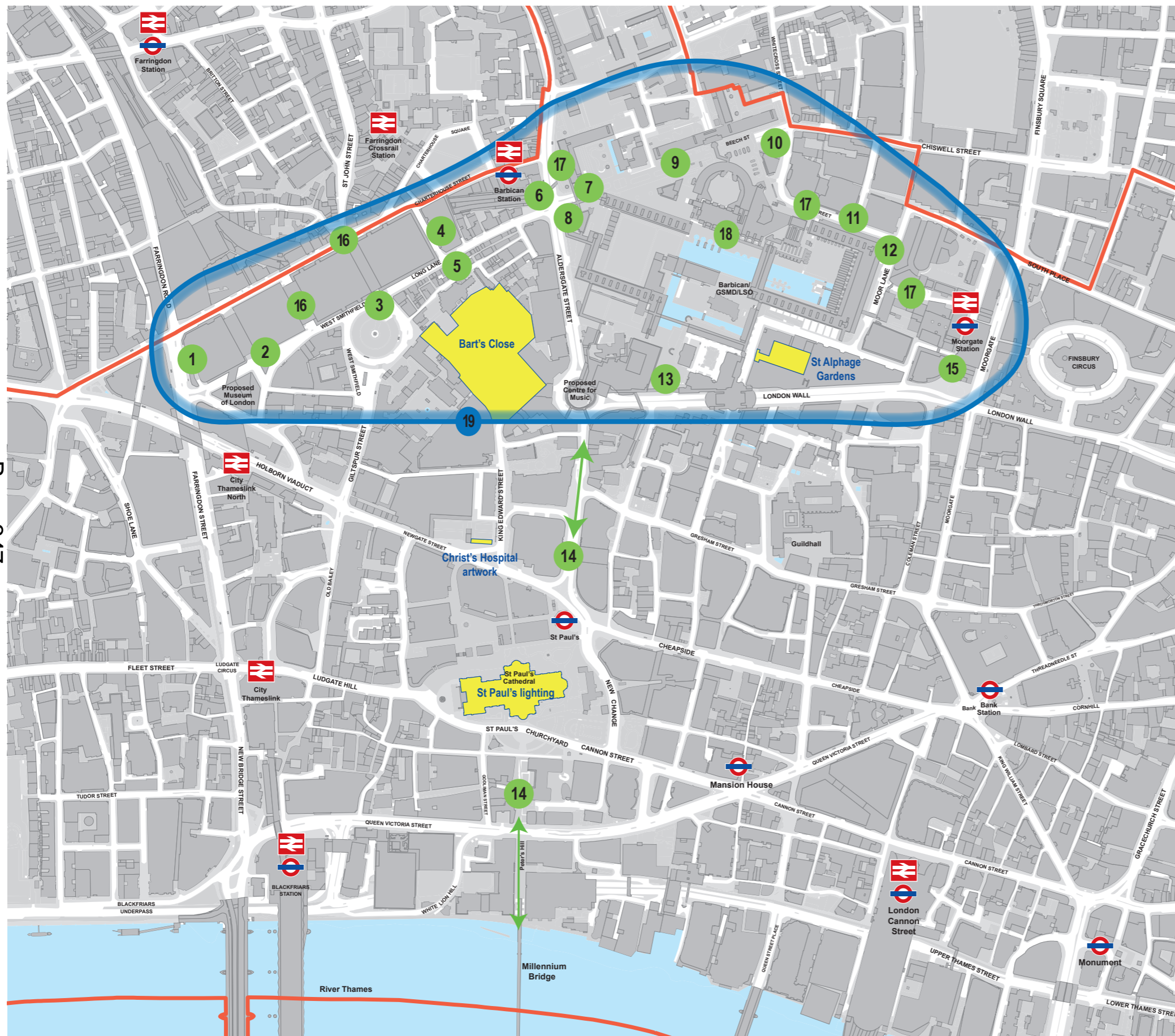
Appendices

| | |
|-------------------|--------------------------|
| Appendix 1 | Quick Wins itemised list |
| Appendix 2 | Map |

Contact

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Keys

- Cultural Hub
- City of London boundary
- CPR enhancement projects to be delivered in 2017/2018

Locations

- 1 Smithfield Market: Proposed new site of the Museum (Western Building)
- 2 Smithfield Market: Public realm around new Museum site - West Smithfield and West Poultry Ave
- 3 Public Realm around West Smithfield Rotunda
- 4 Hoarding around Crossrail East Farringdon station entrance
- 5 Lanes around Cloth Fair
- 6 Within Barbican Tube Station
- 7 Pavement on the corner of Beech Street and Aldersgate Street
- 8 The roof of the entrance to Beech Street
- 9 Within Beech Street Tunnel
- 10 Space in front of Cromwell Tower
- 11 Silk Street
- 12 Moor Lane
- 13 Roman London Wall near the Museum and in the Barbican Estate
- 14 Millenium Bridge; Riverside; Peter's Hill; St Paul's; St. Martin's le Grand
- 15 Hoarding around Moorgate Crossrail Station site
- 16 Various possible sites around Smithfield
- 17 Streets between Moorgate station and Barbican station
- 18 Various public areas within the Barbican complex
- 19 Cultural Hub Area wide and other appropriate locations

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| | Location | Activity | Team | Indicative Timing | Priority | Reason |
|---|--|---|--------------------------------------|----------------------------------|----------|---|
| 1 | Smithfield Market: Proposed new site of the Museum (Western Building) | A. Art/ cultural hub branding project on Hoardings | CPR collaboration with MoL/ Barbican | Start tbc – May 2020 | Medium | Feasibility: Medium Impact: Medium Cost (range): tbc Will depend on the timetabling for the development of the Museum site. |
| 2 | Smithfield Market: Public realm around new Museum site - West Smithfield, West Poultry Avenue, Charterhouse Street | A. Architectural/ artists installation: commission to coincide with festival e.g. London Architecture Festival (June) or London Design Week (Sep) | CPR collaboration with MoL/ Barbican | Festival dates, e.g. June or Sep | High | Feasibility: High Impact: High Cost (range): £40 - 50k Temporary installation is feasible and will be part of festival program and website, bringing many new visitors to the city. |
| | | B. Playable City commission | CPR | Summer/ autumn | High | Feasibility: High Impact: Medium Cost (range): £18-30k Should be low-intervention and therefore more feasible, as Playable city commissions can involve making small additions to already-existing street furniture. |
| | | C. Installation: 'Lighting Rig' by Graham Gussin | CPR | summer | High | Feasibility: Medium Impact: High Cost (range): £30k Will depend on finding a site that can house the sculpture |
| 3 | Public Realm around West Smithfield Rotunda | A. Playable City commission | CPR | Summer | High | Feasibility: High Impact: Medium Cost (range): £18-30k Should be low-intervention and therefore more feasible, as Playable city commissions can involve making small |

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| | | | | | | additions to already-existing street furniture. |
| | | B. New/experimental /playful street furniture, performance stage and/or planters | CPR and LEN | Summer | High | Feasibility: High Impact: High Cost (range): £30-60k Funding may be available through the LEN, and there are a number of potential sites. Impact will depend on critical mass – the more the better |
| | | C. New cycle racks | CPR | Summer onwards | Medium | Feasibility: High Impact: Medium Cost (range): £23-30k Funding may be available through the LEN, and there are a number of potential sites. |
| | | D. Temporary bridge/ staircase | CPR | Summer onwards | Medium | Feasibility: Medium Impact: High Cost (range): £45-65k Could be a very visible and high-impact addition, but may be difficult to find a site big enough |
| | | E. Temporary signage/ wayfinding to signpost people into the garden | CPR | Summer | High | Feasibility: High Impact: Medium Cost (range): £10k |
| 4 | Hoarding around Crossrail East Farringdon station entrance | A. Art/ cultural hub branding project on Hoardings | CPR collaboration with MoL/ Barbican | Barbican hoarding installed already on one site. | Medium | Feasibility: Medium Impact: Medium Cost (range): tbc Will depend on agreement with Crossrail |
| 5 | Lanes around Cloth Fair | A. Playable City commission | CPR | Summer/ autumn | Medium | Feasibility: High Impact: Medium Cost (range): £18-30k |

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| | | | | | | Should be low-intervention and therefore more feasible, as Playable city commissions can involve making small additions to already-existing street furniture. |
| | | B. Heritage trail to incorporate digital and physical | CPR with MoL | Autumn | High | Feasibility: High Impact: High Cost (range): £18k |
| 6 | Within Barbican Tube Station | A. Rationalise signage | TC, TfL LEN | | High | Feasibility: Medium Impact: High Cost (range): TfL-funded Aim is to signpost routes through Beech Street and above to the highwalk in a simple, effective way in the station on street-level |
| | The roof of the entrance to Beech Street | A. Clear signage/branding | TC | | High | Feasibility: Medium Impact: High Cost (range): tbc Will be a good visual cue for wayfinding to the Barbican Centre |
| 8 | Pavement on the corner of Beech Street and Aldersgate Street | A. Digital information Screen | TC and CPR | | Medium | Feasibility: Medium Impact: Medium Cost (range): tbc Town Clerk's department are progressing this project |
| 9 | Within Beech Street Tunnel (Link to CH Launch event – dependent on | A. Playable City commission | CPR | Summer/ autumn | Medium | Feasibility: Low Impact: High Cost (range): £18-30k This will depend on there being any |

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| | tunnel closure and improving air quality) | | | | | temporary closures of Beech Street; the project will not go ahead unless a closure can be organised. |
| | | B. Temporary performance venue | CPR collaboration with Barbican/ Guildhall School | Summer | Medium | Feasibility: Low Impact: High Cost (range): tbc This will depend on there being any temporary closures of Beech Street; the project will not go ahead unless a closure can be organised. |
| | | C. Artistic Lighting trial | CPR | Summer | Medium | Feasibility: Low Impact: High Cost (range): £25k This will depend on there being any temporary closures of Beech Street; the project will not go ahead unless a closure can be organised. |
| | | D. Sound installation | LSO | Summer | Medium | Feasibility: Low Impact: High Cost (range): £15k This will depend on there being any temporary closures of Beech Street; the project will not go ahead unless a closure can be organised. |
| 10 | Space in front of Cromwell Tower | A. Tables and chairs (café style) | CPR | In time for CH launch event | Medium | Feasibility: Low Impact: Medium Cost (range): £18k Project to depend on residents' consultation |
| | | B. Possible LSO sound installation | LSO | In time for CH launch | Medium | Feasibility: Low Impact: Medium |

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| | | | | event | | Cost (range): £15k Project to depend on residents' consultation |
| 11 | Silk Street | A. New wayfinding trial (Barbican and Guildhall School entrances) | CPR collaboration with City Transportation | Autumn | High | Feasibility: High Impact: High Cost (range): £18k Interventions to be temporary, as experiments in wayfinding |
| | | B. Potential site for Barbican Centre workshops to showcase art activities and enhance arrival experience | Barbican | Autumn | Medium | Feasibility: Medium Impact: Medium Cost (range): tbc May be difficult to include in programme at this stage, as artistic programming may have already been finalised |
| 12 | Moor Lane | A. Greening and education programme | CPR collaboration with Ben (LEN) | Spring | High | Feasibility: High Impact: Medium - High Cost (range): LEN funded Scope of project to be increased over time depending on levels of funding |
| 13 | Roman London Wall near the Museum and in the Barbican Estate | A. New/experimental /playful street furniture – picnic area | CPR collaboration with MoL | Summer | Medium | Feasibility: High Impact: Medium Cost (range): £18-25k |
| 14 | Millenium Bridge; Riverside; Peter's Hill; St Paul's; St. Martin's le Grand | A. New wayfinding trial | CPR collaboration with City Transportation/ LEN | Summer | Medium | Feasibility: Medium Impact: High Cost (range): £25k High impact options may include complicated issues such as temporary road closures |

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| | | B. Temporary performance venue | CPR collaboration with Barbican/ Guildhall School | Summer | Medium | Feasibility: Medium Impact: Low-Medium Cost (range): £12-20k Would need to be timed to match other cultural hub activity in order to have higher impact on hub area |
| 15 | Hoarding around Moorgate Crossrail Station site | A. Art/ cultural hub branding project on Hoardings | CPR collaboration with MoL/ Barbican | Tbc | Medium | Feasibility: Medium Impact: Medium Cost (range): tbc Dependent on Crossrail |
| 16 Page 354 | Various possible sites around Smithfield | A. Temporary coloured streets installation, e.g. on paving; carriageway (potential partnership with Islington) | CPR | Summer | High | Feasibility: Medium Impact: High Cost (range): £18-25k Project to be on temporary basis to link to festivals or specific events |
| | | B. Lighting or specific installation highlighting the area history | CPR in collaboration with MoL | Autumn | High | Feasibility: High Impact: Medium - High Cost (range): £20k Impact will depend on the type of installation |
| 17 | Streets between Moorgate station and Barbican station | A. Legible London Signage trial | CPR collaboration with City Transportation | Autumn | High | Feasibility: Medium Impact: High Cost (range): tbc Timetabling may depend on the Citywide Wayfinding Strategy work |
| 18 | Various public areas within the Barbican Complex | A. Temporary events linked to Barbican programme | CPR with Barbican | Ongoing | Medium | Feasibility: Low- Medium Impact: medium Cost (range): tbc Projects to depend on Barbican Centre's |

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| | | | | | | won programming; and on consultation with residents where appropriate |
| 19 | Cultural Hub Area wide and other appropriate locations | A. Digital map of temporary public realm interventions / events | CPR | Summer | High | Feasibility: High Impact: High Cost (range): £20k Digital presence for the programme should be included. |

*All estimates include staff costs

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| Committee(s) | Dated: |
| Resource Allocation Sub-Committee Planning and Transportation Committee | 16th March 2017 21st March 2017 |
| Subject: Allocation of the 2017/18 Transport for London Local Implementation Plan funding and reallocation of part of the 2016/17 funding | Public |
| Report of: Director of the Built Environment | For Decision |
| Report author: Iain Simmons, Assistant Director – City Transportation | |

Summary

This report advises members that Transport for London has confirmed a grant allocation to the City of £1.34 million for 2017/18 to be used to support programmes in the City of London's Local Implementation Plan.

The City has some discretion over the use of £1,056,000 of this funding although it is a requirement that it must be used to support delivery of the Mayor of London's Transport Strategy under the programme headings specified in TfL's allocation letter. Members are asked to approve the funding allocation to certain transportation and public realm projects and programmes within these requirements.

Members are also asked to approve reallocation of £74,000 of 2016/17 TfL grant between projects and to approve the transfer of £49,000 of 2016/17 TfL grant to freight and consolidation centres work. These measures will ensure the 2016/17 TfL grant is fully utilised.

Finally, members are asked to give the Director of the Built Environment delegated authority to approve reallocations of up to £50,000 within a financial year (subject to TfL approval) in consultation with the Chamberlain, Chairman and Deputy Chairman of the Planning & Transportation Committee and provided that the total grant funding is not exceeded.

Recommendation(s)

I recommend your Committee:

- Approves the allocation of the TfL grant 2017/18 to the programmes and projects set out in Table 2
- Approves the reallocation of £74,000 of TfL grant 2016/17 between the projects shown in paragraph 13
- Approves the transfer of £49,000 of TfL grant 2016/17 to freight and consolidation centres work
- Gives delegated authority to the Director of the Built Environment to approve reallocations of up to £50,000 within a financial year (subject to TfL approval) in consultation with the Chamberlain, Chairman and Deputy Chairman of the Planning & Transportation Committee.

Main Report

Background

1. Under Section 159 of the Greater London Authority Act 1999, Transport for London is empowered to give grants for the provision of safe, efficient and economically viable transportation facilities and (or) services to, from or within Greater London.
2. TfL has confirmed its grant allocation to the City for 2017/18 for these purposes in pursuit of the Mayor's Transport Strategy and this report seeks approval for its use on specific programmes and projects
3. Approval is also sought for the reallocation of part of the TfL grant 2016/17 between projects previously approved.

2017/18 TfL Grant

4. In December 2016, Transport for London confirmed a grant allocation to the City of £1.34 million for 2017/18. The funding is to be used to support programmes in the City of London's Local Implementation Plan, as set out in Table 1 below which are designed to support delivery of the mayor of London's Transport Strategy

| Table 1: Transport for London Grants in the 2017/18 Financial Year | |
|---|-------------------|
| LIP Programme | Amount |
| Major schemes - Bank | £200,000 |
| Principal road maintenance | £84,000 |
| Corridors and neighbourhoods | £ 956,000 |
| Local Transport Fund | £100,000 |
| Total | £1,340,000 |

5. The £200,000 allocated to 'Major schemes – Bank' is to be used on the Bank junction safety scheme.
6. The optimal use of the £84,000 'Principal road maintenance grant' is determined by engineering staff within the Transportation and Public Realm Division of the Department of Built Environment. This will be based on needs and opportunities within this year's approved resurfacing work programme.
7. The City has some discretion over the use of the £956,000 allocated to 'Corridors and Neighbourhoods' and the £100,000 allocated to the 'Local Transport Fund'. This report seeks your Committee's approval to use the £1,056,000 combined funding under these headings for specified programmes and projects.

2017/18 Proposals

8. Table 2 sets out proposals for the use of the £1,056,000 allocated by TfL to the Corridors and Neighbourhoods programme and the Local Transport Fund.
9. The Corridors and Neighbourhoods proposals are grouped under four headings: Road Danger Reduction; Streets as Places; Air Quality; and Traffic Management.
10. The 2016/17 allocations are shown for comparison.
11. A summary description of each proposal is included in Appendix 1.

| Table 2: Proposed allocation of the Corridors and Neighbourhoods grant and the Local Transport Fund grant 2017/18 | | |
|--|-------------------------------|--|
| | <i>Allocation 2016/17</i> | Proposed Allocation 2017/18 |
| Corridors and Neighbourhoods | | |
| Road Danger Reduction | | |
| Road safety education, training and publicity | | £120,000 |
| New Change, Cannon Street and Cheapside | | £75,000 |
| Holborn Viaduct / Snow Hill | | £70,000 |
| Newgate Street/Warwick Lane | | £60,000 |
| Further detailed RDR investigations & delivery | | £55,000 |
| sub total | £485,000 | £380,000 |
| Streets as Places | | |
| Mansion House Station environs | | £30,000 |
| Bank By-Pass Walking Routes Phase 2 | | £150,000 |
| Eastern City Cluster Area Strategy | | £ 60,000 |
| sub total | £291,000 | £240,000 |
| Air Quality | | |
| Low Emissions Neighbourhood contribution | | £100,000 |
| sub total | £100,000 | £100,000 |
| Traffic Management | | |

| | | |
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| Freight & Congestion | | £46,000 |
| Way-Finding Review | | £30,000 |
| Congestion Review | | £40,000 |
| Puddle Dock to Blackfriars Pier | | £120,000 |
| sub total | £51,000 | £236,000 |
| Corridors and Neighbourhoods total: | £927,000 | £956,000 |
| Local Transport Fund | | |
| Pedestrian model | | £60,000 |
| Eastern City Cluster Transport Study | | £40,000 |
| Local Transport Fund total: | £129,000 | £100,000 |
| GRAND TOTAL: | £1,056,000 | £1,056,000 |

2016/17 Reallocation

12. The allocation of the 2016/17 TfL grant of £1,056,000 was reported to your Committee on 25th October 2016. Since then, a projected underspend of £74,000 on two projects has been identified and it is proposed that this is reallocated to two other projects which can utilise the funding in the 2016/17 financial year.

13. The projected underspend of £74,000 to be reallocated is made up from the following projects in the Corridors and Neighbourhoods programme:

£50,000 from the Newgate St/Warwick Lane scheme
£24,000 from the Puddledock improvement scheme
£74,000

It is proposed that this is reallocated to the following projects in the same Corridors and Neighbourhoods programme:

£32,000 to Wayfinding
£42,000 to Bank Junction Interim Safety Scheme
£74,000

14. The report to Committee in October 2016 also included a proposed transfer of £49,000 from the 'Puddle Dock improvement scheme' to 'freight/consolidation centres'. Members are requested to give their formal approval to this reallocation.

15. The reallocation of funds between projects during a financial year is often necessary when unforeseen implementation issues arise and when new priorities arise.

16. In order to avoid having to seek Committee approval for every such reallocation, officers propose that the Director of the Built Environment be given delegated

authority to approve reallocations between projects in Table 2 up to £50,000 within a financial year.

Corporate & Strategic Implications

17. The use of Transport for London grants on the projects set out in Table 2 will serve to support the *City of London Corporate Plan 2015-19*, the *Department of Built Environment Business Plan for 2016-19* and the *Transportation and Public Realm Divisional Business Plan*
18. In particular, the use of the funding will align with the City of London Key Policy Priority 3 (KPP3): “Engaging with London and national government on key issues of concern to our communities such as transport, housing and public health” and the specific issues identified under KPP3 of “Working with the Mayor of London – Transport (investment in the network, ‘keeping London moving’, cycle safety); ... Environment (waste issues; air quality);...”
19. The use of the funding on the identified projects will accord with the DBE Business Plan Key Aims: C “highly accessible central location with efficient travel on City streets upon arrival; F “healthy, safe and resilient environment for workers, visitors and residents;” and will contribute to achieving the following objectives of the Transport and Public Realm Division Business Plan:
 - “Reduce traffic accidents on City Streets
 - Reduce the impact of goods vehicles on the City’s streets.
 - Enhance the City streets and spaces to meet the needs of the business City and reinforce a sense of place and local distinctiveness
 - Adapt the City streets in anticipation of the increase in cycling and walking projected for an ever densely developed City.”

Implications

20. The use of Transport for London grants for the 2017/18 financial year will aid in reducing the City’s financial outgoings by making appropriate use of a readily available external funding source.
21. The Chamberlain has been consulted in the preparation of this report and his comments are included.

Conclusion

22. Transport for London has confirmed Local Implementation Plan funding to the City of £1,340,000 for 2017/18 as shown in Table 1.
23. It is proposed that £1,056,000 of this funding is allocated to programmes and projects as shown in Table 2.
24. Approval is also sought to reallocate £74,000 of the 2016/17 TfL grant from two projects with projected underspends to two other projects which can utilise the

funding in the financial year 2016/17. Approval is also sought for the transfer of £49,000 of 2016/17 funding to 'freight and consolidation centres' work.

25. Approval is also sought to give the Director of the Built Environment delegated authority to approve reallocations of up to £50,000 within a financial year (subject to TfL approval) in consultation with the Chamberlain, Chairman and Deputy Chairman of the Planning & Transportation Committee.

Appendices

- Appendix 1: Brief descriptions of proposed schemes scopes and benefits

Background Papers

- Report to Planning & Transportation Committee 25th October 2016: *Allocation of the 2016/17 Transport for London Grants*.

Iain Simmons

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Appendix 1: Brief descriptions of proposed schemes scopes and benefits.

Road Danger Reduction

Road safety, education, training, publicity (£120,000)

A programme of educational, training and publicity activities aimed at improving road safety through influencing behaviour and increasing awareness of risks.

New Change, Cannon Street and Cheapside (£75,000)

These streets and junctions have a high level of injury collisions. This funding will be used to investigate potential solutions to improve road safety including obtaining data and traffic modelling. It is anticipated that simpler measures will be delivered in 2017/18 but more complex solutions will be developed for delivering in the following years.

Holborn Viaduct/Snow Hill (£70,000)

This junction is the 9th most dangerous junction on the City's road network. Investigations in 2016/17 have identified some potential mitigation measures. The funding would therefore be used to develop these measures, seek approvals and implement in 2017/18.

Newgate St/Warwick Lane (£60,000)

This junction is the 2nd most dangerous junction on the City's road network and in February 2016, the Streets & Walkways and Projects Sub-Committees approved a Gateway 4/5 report for proposals to be implemented. Delivery in 2017/18 is therefore subject to members agreeing this funding request.

Further detailed RDR investigations and delivery (£55,000)

This funding will be used to investigate further collision "hot spots" and to identify potential engineering interventions to take forward in 2018/19. It may also be used to deliver low cost, low impact measures in 2017/18.

Freight and congestion (£46,000)

Studies, research, surveys and stakeholder engagement activities aimed at developing targeted approaches to reducing congestion on the City's streets, including through reducing freight and servicing vehicles.

Streets as Places

Mansion House Station environs (£30,000)

Proposals would focus on improvements to accessibility and walking routes in the vicinity of the station, including Garlick Hill and Little Trinity Lane.

A Gateway 1/2 report to initiate the project is planned to be submitted in summer 2017.

Bank By-Pass walking routes Phase 2 (£150,000)

The Bank By-Pass Walking Routes project consists of street enhancements in Birch Lane, Finch Lane, Nicholas Lane and Abchurch Lane. It is a high priority of the Bank Area Enhancement Strategy which was adopted in 2013.

These north-south lanes are currently used as convenient walking routes away from the busy streets and junctions. Works to improve the quality of these streets are being undertaken in response to a significant increase in pedestrian numbers anticipated in the area upon completion of major transport upgrades, such as the new Bank station entrance on Cannon Street and nearby Crossrail. The project will increase the quality of these walking routes through enhancing access for pedestrians, including wheelchair and pushchairs users as well as enhancing the character and appearance of the streets.

Birch Lane was the first phase which was completed in 2015. Finch Lane and Nicholas Lane North form the second phase which is proposed to be part-funded by the TfL allocation with the remainder of the funds from S106 receipts. The project has already received Gateway 4 approval and the Gateway 5 (authority to start work) report for Phase 2 would be submitted in spring 2017

Eastern City Cluster Area Strategy (£60,000)

Officers are currently preparing a strategy for the Eastern Cluster area. The aim is to ensure that the streets and public realm can accommodate future growth and provide an attractive and well-functioning urban environment that is fitting for its high profile status.

The preparation of the strategy will be carried out in two stages. The first stage involves a targeted consultation in order to understand the issues and challenges and develop a vision and objectives for the area. The second stage will include developing proposals to address those issues and challenges together with a detailed public consultation exercise. The proposed funding allocation would be required to progress Stage two and further details will be included in an update report on the strategy development that will be submitted to Committees in spring 2017.

Air quality

Low Emissions Neighbourhood (£100,000)

The grant will contribute to the funding of electric vehicle charging points, a micro-consolidation facility and the Beech street tunnel emissions reduction programme.

Traffic Management

Way finding review (£30,000)

Members agreed a Gateway 2 report in 2016/17. The funding will therefore be used to conclude the options appraisal and to bring the Gateway 3 report to Committee in 2017/18.

Congestion review (£40,000)

In November 2016, Members agreed a number of work streams to try to tackle congestion in the City. These included a review of loading restrictions and zebra crossings to improve traffic flows. It is also worth extending the assessment to include other measures which could also improve traffic flows such as yellow box junctions. This funding will therefore be used to assess the feasibility and delivery of any changes or to identify what further actions will need to be taken in order to deliver any change.

Puddle Dock to Blackfriars Pier (£120,000)

As part of the Thames Tideway project, the Blackfriars Pier has been relocated near Puddle Dock. This means that there will be a need to provide a pedestrian route from the new pier to the City via Puddle Dock. As part of this TfL are currently seeking permission to deliver a pedestrian crossing over their highway (Upper Thames Street) to facilitate this new route.

Members have already approved a Gateway 2 report for this project. The funding will therefore be used to complete the detailed assessments including traffic modelling, detailed design and utility enquiries to inform the Gateway 4/5 report. It is also, anticipated that, some advance works such as utility diversions, procurement of traffic signals, etc may also be carried out during 2017/18 but further details will be set out in the next Gateway report.

Local Transport Fund

Pedestrian model (£60,000)

Further development of a model for testing the impact of development scenarios and highway interventions on pedestrian movement.

Eastern City Transport Study (£40,000)

As part of the development of the second stage of the Eastern City Cluster area strategy (see above), transport studies will be required to enable the development of options. Further details will be included in the planned update report in spring 2017.

| | |
|---|------------------------|
| Committee(s) | Dated: |
| Planning and Transportation Committee | 21 March 2017 |
| Subject: City of London Local Plan Review: Outcome of public consultation on Issues and Options | Public |
| Report of: Carolyn Dwyer, Director of the Built Environment | For Information |
| Report author: Adrian Roche, Department of the Built Environment | |

Summary

In October 2015, the Planning and Transportation Committee approved in principle the commencement of work on a full review of the adopted City Local Plan. The first stage of the review was to consider the key issues and the potential policy options available for the new Local Plan. An Issues and Options document was published for consultation between September and December 2016, and this report summarises the responses to that consultation for Members' information.

Recommendation

Members are asked to note the content of the report.

Main Report

Background

1. The Local Plan sets out the City Corporation's vision, objectives and policies for planning the City of London. It is accompanied by a Policies Map, in two parts, which shows where its policies apply to specific locations. The Local Plan has to be consistent with national policy and in general conformity with the London Plan, prepared by the Mayor of London.
2. The current City Local Plan was adopted in January 2015 and plans for development requirements up to 2026. In October 2015, the Planning and Transportation Committee approved in principle the commencement of work on a full review of the adopted Local Plan, which will look forward to 2036 in line with the timescale of the London Plan.

Issues and Options document

3. The first significant milestone in the Local Plan review process is to gauge the views of interested organisations and members of the public on the key planning issues facing the City. This is known as the Issues and Options stage.
4. An Issues and Options document was approved for consultation by the Planning and Transportation Committee at its meeting on 26th July 2016. The document provided a brief overview of each policy topic, followed by questions based on

the issues and challenges identified. The consultation questions were phrased in an open style in order to encourage debate and not to preclude respondents from coming up with their own ideas and suggestions.

Consultation methods

5. Public consultation took place over an initial six week period from 19th September to 31st October 2016, which was extended until 2nd December 2016. A small number of representations were also accepted after 2nd December 2016.
6. At the outset of the consultation, over 1,350 emails and letters were sent to consultees on the planning policy database, with a separate email sent to 3,300 business occupiers. In addition letters were sent to all properties in the City which are registered as residential for council tax purposes.
7. Two public consultation events were held at the City Centre, and a range of other methods were used to publicise the consultation. This included issuing a press release; distributing 1,500 leaflets around the City; using Social Media including Facebook, Twitter and Eshot; writing articles for publications such as City Resident; and direct contact with business representative groups.
8. A full account of the consultation that was undertaken is contained in the Consultation Statement, which is appended to this report.

Consultation responses

9. A total of 911 formal comments were received from 65 organisations and individuals. In addition, about 150 anonymised comments were collected at the consultation events.
10. Given the extensive publicity undertaken the number of comments received was a little disappointing, albeit very similar to the level of response at the same stage of the current City Local Plan. It is likely that a greater number of responses will be received when draft policies for consultation are published, since that is when organisations and individuals can see what the City Corporation is proposing and comment on their impact accordingly.
11. The quality of responses to the Issues and Options consultation was high, with many respondents taking considerable time and effort to contribute detailed comments on a range of policy topics. A summary of the overall response to each of the consultation questions is contained in the Consultation Statement at Appendix 1. Full summaries of the individual responses can be found on the City Corporation's website at www.cityoflondon.gov.uk/cityplan2036.
12. Respondents to the Issues and Options consultation included residents, workers, visitors, businesses, amenity groups and local authorities, with no single group being particularly dominant in terms of the number of responses. Consequently, there were many questions which prompted a mix of views with no clear consensus.

13. Nonetheless, it is apparent from the responses received that there is a broad degree of support for the City's current planning strategy with, for instance, a significant majority of respondents stating that the strategic objectives in the current Local Plan remain relevant to the new Plan. There was also support for a number of emerging City policies and actions, which build on the framework set out in the current Local Plan. For example, there was widespread support for measures to tackle air pollution and traffic congestion and improve the public realm, alongside new development. It is likely, therefore, that the new Plan will comprise an evolution and updating of the current Local Plan rather than a radical overhaul.

Next steps

14. Following this meeting, officers will start work on the preparation of a Draft Local Plan, which will be informed by the consultation responses together with emerging evidence studies, national and London-wide planning policies and the City Corporation's own priorities.
15. It is intended to arrange meetings of the Local Plans Sub-Committee during the summer and early autumn to assist with shaping and refining emerging policies, and to report back to the Grand Committee with the full text of a Draft Plan towards the end of the year. This will enable us to follow closely behind and take into account the emerging review of the London Plan, a draft of which is expected to be published for consultation in November.
16. Consultation on the City's Draft Local Plan would then extend into the early part of 2018, following which the Plan will be amended and subject to a third and final statutory consultation prior to submission to the Secretary of State for independent examination. It is anticipated that the review will be formally adopted during 2019.

Corporate and Strategic Implications

17. The review of the Local Plan addresses the three Strategic Aims of the Corporate Plan 2015-19 and Key Delivery Theme 1 – Future Key Places – of the Department of the Built Environment's Business Plan. As the new Plan develops, it will take account of the updated Corporate Plan and will provide an opportunity to complement key corporate objectives, such as developing the City's Cultural Hub and progressing the Future City agenda.

Implications

There are no specific financial, legal, HR, equalities or health implications arising from this report.

Appendices

- Appendix 1 – Local Plan Issues and Options consultation statement

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Local Plan Review Issues and Options Consultation Statement

March 2017

Introduction

Public consultation on the City of London Local Plan Issues and Options took place over an initial six week period from 19th September to 31st October 2016, which was extended until 2nd December 2016. A small number of representations were also accepted after 2nd December 2016.

The comments received will be used to inform the drafting of detailed policies for further consultation in autumn 2017.

This Consultation Statement explains the background to this consultation exercise and how the consultation was carried out. It also contains a summary of the comments received under each of the questions in the Issues and Options document.

Statement of Community Involvement

The Statement of Community Involvement (SCI), which was adopted in July 2016, sets out measures for consulting the public on planning policies and planning applications in the City of London. Consultation on the Issues and Options for the Local Plan has been undertaken in accordance with the provisions of the SCI.

The Development Plan

The Local Plan sets out the City Corporation's vision, objectives and policies for planning the City of London. It is accompanied by a Policies Map, in two parts, which shows where its policies apply to specific locations. The Local Plan has to be consistent with national policy and in general conformity with the London Plan, prepared by the Mayor of London.

The current City Local Plan was adopted in January 2015 and plans for development requirements up to 2026. The decision to carry out a full review of the adopted Local Plan was made by the Planning and Transportation Committee in October 2015. At the time of adoption, it was recognised that an early review would be necessary to take into account the Further Alterations to the London Plan and other new policy developments arising from Government initiatives. The review will look forward to 2036 in line with the timescale of the current London Plan.

During 2016 the City Corporation's Local Plans Sub Committee met twice to steer emerging work on the review of the Local Plan. At its first meeting in March, the Sub Committee considered a report outlining some of the key planning issues for the City of London over the next 20 years. The purpose of that meeting was to help determine the scope and policy direction of the next Local Plan at a formative stage.

At its second meeting on 17th June, the Sub Committee gave detailed consideration to a draft Issues and Options document. The Sub Committee suggested changes to a number of the consultation questions as well as to the supporting text. A revised Issues and Options document was then considered by the Planning & Transportation Committee on 26th July 2016, which approved the document and proposals for public consultation.

Consultation on Issues and Options

The Issues and Options stage is the first stage in developing the new Local Plan, to be called City Plan 2036.

The SCI states that the objective at this stage is to assist the City Corporation in the identification of issues which the Local Plan needs to include, and to discuss possible alternative policies and proposals to address these. It adds that another purpose of the consultation is to ensure that communities' views are considered at an early stage in the plan making process and to build and develop on-going community involvement.

The City Corporation published the Issues and Options in the form of a discussion document, which identified key planning issues facing the City and posed a number of questions regarding its future development. The consultation questions were phrased in an open style, rather than setting out a specific list of options. This was done to encourage debate and not preclude respondents from coming up with their own ideas and suggestions.

By enabling a wide range of views to be expressed, it was hoped this would highlight where further research may be required and minimise the risk of unexpected issues emerging at a later stage in the process.

Consultation measures

Consultation on the Issues and Options began on 19th September and closed on 2nd December 2016. A range of measures were used to engage the public and stakeholders, based on those set out in the SCI.

The SCI identifies a number of bodies that need to be consulted. These include "specific" consultation bodies (comprising various statutory authorities) and "general" consultation bodies. The general bodies include a large number of organisations with an interest in City planning, including business and residents' groups, amenity groups, civic groups, cultural organisations, places of worship and voluntary organisations.

The City Corporation also maintains a database of individuals and organisations interested in planning policies. As well as the specific and general consultation bodies, this list includes those who have previously responded to consultation on other planning documents, including the adopted Local Plan.

Over 1,350 emails and letters were sent to consultees on the planning policy database, with a separate email sent to 3,300 business occupiers. In addition letters were sent to all properties in the City which are registered as residential for council tax purposes, over 6,200 in total.

These letters and emails advised recipients of the consultation and invited comments. They also explained where the consultation documents and other information were available to view.

A range of other methods were used to publicise the consultation, which are summarised below:

Website: The City Corporation's website contained extensive information on the consultation. A City Plan 2036 webpage was created, which included the Issues & Options document, a comment form and an online questionnaire. It was also explained where printed versions of these documents could be obtained. The consultation was also publicised on the City Corporation's Intranet pages, promoting it to all staff members.

City Libraries: During the consultation period the Issues & Options document and other supporting documents were made available at the Guildhall and the City's public libraries:

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|--|--|
| Department of Built Environment Enquiries Desk, Guildhall | <i>Monday-Friday 9:15am-4:30pm</i> |
| Guildhall Library and City Business Library Aldermanbury EC2V 7HH | <i>Monday, Tuesday, Thursday, Friday 9:30am-5pm Wednesday 9:30am-7:30pm Saturday 9:30am-5pm (on selected Saturdays only)</i> |
| Artizan Street Library and Community Centre 1 Artizan Street London E1 7AF | <i>Monday 8am-7pm Tuesday-Friday 8am-4pm</i> |
| Shoe Lane Library Little Hill House Little New Street London EC4A 3JR | <i>Monday, Wednesday-Friday 9.30am- 5.30pm Tuesday 9.30am-6.30pm</i> |
| Barbican Library Silk Street London EC2Y 8DS | <i>Monday, Wednesday 9.30am-5.30pm Tuesday, Thursday 9.30am-7.30pm Friday 9.30am-2pm Saturday 9.30am-4pm</i> |

Eshot: The City Corporation issues an *eshot* to inform the subscribers of news and current issues. The *eshot*'s subscribers include businesses and employees. A message publicising the consultation was published and issued via the City Surveyor's Department to 200 business occupiers.

City Resident: This is published three times a year and contains news about the community, environment, events and the latest updates from City Police. An article regarding the consultation was published in the autumn 2016 issue.

Business Representation Groups: Direct contact was made with specific business groups and interests to alert them to the consultation and it was requested that consultation notifications were circulated to their members.

This included the City Property Association, Cheapside BID, Aldgate Partnership, Inner and Middle Temple Associations.

Member Notification: Direct notification of the consultation was sent to all Common Council Members by letter and email and an article appeared in the September Members' Briefing. An additional briefing meeting for Members was held in October.

News coverage: A press release was published which gained wide publicity in the local, professional planning and property press. City Matters, a local paper for the City of London, featured the consultation on the front page of their maiden edition. There were also pieces in Planning Magazine and Property Week.

Facebook: A post regarding the consultation was made to the "City of London Corporation: City View" Facebook account on 20th September 2016. The account is "Liked" or "Followed" by around 13,000 different Facebook users.

Twitter: Posts were made about the consultation on the 19th September and 26th October from the @squarehighways Twitter account, which has around 3,000 followers. Posts regarding the consultation were also made from third party Twitter accounts, such as @tfltp, a TFL account about Taxis and Private Hire vehicles, which has over 11,000 followers and @PWnews, the Property Week account, which has over 60,000 followers.

Leaflets: A leaflet was produced to publicise the consultation. 1,500 copies of the leaflet were printed and distributed around the City. These were placed in key locations to target workers, residents and visitors. These included housing estate offices, libraries, churches, office foyers, and medical buildings.

Events and meetings

Officers of the Department of the Built Environment attended the following meetings to explain the consultation, promote discussion and receive comments:

Public Consultation Events: Two events were held at the City Centre on 3rd and 13th October 2016, to help publicise the consultation. These events were open to the public and involved a presentation, question and answer session and information displays. The first event took place in the late afternoon/early evening, while the second was held in the morning to potentially reach different audiences.

Officers also manned a stand at the launch of the Barbican Low Emission Neighbourhood on 11th January 2017.

Health and Wellbeing Board: This is a forum where key leaders from the health and care system work together to improve the health and wellbeing of the local population and reduce health inequalities. A presentation was given on 13th June 2016 to the Board, which covered the aims of the consultation, content and how to respond.

Conservation Area Advisory Committee: The CAAC was set up to advise the City Corporation on planning proposals and policies relating to conservation areas. A presentation was made to the Committee at its meeting on 29th September 2016.

Department of the Built Environment Users' Panel: The Panel was established to represent users of the service provided by the Department. Users Panel members were briefed on the Issues and Options consultation at their meeting on 13th July 2016.

Access Group: The group was established to advise the City Corporation on access issues. A discussion was held with, and an email sent to, the Head of Access on 20th September 2016, explaining the aim and content of the Issues and Options consultation and how responses could be made.

Comments received

A total of 911 comments in response to the Issues and Options consultation were received from 65 individuals and organisations.

Appendix 1 lists those who responded to the Issues and Options consultation.

Appendix 2 summarises the comments in the same order as the questions in the document. Copies of the full comments are available for inspection at the Guildhall on request.

Appendix 3 summarises the comments received at the public consultation events at the City Centre, as well as at the launch of the Barbican Low Emission Neighbourhood.

The comments received will all be considered and taken into account in preparing the Draft Local Plan.

Integrated Impact Assessment (IIA)

Production of the Local Plan will be supported by the production of an Integrated Impact Assessment (IIA). An IIA combines a number of assessment processes into a single document:

- Sustainability Appraisal, including a Strategic Environmental Assessment and a Habitats Regulation Assessment;
- Equalities Impact Assessment; and
- Health Impact Assessment.

The IIA will be an integral part of the plan making process and will help to inform the development of detailed policies. As part of the Issues & Options consultation, the IIA Scoping Report and Commentary Document were published for information and comment.

Comments were received from two statutory consultees, the Environment Agency and Historic England. The City Corporation's response to these comments is recorded in Appendix 4 and will be reflected in the next iteration of the IIA at Draft City Plan 2036 stage.

Evidence base

Preparation of the City Plan 2036 will be informed by a range of data and research, some prepared by or on behalf of the City Corporation and some by other organisations such as the Mayor of London.

A supporting evidence document was produced to accompany the Issues and Options consultation document. This evidence paper contained a range of facts and figures about land use and development trends in the City, which were intended to provide useful background information for people responding to the consultation. The consultation was also supported by evidence studies undertaken by the City Corporation to inform the development of the Local Plan.

The City Corporation will also commission additional studies to inform the policies in the new Local Plan. This process has started and two studies that had been completed were published at the same time as the Issues and Options consultation.

The following documents were available to view at the Guildhall and were published on the City Plan 2036 webpage.

- Issues and Options Evidence Summary
- Strategic Housing Market Assessment (June 2016)
- Strategic Housing Market Assessment Addendum (September 2016)
- Waste Arisings and Waste Management Capacity Study review 2016

Appendix 1 – list of respondents to the Issues and Options consultation

Anonymous (email address provided)
Barbican Association
Bennett, Peter
Berkeley Homes
Bickerton, Jane
British Sign & Graphics Association
Cadavez, Rita
Chancery Lane Association
Chapter of the Cathedral of St Paul in London
City of London Archaeological Trust
City Property Association
City Public Realm, CoL
Coleman, David
Conservation Area Advisory Committee
Cornish, Adam
de Wit, Ivo
Environment Agency
Fletcher, Charlotte
G, Trevor
Garner, Harold
Greater London Authority
Hayden, M
Hilburn, Heather
Historic England
Historic Royal Palaces
Jones, Gregory QC
Khan, Mohammed
Laake, Jean-Pierre
Lee-French, Segun
London Borough of Bexley
London Borough of Hackney
London Borough of Islington
London Borough of Tower-Hamlets
Linden & Co (Antiques) Ltd
London Cycling Campaign
Martinelli, Paul
Merchant Land Investment Ltd
Merlen
Meyringer, Fiona
Museum of London
Northern & Shell
North London Waste Plan
O'Dowd, William
Port of London Authority
Railwatch
Rees, David
Rentplus
Rogers, Fred

Ronish, Yarema
Rose, Peter
Royal Borough of Kensington and Chelsea
Slough Borough Council
Streeter, Patrick
Team London Bridge
Theatres Trust
Thurrock Borough Council
Transport for London
Transport for London Taxi and Private Hire
Transport for London Property
Travis Perkins PLC
Whitby, Jonathan
Whitehead, John
Whitlock, Richard
Ziv, Amiel

Appendix 2 - Issues and Options Consultation Responses Summary

General Comments on the Whole Plan

Number of comments: 13

- Three respondents referred to the potential impacts of Brexit and the uncertainty that this has generated for future planning.
- The GLA recognised the unique role of the City of London and highlighted the critical relationships between central London activities and adjoining boroughs.
- Joint working was suggested on a number of issues, including any potential expansion of the Central Activities Zone (CAZ) and the introduction of an Article 4 Direction to extend the CAZ exemption from residential permitted development rights beyond May 2019.
- Two respondents suggested that the Local Plan should include a Special Policy Area to protect the Silver Vaults in Chancery Lane.
- Historic England highlighted the importance of developing a robust evidence base which demonstrates clearly an understanding of the City's historic environment, the significance of its heritage assets and their contribution to the wider environment.
- The Chapter of St Paul's Cathedral expressed an interest in policy development in the area of spirituality, wellbeing, social cohesion, diversity and equality.

Strategic Objectives

Question 2.1

What do you consider to be the key challenges that need to be addressed in the Local Plan review?

Number of comments: 21

- There were a wide range of views on the key challenges for the Local Plan review, with no particularly dominant theme emerging.
- Six respondents mentioned Brexit, suggesting that the Local Plan needs to provide a flexible and supportive policy approach towards future commercial office demands in order to maintain the City's competitiveness.
- Six respondents highlighted traffic congestion and related impacts, including road safety concerns, impacts on more vulnerable road users, and traffic pinch-points.
- Five respondents highlighted tackling pollution, particularly poor air quality.
- Four respondents stated that the City needs to play its part in addressing London's housing shortage, including local affordable housing need and accommodation for young City professionals.
- Three respondents referred to overcrowding, pedestrian capacity and the need to widen pavements.
- Three respondents highlighted the importance of the delivery of high quality public realm and making effective use of the City's limited open spaces/green infrastructure.

- A range of other challenges were identified including tall buildings and further development of the Eastern Cluster; protecting the setting of internationally significant heritage assets; the delivery of IT infrastructure; protection of amenity in residential wards; changing work patterns; better wayfinding and promotion of the City to visitors; capitalising on the development opportunities presented by Crossrail; minimising flood risk; and providing better linkages with surrounding areas.

Question 2.2

How could the Local Plan help to facilitate the City of London's role as the leading future world class City? Can it provide a flexible framework to respond to significant change whilst providing the certainty sought by much of the development industry?

Number of comments: 11

- This question prompted a mix of views with no dominant themes emerging.
- Two respondents highlighted that the quality of the City's built environment is critical to its future competitiveness, and that the City should lead in providing an environment which delivers for all users. Specific suggestions included allowing flexible use of street level spaces; promoting tall buildings which can provide increased office space, but also more public realm by having smaller footprints; greater integration of the City's buildings with its heritage; and encouraging infrastructure improvements.
- The City Property Association (CPA) commented that the Plan needs to be sufficiently flexible to allow the competing demands of policy to be achieved whilst allowing high-quality, sustainable development, but at the same time needs to avoid ambiguity.

Question 2.3

Are the five strategic objectives listed in paragraph 2.6 still relevant? If not, what should the key objectives be in the new Plan?

Number of comments: 23

- A clear majority of respondents (18) felt that the existing strategic objectives remain relevant, although some qualified this by suggesting amendments or additions to the current wording.
- Specific suggestions for additional objectives, or for issues that should be given greater prominence, included:
 - The GLA suggested a new objective focused on spreading the benefits of the City's investment and growth to all Londoners;
 - A new objective that the City remain internationally competitive as a business location in terms of its relative cost and quality;
 - A new objective to improve the quality of life for City residents, addressing health and wellbeing, including spiritual wellbeing;

- Greater prominence to public realm, open spaces and the pedestrian environment;
- A more proactive approach to the historic environment;
- Addition of references to the River Thames and the Cultural Hub.

Key Diagram

Number of comments: 3

- A small number of respondents made comments relating to the Key Diagram from the adopted Local Plan.
- Historic Royal Palaces would like to see the Eastcheap Retail Link extended to the Tower of London, and a visitor route identified between the Monument and the Tower.
- The Port of London Authority asked for the new location of Blackfriars Millennium Pier to be identified.
- The Conservation Area Advisory Committee (CAAC) agreed with the intensification area at Farringdon, but noted that protected views may make the area of intensification difficult to achieve.

A World Financial and Business Centre

General Comments:

Number of comments: 5

- General comments raised included:
 - More emphasis is needed on public realm and street activity.
 - Newer sectors such as technology firms may want more than just corporate office space.
 - There needs to be a close relationship between the City and the City Fringe.
 - The potential for a policy on affordable space for SMEs should be considered.
 - A balanced approach is needed between office development and complementary land uses to ensure continued job growth.
 - The Plan should avoid being overly rigid or restrictive, with the market best placed to determine the format of future office provision.

Offices

Question 3.1

Should we protect an identified “Commercial Core” where only offices and complementary commercial uses will be permitted? Outside the core, should we be more flexible allowing a mix of land uses, including housing and hotels? What areas of the City should be outside of any identified core?

Number of comments: 23

- Eight respondents, including the GLA, supported the concept of a “commercial core”. The GLA asked for the core area to be more clearly defined.
- Four respondents were opposed to identification of a “commercial core”: as it would not be sufficiently flexible to adapt to changing trends; it could disrupt the commercial mix currently found and adversely affect the City office market; and the whole of the City should be seen as commercial core.
- TfL highlighted the possibility that the CAZ will not have enough capacity for anticipated employment growth into the 2040’s, and that the benefits of the City’s public transport links and agglomeration of office uses should be maximised rather than losing key sites to housing and other non-office uses.
- Flexibility was considered important with nine respondents suggesting it was necessary within the City (either in combination or separate to designating a “commercial core”).
- There was limited support for ending the City’s current exemption from office to residential permitted development rights, with some contrasting support for an Article 4 Direction requiring planning permission for all changes of use in the City to account for the intense competition for land.
- A number of respondents referred specifically to the Riverside as an area that should be outside the “commercial core”. The Riverside would benefit from a mixed use approach, for example with cafés, restaurants and associated new public spaces.
- Six respondents stated that existing hotel and/or residential clusters should be outside any “commercial core”.
- The Barbican Association suggested that the City’s four residential wards should be outside a “commercial core”, while the Chancery Lane Association considered that residential use in this location would minimise office vacancies and add to the area’s vitality.

Question 3.2

How should the Local Plan provide the flexibility in workspaces needed to address increased economic uncertainty and possible turbulence?

Number of comments: 7

- Responses suggested that there needed to be greater flexibility in office floorspace, particularly allowing for the conversion of larger buildings to provide space suitable for SMEs. The Plan should also provide for affordable work space for SMEs.
- Alongside flexibility in the use of offices, respondents supported greater flexibility in lease terms for offices to enable easier adaptation to changing circumstances.
- Other comments considered there should be provision for live-work units in the City and a greater encouragement to joint working with the education sector.

Question 3.3

Should we continue with the current approach of setting office floorspace targets with defined 5 year phases, or move to a different approach, possibly using a criteria based policy?

Number of comments: 6

- There was a mixed response to this question, with some support for moving away from floorspace targets to a more flexible, criteria based policy. There was also support for the retention of specific targets, albeit they need to take account of the greater density of occupation of space.
- The CPA, while supporting the retention of targets, acknowledged that we are entering a period of some uncertainty following the EU referendum result and that the Plan should provide sufficient flexibility in terms of office policies and associated viability matters.
- No-one specifically commented on the merits or otherwise of 5-year phasing.

Question 3.4

How should the Local Plan encourage new and emerging employment sectors? Should we aim to maintain the City's distinctive employment base, with a concentration of financial and business services, or diversify more?

Number of comments: 9

- All respondents supported a more diversified employment base. Benefits cited included creating more vibrancy at weekends and providing more resilience against economic crises. The Plan should address growth in a number of sectors, particularly creative and tech sectors.
- Some respondents qualified this support with the observation that diversification should not be at the expense of losing the City's historic function as a global financial hub.
- The CPA suggested that flexibility is required to support SMEs' changing working patterns and emerging sectors, such as Fin Tech and the TMT sector. It would like to see the Plan being 'outward looking' in terms of its relationship with the adjoining boroughs.
- The GLA commented that policies to encourage a diverse range of employment uses would be welcomed, especially in areas which have potential to support specialisms and agglomerations outside the commercial core.

Question 3.5

How important is it to use policy to protect a range of office sizes and employment opportunities? Should we have specific policy protection for offices suitable for Small and Medium Enterprises (SMEs)? What type of floorspace are SMEs looking for?

Number of comments: 7

- Respondents were generally positive about protecting a range of office sizes and promoting space for SMEs, but highlighted the need to understand their requirements and to consider refurbishment before replacement in smaller developments.
- It was suggested that Section 106 Agreements could be used to deliver subsidised office accommodation, and that the City Corporation could offer subsidised rents as well as providing a range of office sizes and types within its own property holdings.
- The CAAC welcomed the provision of office space for SMEs, noting that SMEs were more likely to seek out sites in fringe areas where floorspace is less expensive.
- The area around Chancery Lane was identified as being appropriate for a mix of residential and smaller office units that could accommodate SMEs.

Question 3.6

Are large floorplate offices still required in the City? Should more flexible floorplates and building designs be encouraged to support new ways of working?

Number of comments: 7

- All respondents agreed that there should be flexibility in the provision of office floorspace to respond to changing demands and working practices and to accommodate more diverse, smaller businesses.
- Three respondents, including the GLA, stated that there is likely to be a continuing need for some large floorplate occupiers in the City and that policy should facilitate a range of sizes and types of employment.
- The CPA felt that the planning system should not engage in determining floor plate sizes.

Utilities Infrastructure

Question 3.7

How can we ensure that the necessary infrastructure is planned for and installed in a timely and cost effective manner? Could the City Corporation instigate a more strategic and collaborative approach to implementation and funding of utility infrastructure?

Number of comments: 9

- There was support for a more strategic and collaborative approach to infrastructure provision in order to ensure the City's resilience, including from the CPA.

- The GLA highlighted the importance of taking a long-term view of the needs of various utilities as well as measures to reduce the demands of new development on such infrastructure.
- It was suggested that specific reference be made to low emissions/green infrastructure.

Question 3.8

How can we influence the development of digital connectivity infrastructure ensuring that it is effective but does not detract from the significance of heritage assets or obstruct streets and pavements?

Number of comments: 11

- Respondents supported an objective to achieve full 4G coverage across the City. Various options for delivering digital connectivity were suggested, including:
 - Using street furniture to relay local Wi-Fi
 - Rolling out BT's LinkUK programme to the City.
- The CPA stressed that digital and telecommunications infrastructure must continue to be prioritised, to ensure the City is able to compete with other world cities.
- Historic Royal Palaces highlighted that provision of digital infrastructure needs to be handled sensitively and not have adverse effects on heritage assets.
- Ensuring that the utilities required for the Square Mile are delivered was highlighted as vital to the software needed at the Museum of London.

Question 3.9

Are there further mitigation measures which could be considered to reduce the disruption caused by construction activity in the City? How can we influence the provision of suitable utilities infrastructure for construction sites, ensuring it does not result in unacceptable air quality, noise and vibration impacts or affect the utilities capacity available for neighbouring properties?

Number of comments: 7

- Noise and pollution impacts from construction sites were a theme of four responses, including from the Barbican Association. Suggested actions included strict codes of conduct, full consultation with neighbours, tougher standards during construction, restrictions on noisy night-time working and greater use of off-site assembly
- More use should also be made of solar panels and low DC voltage internal systems to reduce demand on the mains electricity supply, while local composting networks should be considered for foul waste.

Safety and Security

Question 3.10

What are the key issues concerning night-time entertainment? Should we identify areas of the City either to promote or restrict night-time entertainment uses? If so, which areas would you suggest? Would clear dispersal routes help to minimise the impact of night-time venues?

Number of comments: 16

- A key theme was the need for clear dispersal routes (10 responses).
- Provision of more night-time uses was suggested by four respondents, with areas of potential growth highlighted in the Farringdon/Barbican/St. Paul's area and on the north bank of the Thames.
- Four respondents recommended that there should be restrictions on entertainment uses and the size, number and concentration of bars, particularly in residential areas. However, there was also support for restrictions on night-time entertainment where it impacts on more dispersed residential properties.
- The Barbican Association suggested restrictions should apply in the residential wards, and the Chancery Lane Association identified Chancery Lane as unsuitable for the promotion of night time entertainment uses other than bar and restaurant uses subject to normal hours restrictions.
- Six respondents drew a distinction between different night-time uses, suggesting this should be addressed in the Plan.
- The GLA indicated there may be opportunities for offering an improved night-time economy in light of the City's good public transport and relatively low resident population.
- The need for a collaborative approach between planning, licensing, environmental health and policing was expressed by a number of respondents, as was the need for night toilet facilities near tube stations and licensed premises.

Question 3.11

How can buildings and spaces be designed to create a safe and permeable public realm while protecting against security threats?

Number of comments: 12

- Five respondents suggested that overlooking, pleasant lighting and complementary adjoining uses such as pavement cafes would increase safety and security. Hostile vehicle mitigation should be permitted where there is a need and should be designed to complement the streetscape.
- Other measures mentioned included CCTV and well-designed public realm, and an area-wide approach..
- There was support from the GLA for the Local Plan to give detailed consideration to security.

Question 3.12

Should we include further planning policy measures to tackle crime and anti-social behaviour? If so, what measures?

Number of comments: 12

- All respondents agreed that additional measures could be implemented to tackle crime and anti-social behaviour.
- Six responses highlighted the role of the design of public spaces and buildings in tackling crime and anti-social behaviour.
- Historic Royal Palaces highlighted public areas around the Tower of London where appropriate measures to address crime and anti-social behaviour would be welcomed.
- The Chapter of St Paul's Cathedral would welcome clearer design policies for the public realm, combined with active policing and management, to limit activities that can damage the environment such as skateboarding.
- Other measures identified included:
 - More cameras and stricter enforcement were suggested.
 - Provision of facilities for the homeless.

Key City Places**General comments**

Number of comments: 5

- All responses referred to the need to improve the Riverside Walk, with the PLA supporting measures to address current gaps on the Thames Path.
- Four respondents suggested measures to improve the appearance and pedestrian permeability of Lower Thames Street.

Question 4.1

Should the concept of Key City Places be retained in the new Local Plan? Should we continue to focus only on areas where significant change is expected? Should they be renamed as Areas of Change?

Number of comments: 13

- Six respondents, including the GLA, the CPA and Historic England, supported the concept of place-based policies, with no-one suggesting they should be removed from the Local Plan.
- There was no firm view on whether the term Key City Places (KCPs) should be retained, or amended to Areas of Change
- Four respondents expressed concern that the KCPs are shown as 'vague blobs' and suggest defining precise boundaries on a map. However, the CPA, while supporting area based policies, felt that they need to be sufficiently flexible and

adaptable to be able to reflect and respond to emerging market and economic changes.

- Historic England expressed concern that the extent and justification of the current KCPs appear to be driven by the demand for development and its form, rather than by an evaluation of their historical development and resulting characteristics.

Question 4.2

Are there other areas of the City not mentioned in the questions below that require a particular policy focus? If so, please state why.

Number of comments: 7

- Areas suggested by respondents that require a particular policy focus were:
 - The western part of the City (areas between Fleet Street, Chancery Lane, Holborn Viaduct/Holborn and Farringdon Road);
 - The area around St Paul's Cathedral;
 - The Chancery Lane area;
- The GLA stated that reference should also be made to the London Plan areas of change which lie close to the borders of the City, namely the City Fringe/Tech City Opportunity Area and the Farringdon/Smithfield Area for Intensification.
- The CPA mentioned the need for new and updated area policies for Smithfield/Cultural Hub; Liverpool Street/Broadgate; Aldgate; and Eastern Cluster.
- The Barbican Association suggested that the residential wards should be treated differently to the rest of the City, and given more protection from excessive development, evening and night time activity, noise and light pollution.

The North of the City/Cultural Hub

Question 4.3

Should the North of the City continue to be considered as a single Key City Place, or should we focus attention on two specific Areas of Change; the Cultural Hub in the North-West and the Liverpool Street/Broadgate area in the North-East?

Number of comments: 12

- Overall, eight respondents agreed that the North of the City KCP should be divided into two specific areas
- Four respondents thought the east and west of Moorgate are quite different in character and suggested that the area west of Moorgate should be part of a Cultural Hub KCP, while the area east of Moorgate is dominated by offices and no different from the main fabric of the City.
- The Museum of London noted that the Smithfield/Barbican area will be transformed by the Elizabeth Line, the new Museum and Beech Street and

commented that a particular focus on this area may be helpful in the years ahead.

- There was no firm view on whether Liverpool Street/Broadgate should be identified separately as a KCP, with one suggestion that it should be incorporated into the Eastern Cluster.

Question 4.4

What new issues will we need to consider in the Local Plan as the Cultural Hub develops? What other land uses and facilities will be required to support the emerging Cultural Hub, and how can these be accommodated whilst protecting residential amenity? How can we balance the needs of larger numbers of pedestrians with vehicles that are essential for the running of Smithfield and St Bartholomew's Hospital?

Number of comments: 15

- Four respondents indicated that the key challenges to address are improving permeability; creating active frontages to new buildings; providing signage and wayfinding cues to assist visitors; and linking the Cultural Hub to Farringdon Station. Other suggestions included the widening of pavements; better designated cycleways; time separation of pedestrians and vehicles; and creating more pedestrian routes and providing more visitor accommodation.
- The CPA indicated that it fully supports the Cultural Hub initiative and the diversification of uses, where appropriate, to ensure the initiative is a success.
- The Barbican Association indicated that the Local Plan needs to consider the balance between the activities of the Cultural Hub and the residential area it sits within. It suggested limits on night time activities in open areas near residential flats.
- Beech Street should be a priority area for reduced traffic, increased pedestrian use and an improved environment, while an upgrade is required to the whole area around Barbican Underground station, including step-free access.

Question 4.5

How should the business environment around Liverpool Street be planned? Should there be increased support in the Local Plan for technology sector companies, particularly seeking to provide more flexible and adaptable workspaces? What challenges will this bring and how can they be addressed?

- Five respondents supported promoting business intensification and flexible workspaces in the Liverpool Street/Broadgate area.
- The CPA highlighted the importance of the Liverpool Street/Broadgate KCP being sufficiently outward looking to ensure policies take advantage of the adjacent markets in other boroughs. The new Local Plan should increase support for the technology sector and other markets in the City Fringe, with support for this approach also expressed by neighbouring boroughs.

Cheapside and St Paul's

Question 4.6

Is there a need to retain a specific policy for Cheapside and St Paul's as a Key City Place? Should the area be modified? If so, how?

Number of comments: 13

- Eight respondents felt that Cheapside and St Paul's should be retained as a KCP, reflecting its distinctive character as a result of the 7-day a week vibrancy created by One New Change. The potential for extending the area to include retail streets east of Royal exchange was mentioned..
- The Chapter of St Paul's Cathedral referred to the need for integration with the Cultural Hub and opportunities for reinforcing the identity and significance of St Paul's as one of the 'key spaces' in London.
- Three respondents felt that there is no need to retain a specific area based policy as most of the likely changes have already occurred or will do so shortly.
- The CPA commented that the highway proposals and associated change at Bank Junction could be covered by a specific transport policy on this topic, rather than a KCP policy.

Question 4.7

How can the area provide greater appeal to visitors, workers and shoppers? How should it link to the proposed Cultural Hub to the north?

Number of comments: 9

- Most of the respondents commented that improvements are needed to draw visitors from Cheapside to the Cultural Hub. Suggestions included public art on St Martin's Le Grand and Greyfriars Church Garden; traffic reduction measures including road closures; and the provision of more independent stores.

Eastern Cluster

Question 4.8

Should further intensification be encouraged within the Eastern Cluster? Should the current policy area be retained or should it be modified? If so, where and how?

Number of comments: 10

- This question produced no clear agreement, with half the respondents (5) being broadly supportive of further intensification within the Eastern Cluster and the other half expressing concerns about further intensification.
- Amongst those who were supportive, the CPA pointed to the transport upgrades coming forward at Bank Underground and Liverpool Street Station, while the

GLA highlighted the area's excellent public transport links as well as some under-used land and buildings and a relative lack of constraints compared to other areas.

- There was also support for a positive approach to tall buildings to add certainty for developers and tenants alike.
- Respondents who did not support further intensification cited concerns about the shortage of open spaces in the area and about whether the streets and public realm can cope with the increased number of people.
- Historic Royal Palaces was concerned about the continuing increase in height and scale of buildings within the Eastern Cluster and its impact in views of the Tower of London World Heritage Site (WHS) and the related gradual reduction in visual separation between the cluster and the WHS. HRP would oppose any infilling of the gap between the current cluster and 20 Fenchurch Street, and to the development of taller buildings in the Aldgate area which would lie within the protected vista of LVMF view 25A.1 from Queen's Walk.
- Historic England commented on the need to make publicly available 3D modelling of the Eastern Cluster in the interests of transparency, and also recommended greater clarity on the development and design parameters for future proposals.

Question 4.9

What changes would be needed to existing infrastructure to accommodate further intensification in the Eastern Cluster?

Number of comments: 6

- Infrastructure improvements that were suggested included:
 - safer streets for cyclists;
 - segregated infrastructure;
 - pedestrianisation;
 - increasing footway widths;
 - improved crossing facilities;
 - better freight handling;
 - alternative walking routes through development sites; and
 - improved travel demand management at peak times.

Question 4.10

Should special emphasis be placed on the public realm to cope with increased pedestrian movement in the Eastern Cluster? Should we be pedestrianizing streets in the Eastern Cluster and creating more open spaces through buildings? What routes through the Eastern Cluster should we improve?

Number of comments: 13

- All but one of the respondents agreed that emphasis should be placed on public realm improvements, and 11 out of 13 mentioned the need for new or improved pedestrian routes.

- Five respondents supported the public art programme in the Eastern Cluster and suggested the need for a specific public art policy.
- The GLA indicated that strengthening pedestrian connections east and into Tower Hamlets would be a positive strategic objective.
- TfL commented that special emphasis should be placed on measures to improve the capacity of the public realm to cope with increased pedestrian movements.
- The CPA supported opportunities for pedestrianisation or timed restrictions on traffic and also potentially opportunities for shared surfaces.
- Five respondents argued that pedestrian routes through buildings are only desirable if they are under a glazed roof and animated with retail, such as at Leadenhall Market and One New Change. Undercroft space should not be accepted as a substitute for public open space.

Aldgate

Question 4.11

Does the Aldgate area still merit its own Key City Place? If so, should the area be extended to become an East of City area including the area around Tower Hill and/or Middlesex Street? What should be the main policy focus of any newly designated area?

Number of comments: 14

- No responses argued for the deletion of this KCP.
- Five respondents suggested a specific boundary for the Aldgate KCP, which would be slightly larger than the current area.
- Four respondents supported the idea of extending the Aldgate KCP to become an East of City area. The CPA commented that this extended KCP could draw on the Mayor's City Fringe SPG, where appropriate.
- Historic Royal Palaces expressed concern about any change to the designation or extension of the existing Aldgate area that might encourage new tall buildings in this area of high sensitivity in the backdrop to the Tower of London.
- In terms of the policy focus, suggestions included balancing community needs between residential, offices and visitors; promoting vibrancy and mixed uses; improving connectivity and sustainable transport; and street scene/public realm enhancements.

Question 4.12

How can the amenity of residents in the Aldgate area be protected within a lively mixed use environment?

Number of comments: 8

- The major concern was the impact of the night-time economy on residents, with the majority of respondents (5) wanting greater protection from nightclubs and bars.

Thames and the Riverside

Question 4.13

What mix of land uses will be appropriate on the City's riverside over the next 20 years? Should the Local Plan provide clearer, more prescriptive guidance on the development potential and appropriate uses of sites along the riverfront?

Number of comments: 15

- Eight respondents supported a wider mix of uses, to include cafes and restaurants; sports and recreational facilities; cultural venues; offices; hotels; residential; and outdoor public space, although a minority of respondents were concerned about the impact of change on the area's peace and tranquillity.
- Comparison with the South Bank was raised by several respondents,
- The CPA stated that it sees no immediate need for further or more prescriptive policies for this area, nor is there an overwhelming case for promoting one particular land use over any other.

Question 4.14

Should we seek greater use of the River Thames for transport, for example by retaining and enhancing river transport infrastructure at Blackfriars Pier (when relocated) and Walbrook Wharf, and the reinstatement of infrastructure at Swan Lane Pier? Should we promote the use of the river for future servicing of buildings in the City?

Number of comments: 13

- All of the responses supported greater use of the river for transport purposes.
- TfL and the Port of London Authority (PLA) were supportive of the potential use of the river for deliveries and servicing, while the GLA indicated that use for movement of demolition waste and construction materials should be considered.
- However, five respondents argued that use of the river for servicing should only be allowed where this does not interfere with pedestrian use of the Riverside Walk.
- Nine respondents specifically supported bringing unused piers back into operation, with several indicating that this would help reduce current congestion at Tower Pier.
- TfL and the PLA supported investigating the potential reinstatement of Swan Lane Pier, and both added that the City Corporation should also consider the possible reinstatement of Custom House Pier.

Question 4.15

Should we continue to maintain the current openness of the river by refusing development on or over the river, reinforcing the flood defences and protecting the foreshore for biodiversity?

Number of comments: 13

- This question prompted a difference of views. Seven respondents agreed with the question, identifying the openness of the river landscape as being a key feature of the City environment. However, five suggested a more flexible approach to development is needed, which would be consistent with creating a vibrant Riverside Walk, while securing the necessary flood defences and future maintenance of the river bank. .
- The Environment Agency stated that development on or over the river should be resisted, pointing out the benefits for amenity and biodiversity and the need for inspection, maintenance and improvement of flood defences. The Environment Agency would also like redeveloped buildings to be set further back from the river to enable future flood defence raising and more amenity space.

City Culture and Heritage

General comments

Number of comments: 7

- The majority of comments expressed general support for the City Corporation's positive approach to protecting the historic environment and the need for the City Corporation to do all it can to protect the historic environment.

Design

Question 5.1

What are the new design issues for the City that we need to consider in the Local Plan review? Should more detail be included in the design policies?

Number of comments: 15

- Five respondents suggested that the City should adopt a more considered and coherent approach to the massing of buildings.
- There were different views on the policy approach to advertising. There was some support for the current restrained approach, but also a view that the existing policies are far too rigid, prescriptive and detailed.
- The CPA considered that the City's current design policies are working well and did not see any immediate need for significant revision.
- The Barbican Association requested the exclusion of the effects of balconies from daylight and sunlight calculations; called for planning conditions to restrict the use of roof terraces which overlook residential clusters after 7pm; and suggested limits on the use of plate glass windows to reduce light exposure and improve privacy.
- The Chapter of St Paul's Cathedral referred to development impacts such as daylight, wind, noise, pollution and pedestrian flows, and noted that impact assessments on planning applications sometimes fall short of expectations. The Chapter would welcome stronger guidance which ensures quantifiable standards are achieved.

Visitors, Arts and Culture

Question 5.2

Are there certain areas of the City where hotel development is inappropriate, or where hotels should be encouraged? Should these areas be identified in detail or more generally?

Number of comments: 12

- The majority of respondents (8) supported hotel development in principle, with one opposed to any further hotels at all and one supporting the development of hostel type accommodation rather than hotels.
- New hotel development should be located near transport hubs or major visitor attractions, and large hotels should only be on sites which are suitable for taxi and coach drop-off and servicing.
- The GLA welcomed additional hotel accommodation in principle providing the other functions of the CAZ were not compromised. City fringe areas with good public transport access were suggested as best able to support this fine balance. However, a neighbouring borough highlighted that it has limited capacity for new hotels.
- The CPA indicated that hotels should be allowed where appropriate and where they support the overall mix of the City. Hotels could be encouraged in the Cultural Hub, but in general each site should be considered on its individual merits.
- Another respondent suggested that St Paul's and Farringdon/Barbican/Smithfield might be areas for consideration.

Question 5.3

Should we set a target for the number of new hotel bedrooms or hotels in the Local Plan? If so, what do you think that target should be?

Number of comments: 5

- There was no support for including a target within the Local Plan.
- The Barbican Association stated that hotel growth should be restricted to areas adjacent to St Paul's which would serve both the business City and the Cultural Hub.

Question 5.4

Should accommodation for business visitors to the City be prioritised over accommodation for tourists? If so, what role can the planning system play in ensuring this is delivered?

Number of comments: 12

- Five respondents argued that it would not be practical to prioritise hotel accommodation for business visitors because hotels trade seven days a week and cater for a mix of visitor types.
- There was some support for catering principally for tourists (2 responses) and some for prioritising business visitors (3 responses).
- Several respondents pointed out that the introduction of Crossrail and 24-hour tube services will enable easier access to the City for visitors from other parts of London.

Question 5.5

Should the Local Plan encourage uses and activities which could attract more visitors? Should this include on-street activities? What type of activities would be appropriate in the City and what types would be inappropriate?

Number of comments: 18

- A majority of respondents (12) supported uses and activities which could attract more visitors, with several observing that the City Corporation's Visitor Strategy and Cultural Strategy already encourage more visitors and that the Local Plan should follow suit.
- Nine respondents expressed specific support for on-street activities, with a number saying this would bring more vitality to the City in the evenings and at weekends. Suggestions included appropriate seating; public art; wayfinding; public toilets; litter collection; street markets and catering uses along main tourist routes; 'changing places'; and facilities for people with disabilities.
- A minority of responses were opposed to on-street activities for reasons including disturbance to residents, poor air quality and congested roads.
- The need for a high-quality public realm at locations such as the Eastern Cluster and West Smithfield was mentioned.

Historic Environment

Question 5.6

How can the Local Plan help new development conserve and enhance the significance of heritage assets? What should the Local Plan say about the setting of heritage assets? Should we include policies and guidance within the Local Plan on non-designated heritage assets?

Number of comments: 12

- This question prompted a range of comments with no overall consensus.
- There was some support for the protection of non-designated heritage assets through policy, but also a concern that such policies would not add value and that proposals should be dealt with on a case-by-case basis.
- Historic England welcomed the Corporation's commitment to developing a Historic Environment SPD, with clear policy hooks in the Local Plan to help

inform the management of all heritage assets and their settings. Historic England also suggested a policy that encourages heritage-led regeneration.

- The Barbican Association would like to see the Barbican and Golden Lane estates designated as conservation areas.

Question 5.7

How can heritage assets be used in the most adaptable and flexible way to boost their future relevance without harming their significance?

Number of comments: 8

- It was noted that the proposed relocation of the Museum of London to Smithfield is a good example of reusing a heritage asset.
- The Barbican Association was concerned at the impact of oversized development on the Barbican and suggested that the Highwalks could be extended to increase pedestrian safety.

Question 5.8

Should there be a specific policy that protects the setting and Outstanding Universal Value of the Tower of London World Heritage Site?

Number of comments: 11

- Seven respondents, including HRP and Historic England supported the inclusion of a specific policy protecting the Tower of London World Heritage Site (WHS).
- Three respondents felt there was no need for a specific policy as existing policies combined with WHS designation should be sufficient to protect the setting of the Tower.

Protected Views

Question 5.9

Should we maintain the current approach to local view protection in the City? If not, how should the approach be changed and which views should be affected?

Number of comments: 13

- There was widespread support for retention of the current Local Plan approach to view protection.
- Historic England suggested that additional policy consideration be given to views from within conservation areas and HRP requested that updated guidance on the Tower of London be taken into consideration.
- The Chapter of St Paul's Cathedral indicated support for current view protection, but also drew attention to recent publicity that had identified shortcomings with the protection afforded by the London Views Management Framework.

Question 5.10

How do the current view protection policies affect development in the City? What would be the impact on development in the City if the view protection policies were changed?

Number of comments: 9

- All but one of the responses felt that view protection policies helped protect the City's character and 'uniqueness' and allow for better orientation around the City.
- The CPA suggested that any review of local view protection should be undertaken as part of the Mayor's review of the London View Management Framework.
- Historic Royal Palaces expressed concern about any reduction of current view protection policies which could increase the impact of major development on the setting of the Tower of London WHS.

Question 5.11

Should we be recognising and protecting new views from publicly accessible locations? If yes, which ones?

Number of comments: 7

- Five respondents supported in principle the protection of new views, while two respondents were against. Locations suggested for new views were from the Sky Garden at 20 Fenchurch Street or the view of St Pauls from One New Change.

Tall Buildings**Question 5.12**

Should we continue to promote tall building development in the City and should these buildings continue to be clustered? Should the current tall building cluster in the east of the City be altered? Are there any other areas of the City which could accommodate tall buildings without compromising its distinctive character and heritage?

Number of comments: 26

- This question prompted an even split of opinions. 11 respondents were broadly supportive of further tall buildings in the City, while 11 either raised concerns or called for no more tall buildings to be permitted.
- Nine responses specifically supported the continued clustering of tall buildings, although there were some critical comments about the design quality of the Eastern Cluster and recognition that concentrating the densest development is likely to put more strain on local infrastructure including transport and public realm.

- A number of respondents were concerned about the impact of tall buildings on City churches or other listed buildings, as well as open spaces, in terms of overshadowing or loss of character.
- The GLA supported the City's approach providing it is backed by clear locational guidance and robust policy to secure high quality design.
- The CPA argued that high density development in tall buildings represents a sustainable form of development where they form clusters. The CPA added that policy should not preclude tall buildings outside the Eastern Cluster.
- The Barbican Association commented that continued development of tall buildings seems inevitable given the constraints on space, but called for clusters of tall buildings to be precluded around residential areas.
- Historic Royal Palaces reiterated concerns about any potential expansion of tall buildings, particularly in the area around Aldgate.
- The Chapter of St Paul's Cathedral expressed concern that if the primary Eastern Cluster were to extend well beyond the original boundary, this would be detrimental to the general character of the City, not just the wider setting of St Paul's.
- Three neighbouring boroughs responded to this question. Tower Hamlets expressed concerns about the potential impact of the intensification of the Eastern Cluster on the Artillery Passage Conservation Area and the Tower of London. Hackney expressed a desire to work with the City with regard to the development of tall buildings in the vicinity of Liverpool Street, and Islington commented that future proposals are likely to be more appropriate where they correlate with existing clusters.
- Liverpool Street was mentioned in a couple of responses as an area which could be suitable for more tall buildings.

Question 5.13

What more should we do to address the wider impacts of tall buildings proposals, such as pedestrian movement, public realm, micro-climate and wind mitigation? Are there any other factors to consider?

Number of comments: 15

- The majority of respondents agreed that the impacts mentioned in the question were important, but a range of factors were raised:
 - Five respondents considered that new tall buildings should be required to provide well designed, publicly accessible, open spaces
 - Several respondents suggested that special regard should be paid to heritage assets and their setting.
 - Other factors that were mentioned included solar reflection/glare, daylight/sunlight impacts and the need for building protection measures to be fully integrated into the fabric of the building.
- The Chapter of St Paul's Cathedral encouraged the use of visualisation tools to gain a better understanding of the development capacity of the tall buildings cluster, so that the impacts of change can be assessed and proposed change is evidence-based.

- The Environment Agency considered it important to have regard to the proximity of tall buildings to the River Thames and any impacts on the integrity of existing flood defences or the shading of the foreshore.

Question 5.14

Should the Local Plan include a reference to the CAA's London Tall Building Policy and its intention to object to proposals exceeding 305m AOD in order to give more comprehensive policy guidance in the Local Plan?

Number of comments: 13

- The majority of respondents (10) agreed that a reference should be added into the Local Plan to provide more comprehensive policy guidance.

Environmental Sustainability

General comments

Number of comments: 15

- Around half of these general comments focus on transport related issues.
- Reducing noise, light and air pollution and improving conditions for walking and cycling were supported.
- TfL commented that this section had little mention of public transport and particularly buses and the Local Plan should recognise the important role of buses within the hierarchy of transport in the City and set out a vision for their future role.
- TfL also requested that dedicated taxi ranks should be accommodated in new development.
- The Museum of London noted the importance of planning effectively for deliveries and coach visitors, alongside public transport and cycle parking.
- Historic England commented that climate change measures should be balanced against the need to preserve and enhance the historic environment.

Sustainability and Climate Change

Question 6.1

Should we identify and positively plan for infrastructure such as district heating and smart grid technologies to enable a more sustainable, low carbon future for the City? What technologies and infrastructure are likely to be viable and operationally feasible in the City? Should they be required in certain types of developments?

Number of comments: 10

- The majority of respondents (9) supported positive planning to enable a more sustainable, low carbon future City.

- There was specific support for district heating and smart grid technologies. Other technologies which were mentioned included green infrastructure, solar energy, high tech insulation, recycling, sustainable transport, low energy lighting and air source heat pumps.

Question 6.2

What type of climate resilience measures should be incorporated into new development, refurbishment and the public realm? How should such measures be secured?

Number of comments: 8

- The majority of respondents (7) were in favour of climate resilience measures. A range of measures were identified including sustainable drainage systems (SuDS), management of water use and rainwater run-off, green infrastructure, green roofs and walls and measures to avoid the creation of wind tunnels.
- Respondents suggested that resilience must extend to cover transport, ICT and public realm as well as buildings. Refurbishment of buildings was noted as being more sustainable than demolition and rebuild.
- The GLA commented that temperature control in glazed and tall buildings is an issue which merits attention in the Local Plan.

Question 6.3

Should we identify and encourage specific local measures to improve air and water quality, conserve water and minimise flood risk, minimise noise and light pollution and eliminate potential land contamination. If so, what should they include?

Number of comments: 10

- All respondents supported the proposal to identify and encourage specific local environmental protection measures.
- Air quality measures proposed included reducing the numbers of vehicles; restrictions on parking and allocating more road space for walking and cycling; promoting cleaner vehicles and tightening vehicle emissions standards; vehicle free days and enforcement of no vehicle idling legislation. Improved planting and greening and water management. Enclosing waste sites to prevent dust was also suggested.
- There was support for some of these measures to be implemented through the planning system with requirements for Air Quality Management Plans to be submitted with planning applications. Expansion of the Low Emission Neighbourhood to cover areas such as Thames Street, Victoria Embankment and Bishopsgate was suggested.
- Water management measures proposed include SuDS to improve water quality and reduce rainwater run-off, and promotion of water efficiency measures
- Noise control was promoted by the Barbican Association, through the adoption of tougher noise standards for contractors, stronger enforcement and restrictions on noisy work on Saturdays in residential areas.

- Light pollution was also raised by the Barbican Association, which called for a robust approach towards offices that cast intrusive light into dwellings. Other respondents suggested offices should have automatic light sensors when rooms/floors are unoccupied, and for the use of solar powered street lighting.

Transport and Motor Vehicles

Question 6.4

What actions could the City Corporation take to reduce congestion in the City?

Number of comments: 16

- A wide range of suggestions were made in response to this question, including: banning private cars during normal working hours; making all other vehicles zero emission; reviewing delivery times; improving public transport; encouraging walking and cycling; increasing car parking charges; better use of existing car parking for alternative uses; and enforcement of the 20mph speed limit.
- TfL suggested incentivising off-peak servicing and deliveries; improving conditions for cyclists and pedestrians; improving bus journey times and making efficient use of space on the roads.
- The CPA supported in principle the use of consolidation centres for new major developments, together with re-timing of delivery and servicing trips outside of peak hours. In addition, there may be an opportunity to reduce bus service frequencies from 2018 onwards with the opening of Crossrail and completion of underground line upgrades.
- The CAAC noted that street clutter impedes pedestrian movement, and asked for a policy requiring the removal of redundant street clutter.
- Other suggestions included developing strategic infrastructure tunnels to reduce the frequency of street works in the long-term; preventing motorised traffic from using Beech Street; and making “direct vision” lorries with minimal blindspots the standard HGV type in the City.

Question 6.5

Should occupiers of large developments be required to only accept deliveries outside peak periods, including at nighttime? Should medium-sized buildings be required to provide off-street servicing areas?

Number of comments: 12

- The majority of respondents (8) welcomed the idea of deliveries being made outside peak periods, including at night-time.
- Three respondents were opposed to off-peak/night-time deliveries due to the impact on residential amenity and because the commercial sector would be undermined by such restrictions. It was suggested that deliveries be made in the early morning where feasible.

- The CPA acknowledged that off-peak servicing may not be achievable for all existing buildings, and suggested it should be particularly encouraged for large scale schemes which can also work with a consolidation centre.
- TfL referred to its London wide retiming programme which encourages deliveries taking place outside of peak hours, and indicated that delivery time periods should be considered within delivery and servicing plans on a site by site basis.
- Off-street servicing for medium-sized buildings was supported by five respondents, albeit with a caveat that this is not always possible in such buildings. The CAAC expressed concern that compelling off-street servicing for medium sized buildings would result in bland inactive frontages and lack of street activity.

Question 6.6

Should we promote consolidation centres, even though this may require the use of land outside the City and over which the Local Plan has no jurisdiction?

Number of comments: 16

- A clear majority of respondents (14) agreed in principle with the promotion of consolidation centres.
- TfL welcomed the promotion of consolidation centres in principle and referred to a number of different types of consolidation, such as procurement led/supply chain solutions and micro consolidation centres.
- The CPA noted consolidation centres could bring a range of benefits, including serving developments in a specific area such as the Easter Cluster.
- Team London Bridge (a Business Improvement District) indicated that it will be investigating options for a consolidation centre in south London and suggested that the City should only seek options north of the river to avoid worsening congestion on key routes across the river.
- Two respondents questioned whether decanting deliveries into smaller vehicles would in fact reduce congestion. Consolidation centres near residential properties would be inappropriate as they operate 24 hours a day.
- Other comments referred to the need to reduce the growing numbers of personal deliveries made by LGV's to City workers.

Question 6.7

How can we reduce the impact of motor vehicle traffic on air quality? What measures could reduce exposure to pollution? Should we encourage alternative modes of travel, including electric vehicles, providing appropriate electric charging infrastructure without causing street clutter?

Number of comments: 16

- 12 respondents commented on the use of electric vehicles and supported the need to provide charging points in accessible locations. However respondents also noted that the increased use of electric vehicles will not reduce congestion.

- TfL highlighted the introduction of the Ultra-Low Emission Zone, which will help to tackle poor air quality.
- The CPA commented that advertising safer cycle routes to destinations in the City could encourage more commuters to cycle to work. There should be further provision of electric vehicle charging points in all new developments and existing where possible. Charging points should also be provided in loading bays.
- Other suggestions included incorporating air filters/extractors into heavily polluted places; transferring existing car parking spaces to car-sharing schemes; reducing on-street car parking; car-free days; and provision of consolidation centres and cargo bikes.
- Promoting other modes of transport was a common theme. The London Cycling Campaign commented that cycling infrastructure has been shown to dramatically boost health outcomes, with spending outranking all other transport modes for return on investment.
- Team London Bridge highlighted the potential for urban greenery, wider pavements and street trees to help mitigate poor air quality on both sides of the river.

Pedestrians, Cyclists and Motorcyclists

Question 6.8

How can more open space and pedestrian routes be created in and around large developments? How can we create more space for pedestrians? Should certain streets in areas of high congestion be pedestrianized or time limited, or should certain types of vehicles be restricted in those areas?

Number of comments: 13

- Eight respondents supported restrictions on vehicular movements in some areas and at certain times. Respondents generally favoured restrictions at peak times or the narrowing of roadways to provide more space for pedestrians or cyclists.
- TfL commented that it is vitally important that planning decisions take account of the need to keep developments and street permeable.
- The CPA noted that footway widths will become a huge constraint on future pedestrian flows in the Eastern Cluster, and recommended the transfer of vehicular carriageway space to additional pedestrian space. Ground floor pedestrian passages or retail arcades should be encouraged through major new developments.
- Other comments included support for limiting general traffic at Bank Junction, support for the potential pedestrianisation of St Paul's Churchyard and reference to Cheapside being a model that could be used elsewhere.

Question 6.9

Should the requirements for cycle parking in developments be increased, remain the same or be decreased? Should large developments be required to provide off-street public cycle parking spaces?

Number of comments: 10

- Most respondents were supportive of cycle parking in new developments, with five calling for increased levels of cycle parking.
- The CPA argued that the London Plan cycle standards are already challenging for many schemes and is about the right standard for the next decade. Public cycle parking within private developments would be impractical and likely impossible for reasons of capacity and security.
- The London Cycling Campaign highlighted the importance of showers and changing facilities as well as cycle parking.
- While there was some support for more on-street cycle parking, a number of comments also referred to the need to avoid further street clutter. TFL suggested that the City Corporation should consider innovative cycle parking solutions that would minimise street level space requirements, such as underground parking.

Question 6.10

Should there be more on-street or off-street motorcycle parking in the City?

Number of comments: 7

- The majority of respondents felt that no more motorcycle parking is required and that this should not be seen as a priority.
- TfL commented that provision of on and off-street motorcycle parking would come as a trade-off against space for cycle parking, pedestrians and amenity space.
- The CPA recommended that the City explores the use of electric bikes as a potential replacement of motorbike trips.

Waste and the Circular Economy

Question 6.11

What measures could we include to secure waste reduction associated with development? Should we promote circular economy principles, zero waste plans and on-site management of waste for large developments?

Number of comments: 13

- All respondents were in favour of waste reduction measures with seven specifically supporting promotion of the circular economy, six supporting on-site waste management on large sites and four supporting zero waste plans.
- Specific measures suggested included promotion of reuse and recycling of demolition waste; use of 100% recyclable packaging by food and drink outlets; anaerobic digestion and on site management of food waste; and ensuring Barbican residents make full use of its existing waste collection and recycling system.

- Some respondents considered that collection and handling of waste and recyclables should be designed into development from the outset, and the Environment Agency highlighted the London Waste and Recycling Board's recent work on waste management in flatted developments.
- The use of Site Waste Management Plans, and standards such as CEEQUAL and BREEAM were advocated to provide delivery of the waste hierarchy.

Question 6.12

Should we continue to rely on waste management facilities outside the City? If so, how should we co-operate with other waste planning authorities to ensure adequate and appropriate planning for waste?

Number of comments: 9

- All respondents acknowledged that due to the unique nature of the City it will be necessary to continue to rely on waste management facilities elsewhere. A couple of respondents recommended that waste capacity in the City should, however, be assessed through an options appraisal.
- Five of the responses to this question came from waste planning authorities (either individually or as part of a group), who pointed out that waste capacity at recipient authorities is diminishing due to landfill closures. A number of respondents commented that the City should continue to co-operate with the London Waste Planning Forum, the GLA, the South East London Waste Planning Group, other boroughs and authorities elsewhere that receive waste from the City.
- The London Plan's aim for net self-sufficiency by 2026 was supported. However, construction waste is a particular issue as there is currently no agreed apportionment for where this should be managed.
- There was support for the use of Walbrook Wharf coupled with waste management facilities downstream to encourage sustainability and reduce road congestion.

Question 6.13

Should we continue to safeguard Walbrook Wharf as a waste site? Are there any other sites in the City which could be used for waste management, reducing the need to export waste elsewhere?

Number of comments: 15

- The majority of respondents (12) thought that Walbrook Wharf should continue to be safeguarded, noting its benefits for low emission waste transport.
- It was suggested that other waste-related uses, such as the transfer of construction, demolition and excavation waste, should be considered at Walbrook Wharf.

- The Port of London Authority highlighted that even if Walbrook Wharf were no longer used for the transport of waste by water, it would still be a safeguarded wharf.
- There was some support for the provision of waste treatment facilities, particularly for food waste, within commercial developments.

Flood Risk

Question 6.14

Should national SuDS standards continue to be applied to major development only or should we require smaller development to incorporate a certain standard of SuDS? If so, what type of smaller developments should be included?

Number of comments: 9

- Four respondents considered that SuDS standards should be applied to all scales of development. However, two respondents felt that SuDS standards should only be applied to major development, with the CPA pointing to viability and feasibility concerns.
- The GLA commented that the applications of SuDS to smaller scale development merits consideration and the Environment Agency highlighted that the policy should be informed by evidence from the City's Strategic Flood Risk Assessment.

Question 6.15

Should we require flood resistance and resilience measures for new development and refurbishment schemes within the City Flood Risk Area? If so what measures should be specified?

Number of comments: 9

- All respondents were in favour of requiring flood resistance and resilience measures for premises in the City Flood Risk Area, with the GLA suggesting the approach to Flood Risk Management is forward looking and seeks to address the particular flood risk challenges in the City.
- Specific measures proposed included the use of non-porous materials at ground floor level and flood resilient doors and windows.
- Other respondents suggested adopting best practice measures at the time of the planning application, following national and regional guidance, using BREEAM, and identifying suitable measures through the Strategic Flood Risk Assessment.

City Communities

General comments

Number of comments: 1

- It was suggested that there should be more inclusion of surrounding boroughs in the Plan in order to better co-ordinate the needs of the City and ensure that these boroughs benefit from the economic success of the City.

Open Spaces and Recreation

Question 7.1

Should we continue to protect or enhance the existing open spaces in the City? How can we deliver more open space in the City?

Number of comments: 19

- This question produced a clear consensus, with all respondents agreeing that open spaces in the City should be protected, enhanced and expanded where possible. A number commented that open spaces and green areas are vital to achieving the Local Plan's strategic objectives.
- Five respondents felt that existing open spaces should be protected from overshadowing and encroachment of nearby developments.
- There were five comments suggesting there should be a requirement for public open space to be provided at ground level in large and tall building developments.
- Six respondents commented that, while skygardens can provide amenity for office workers, they are no substitute for public open space at ground level.
- The City of London Archaeological Trust highlighted that open spaces have a history which should be made evident in the space itself, adding that historic spaces must be valued because they are historic and serve as places of memory.
- The Chapter of St Paul's Cathedral commented that open spaces are important resources for seeking solace and calm, places for reflection as well as active learning and can support community cohesion, if managed well.
- The Barbican Association indicated that roof top terraces should not be built on office blocks adjacent to the Barbican or Golden Lane estates, but where such terraces are built their usage should be limited to 8am to 7pm.
- The Museum of London commented that there are opportunities to enhance some of the open spaces around West Smithfield as part of the plans for a new museum.

Question 7.2

Should priority be given to greenery within open spaces or to harder surfaces that are easier to maintain? Should developers be required to contribute towards the future maintenance of new open spaces?

Number of comments: 15

- The majority of respondents (10) expressed a preference for greenery to be given priority in open spaces. Several respondents felt that even the smallest public realm proposals should include some form of planting. Reasons for preferring greenery included relaxation, mitigating the impacts of pollution and climate change, and assisting biodiversity.
- Four respondents felt that a mixture of hard and soft landscaping should be provided, depending on the circumstances of each site.
- Six respondents suggested that developers should be required to maintain public open spaces within their site boundaries.

Question 7.3

Should we require buildings over a certain size to contain a proportion of public space and/or employee recreational space within the building, including roofspace?

Number of comments: 16

- The majority of respondents (11) supported the provision of public space and/or employee recreational space within buildings. However, several respondents emphasised that employee recreational space within buildings should not be a substitute for public open space at ground level.
- The CPA expressed concerns about a one size fits all policy on this topic, and does not believe it is appropriate to provide public space or viewing galleries in all major developments or tall buildings. A policy which leads to a proliferation of viewing galleries is not considered sustainable, or necessarily in the best interests of the City.
- The Barbican Association reiterated concerns about roof terraces close to residential clusters, and suggested that developers be encouraged to make imaginative use of internal atriums, for example to include climbing walls.

Question 7.4

What type of outdoor open spaces and recreation facilities are most needed in the City? Should we specify what should be sought in new open spaces in terms of seating, planting and other facilities, depending on their location and character?

Number of comments: 14

- All respondents suggested what they would like to see in open spaces, but there were few comments on whether the Local Plan should specify types of facilities in particular locations. Amongst the suggestions were: seating (in sunlight); eating areas; rain shelters; easy access to toilets and catering facilities; lighting; trees; wildlife and water features.
- The Barbican Association suggested that where there is space in a large development, away from residential clusters, the hard landscaping should include sports facilities.

- The CPA commented that factors will vary between sites and did not wish to see a prescriptive policy on this topic, whilst supporting the ambition of the policy sentiment.
- The Chapter of St Paul's Cathedral commented that modest commercial use of open spaces, if well-judged and managed, could provide a public benefit and is an issue worthy of consideration.

Retailing

Question 7.5

Should the number or role of PSCs be modified and/or should the boundaries of existing PSCs be amended? Is it still an appropriate policy objective to prioritise A1 units over other retail uses in PSCs?

Number of comments: 10

- Respondents to the first part of this question supported the retention of the PSCs, although three mentioned the need to review current PSC boundaries.
- The Museum of London suggested there may be a case in the future for a new PSC in the Farringdon area to reflect the potential change in character resulting from Crossrail and development activity in this area.
- There was a mix of views regarding prioritising A1 (shop) units in PSCs. Four respondents supported prioritising A1 units, or at least setting a baseline level of A1, although the CPA qualified this with the comment that policy should not be too prescriptive.
- The Barbican Association suggested that permissions for A3 uses (restaurants and cafes) in or opposite the Barbican Residential Estate should be conditioned to prevent an A5 (hot food takeaway) element in order to avoid nuisance from delivery services.

Question 7.6

Do the retail links still serve a clear purpose or should we allow retail uses throughout the City? Should isolated retail units continue to be protected?

Number of comments: 10

- There were mixed views in relation to this question. Three respondents felt that the retail links still serve a clear purpose. On the other hand, three respondents were in favour of allowing retail uses throughout the City, unless there is a particularly strong reason not to allow it.
- Tower Hamlets suggested a new retail link north of the Liverpool Street PSC to promote movement between there and Spitalfields Market.
- Two respondents supported continued policy protection of isolated retail units, while two were opposed to this.

Housing

Question 7.7

Should we define the boundaries of existing residential areas more clearly to indicate where in the City further residential development would be permitted? Or, should residential development be permitted anywhere in the City as long as the particular site is not considered suitable for office use and residential amenity consistent with a city centre location can be achieved?

Number of comments: 19

- The majority of respondents (12) supported residential development being permitted anywhere in the City providing the site is not suitable for office use and a reasonable standard of residential amenity can be achieved.
- It was argued by some of those who supported a dispersed approach that policies should be flexible and the potential for residential use should be considered on a site-by-site basis. Others stated that residential development can co-exist with offices and that there are good examples of this in the City.
- Five respondents, including the GLA and the CPA, favoured a continuation of the current policy approach of focusing new housing in existing residential areas.
- Four respondents felt that residential boundaries should be defined or made clearer in the Plan, while three respondents were opposed to defining specific boundaries.
- The Chancery Lane Association stated that it would object to defined boundaries if the Chancery Lane area were not included within a residential area.

Question 7.8

Should we plan to meet the London Plan housing target, or the level of need identified in the Strategic Housing Market Assessment? Is there a need to exceed the London Plan housing target to address wider London housing need?

Number of comments: 12

- The majority of respondents (9) considered that the City should at least meet the housing target in the London Plan. Of these, 5 expressed support for potentially exceeding the London Plan target and 4 referred simply to meeting the target.
- Two respondents felt that either no additional housing or the absolute minimum should be provided within the City's boundaries.
- The GLA and TfL both stated that the City should meet its London Plan housing target, but added this will need to be managed in ways which do not compromise the City's strategic CAZ roles.
- The Barbican Association called for measures to prevent residential units being bought by overseas investors and never occupied.

Question 7.9

Is it feasible in the City for residential units to be successfully incorporated in a building with non-residential uses? Or would co-existence undermine the operation of City businesses and/or residential amenity?

Number of comments: 16

- The majority of respondents (11) stated that it is feasible for residential units to be successfully incorporated in buildings alongside non-residential uses.
- Some respondents felt that mixed-use developments should be encouraged because they would bring wider benefits, such as allowing for interesting design solutions or assisting with placemaking.
- A number of respondents, while supporting co-location of uses from a design point of view, did not specifically state whether or not this would be desirable in the City.
- Four respondents were opposed to mixing residential and non-residential uses in the same building, either because this would impact on the flexibility required to respond to changing business needs or because it would result in a loss of residential amenity.

Question 7.10

Are there types of housing to suit specific needs that we should encourage in the City e.g. sheltered housing for the elderly or new forms of rental accommodation?

Number of comments: 5

- All respondents felt there is a need for specific types of housing in the City, albeit they had different views on what that should comprise. Suggestions included rent to buy housing; short-stay accommodation with weekly or monthly rentals; hostels; student-type accommodation with flexible tenancies; key worker accommodation; and sheltered housing for the elderly.
- While three respondents supported the provision of short-stay accommodation, the Barbican Association felt that hostels, student accommodation and short term lets should be discouraged within or close to residential clusters due to their impact on amenity.

Question 7.11

Should the level of affordable housing required in the City be increased to allow the supply of rented affordable housing to be retained alongside starter homes? Is the approach to seeking commuted sums and delivering affordable housing acceptable?

Number of comments: 9

- This question prompted divergent views, with four respondents supporting an increase in the level of affordable housing within the City and four against.

- Amongst those who supported an increase, two respondents commented that starter homes alone would not adequately address housing needs and that an increased target would enable other affordable housing tenures to be provided.
- Those who did not support an increase felt that provision of affordable housing is more appropriate elsewhere in London where there is less competition from commercial users.
- Four respondents supported the City's current approach to collecting commuted sums and using these to deliver affordable housing outside the Square Mile.
- The Barbican Association suggested that the new housing should be within 2 km of the City's boundaries to make it easier for lower paid City workers and key workers.
- On the other hand, two respondents favoured on-site affordable housing provision.

Question 7.12

Are there any areas of land in the City that should be considered suitable for 'permission in principle' for housing-led development through the Local Plan review?

Number of comments: 5

- Three respondents considered there were no suitable areas in the City for 'permission in principle' housing development.
- A landowner put forward a site in Lower Thames Street as suitable for residential development as part of a mixed-use scheme that includes offices and retail. Another respondent suggested the St. Paul's and Smithfield areas would be suitable.

Social and Community Infrastructure

Question 7.13

What type of facilities and services would be appropriate to meet the needs of current and future City workers? Are these different to the facilities needed by residents? How can facilities for workers and residents be best delivered?

Number of comments: 4

- The Barbican Association highlighted that City workers can register at City GP practices, yet there is only one NHS doctors' surgery within the City. It advocated securing space for additional surgeries within large redevelopment schemes with the aim of achieving an NHS surgery in each of the four quarters of the City.
- The CPA considered that current policies are appropriate to achieve a diverse range of facilities and services to meet current and future City office needs.
- The Campaign for Real Ale (CAMRA) felt that the development of traditional pubs for alternative, more profitable uses is a major threat to the future vibrancy and vitality of the City. It called for a specific policy to protect pubs in line with the broad requirements of the NPPF and the London Plan.

Question 7.14

Should we plan to meet the need for social and community services in full within the City, or work with partners in neighbouring boroughs?

Number of comments: 6

- Two respondents felt the City Corporation should work with neighbouring boroughs to provide social and community facilities. Given the unique nature of the City, the GLA indicated it is acceptable to consider shared provision with adjoining boroughs, although there may be demand for certain types of daytime services for the working population.
- Two respondents considered that services and facilities should be located within the City. The CPA noted that social and community services are hugely important to the functioning of a sustainable City, while the Barbican Association felt that the necessary physical infrastructure and buildings should be within the City.

Appendix 3 – comments received at public consultation events

| Topic | Comments from 1 st consultation event 03/10/16 |
|---------------------------------|---|
| Offices/SMEs | How will the plan address those SMEs that wish to remain small and not expand? |
| | City needs more creative industries and not 'for profit' organisations. |
| | Corporation needs to engage with SME's and residents. |
| | The City has character but this is being threatened by large buildings. Given Brexit, large floor space buildings may become less attractive. |
| | The cost of the City's office space is a pertinent issue. Policies need to be robust to avoid being overridden by high rents. |
| | Since the 1980's office rents have not increased. |
| | Interesting to see how City treats its own development sites. Eastern Cluster integration with area over the boundary. Contrast between one of the wealthiest Local Authorities and most deprived. |
| | Large floor plate buildings should be designed to be flexible so they can accommodate small business space as well. |
| Tall Buildings | Important that tall buildings are grouped to avoid a messy look to the skyline. |
| | Retaining tall building constraints indicates that the City is actively planning the skyline. |
| | As land is so valuable, developers are maximising profits by building taller. City must combat short-term wins. |
| Development (general) | Pushes activities outside City because of the concentration inside the City e.g. South Bank – easier to accommodate different uses. |
| | Designs of buildings and support services are not keeping up with requirements. |
| | Different types of property, including offices and residential should not be mixed. |
| Environment | Pollution levels in the City are too high. Key cause of poor air quality is traffic and construction activity. |
| | City should be a little Singapore. Green space on top of buildings excuses other initiatives, shouldn't be let off the hook. |
| | There are conflicts within the Corporation; green issues are not given enough importance. |
| | Contradiction in permitting residential development along Thames Street given high levels of pollution. |
| | The Circular Economy is not given sufficient priority in the planning process. Policy and Resources Committee does not give enough priority to refurbishment and saving resources. Need references throughout the Plan. |
| | The Sustainable City Forum should be prioritised and allowed to have influence. |
| Servicing and Deliveries | Need to ensure that deliveries are still able to service the centre of the City. |

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| Parking | There is no reference to disabled residents. On-street spaces should be provided for disabled residents. Blue Badge provision doesn't reserve spaces for residents. In Westminster there is allocated parking for disabled residents. There is a problem with disabled parking in residential conversions not being maintained for people with disabilities. |
| Residential amenity | Residents living in Andrews House facing Fore Street suffer constant disturbance from coaches in bays, taxis and drivers. Traffic laws are not being enforced. Would be useful to close Fore Street to traffic. |
| | Development of new buildings needs to consider disturbance to residents. |
| | What is the City's future view on rights to light? |
| | Residential amenity is a big problem for residents. Residents suffer from noise and bars and restaurants with late licenses. People and their noise are not managed as they leave the premises. |
| Public Realm | The City has the potential to be characterful and a great place to walk around. However, the City is a grim place to walk around due to the degree of development. |
| | More greenery in the Barbican needed. |
| | Street cleaning does not keep pace with increasing visitor numbers, particularly at weekends, when there are more visitors and construction workers. |
| | Need a beautiful entrance to the new museum and the Barbican. Roads should have creative art and design shops; good examples - Landmark Trust building and Geranium. |
| Policy-making/ implementation | Will this consultation exercise sincerely seek to address issues raised? |
| | Is there someone with an arts background in DBE? |
| | Difficult to get planning conditions honoured and enforced. |
| | Need to make sure that policy in the Plan transpires into reality and is able to mitigate noise and disturbance. There is too much appeasement by elected representatives. Members make decisions but barely read the relevant reports. |
| | Corporation should be stricter in enforcing policies and regulations e.g. views affected by the Garden Bridge and peanut seller carts. |
| | Corporation gives too much leeway to developers on key issues |
| Transport | What is the Corporation's vision for transport in 20 years' time? What level of electrification is anticipated? Drones may replace deliveries by van. |
| | Need more cycle lanes and a reduction in vehicular traffic. |
| City Fringe | Relationship between City Fringe/Canary Wharf/London Plan is important. City Corporation must work with its neighbours. |
| | Shoreditch becoming too expensive. SMEs moving into City as rents in Shoreditch area increase. |
| | Tech City has passed the City by. |
| | Norton Folgate is prime commercial property which, if in Mayfair, would command very high rent. City is dislodging this type of floor |

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| | space. |
| Puddle Dock | Puddle Dock area needs redevelopment. |
| | Need for strategic impetus and direction for Puddle Dock. What is happening at White Lion Hill? Any plans for progress? |
| Night-time Economy | To what extent is CoL prepared to enforce its policies? Need more stringent enforcing of breaches of night time economy conditions, protection of public realm. |
| Emissions | More information is needed on the Low Emission Neighbourhood, how it will operate and how it will be enforced. |
| Waste | Need to minimise waste and how it is transported. Demolition and construction waste from Queensbridge House should have been moved by the river. |
| | Should try and refurbish rather than demolish buildings. Need laws to regulate waste, similar to the Clean Air Act laws. |
| Housing | Housing target should be increased. Housing target should be broken down by tenure and target formulation should be more transparent. |
| | Affordable and specialist housing should not be moved out to other boroughs. |
| Views | Views should be protected. |
| Hotels | Need more hotels. |
| Health and Wellbeing comments | The Joint Strategic Needs Assessment team had a separate display table at our consultation event. They asked consultees to indicate what they felt were the key health issues facing the City. People were asked to indicate whether they were residents, workers or other as below. |
| Residents | |
| <ul style="list-style-type: none">• Loss of daylight• Traffic-speed control needed• Cycle Super Highway• Road traffic - too many buses and taxis• Air pollution• Lack of green space• Noise pollution - too much construction• Illegal building work• Noise outside quiet hours• Rubbish collection• Street cleaning• Black carbon• Idling lorries and diesel generators | |
| Workers | |
| <ul style="list-style-type: none">• Need for more sports facilities• Protection of cyclists and motorcyclists• Space to relax more - open spaces• Support for mental health issues• Noise pollution• Lack of public realm• Air pollution | |
| Other | |
| <ul style="list-style-type: none">• Air pollution• Fog | |

| Topic | Comments from 2nd consultation event 13/10/16 |
|---------------------------------|--|
| Retail | Allow more retail in quieter places as long as there is enough footfall |
| Economy | How will Brexit impact planning the City? |
| Tall Buildings | Build taller than Dubai |
| Servicing and deliveries | Favours the use of consolidation centres |
| | Encourage more catering facilities within buildings |
| | Timed deliveries to avoid the rush hour |
| Development (general) | How can we find new uses for old buildings? |
| Environment | There should be a co-ordinated scheme for flood defence raising across London, with a London wide levy to pay for this |
| Amenity | Concerns around noise from flats let through Air bnb. Could CoL adopt a similar approach to Berlin? |
| | Concerns about loss of natural light and sunshine as a result of development |
| Public Realm | The trees in front of the Cheese Grater are not looking very good – how can we improve the public realm around there? |
| | Tables in open spaces |
| | How can you improve the public realm and rubbish? Particularly around lunchtimes. |
| Policy-making/process | Too many people involved! |
| Transport | How can new technology be used to help remedy traffic congestion? |
| | Electric vehicles should be encouraged |
| | Communal cycle storage in buildings reduces cycle theft |
| Fleet Street | Fleet Street should be more pedestrian friendly |
| Smithfield | Is Smithfield Market going to stay in the same place? The traffic around the market is very bad. |
| Cultural Hub | What about the Cultural Hub? |
| Night-time Economy | Issues with licensed premises and the night-time economy. Is there an upper limit for licenses in the City? |
| | Private functions at licensed premises at the weekend are an issue – hard to track and manage these. |
| | How can you accommodate late and/or early workers in the City? |
| Emissions | No emission tax |
| Smart City | Free WiFi should be available everywhere including the Tube |
| | City should be a CISCO style smart city |
| | Work space in parks |
| Waste | Should encourage on-site waste management in large developments, but may not be popular with developers |
| | Public management of waste collection rather than relying on private contractors |
| Security | Should have more attractive anti vehicle measures – not just bollards |
| | Are there any technological advances to improve security around |

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| | the Eastern Cluster? |
| | ATTRO has decreased traffic around St Mary Axe |
| Housing | No more residential development |
| Hotels | Aldgate area should be extended to include existing hotel cluster at Tower. |
| | How can you stop hotels being turned into offices for big businesses/banks? |
| | Shortage of hotels in central part of the City |
| Conference Centre | Lack of large conference centre in the City |

Low Emission Neighbourhood Launch event 11/01/17

At the Local Plan stand we posed 2 questions from the Issues and Options consultation document:

Question 6.3

Should we identify and encourage specific local measures to improve air and water quality, conserve water and minimise flood risk, minimise noise and light pollution and eliminate potential land contamination. If so, what should they include?

Question 6.7

How can we reduce the impact of motor vehicle traffic on air quality? What measures could reduce exposure to pollution? Should we encourage alternative modes of travel, including electric vehicles, providing appropriate electric charging infrastructure without causing street clutter?

The following post-it note comments were received:

| Topic | Comment |
|---------------------------------|---|
| Electric vehicles | Promote electric charging points in car parks – especially in the Barbican |
| | Promote electric vehicles as long as residents without electric vehicles can still access car parks |
| | Electric police and emergency service vehicles |
| | Encourage charging points for electric vehicles |
| | Incentivise electric vehicles |
| | Support electric vehicle only taxi rank at Lauderdale Tower |
| Beech Street | Close Beech Street Tunnel to <u>all</u> traffic immediately |
| | Improve air quality in Beech Street Tunnel |
| | Close Beech Street Tunnel |
| | Consider the knock on impacts of rerouting Beech Street to other neighbouring streets |
| | How would we enforce ban on non-electric vehicles in Beech Street? |
| Parking | Stop all car parking. Provide cycle parking at all public venues especially Barbican |
| | Reduce motor cycle parking to reduce noise levels |
| | Link CO2 emissions to parking costs |
| Vehicle emissions | Fine all idling vehicles – including police |
| | Remove diesel vehicles from <u>all</u> London Streets |
| Emissions from buildings | Reduce pollution associated with emergency diesel generators |
| | Emissions from buildings de-coking on Saturday morning are noticeable – vapour/mist |
| | Do not allow or especially not incentivise the use of diesel generators by City businesses |

| | |
|---------------------------------|---|
| Building sites | Stop building altogether – Air pollution from building sites kills people. Compare this with action to prevent exposure to smoking. |
| | Reduce dust from building sites |
| | Air Quality Management Plans should be submitted with planning applications |
| Deliveries and servicing | Provide space in buildings for deliveries to avoid queuing in the street |
| | Promote consolidation of deliveries |
| | Light pollution is a concern – loading bays as well as buildings |
| Greening and environment | Improved planting and greening would have air quality benefits |
| | Green barriers to reduce particulates |
| | Make clean air walking routes more visible |
| | Create more play streets |
| | Water collection from Podium waterproofing project – extension of Beech Gardens |
| Beyond the City | Extend air quality initiatives beyond the City boundary |
| | Initiatives in the City must not have negative impact elsewhere |

Appendix 4 – comments on Integrated Impact Assessment

As part of the Issues & Options consultation the following documents were published for comment:

- Integrated Impact Assessment Scoping Report
- Scoping Report Appendix 1 – Other plans and programmes
- Scoping Report Appendix 2 – Baseline information
- Scoping Report Appendix 3 – Consultation Responses
- Integrated Impact Assessment Commentary Document

Responses: Comments were received from two statutory consultees; the Environment Agency and Historic England. The City Corporation's response to these comments is recorded in the following table and will be reflected in the next iteration of the IIA at draft City Plan 2036 stage.

Organisation: Environment Agency

Comment: Thank you for taking into account our previous comments at the scoping stage of the IIA. We welcome the changes you have made to the IIA report to the criteria questions for objectives on waste management, environmental protection, climate change and biodiversity and urban greening. There is also the opportunity to use the current WFD status of the New River and Thames (Middle) as an indicator for water quality or biodiversity. Both are currently achieving moderate status. The water body summary reports I've enclosed specify the reasons for not achieving good, and list the draft action measures required to achieve good status by 2027.

City Corporation Response

The draft SA Scoping Report appendix 2 baseline information has been amended to include the current WFD status for the Thames (Middle) and proposed measures required to achieve good status by 2027 have been noted.

The WFD status of the New River has not been included since it does not flow through the City and there are no actions proposed within the City to improve its status.

Organisation: Historic England

Comment: In our response to this version of the IIA Scoping Report, we draw your attention to our letter (dated 25th February 2016) in response to the previous iteration of the IIA Scoping Report as published in January 2016. For example issues not yet addressed include:

- Baseline – commentary on the condition of heritage assets in the City there are a small number of assets on Historic England's Heritage at Risk Register (2016) (e.g. 1 listed building, 3 Places of Worship and 3 Schedule Monuments).
- Compatibility Matrix – where the commentary on the relationship between heritage and economic growth objectives is ambiguous, yet on the matrix it is marked as a 'x', which suggests conflict. Greater clarity is needed.

City Corporation Response

The draft SA Scoping Report appendix 2 baseline information paragraph 8.3 has been added providing details of the condition of heritage assets that are “at risk” in the City.

The compatibility matrix has been amended to indicate uncertainty regarding the impact of heritage assets on economic growth. Further monitoring is underway to determine the impact of heritage status on planning permissions.

| | |
|---|------------------------|
| Committee(s) | Dated: |
| Planning & Transportation Committee – For Information | 21032017 |
| Subject: Department of the Built Environment Risk Management – Quarterly Report | Public |
| Report of: Director of the Built Environment | For Information |
| Report author: Richard Steele | |

Summary

This report has been produced to provide the Planning & Transportation Committee with assurance that risk management procedures in place within the Department of the Built Environment are satisfactory and that they meet the requirements of the corporate Risk Management Framework.

This report only considers risks managed by the Department of the Built Environment that fall within the remit of the Planning & Transportation Committee.

Risk is reviewed regularly as part of the ongoing management of the operations of the Department of the Built Environment. In addition to the flexibility for emerging risks to be raised as they are identified, a process exists for in-depth periodic review of the risk register.

Since the last report to Members there have been no changes in the list of Corporate or Red risks managed by the department.

There is one Corporate Risk managed by the Department of the Built Environment. This is:

- CR20 - Road Safety (Current risk: RED – unchanged)
[Planning & Transportation Committee]

There are no Departmental RED Risks managed by the Department of the Built Environment.

Recommendation

Members are asked to:

- Note the report and the actions taken in the Department of the Built Environment to monitor and manage effectively risks arising from the department's operations.

Main Report

Background

1. The Risk Management Framework of the City of London Corporation requires each Chief Officer to report regularly to Committee the risks faced in their department.
2. Risk Management is a standing item at the Senior Leadership Team meetings.
3. Risk owners are consulted and risks are reviewed between SLT meetings with the updates recorded in the corporate (Covalent) system.
4. Each risk managed by the Department of the Built Environment is allocated to either the Planning & Transportation Committee or the Port Health & Environmental Services Committees. **This report only considers risks managed by the Department of the Built Environment that fall within the remit of the Planning & Transportation Committee.**

Parallel periodic reports are submitted to the Port Health & Environmental Services Committee.

Current Position

5. This report provides an update on the current risks that exist in relation to the operations of the Department of the Built Environment that fall within the remit of the Planning & Transportation Committee.
6. In order to reduce the volume of information presented, and accordance with the Corporate Risk Management Strategy, this report includes all Corporate and Departmental level risks but not Service Level risks (unless there are changes which are considered to be likely to be of interest to Members).
7. The risk register captures risk across all four divisions within the department, (Transportation & Public Realm, District Surveyor, Development and Policy & Performance) but risks relating to the City Property Advisory Team are managed by the City Surveyor.

Risk Management Process

8. Risk and control owners are consulted regarding the risks for which they are responsible at appropriate intervals based on the level of risk and the likelihood that this level will change. In general RED risks are reviewed monthly; AMBER risk are reviewed quarterly; and GREEN risks are reviewed quarterly, 6 monthly or annually depending on the likelihood of change.
9. Changes to risks were, historically, reported to Members as part of the Business Plan report. Members now receive this report quarterly in accordance with the Corporate Risk Management Strategy.

10. All significant risks (including Health & Safety risks) identified by the Department are managed through the Covalent Corporate Risk Management System.
11. Many of the department's risks have "Business As Usual" mitigations. These mitigations are ongoing and in Appendix 1 they do not have either a "Latest Note" or a "Latest Note Date". Because the Covalent system requires that they have a Due Date the fictitious (and meaningless) date of 31 Dec 2999 has been used.

Significant Risk Changes

12. Regular assessments of risks have identified no increase or decrease in the Risk Score of the Corporate or any Departmental risk.

Identification of New Risks

13. New risks may be identified at the quarterly review of all risk; through Risk reviews at the Department Management Team; or by a Director as part of their ongoing business management.
14. An initial assessment of all new risks is undertaken to determine the level of risk (Red, Amber or Green). Red and Amber risks will be the subject of an immediate full assessment with Red risks being report to the Department Management Team. Green risks will be included in the next review cycle.
15. No new risks that fall within the remit of the Planning & Transportation Committee have been identified since the last report.
16. The impact of Brexit continues to be reviewed and is referenced in DBE-PL-02 (relating to being alive to the needs/requirements of the world business centre and political environment).

Planning for the Future City

17. The Department's Business Plan for 2016/19 is focused on the Future City with a vision of 'creating and facilitating the leading future world class City'

It is critical that the department, whilst focused on its vision, continues to deliver its key services and facilitates delivery by our partners. Our risk registers are currently aligned to this work.

As we develop long term ambitious strategies for the Future City through the cross departmental Chief Officer Place Steering Group this will lead to the identification of more strategic risks and opportunities, which in turn will inform those strategies.

Summary of Key Risks

18. The Department of the Built Environment is responsible for one Corporate Risk. This is:

- **Road Safety (CR20) which is RED**

This is the risk related to road traffic collisions.

This risk is assessed as having impact 8 (Critical) and Likelihood 4 (Likely).

The Interim Bank (experimental) Scheme is progressing well, signpost foundations have been laid, enforcement cameras are being tendered and formal notice letters have been sent to businesses. Due to emergency National Grid works on Cannon Street and the need to establish baseline data before the scheme goes live it is likely that the implementation date will slip into May. Once the Interim Bank Junction redesign is implemented this risk will be reduced to Amber.

The Road Danger Reduction Partnership has developed a joint work programme (City of London Corporation with the City Police) for the financial year 2017/18, (which includes the Communications Strategy) this will be presented to the Planning and Transportation Committee on March 21st.

Conclusion

19. Members are asked to note that risk management processes within the Department of the Built Environment adhere to the requirements of the City Corporation's Risk Management Framework and that risks identified within the operational and strategic responsibilities of the Director of the Built Environment are proactively managed

Appendices

- Appendix 1 – City of London Corporation Risk Matrix
- Appendix 2 – Register of DBE Corporate and Departmental risks (Planning & Transportation Committee)

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City of London Corporation Risk Matrix (Black and white version)

Note: A risk score is calculated by assessing the risk in terms of likelihood and impact. By using the likelihood and impact criteria below (top left (A) and bottom right (B) respectively) it is possible to calculate a risk score. For example a risk assessed as Unlikely (2) and with an impact of Serious (2) can be plotted on the risk scoring grid, top right (C) to give an overall risk score of a green (4). Using the risk score definitions bottom right (D) below, a green risk is one that just requires actions to maintain that rating.

(A) Likelihood criteria

| | Rare (1) | Unlikely (2) | Possible (3) | Likely (4) |
|-------------|--|--|---|---|
| Criteria | Less than 10% | 10 – 40% | 40 – 75% | More than 75% |
| Probability | Has happened rarely/never before | Unlikely to occur | Fairly likely to occur | More likely to occur than not |
| Time period | Unlikely to occur in a 10 year period | Likely to occur within a 10 year period | Likely to occur once within a one year period | Likely to occur once within three months |
| Numerical | Less than one chance in a hundred thousand (<10-5) | Less than one chance in ten thousand (<10-4) | Less than one chance in a thousand (<10-3) | Less than one chance in a hundred (<10-2) |

(B) Impact criteria

| Impact title | Definitions |
|--------------|--|
| Minor (1) | Service delivery/performance: Minor impact on service, typically up to one day. Financial: financial loss up to 5% of budget. Reputation: Isolated service user/stakeholder complaints contained within business unit/division. Legal/statutory: Litigation claim or find less than £5000. Safety/health: Minor incident including injury to one or more individuals. Objectives: Failure to achieve team plan objectives. |
| Serious (2) | Service delivery/performance: Service disruption 2 to 5 days. Financial: Financial loss up to 10% of budget. Reputation: Adverse local media coverage/multiple service user/stakeholder complaints. Legal/statutory: Litigation claimable fine between £5000 and £50,000. Safety/health: Significant injury or illness causing short-term disability to one or more persons. Objectives: Failure to achieve one or more service plan objectives. |
| Major (4) | Service delivery/performance: Service disruption > 1 - 4 weeks. Financial: Financial loss up to 20% of budget. Reputation: Adverse national media coverage 1 to 3 days. Legal/statutory: Litigation claimable fine between £50,000 and £500,000. Safety/health: Major injury or illness/disease causing long-term disability to one or more people Objectives: Failure to achieve a strategic plan objective. |
| Extreme (8) | Service delivery/performance: Service disruption > 4 weeks. Financial: Financial loss up to 35% of budget. Reputation: National publicity more than three days. Possible resignation leading member or chief officer. Legal/statutory: Multiple civil or criminal suits. Litigation claim or find in excess of £500,000. Safety/health: Fatality or life-threatening illness/disease (e.g. mesothelioma) to one or more persons. Objectives: Failure to achieve a major corporate objective. |

(C) Risk scoring grid

| Likelihood | Impact | | | | |
|------------|--------------|------------|-------------|-------------|-------------|
| | X | Minor (1) | Serious (2) | Major (4) | Extreme (8) |
| | Likely (4) | 4 Green | 8 Amber | 16 Red | 32 Red |
| | Possible (3) | 3 Green | 6 Amber | 12 Amber | 24 Red |
| | Unlikely (2) | 2 Green | 4 Green | 8 Amber | 16 Red |
| | Rare (1) | 1 Green | 2 Green | 4 Green | 8 Amber |

(D) Risk score definitions

| | |
|-------|--|
| RED | Urgent action required to reduce rating |
| AMBER | Action required to maintain or reduce rating |
| GREEN | Action required to maintain rating |

This is an extract from the City of London Corporate Risk Management Strategy, published in May 2014.

Contact the Corporate Risk Advisor for further information. Ext 1297

October 2015

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DBE Corporate & Departmental Risks (*Planning & Transportation Committee*)

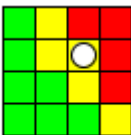
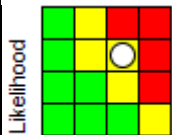

APPENDIX 2

Report Author: Richard Steele

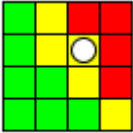
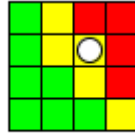

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| Action no, Title, | Description | Latest Note | Managed By | Latest Note Date | Due Date |
|---|---|--|----------------|------------------------|-------------|
| CR20a Joint Safer Transport Team | Implement a joint City of London Corporation & City of London Police Road Safety/Safer Transport Team | We work in close partnership with the City Police and at the February meeting of the Road Danger Reduction Partnership it was agreed to develop a joint work programme for the financial year 2017/18. The proposed work programme will be presented to the Planning and Transportation Committee on March 21st and the due date has been adjusted accordingly. | Steve Presland | 02-Mar-2017 | 31-Mar-2017 |
| CR20b Permanent Bank Junction redesign | Permanent Bank Junction redesign | Still on track. | Steve Presland | 02-Mar-2017 | 30-Nov-2018 |
| CR20c Interim Bank Junction redesign | Working with TfL to explore and, where practicable, deliver short term design/operational improvements to Bank Junction | <p>The tender for the enforcement cameras for the scheme is drawing to a close and foundations for the new sign posts are already being installed. Letters to local businesses has been sent as a formal notice that the scheme will be going ahead.</p> <p>The implementation is likely to slip into May. We are working with TfL around traffic signals issues and also monitoring the programme of work on Cannon Street which has been delayed due to emergency National Grid works. We require a brief window between Canon Street re-opening and Bank going live to complete the baseline data monitoring.</p> | Steve Presland | 02-Mar-2017 | 30-Apr-2017 |
| CR20d Road Safety Communication s Strategy | Work with the Corporation's Communications Office to deliver a Road Safety Communications Strategy | The Communications Plan was presented to the Road Danger Reduction Partnership Board in February which requested some changes in presentation before it is presented to the Planning and Transportation Committee on March 21st. | Steve Presland | 02-Mar-2017 | 31-Mar-2017 |
| CR20e City Contracts | Explore embedding vehicle and driver safety in all City of London Corporation contracts | <i>ACTION COMPLETE. Vehicle and driver safety now a requirement in the City of London Responsible Procurement Strategy.</i> | Steve Presland | 18-Oct-2016 | 30-Sep-2016 |

| Risk no, Title, Creation date, Owner | Risk Description (Cause, Event, Impact) | Current Risk Rating & Score | | Risk Update and date of update | Target Risk Rating & Score | | Target Date | Current Risk score change indicator |
|---|--|--|----|---|---|----|-------------|--|
| DBE-DS-01 The Division becomes too small to be viable 25-Mar-2015 Bill Welch | Cause: Reduced Income causes the service to be unviable Event: Development market fails to maintain momentum or our market share shrinks Impact: Reduced staffing levels do not provide adequate breadth of knowledge and experience |  Likelihood Impact | 12 | There is a marginal reduction in the likelihood of this occurring. (a) Consulting with LABC & neighbouring Local Authorities has commenced and is on-going; (b) Undertaking options review to commence in March 2017. The Due Date has been adjusted accordingly 24 Feb 2017 |  Likelihood Impact | 12 | 31-Jul-2017 |  No change |

| Action no, Title, File, | Description | Latest Note | Managed By | Latest Note Date | Due Date |
|--|--|--|------------|------------------|-------------|
| DBE-DS-01a Business as usual mitigating controls | (1) Continue to provide excellent services [evidenced by customer survey]; (2) Maintain client links with key stakeholders; (3) Continue to explore new income opportunities; (4) Continue to undertake cross-boundary working. | | Bill Welch | | 31-Dec-2999 |
| DBE-DS-01b Building Control business model review | Consider Options for Change | (a) Consulting with LABC & neighbouring Local Authorities has commenced and is on-going; (b) Undertaking options review to commence in March 2017. The Due Date has been adjusted accordingly | Bill Welch | 24-Feb-2017 | 31-Jul-2017 |

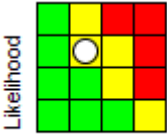
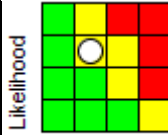

| Risk no, Title, Creation date, Owner | Risk Description (Cause, Event, Impact) | Current Risk Rating & Score | | Risk Update and date of update | Target Risk Rating & Score | | Target Date | Current Risk score change indicator |
|---|---|--|----|--|---|----|-------------|--|
| DBE-PP-01 Adverse planning policy context 06-Mar-2015 Paul Beckett | Cause: A desire in Government and others to change the existing planning system in a way which may be detrimental to the City Event: Changes detrimental to the City are implemented Impact: Adverse changes cannot be prevented using local planning control | Likelihood  Impact | 12 | Content of Government's Housing White Paper needs assessment and response by May 2017. 09 Feb 2017 | Likelihood  Impact | 12 | |  No change |

| Action no, Title, | Description | Latest Note | | | Managed By | Latest Note Date | Due Date |
|---|--|-------------|--|--|--------------|------------------|-------------|
| DBE-PP-01a Business as usual mitigating controls | (1) Ongoing monitoring of government regulations; (2) continue monitor progress of, and seek to influence, Housing and Planning Bill | | | | Paul Beckett | | 31-Dec-2999 |

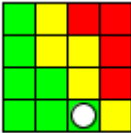
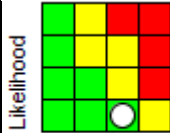

| Risk no, Title, Creation date, Owner | Risk Description (Cause, Event, Impact) | Current Risk Rating & Score | | Risk Update and date of update | Target Risk Rating & Score | | Target Date | Current Risk score change indicator |
|--|---|--|---|---|--|---|-------------|-------------------------------------|
| DBE-02 Service/Pipe Subways 02-Dec-2015 Giles Radford | <p>Cause: Provide safe access and egress for utilities and maintenance functions, whilst having operatives entering the confined space to undertake checks.</p> <p>Event: A lack of Oxygen, poisonous gases, fumes and vapour, liquids and solids that suddenly fill spaces, Fire and explosions, hot conditions, Entrapment and falling debris.</p> <p>Impact: Fatality / Major Injury / Illnesses</p> | <div> <div>Likelihood</div> <div>Impact</div> </div> | 8 | COP complete - No further mitigations are possible. 22 Feb 2017 | <div> <div>Likelihood</div> <div>Impact</div> </div> | 8 | 31-Dec-2016 | No change |

| Action no, Title, | Description | Latest Note | Managed By | Latest Note Date | Due Date |
|--|--|-------------|---------------|------------------|-------------|
| DBE-02a Business As Usual Mitigations 02-Dec-2015 Giles Radford | <p>Confined space working is avoided when possible.</p> <p>All PPE and other equipment required for a SSOW shall be suitable and sufficient for the tasks identified. The following PPE and equipment shall be provided, as stated in the approved code of practice</p> <p>All openings are controlled through a central booking system. A subway must not be entered if permission to do so has been refused.</p> <p>No booking will be granted to parties who are not on the database. If the contractor is not on the database they must seek approval from CoL regarding their works. Once confirmed, the contractors will be added to the system before agreeing access.</p> <p>All works and operatives entering the pipe subway must comply with the code of practice for access and safe working in local authority subways.</p> | | Giles Radford | | 31-Dec-2999 |

| | | | | | |
|---|--|--------------------------------|----------------|-------------|-------------|
| | <p>Regular inspections of the structure, covers, condition and asbestos surveys are undertaken.</p> <p>The Permit to enter form must be completed and contractors checked to ensure they have suitable and sufficient equipment to enter a confined space.</p> <p>No smoking is allowed at any time.</p> | | | | |
| DBE-02b Update Code of Practice | Revisit and update the approved code of practice working with other Local Authorities who have pipe subways. | COP went live in December 2016 | Giles Radford | 22-Feb-2017 | 31-Dec-2016 |
| DBE-02c Permit to Enter application form | Update Permit to Enter application form to improve clarity and reduce incorrect completion | [COMPLETED] | Steve Presland | 19-Apr-2016 | 01-Mar-2016 |
| DBE-02d Web presence | Publish an extranet page that includes all relevant documentation to ensure that utilities have access to up-to-date documents at all times. This will also include an on-line booking form. | [COMPLETED] | Giles Radford | 26-Aug-2016 | 30-Apr-2016 |

| Risk no, Title, Creation date, Owner | Risk Description (Cause, Event, Impact) | Current Risk Rating & Score | | Risk Update and date of update | Target Risk Rating & Score | | Target Date | Current Risk score change indicator |
|---|---|--|---|--|---|---|-------------|--|
| DBE-PL-02 Not being alive to the needs/requirements of the world business centre and the political environment 23-Mar-2015 Annie Hampson | Cause: Staff are badly briefed in relation to the planning development needs of the City as a world business centre Event: Perception that we are not responsive to the planning development needs of the City as a world business centre Impact: The City's reputation suffers and we fail to deliver buildings that meet the needs of the City as a world business centre |  Impact | 6 | Risk unchanged. This will be reviewed further post Article 50. 01 Mar 2017 |  Impact | 6 | |  No change |

| Action no, Title, File, | Description | Latest Note | | | Managed By | Latest Note Date | Due Date |
|---|---|-------------|--|--|---------------|------------------|-------------|
| DBE-PL-02a Business as usual mitigating controls | (1) Continue to work closely with other parts of the department; the City Property Advisory Team; other City of London Departments; & the Greater London Authority. (2) Attendance at MIPIM. | | | | Annie Hampson | | 31-Dec-2999 |

| Risk no, Title, Creation date, Owner | Risk Description (Cause, Event, Impact) | Current Risk Rating & Score | | Risk Update and date of update | Target Risk Rating & Score | | Target Date | Current Risk score change indicator |
|---|--|--|---|--|---|---|-------------|--|
| DBE-TP-03 Major Projects and key programmes not delivered as TfL funding not received 27-Mar-2015 Steve Presland | Cause: City of London fail to bid at the appropriate time or City of London lose credibility with TfL or Reduced funding from TfL Event: TfL funding for Local Investment Plan ceased or significantly reduced Impact: Unable to deliver highway investment & improvement programmes |  Likelihood | 4 | Meetings preparing to conclude FY16/17 have already taken place. FY17/18 programme being loaded on the TfL Portal. 08 Feb 2017 |  Likelihood | 4 | 30-Apr-2017 |  No change |

| Action no, Title, | Description | Latest Note | | | Managed By | Latest Note Date | Due Date |
|--------------------------------|--------------------------------------|--|--|--|----------------|------------------|-------------|
| DBE-TP-03a TfL interactions | Agree TfL interactions timetable | COMPLETED | | | Steve Presland | 25-Aug-2016 | 30-Apr-2016 |
| DBE-TP-03b TfL meetings | Conduct quarterly meetings with TfL- | Meetings preparing to conclude FY16/17 have already taken place. FY17/18 programme being loaded on the TfL Portal. | | | Steve Presland | 08-Feb-2017 | 30-Mar-2017 |

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of the Local Government Act 1972.

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