



Planning and Transportation Committee

Date: TUESDAY, 2 MAY 2017
Time: 10.00 am
Venue: LIVERY HALL - GUILDHALL

Members*:

Rehana Ameer	Alderman Vincent Keaveny
Randall Anderson	Oliver Lodge
Alderman Sir Michael Bear	Andrew Mayer
Mark Boleat	Deputy Brian Mooney
Mark Bostock	Deputy Alastair Moss
Deputy Keith Bottomley	Sylvia Moys
Henry Colthurst	Barbara Newman
Peter Dunphy	Graham Packham
Emma Edhem	Susan Pearson
Sophie Anne Fernandes	Judith Pleasance
Marianne Fredericks	Deputy Henry Pollard
Graeme Harrower	Jason Pritchard
Christopher Hayward	James de Sausmarez
Christopher Hill	Oliver Sells QC
Alderman Robert Howard	Graeme Smith
Deputy Jamie Ingham Clark	Deputy James Thomson
Alderman Gregory Jones QC	William Upton

***together with one Member to be appointed for Bishopsgate by the Court of Common Council on 27 April 2017**

Enquiries: Amanda Thompson
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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. **APPOINTMENT OF COMMITTEE (REPORT TO FOLLOW)**

To receive the Order of the Court of Common Council, appointing the Committee and approving its terms of Reference.

This agenda item was not available at the time of publishing and will be circulated separately.

For Decision

4. **ELECTION OF CHAIRMAN**

To elect a Chairman for the ensuing year in accordance with Standing Order 29.

For Decision

5. **ELECTION OF DEPUTY CHAIRMAN**

To elect a Deputy Chairman for the ensuing year in accordance with Standing order 30.

For Decision

6. **APPOINTMENT OF SUB-COMMITTEES AND WORKING PARTIES**

Report of the Town Clerk.

For Decision
(Pages 1 - 6)

7. **MINUTES**

To agree the public minutes and summary of the meeting held on 21 March 2017.

For Decision
(Pages 7 - 18)

8. **DELEGATED DECISIONS OF THE CHIEF PLANNING OFFICER AND DEVELOPMENT DIRECTOR**

Report of the Chief Planning Officer and Development Director.

For Information
(Pages 19 - 42)

9. **VALID APPLICATIONS LIST FOR COMMITTEE**

Report of the Chief Planning Officer and Development Director.

For Information
(Pages 43 - 50)

10. **REPORTS RELATIVE TO PLANNING APPLICATIONS**

- a) Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA (Pages 51 - 272)
For Decision
- b) Barbican and Golden Lane Estates: Proposed Conservation Area (Pages 273 - 278)
For Decision
- c) Bernard Morgan House 43 Golden Lane London EC1Y 0RS (Pages 279 - 752)
For Decision
- d) Enforcement Policy SPD Report (Pages 753 - 798)
For Decision

11. **REPORTS OF THE DIRECTOR OF THE BUILT ENVIRONMENT**

- a) Thames Court Footbridge (Pages 799 - 804)
For Decision
- b) Electric Vehicle Charging Update (Pages 805 - 810)
For Information

12. **DECISIONS TAKEN UNDER DELEGATED AUTHORITY OR URGENCY SINCE THE LAST MEETING OF THE COMMITTEE**
Report of the Town Clerk.

For Information
(Pages 811 - 812)

13. **APPOINTMENT OF SUB-COMMITTEE CHAIRMEN**
Report of the Town Clerk.

For Information
(Pages 813 - 818)

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

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

16. **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

- 17. NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
- 18. 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.

Committee(s):	Date:
Planning and Transportation Committee – For Decision	2 May 2017
Subject: Appointment of Sub Committees	Public
Report of: Town Clerk	For Decision
Report author: Amanda Thompson	

Summary

1. The purpose of this report is to consider the appointment of the Committee's Sub-committees and working party, and approve the compositions and terms of reference.
2. The Planning and Transportation Committee appoints two sub-committees and one working party:-
 - Streets and Walkways Sub Committee
 - Local Plan Sub Committee
 - Local Plan Working Party (membership to be the same as the Local Plan Sub Committee.)
3. For ease, details of the composition and terms of reference of the Sub-committees and working party are set out in Appendix A.

Recommendation(s)

4. It is recommended that:-
 - a) The Committee appoints the Streets and Walkways Sub Committee for the ensuing year and approves its terms of reference detailed at Appendix A to this report; and
 - b) The Committee appoints the Local Plan Sub Committee and the Local Plan Working Party for the ensuing year and approves the terms of reference detailed at Appendix A to this report.

Main Report

Background

5. This report considers the appointment, terms of reference and composition of the Planning and Transportation Committee's sub-committees and working party.
6. Each of the Committee's proposed sub-committees and working party are considered in turn below. Details of their terms of reference and proposed composition are set out in Appendix A of this report.

Streets and Walkways Sub-Committee

7. The Sub Committee was originally formed in 2004 and has acted fairly independently of the Grand Committee since then. The Terms of Reference have always included responsibility for such things as traffic engineering and management, street scene enhancements, the Riverside Walkway, and road safety matters.
8. It should be noted that the Sub Committee continues to have power to act in those matters, in order to avoid potentially delaying projects by requiring the Grand Committee's approval as well, when they often involve tight timescales to complete them or use external funding.
9. Expressions of interest are sought for **seven Members of the Committee** who wish to serve on this Sub Committee.
10. The Sub Committee meets every 5-6 weeks on a Monday and has met eight times since it was last appointed in April 2016.

Chairman and Deputy Chairman of the Sub Committee

11. The Sub Committee elects its own Chairman and Deputy Chairman at its first meeting following the first meeting of the new Grand Committee which in this case will be 16 May 2017.
12. The Committee is therefore requested to agree the membership and the Terms of Reference of the Streets and Walkways Sub Committee for the ensuing year, (at Appendix A), with power to act.

Local Plan Sub-Committee

13. The Committee first appointed a Sub Committee in October 2004 with the specific task of considering the Local Development Framework (LDF), which replaced the Unitary Development Plan as the spatial planning strategy for the City. It was later agreed that this Sub Committee would also be suitable for considering details of the traffic-related Local Implementation Plan (LIP) as

well. Its Terms of Reference are simply to consider those types of documents in detail and make recommendations to the Grand Committee.

14. Expressions of interest are sought for **five Members of the Committee** who wish to serve on this Sub Committee, together with an *ex-officio* Member appointed by the Policy and Resources Committee.
15. The Committee also agreed in September 2005 to appoint a Working Party to consider the LDF in more detail, when necessary. Those meetings usually take place in tandem with those of the existing Sub Committee, and they share the same membership, except the Working Party also includes two officers: the Town Clerk or his representative and the Director of the Built Environment or his representative.
16. This Sub Committee and Working Party meet when necessary to progress the Local Plan or LIP. The Sub Committee last met on 17 June 2016 and is due to meet again in June 2017. Although the meetings can be long, membership of the Sub Committee presents the opportunity to be involved in the early stages of deciding the many policies upon which the City's entire planning strategy is based.
17. The Committee is requested to agree for the ensuing year the membership of the Sub Committee that considers the City's Local Plan and Local Implementation Plan, which will be the same for the Working Party.

Appendices

Appendix A – composition and terms of reference of the Planning and Transportation Committee's sub-committees and working party.

Background Papers:

Appointment of Sub Committees, Working Parties and Representatives on Other Committees – Report 2 May 2014

Contact:

Amanda Thompson

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(A) Streets and Walkways Sub-Committee

Composition

1. The Streets and Walkways Sub Committee comprises –
 - a) The Chairman and Deputy Chairman of the Grand Committee along with seven other Members;
 - b) Together with three *ex-officio* Members representing the Finance, Police and Open Spaces, City Gardens and West Ham Park Committees.
2. The 2016/17 Membership comprised the following Members –

Christopher Hayward (Chairman, Grand Committee)
Alistair Moss (Deputy Chairman, Grand Committee)
Randall Anderson
Deputy John Barker (ex-officio, Finance Committee)
Emma Edhem
Alderman Alison Gowman (ex-officio, Police Committee)
Deputy Brian Harris (Deputy Chairman, Sub-Committee)
Gregory Jones QC
Marianne Fredericks
Tom Sleigh
Graham Packham (Deputy Chairman, Sub-Committee)
Jeremy Simons (ex-officio, Open Spaces)

Terms of Reference

3. The Sub Committee is responsible for:-
 - (a) traffic engineering and management, maintenance of the City's streets, and the agreement of schemes affecting the City's Highways and Walkways (such as street scene enhancement, traffic schemes, pedestrian facilities, special events on the public highway and authorising Traffic Orders) in accordance with the policies and strategies of the Grand Committee;
 - (b) all general matters relating to road safety;
 - (c) the provision, maintenance and repair of bridges, subways and footbridges, other than the five City river bridges;
 - (d) public lighting, including street lighting;
 - (e) day-to-day administration of the Grand Committee's car parks
 - (f) all matters relating to the Riverside Walkway, except for adjacent open spaces; and

- (g) to be responsible for advising the Grand Committee on:-
 - (i) progress in implementing the Grand Committee's plans, policies and strategies relating to the City's Highways and Walkways; and
 - (ii) the design of and strategy for providing signposts in the City
- (h) Those matters of significance will be referred to the Grand Committee to seek concurrence.

(B) **Local Plans Sub Committee**

Composition

4. The 2016/17 Membership comprised the following Members –

Christopher Hayward(Chairman of the Grand Committee and Sub Committee)
Alistair Moss(Deputy Chairman of the Grand Committee)
Randall Anderson
Henry Colthurst
Paul Martinelli
Graham Packham
Dhruv Patel (ex-officio, Policy and Resources Committee)

Terms of Reference

5. The Committee first appointed a Sub Committee in October 2004 with the specific task of considering the Local Development Framework (LDF), which replaced the Unitary Development Plan as the spatial planning strategy for the City. It was later agreed that this Sub Committee would also be suitable for considering details of the traffic-related Local Implementation Plan (LIP) as well. Its Terms of Reference are simply to consider those types of documents in detail and make recommendations to the Grand Committee

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PLANNING AND TRANSPORTATION COMMITTEE

Tuesday, 21 March 2017

Minutes of the meeting of the Planning and Transportation Committee held at Livery Hall - Guildhall on Tuesday, 21 March 2017 at 10.30 am

Present

Members:

Christopher Hayward (Chairman)	Alderman Vincent Keaveny
Randall Anderson	Oliver Lodge
Henry Colthurst	Paul Martinelli
Revd Dr Martin Dudley	Deputy Brian Mooney
Peter Dunphy	Sylvia Moys
Emma Edhem	Graham Packham
Deputy Bill Fraser	Judith Pleasance
Marianne Fredericks	Deputy Henry Pollard
Deputy Brian Harris	James de Sausmarez
Graeme Harrower	Patrick Streeter
Alderman Robert Howard	Michael Welbank (Chief Commoner)

In Attendance

Officers:

Amanda Thompson	-	Town Clerk's Department
Jennifer Ogunleye	-	Town Clerk's Department
Simon Owen	-	Department of the Built Environment
Deborah Cluett	-	Comptroller & 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
Paul Beckett	-	Department of the Built Environment
Iain Simmons	-	Department of the Built Environment
Peter Young	-	City Surveyor's Department
Henry Tanner	-	Town Clerk's Department
Gwyn Richards	-	Department of the Built Environment

1. CHAIRMAN'S UPDATES

The Chairman reported that this would be last meeting for the following Members of the Committee who were due to stand down from the Court of Common Council in March 2017.

The Reverend Doctor Martin Dudley
Angela Starling

Patrick Streeter

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

2. **APOLOGIES**

Apologies were received from Deputy Alistair Moss, David Bradshaw, George Gillon, Deputy Henry Jones, Graeme Smith and Deputy James Thompson.

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

Marianne Fredericks declared a personal interest in agenda item 6 g) – 15 Trinity Square – and advised that she would leave the meeting during consideration of the item.

4. **MINUTES**

4.1 **Planning and Transportation Committee**

The minutes and summary of the meeting held on 28 February 2017 were agreed as a correct record.

4.2 **Streets and Walkways Sub-Committee**

The draft minutes of the Streets and Walkways Sub Committee held on 14 February 2017 were received.

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. **REPORTS OF THE CHIEF PLANNING OFFICER**

7.1 **117 - 121 Bishopsgate London EC2M 3UJ**

The Committee considered a report of the Chief Planning Officer (CPO) in respect of alterations to shopfronts and installation of 2 ATMs at 117-121 Bishopsgate.

The CPO introduced the application and advised that further representations from Historic England and the Conservation Area Advisory Committee had been received. The CPO also explained that some additional information had been received and an Addendum Report was tabled setting this out. Members were given the opportunity to read the further representations and Addendum Report.

The CPO reported that officers 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 and the former Great Eastern Hotel.

Mr Calum Ewing was heard on behalf of the applicant, Metrobank.

Several Members expressed concern that the application was not in keeping with the surrounding area and did not respect the differing character of the adjacent historic buildings. Also despite detailed pre-application discussions and further negotiations, the applicant had chosen not to amend their design.

Other members were in support of the application and suggested that the CoL should look towards combining the old with the new, accept that modern buildings could provide contrast next to the historic ones, and welcome a dynamic new use of value to local workers and residents .

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

- 14 votes in favour of the CPO recommendation.
- 6 votes against

RESOLVED – That the planning applications be refused on the grounds as set out in the report.

REASON FOR REFUSAL

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.

7.2 **117 - 121 Bishopsgate London EC2M 3UJ**

The Committee considered a report of the Chief Planning Officer (CPO) in respect of the display of adverts at 117-121 Bishopsgate in relation to the use of the premises as a Bank.

The CPO introduced the application and explained that some additional information including revised drawings had been received. She referred to the Addendum Report tabled before the previous Agenda Item which set out details of the revised drawings and concerns about their accuracy.

The CPO advised that the proposed commercial advertising was 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.

Several members spoke in support of refusal of the application which they considered would be detrimental to amenity, particularly the illumination of the advertising signage, and not in keeping with the historic nature of the area. Others considered that the opening of any new bank should be welcomed, together with its corporate branding, and the City should combine old and new.

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

- 15 votes in favour of the CPO recommendation.
- 5 votes against

RESOLVED – That the express consent for adverts be refused on the grounds as set out in the Addendum Report.

Reason for refusal

The proposed *five* fascia signs with internally illuminated lettering, four non-illuminated fascia signs, two internally illuminated projecting signs and four 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 *buildings* 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. *The application cannot be approved on the basis of the submitted drawings as they contain inaccuracies and do not clearly show the proposals or their relationship to retained features*

7.3 The Turret, John Wesley Highwalk Barbican London EC2

The Committee considered a report of the Chief Planning Officer in respect of the installation 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.

The CPO introduced the application and advised that some further objections had been received, together with some additional and amended conditions which were tabled and Members were given the opportunity to read them.

Members were advised that the report covered 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 was similar to the planning permission and listed building consent that were allowed on appeal in 2008 (although not implemented) but now included improvements to the scheme.

Several members spoke in support of the application which they felt would not be detrimental to the special architectural or historic interest of the listed building, and would result in improvements to the public walkway passing through the structure and make effective use of the empty upper sections of the building.

Other Members expressed concern that the alterations would detract from the appearance and character of the listed building and undermine the architectural integrity and original purpose of the turret which was an integral part of the Highwalk around the Barbican.

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

- 11 votes in favour of the CPO recommendation.
- 8 votes against
- 1 Abstention

RESOLVED – That, Listed Building consent be granted in accordance with the details and conditions set out on the attached schedule.

7.4 The Turret, John Wesley Highwalk Barbican London EC2

The Committee considered a report of the Chief Planning Officer in respect of the 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 would require the rescission of part of the City Walkway.

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

- 12 votes in favour of the CPO recommendation.
- 7 votes against
- 1 Abstention

RESOLVED - that:

- 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.

7.5 **Leadenhall Market Draft SPD**

The Committee considered a report of the Chief Planning Officer (CPO) in respect of a Leadenhall Market Supplementary Planning Document (SPD), which had been prepared to provide guidance on the Leadenhall Market Conservation Area and the management of the Market as a Grade II* Listed Building.

Members welcomed the report which they considered to be very informative and also indicated an active tenant's association.

In response to a question concerning consultation the CPO advised that this would be City-wide.

RESOLVED – That, the draft text of the Leadenhall Market SPD be approved and issued for public consultation for six weeks during April and May 2017.

7.6 **Construction Site Noise Monitoring**

The Committee considered a report of the Director of Markets and Consumer Protection and the Chief Planning Officer (CPO), which had been written in response to an Alderman's question to the Court of Common Council in December 2016. The Alderman had enquired as to 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 to investigate this and the report recommended the next steps following that investigation.

The CPO reported that in January 2017 a new Noise Strategy 2016-2026 was approved together with a Draft Code of Practice for Deconstruction and Construction Sites which was approved for consultation. Further to the investigation in response to the noise monitoring question, it was now 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.

It was considered that this should improve noise and other environmental impacts from development for adjoining occupiers but would increase development costs in the City.

Members welcomed the report but sought clarification on the charging process and how the payment would alleviate the problem, as well as whether or not planning permissions might be delayed in lieu of this.

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

- 21 in favour
- 0 against
- 1 abstention

RESOLVED – That:

- a) The necessary amendments to the Draft Code be agreed, to make provision for monitoring payments 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; and
- b) Following consultation, officers report back with recommendations for the Draft Code to be adopted, and to make any necessary changes to conditions.

7.7 15 Trinity Square Unauthorised Short Term Letting-Enforcement Report

Marianne Fredericks had declared a personal interest in this item and left the meeting while it was being considered by the Committee.

The Committee received a report of the Chief Planning Officer and Development Director, in respect of enforcement action taken for the unauthorised use of flats 6, 9 and 15, 15 Trinity Square, as short term lets. Members noted that the breaches had been remedied (and assurances given) and it would therefore not be expedient or in accordance with the draft Enforcement Plan to serve Enforcement Notices but the position would be monitored

RESOLVED – That the report be noted.

7.8 Preparation of Planning Technical Guidelines for Development in the City

The Committee received a report of the Chief Planning Officer (CPO) in respect of the preparation of Planning Technical Guidelines for Development in the City.

The CPO advised that when major developments were under consideration in the City of London it was necessary for the City of London Corporation, as Local Planning Authority, to take into account a considerable number of

environmental impacts. These often required 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.

It was therefore proposed that the City Corporation introduced Planning Technical Guidelines for developers so as to clarify what was required of them when instructing third party experts thus simplifying the planning process and ensure consistency between projects.

RESOLVED – That the report be noted.

At the end of this item, and in respect of Standing Order No. 40, the Chairman sought the Committee's consent to extend the meeting to allow for the remaining business to be considered. This was put to the meeting and **AGREED**.

8. REPORTS OF THE DIRECTOR OF THE BUILT ENVIRONMENT

8.1 Road Danger Reduction Programme 2017/18

The Committee considered a report of the Director of the Department of the Built Environment and the Commissioner of the City of London Police in respect of the Road Danger Reduction Programme 2017/18.

The report advised that officers would 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 to try and improve road safety.

Members noted that officers were proposing a wide range of measures aimed at reducing casualties further, including

- 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)

In response to questions the Director of the Built Environment advised that it was expected that all of these measures would contribute to reducing casualties on City Streets, however analysis of casualties over the last year had made it clear that one of the biggest issues to address was 'inattention' and it was proposed that 17/18 would see a particular focus on addressing inattention by all road users.

RESOLVED - that:

- 1) The 2017/18 Road Danger Reduction Work Programme be approved;

- 2) City Mark be introduced as part of the Considerate Contractors Scheme (CCS);
- 3) Road Danger Requirements (as set out at Appendix 5 to the report) be included within corporate contracts (subject to the agreement of the Finance Committee, and
- 4) The Communications Strategy be approved.

At the end of this item, and in respect of Standing Order No. 40, the Chairman sought the Committee's consent to extend the meeting to allow for the remaining business to be considered. This was put to the meeting and **AGREED**.

8.2 Cultural Hub Public Realm Temporary Projects 2017: 'Quick Wins'

The Committee considered a report of the Director of the Built Environment in respect of a programme of events for the Cultural Hub Area of the City (as set out in Appendix A to the report). Members noted that the programme would commence in 2017, as a set of 'Quick Wins', which could be introduced into the public realm.

RESOLVED, that:

- 1) The initiation of a programme of 'Quick Wins'; comprising events, installations and greening in the public realm, in support of the Cultural Hub, be approved.
- 2) Funding of £60,000, as set out in Section 20 of this report, be approved in order to develop the project to the next gateway.

8.3 Allocation of the 2017/18 Transport for London Local Implementation Plan funding and reallocation of part of the 2016/17 funding

The Committee considered a report of the Director of the Built Environment, which advised Members that Transport for London had confirmed a grant allocation to the City, of £1.34m, to be used to support programmes in the City of London's Local Implementation Plan.

RESOLVED - To

- 1) Approve the allocation of the TfL grant 2017/18 to the programmes and projects set out in Table 2
- 2) Approve the reallocation of £74,000 of TfL grant 2016/17 between the projects shown in paragraph 13
- 3) Approve the transfer of £49,000 of TfL grant 2016/17 to freight and consolidation centres work
- 4) Give 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.

8.4 City of London Local Plan Review: Outcome of public consultation on Issues and Options

The Committee received a report of the Director of the Built Environment in respect of the outcome of public consultation on issues and options in relation to the City of London Local Plan Review.

Members were advised that 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. Given the extensive publicity undertaken the number of comments received was disappointing, although very similar to the level of response at the same stage of the current City Local Plan. However it was likely that a greater number of responses would be received when the draft policies for consultation were published, since that was when organisations and individuals could see what the City Corporation was proposing and comment on their impact accordingly.

RESOLVED – That the report be noted.

8.5 Department of the Built Environment Risk Management – Quarterly Report

The Committee received a report of the Director of the Built Environment in respect of the risk management procedures in place within the Department of the Built Environment.

RESOLVED - That the report and actions taken in the Department of the Built Environment; to monitor and manage effectively those risks arising from the department's operations be noted.

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

The Committee was asked to send any questions to the Town Clerk who would forward them onto the appropriate officers to provide a response at the next meeting.

10. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

There were no urgent items.

11. EXCLUSION OF THE PUBLIC

RESOLVED, That – Under Section 110A(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. NON-PUBLIC MINUTES

12.1 Planning and Transportation Committee

The non-public minutes of the meeting held on 28 February 2017 were agreed as a correct record.

12.2 Streets and Walkways Sub-Committee

The draft non-public minutes of the meeting held on 14th February 2017 were received.

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

The Committee considered and approved a report of the City Surveyor in respect of essential repairs to the flood defence wall at Trig Lane Stairs and Castle Yard Wharf, to be progressed to the next gateway of the project.

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

The Committee was asked to send any non-public questions to the Town Clerk who would forward them onto the appropriate officers to provide a response at the next meeting.

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

There were no items.

The meeting ended at time not specified

Chairman

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Committee(s)	Dated:
Planning and Transportation	2 nd May 2017
Subject: Delegated decisions of the Chief Planning Officer and Development Director	Public
Report of: Chief Planning Officer and Development Director	For Information

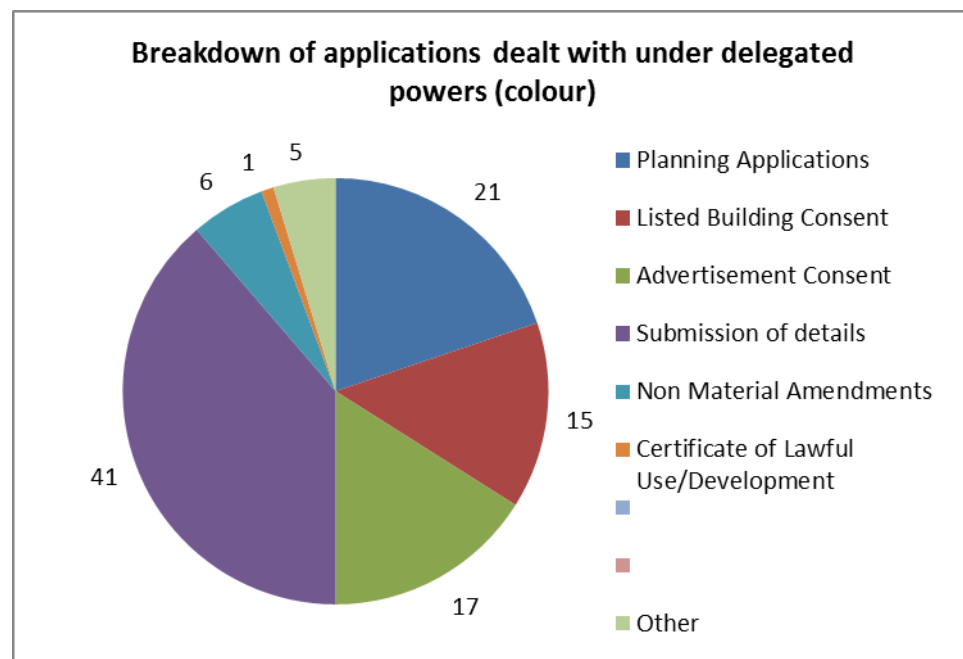
Summary

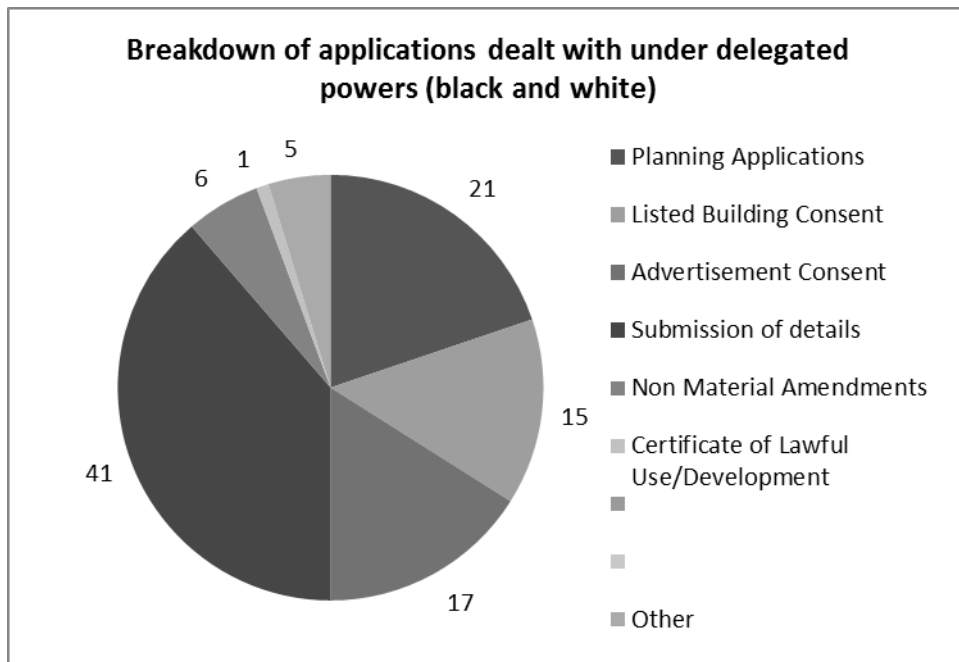
Pursuant to the instructions of your Committee, I attach for your information a list detailing development and advertisement applications determined by the Chief Planning Officer and Development Director or those so authorised under their delegated powers since my report to the last meeting.

In the time since the last report to Planning & Transportation Committee 106 (One-Hundred & Six) matters have been dealt with under delegated powers.

Forty-one (41) relate to submission of details of previously approved schemes. Seventeen (17) applications for advertisement consent have been dealt with, which one was refused

Twenty-One (21) applications for development have been approved including Five (5) residential units and 104.25sq.m of floorspace created and five (5) 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
17/00023/MDC Aldgate	52-54 Lime Street & 21-26 Leadenhall (Prudential House), 27 & 27A Leadenhall Street (Allianz Cornhill House) & 34-35 Leadenhall Street & 4-5 Billiter Street (Winterthur House) London, EC3	Details of external materials (louvres and photovoltaic panels) pursuant to condition 8(a) [in part] of planning permission (application No. 14/00027/FULMAJ) dated 30th June 2014.	Approved 09.03.2017

16/00941/MDC Aldgate	Site Bounded By 19-21 & 22 Billiter Street, 49 Leadenhall Street, 108 & 109-114 Fenchurch Street, 6-8 & 9-13 Fenchurch Buildings London	Details of a programme of archaeological work and foundation design pursuant to conditions 11 (part) and 12 (full) of planning permission dated 29.5.2014 (application number 13/01004/FULEIA).	Approved 14.03.2017
16/00942/LDC Aldgate	19 - 21 Billiter Street London EC3M 2RY	Details of a programme of archaeological work and foundation design pursuant to conditions 5 and 6 pursuant to Listed Building Consent dated 11.12.2015 (application number 15/01081/LBC)	Approved 14.03.2017
16/00492/MDC Aldgate	52-54 Lime Street & 21-26 Leadenhall (Prudential House), 27 & 27A Leadenhall Street (Allianz Cornhill House) & 34-35 Leadenhall Street & 4-5 Billiter Street (Winterthur House) London, EC3	Details of ground floor elevations and external surfaces within the site boundary including hard and soft landscaping pursuant to conditions 8 (c) and (f) of planning permission (application no. 14/00027/FULMAJ) dated 30th June 2014.	Approved 30.03.2017
17/00205/MDC Aldgate	60 - 70 St Mary Axe London EC3A 8JQ	Details of the external materials (mesh between fins at levels 21 and above) and the integration of window cleaning equipment pursuant to conditions 7(a) [in part] and 7(d) of planning permission (application no. 08/00739/FULEIA) dated 10th June 2010.	Approved 04.04.2017
17/00004/ADVT Aldgate	50 St Mary Axe London EC3A 8FR	Installation and display of one internally illuminated (lettering only) projecting sign measuring 0.73 metres wide, 0.6 metres high displayed at height of 2.77 metres above ground level.	Approved 11.04.2017
17/00033/LBC	60 Defoe House Barbican	Internal alterations to include a single panel sliding door and	Approved

Aldersgate	London EC2Y 8DN	suspended ceiling to the hallway.	16.03.2017
17/00096/LBC Aldersgate	331 Shakespeare Tower Barbican London EC2Y 8NJ	Proposed refurbishment including reconfiguring non-structural walls plus doors and associated frames.	Approved 30.03.2017
17/00153/LBC Aldersgate	11 Shakespeare Tower Barbican London EC2Y 8DR	Internal refurbishment including removal of non-structural internal walls and the replacement of internal doors.	Approved 11.04.2017
17/00006/MDC Broad Street	85 London Wall London EC2M 7AD	Submission of a Servicing and Management Plan to discharge Condition 4 pursuant to Planning Application 16/00550/FULL dated 28th July 2016.	Approved 16.03.2017
16/01370/ADVT Broad Street	1 Angel Court London EC2R 7HJ	Installation and display of one internally illuminated projecting sign measuring 0.6m high by 0.6m wide at a height above ground of 4.7m	Approved 23.03.2017
17/00075/ADVT Broad Street	Kiosk 1 Angel Court London EC2R 7HJ	Installation and display of one internally illuminated projecting sign measuring 0.6m high by 0.6m wide at a height above ground of 4.6m.	Approved 23.03.2017
17/00024/MDC Broad Street	1 Angel Court & 33 Throgmorton Street London EC2	Details of flank and party walls; land between the existing building lines and the face of the new building; Servicing Management Plan and Interim Travel Plan pursuant to conditions 15, 19, 40 and 41 of planning permission 13/00985/FULL dated 17/11/2014.	Approved 30.03.2017
17/00104/MDC Broad Street	1 Angel Court And 33 Throgmorton Street London EC2N 2BR	Details of plant mountings pursuant to condition 8 of planning permission 13/00985/FULL dated 17/11/2014.	Approved 06.04.2017
17/00129/MDC	1 Angel Court And 33 Throgmorton	Details of a noise survey pursuant to condition 5 of	Approved

Broad Street	Street London EC2N 2BR	planning permission 13/00985/FULL dated 17/11/2014.	13.04.2017
16/01271/MDC Bridge And Bridge Without	31 - 35 Eastcheap London EC3M 1DE	Details of a scheme to protect residents and commercial occupiers from noise, dust and other environmental effects during demolition and materials to be used on the external faces of the building pursuant to condition 2 and 5 of planning permission dated 24 November 2016 (16/01042/FULL).	Approved 09.03.2017
17/00027/MDC Bridge And Bridge Without	23-29 Eastcheap London EC3M 1DE	Details of fume extract arrangements, mounting of mechanical plant and ventilation pursuant to conditions 4, 5 (part) and 6 of planning permission 16/00267/FULL dated 24/5/2016.	Approved 09.03.2017
17/00031/FULL Bridge And Bridge Without	23-29 Eastcheap London EC3M 1DE	Installation of two flues and four louvres on the rear elevation.	Approved 09.03.2017
17/00040/ADVT Bridge And Bridge Without	23 Eastcheap London EC3M 1DE	Installation and display of i) one non illuminated fascia sign measuring 0.2m high by 1m wide at a height above ground of 2.55m and ii) two non illuminated projecting signs measuring 0.6m in diameter at a height above ground of 3.12m.	Approved 23.03.2017
17/00042/LBC Bridge And Bridge Without	23 Eastcheap London EC3M 1DE	Decoration of the facade; internal fit out; installation of external condenser unit on the fifth floor flat roof within the plant enclosure and installation of signage.	Approved 23.03.2017
17/00146/FULL Bridge And Bridge Without	23 - 29 Eastcheap London EC3M 1DE	Installation of louvres within the stallriser, new doors and light fittings on the Philpot Lane elevation.	Approved 13.04.2017
17/00147/ADVT	23 - 29 Eastcheap	Installation and display of (i)	Approved

Bridge And Bridge Without	London EC3M 1DE	one internally illuminated projecting sign measuring 0.6m high by 0.15m wide at a height above ground of 2.75m and (ii) one externally illuminated fascia sign measuring 0.18m high by 1.1m wide at a height above ground of 2.75m.	13.04.2017
17/00148/LBC Bridge And Bridge Without	23 - 29 Eastcheap London EC3M 1DE	Installation of louvres within the stallriser, new doors and light fittings on the Philpot Lane elevation; installation of one internally illuminated projecting sign and one externally illuminated fascia sign.	Approved 13.04.2017
17/00026/MDC Bishopsgate	61 St Mary Axe, 80-86 Bishopsgate, 88-90 Bishopsgate, 12-20 Camomile Street, 15-16 St Helen's Place And 33-35 St Mary Axe (North Elevation Only), London, EC3	Details of materials on all external faces of the buildings pursuant to condition 11(a) (Part) of planning permission 12/00129/FULL dated 30.03.12	Approved 14.03.2017
16/01104/FULL Bishopsgate	9 & 9A Devonshire Square & 16 New Street London EC2M 4WD	Public realm improvements to the Devonshire Square Estate, comprising new lighting along New Street.	Approved 16.03.2017
16/01105/LBC Bishopsgate	9 & 9A Devonshire Square & 16 New Street London EC2M 4WD	Public realm improvements to the Devonshire Square Estate, comprising new lighting along New Street.	Approved 16.03.2017
16/01319/FULL Bishopsgate	2 Finsbury Avenue London EC2M 2PA	Change of use, for a temporary period, of (i) part ground floor (east) from office (Class B1) to a flexible use for either office (Class B1) or retail (Class A1) (136 sq.m GIA); (ii) part ground floor (west) from office (Class B1) to a flexible use for either: (a)	Approved 16.03.2017

		office (Class B1); (b) theatre space with ancillary studios / workshops and café (Sui Generis); or (c) theatre space with ancillary studios / workshops, café and retail (Class A1) (Sui Generis) (604 sq.m GIA); (iii) first floor from office (Class B1) to a flexible use for either: (a) office (Class B1); or (b) theatre space with ancillary studios / workshops and café (Sui Generis) (1,649 sq.m GIA).	
16/01320/FULL Bishopsgate	2 Finsbury Avenue London EC2M 2PA	Change of use, for a temporary period, of the seventh floor from office (Class B1) to flexible use for either; (a) office (Class B1); (b) conferencing events space (Class D1); (c) assembly and leisure (Class D2); or (d) conferencing, events and / or assembly and leisure (Sui Generis) (1,201sq.m GIA).	Approved 16.03.2017
16/01325/FULL Bishopsgate	Finsbury Avenue Square Broadgate Estate London EC2M 2PA	Erection of 4 temporary retail units (Use Classes A1, A3-A5) and associated works (104.25 sq.m GIA).	Approved 16.03.2017
17/00018/FULL Bishopsgate	Dashwood House 69 Old Broad Street London EC2M 1QS	Application under section 73 of the Town and Country Planning Act 1990 to vary the wording of condition 8 of planning permission dated 12/12/2006 (06/00240/FULL) to extend the hours of access to the external seating area.	Approved 16.03.2017
17/00064/ADVT Bishopsgate	100 Liverpool Street London EC2M 2RH	Installation and display of two non-illuminated hoarding advertisements associated with the 100 Liverpool Street development.	Approved 23.03.2017

16/01191/XRAI L Bishopsgate	Liverpool Street Station And Moorgate Ticket Hall Crossrail Worksites London EC2	Installation of bollards, lighting, wayfinding, walls and cycle stands in relation to the upgrade of the urban realm adjacent to Moorgate and Broadgate Ticket Halls at Liverpool Street Crossrail Station pursuant to Schedule 7 para 6 of the Crossrail Act 2008.	Approved 30.03.2017
16/01298/XRAI L Bishopsgate	Liverpool Street Station And Moorgate Ticket Hall Crossrail Worksites London EC2	Scheme for Agreement under Schedule 7 para 11(2) for the restoration of Crossrail worksites at Moorgate and Broadgate used in connection with the construction of Liverpool Street Station.	Approved 30.03.2017
17/00076/MDC Bishopsgate	16 - 17 Devonshire Square London EC2M 4SQ	Details of plant equipment mounting pursuant to condition 2 of planning permission 15/00179/FULL dated 02.06.15.	Approved 30.03.2017
17/00109/LBC Bishopsgate	11 Devonshire Square London EC2M 4YR	Installation of one externally illuminated fascia sign.	Approved 06.04.2017
17/00110/ADVT Bishopsgate	11 Devonshire Square London EC2M 4YR	Installation and display of one externally illuminated fascia sign measuring 0.9m high 0.86m wide at a height above ground of 0.6m	Approved 06.04.2017
17/00111/FULL Bishopsgate	11 Devonshire Square London EC2M 4YR	Installation of an entrance post at Building 11 Devonshire Square.	Approved 06.04.2017
17/00112/LBC Bishopsgate	11 Devonshire Square London EC2M 4YR	Installation of an entrance post at Building 11 Devonshire Square.	Withdrawn 09.04.2017
17/00191/NMA Bishopsgate	100 Liverpool Street & 8-12 Broadgate London EC2M 2RH	Non material amendment under section 96A of the Town and Country Planning Act 1990 to planning permission 15/01387/FULEIA dated 31	Approved 10.04.2017

		<p>October 2016 for an increase in the size and change in shape of the northern entrance and its canopy to accommodate re-modelled escalators leading up to the office reception; changes to the facade skirt including changing from aluminium louvre to glass and reduction in height in all areas except for the elevation fronting the adjacent Bus Station where a portion remains as aluminium louvres; a change in the facade from a bronze colour to a dark grey and fritting to facade spandrel panels to incorporate colour; an amendment to the facade of the retail units (Use Class A3) around Broadgate Circle to incorporate opening facades and awnings; relocation of United Kingdom Power Networks (UKPN) vent on Blomfield Street ramp; a reduction in the slope of the atrium roof, from 6 degrees to 4 degrees; changes to the Octagon Mall escalators and an increase in the size of kiosk units; changes to the Octagon Mall soffit; various amendments at roof level as a result of the development in plant (including the re-location of photovoltaics, flues and satellite dishes and the amendment of building maintenance units (BMUs)); changes in shape of southern entrance canopy; and internal layout changes to cycle changing facilities and building cores; increase in the retail (Class A1-A3) floorspace of 132sq.m.</p>	
17/00106/FULL	Eldon House 2 - 3	Removal of security bars at	Approved

Bishopsgate	Eldon Street London EC2M 7LS	ground floor level, alterations to entrance including installation of new lighting and entrance door.	11.04.2017
17/00107/ADVT Bishopsgate	Eldon House 2 - 3 Eldon Street London EC2M 7LS	Installation and display of: (i) an internally illuminated (letter only) fascia advert measuring 1.9m (h) by 0.3m (w) displayed at a height of 2.9m above ground floor level; (ii) an internally illuminated (lettering only) projecting sign measuring 0.8m (h) by 0.58m (w) displayed at a height of 2.7m above ground floor level.	Approved 11.04.2017
16/01350/FULL Bread Street	1 Rose Street London EC4M 7DQ	Erection of retractable awning over existing outside seating area.	Approved 28.03.2017
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.	Approved 13.04.2017
17/00132/MDC Bassishaw	Land Bounded By London Wall, Wood Street, St. Alphage Gardens, Fore Street, Fore Street Avenue, Bassishaw Highwalk, Alban Gate Rotunda, Alban Highwalk, Moorfields Highwalk And Willoughby Highwalk, London, EC2	Details of CCTV equipment pursuant to conditions 1(d) and 2(d) of planning permission dated 30 June 2014 (ref: 14/00259/FULL).	Approved 04.04.2017
17/00134/MDC Bassishaw	Land Bounded By London Wall, Wood Street, St. Alphage Gardens, Fore Street, Fore Street Avenue, Bassishaw Highwalk, Alban Gate Rotunda,	Acoustic report pursuant to conditions 23 of planning permission dated 30 June 2014 (ref: 14/00259/FULL).	Approved 06.04.2017

	Alban Highwalk, Moorfields Highwalk And Willoughby Highwalk, London, EC2 London		
17/00136/MDC Bassishaw	Land Bounded By London Wall, Wood Street, St. Alphage Gardens, Fore Street, Fore Street Avenue, Bassishaw Highwalk, Alban Gate Rotunda, Alban Highwalk, Moorfields Highwalk And Willoughby Highwalk, London, EC2	Acoustic report pursuant to condition 24 of planning permission dated 30 June 2014 (14/00259/FULL).	Approved 11.04.2017
17/00137/MDC Bassishaw	Land Bounded By London Wall, Wood Street, St. Alphage Gardens, Fore Street, Fore Street Avenue, Bassishaw Highwalk, Alban Gate Rotunda, Alban Highwalk, Moorfields Highwalk And Willoughby Highwalk, London, EC2 London	Acoustic report pursuant to condition 27 of planning permission dated 30 June 2014 (14/00259/FULL).	Approved 11.04.2017
17/00150/MDC Billingsgate	30 Fenchurch Street London EC3M 3BD	Details of a post installation acoustic report pursuant to Condition 2(b) of planning permission 16/01099/FULL dated 20/12/2016.	Approved 09.03.2017
17/00030/MDC Billingsgate	3 Minster Court London EC3R 7DD	Submission of details: (i) black powder coated Aluminium; (ii) new entrances, glazing, louvred screens and shopfronts; (iii) new ground	Approved 16.03.2017

		level surfaces; (iv) metal cladding profile; (v) new curtain walling; and (vi) new windows pursuant to conditions 2(a), (b) (in part), (c), (d), (e) and (f) of planning permission dated 16 February 2016 (reference: 15/01115/FULL).	
16/01323/MDC Billingsgate	Sugar Quay Lower Thames Street London	Details of changes to dwellings configuration pursuant to condition 18 of Planning Permission 14/01006/FULMAJ dated 11.05.2016	Approved 04.04.2017
16/00943/FULL Castle Baynard	8 Bride Court London EC4Y 8DU	Retention of the use of the ground floor as Class Use A4 (Drinking establishment) (86sq.m GIA).	Approved 09.03.2017
16/00959/CLEU D Castle Baynard	60 Fleet Street London EC4Y 1JU	Certificate of lawful development for the existing use of the ground floor and basement as a sui generis use (restaurant/cafe Class A3 and takeaway Class A5).	Grant Certificate of Lawful Development 16.03.2017
16/01368/ADVT Castle Baynard	12 Great New Street London EC4A 3BN	Installation and display of two internally illuminated (lettering only) projecting signs measuring 0.6 metres wide by 0.6 metres high displayed at a height of 3.31 metres above ground level.	Approved 21.03.2017
17/00097/ADVT Castle Baynard	1 Thavies Inn London EC4A 1AN	Installation and display of: (i) one internally illuminated fascia sign measuring 0.55m high by 4.93m wide at a height above ground of 2.3m; (ii) one internally illuminated projecting sign measuring 0.75m high by 0.75m wide at a height above ground of 2.75m.	Approved 13.04.2017
16/00947/ADVT Cripplegate	Barbican Arts And Conference Centre Silk Street London EC2Y 8DS	Installation and display of: i) Internally illuminated fascia sign measuring 1.48m high by 1.99m wide located at a height of 1m above ground floor level on the Beech Street elevation; ii) Internally illuminated fascia	Approved 16.03.2017

		sign measuring 4m high by 1.40m wide located at a height of 0.7m above ground floor level on Beech Street elevation; iii) Internally illuminated individual lettering measuring 1.75m high by 0.3m wide located at a height of 3.2m above ground floor level on Beech Street elevation; iv) Internally illuminated fascia sign measuring 3.5m high by 1.7m wide located at a height of 0.18m above ground floor level on Silk Street elevation; v) Internally illuminated fascia sign measuring 3.5m high by 0.5m wide located at a height of 0.2m above ground floor level on Silk Street elevation; vi) Two sets of internally illuminated individual lettering measuring 3m high by 0.7m wide located at a height of 2m above ground floor level at Lakeside Terrace. (Revised development description to omit signs 006 above Silk Street entrance and 007 at Defoe Place)	
16/00948/LBC Cripplegate	Barbican Arts And Conference Centre Silk Street London EC2Y 8DS	Installation of replacement logo signs in the following locations around the Barbican Arts and Conference Centre; i) Beech Street Cinema entrance; ii) Silk Street entrance; iii) Totem sign in Lakeside Terrace (Revised development description to omit signs 006 above Silk Street entrance and 007 at Defoe Place)	Approved 16.03.2017
17/00034/LBC Cripplegate	212 Cromwell Tower Barbican London EC2Y 8DD	Internal refurbishment to include alterations to internal non-structural walls and doors.	Approved 16.03.2017
17/00121/MDC	Livery Hall Barber-Surgeons' Hall	Details of a scheme for protecting nearby residents	Approved

Cripplegate	Monkwell Square London EC2Y 5BL	and commercial occupiers from noise, dust and other environmental effects pursuant to condition 2 of planning permission 16/01081/FULL dated 12.01.17.	04.04.2017
17/00102/FULL Cripplegate	City Of London School For Girls St Giles' Terrace Barbican London EC2Y 8BB	Refurbishment of existing timber framed windows and timber doors, replacement of clerestory metal framed windows.	Approved 06.04.2017
17/00103/LBC Cripplegate	City Of London School For Girls St Giles' Terrace Barbican London EC2Y 8BB	Refurbishment of existing timber framed windows and timber doors, replacement of clerestory metal framed windows.	Approved 06.04.2017
17/00152/LBC Cripplegate	102 Speed House Barbican London EC2Y 8AU	Replacement of internal doors.	Approved 11.04.2017
16/00909/NMA Cornhill	15 Bishopsgate & Tower 42 Estate London EC2N 3NW	Non-material amendment under Section 96A of the Town and Country Planning Act 1990 to planning permission dated 4th January 2016 (14/01251/FULMAJ) to provide for minor changes to the office lift core; retail lift core; substation location; relocation entrances to the retail units; omission of the BMU track and minor amendments to the roof layout.	Approved 09.03.2017
17/00060/ADVT Cornhill	15 Bishopsgate London EC2N 3NW	Installation and display of:(i) one projecting blade sign with halo illuminated lettering measuring 0.90m high by 0.38m wide at a height of 2.95m above ground level; (ii) one set non illuminated lettering at canopy level measuring 0.355 high by 3.04m wide at height of 4.5m above ground floor level; (iii) one set of halo illuminated	Approved 04.04.2017

		letters measuring 0.37m high by 1.55m wide at a height of 3.98m above ground floor level and (iv) non illuminated plaque measuring 0.5m high by 0.6 wide at a height of 1.55m above ground floor level.	
17/00163/MDC Cornhill	15 Bishopsgate & Tower 42 Public Realm. London EC2N 3NW	Details of the position and size of green roofs, type of planting and contribution of the green roofs to biodiversity and rainwater attenuation pursuant to condition 14 of planning permission dated 4th January 2016 (App No 14/01251/FULMAJ).	Approved 04.04.2017
17/00113/LBC Cornhill	Royal Exchange Threadneedle Street London EC3V 3DG	Installation and display of four replacement projecting banner signs each measuring 2.16m high by 0.69m wide at a height above ground of 3.2m (Cornhill) and 3.45m (Threadneedle Street).	Approved 11.04.2017
17/00114/ADVT Cornhill	Royal Exchange Threadneedle Street London EC3V 3DG	Installation and display of four replacement projecting banner signs each measuring 2.16m high by 0.69m wide at a height above ground of 3.2m (Cornhill) and 3.45m (Threadneedle Street).	Approved 11.04.2017
17/00162/MDC Cornhill	15 Bishopsgate & Tower 42 Public Realm. London EC2N 3NW	Details of a scheme in the form of an acoustic report to demonstrate adequate sound proofing between the Class A uses and the surrounding offices in the building pursuant to condition 20 of planning permission dated 4th January 2016 (App No 14/01251/FULMAJ).	Approved 13.04.2017
17/00068/FULL Candlewick	Sherborne House 119 - 121 Cannon Street London EC4N 5AT	Installation of two heat recovery units and one heat pump on the roof at second floor level.	Approved 09.03.2017
15/00112/MDC Candlewick	1 King William Street London EC4N 7AR	Samples and particulars of materials and details brickwork, ground floor	Approved 30.03.2017

		elevations, ground floor office entrance, service entrance gates, windows and external joinery, external louvres, soffits, handrails and balustrades, alterations to existing facades, junctions, window cleaning equipment and roof level plant, ground level surfaces pursuant to condition 4 of planning permission dated 1st October 2013 (13/00366/FULMAJ).	
17/00143/MDC Candlewick	32 Lombard Street London EC3V 9BQ	Details of soffits, handrails and balustrades pursuant to Condition 9 (b) of planning permission dated 21.07.15 (14/01103/FULL).	Approved 13.04.2017
17/00149/MDC Candlewick	32 Lombard Street London EC3V 9BQ	Details of manifestations and automatic controls to the entrance doors pursuant to Condition 9 (j) of planning permission dated 22.07.15 (14/01103/FULL).	Approved 13.04.2017
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.	Approved 04.04.2017
17/00118/MDC Coleman Street	7 - 11 Finsbury Circus London EC2M 7EA	Submission of an Interim Travel Plan pursuant to condition 29 of planning permission dated 10th May 2013 (12/00811/FULMAJ).	Approved 13.04.2017
16/01335/NMA Cheap	Abacus House 33 Gutter Lane London EC2V 8AS	Non-material amendment under Section 96A of the Town and Country Planning Act 1990 (as amended) to planning permission 16/00077/FULL dated 14.04.16 to allow minor changes at roof level.	Approved 04.04.2017
17/00028/LBC Cordwainer	1 Poultry London EC2R 8EJ	Replacement of the existing shopfront and glazing to the unit fronting Queen Victoria Street, the creation of new openings and enlargement of existing openings to the office spaces at 1st and 2nd floors within the central rotunda and	Approved 16.03.2017

		the enlargement of the existing high level windows to the corner unit on Queen Victoria Street.	
17/00029/MDC Cordwainer	1 Poultry London EC2R 8EJ	Details of the new office entrance and windows to the public house pursuant to condition 4(b) & (c) of planning permission 15/00496/FULL dated 10 March 2016.	Approved 16.03.2017
16/01360/ADVT Cordwainer	1 Poultry London EC2R 8EJ	Installation and display of three non-illuminated advertisements on hoarding measuring (i) 1.7m high by 1.7m wide; (ii) 1.5m high by 1.8m wide; and (iii) 1.7m high by 1.2m wide to be located 4m above ground level.	Approved 28.03.2017
17/00100/POD C Cordwainer	39-53 Cannon Street, 11-14 Bow Lane & Watling Court London EC4	Retrospective submission of Local Training Skills and Job Brokerage Strategy and Local Procurement Strategy pursuant to section 106 agreement dated 27.02.2014 planning application reference 13/00339/FULMAJ.	Approved 28.03.2017
17/00089/MDC Cordwainer	39-53 Cannon Street, 11-14 Bow Lane And Watling Court London EC4	Submission of particulars and samples, details of facades, fenestration and entrances, stonework, ground floor elevations, ground floor office and retail entrances pursuant to condition 14 (a), (b), (c), (d), (e) of planning permission 13/00339/FULMAJ dated 27.02.14.	Approved 30.03.2017
17/00116/MDC Dowgate	Cannon Green Building 27 Bush Lane London EC4R 0AN	Details of samples of materials to be used on all external faces of the new extension including ventilation pursuant to condition 7 of planning permission 16/00102/FULL dated 4/11/2016.	Approved 06.04.2017
16/00164/FULL Farringdon Within	42 - 44 Little Britain London EC1A 7BE	Demolition of the existing building and redevelopment of the site to provide a ground plus six storey building to provide 5 x 1 bed residential	Approved 16.03.2017

		units (Use Class C3) and other residential accommodation (including bedrooms to penthouse apartment) (Use Class C3) in association with planning application reference 16/00165/FULMAJ and a retail unit (Use Class A1/A3) at ground floor level.	
16/00165/FULMAJ 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	Application under section 73 of the Town and Country Planning Act 1990 to vary condition 75 (approved plans) of planning permission dated 24 July 2015 (ref: 15/00417/FULMAJ) to enable minor material amendments to the consented scheme including: (i) an increase in the total number of residential units from 226 to 231 and alterations to the unit mix (ii); a reconfiguration and reduction of retail floorspace (-109 sq.m); (iii) a reconfiguration and reduction of the basement areas below phase 1 of the development; (iv) a reduction in car parking spaces and an increase in cycle parking spaces; and (v) associated minor external alterations.	Approved 16.03.2017
16/01264/XRAIL Farringdon Within	Crossrail Farringdon Ticket Hall Worksite London EC1	Scheme for Agreement under Schedule 7 paragraph 11(2) for the restoration of the Crossrail worksite at Farringdon Station Eastern Ticket Hall pursuant to Schedule 7 Paragraph 11 of the Crossrail Act 2008.	Approved 30.03.2017
16/01263/XRAIL Farringdon Within	Crossrail Farringdon East Ticket Hall Worksite EC1	Installation of street furniture in relation to the restoration of the Farringdon Station Eastern Ticket Hall worksite pursuant to Schedule 7 Paragraph 6 of the Crossrail Act 2008.	Approved 30.03.2017
17/00127/MDC	160 Aldersgate	Details of kitchen extract	Approved

Farringdon Within	Street London EC1A 4DD	pursuant to condition 13 of planning permission dated 30 April 2015 (ref: 15/00086/FULMAJ).	30.03.2017
15/01148/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	Submission of details for Phase 1: (a) particulars and samples of the materials to be used on all external faces of the buildings; (b) proposed new facades of the buildings; (c) alterations to retained facades; (d) flank walls of the new buildings; (e) windows and external joinery; (f) new dormer windows; (g) soffits, handrails and balustrades; (h) junctions with adjoining premises; (i) window cleaning strategy, access ladders and other excrescences at roof level; (j) plant and ductwork to serve the retail uses; (k) ventilation and air-conditioning for the retail uses; (l) removable seating for the screening room pursuant to condition 29 (a)(part), (b)(part), (c)(part), (d)(part), (e)(part), (f)(part), (g)(part), (h)(part), (i)(part), (j)(part), (k)(part) and (l) of planning permission dated 16 March 2017 (ref: 16/00165/FULMAJ).	Approved 04.04.2017
17/00093/NMA Farringdon Without	90 Fetter Lane London EC4A 1EN	Application under Section 96a of the Town and Country Planning Act 1990 for a non- material amendment to vary condition 22 of planning permission dated 26 October 2016 (ref: 16/00299/FULMAJ) to enable façade alterations including revised balustrade details, re-setting out of windows and doors at 7th floor level, and other minor elevational changes.	Approved 08.03.2017
17/00080/LBC Farringdon Without	St Bartholomew's Hospital East Wing West Smithfield London	Internal alterations at basement and ground floor level including the removal of existing partition walls and the	Approved 28.03.2017

	EC1A 7BE	installation of new partition walls and other strip out works.	
16/01251/MDC Farringdon Without	1-6 Dyer's Buildings London EC1N 2JT	Details of sewer vents and a plant noise assessment pursuant to conditions 6 and 13 of planning permission dated 01 July 2013 (ref: 11/00885/FULMAJ).	Approved 04.04.2017
17/00101/MDC Farringdon Without	90 Fetter Lane London EC4A 1EN	Submission of an acoustic report specifying the materials and constructional methods to be used pursuant to condition 5 of planning permission 16/00299/FULMAJ dated 26.10.16.	Approved 06.04.2017
17/00126/MDC Farringdon Without	90 Fetter Lane London EC4A 1EN	Particulars and samples of materials pursuant to condition 7 (a) of planning permission 16/00299/FULMAJ dated 26.10.16.	Approved 13.04.2017
17/00145/MDC Farringdon Without	90 Fetter Lane London EC4A 1EN	Details of the positioning and size of green roofs, planting and the contribution of the green roof(s) to biodiversity and rainwater attenuation) pursuant to Condition 15 of planning permission 16/00299/FULMAJ dated 26.10.16.	Approved 13.04.2017
17/00072/MDC Langbourn	60 Lombard Street London EC3V 9EA	Details of materials for 5th floor extension, windows and external joinery, handrails, balustrades and external doors at 5th floor, and louvres pursuant to Conditions 2 (a) (c) (d) and (e) of planning permission 16/01012/FULL and listed building consent 16/01013/LBC dated 20th December 2016.	Approved 23.03.2017
17/00056/FULL R3 Langbourn	Leadenhall Market London EC3	The use of part of the private roadway for either Class A1, A3, A4, A5 use to provide for the placing out of tables and chairs.	Approved 04.04.2017
17/00071/MDC Langbourn	60 Lombard Street London EC3V 9EA	Details of the aedicule at 3rd floor level pursuant to condition 2(B) of planning permission 16/01012/FULL	Approved 06.04.2017

		and listed building consent 16/01013/LBC dated 20th December 2016.	
17/00092/NMA Portsoken	9-13 Aldgate High Street London EC3N 1AH	Non-material amendment under Section 96A of the Town and Country Planning Act 1990 (as amended) to planning permission 15/00878/FULL dated 05.05.2016 for internal alterations to revise the number and layout of hotel rooms and ancillary facilities.	Approved 14.03.2017
16/01202/MDC Portsoken	Aldgate House 33 Aldgate High Street London EC3N 1AH	Materials samples, detailed Computer Generated Image of the portal and details of illumination pursuant to condition 2 of planning permission dated 5th July 2016 (reference 16/00073/FULL).	Approved 23.03.2017
16/01337/FULL Portsoken	Aldgate House 33 Aldgate High Street London EC3N 1AH	Application under Section 73 to vary condition 4 of planning permission 16/00073/FULL dated 5th July 2016 to create a dedicated entrance to the cycle store.	Approved 23.03.2017
17/00207/NMA Tower	Walsingham House 35 Seething Lane London EC3N 4AH	Non material amendment under section 96A of the Town and Country Planning Act 1990 to planning permission 14/01226/FULMAJ dated 8 January 2016 for amendments to the main entrance; re-location of UKPN substation and amendment to venting strategy; removal of the cycle lift from ground floor to basement level; installation of external doors to the 6th, 7th, 8th and 9th floor external terraces for fire escape requirements and new access door to roof top plant screen.	Approved 06.04.2017
17/00073/FULL Tower	2 America Square London EC3N 2LU	Installation of shopfront to front elevation and louvres to rear elevation within railway arch.	Approved 11.04.2017

17/00074/ADVT Tower	2 America Square London EC3N 2LU	Installation and display of: (i) one internally illuminated (lettering only) fascia sign measuring 7.9m wide by 0.68m high, displayed at a height of 2.64m above ground floor level; (ii) one non-illuminated vinyl sign measuring 1.5m wide by 3.2m high, displayed at a height of 1.8m above ground floor level; (iii) one non-illuminated vinyl advert measuring 1m wide by 1.6m high, displayed at a height of 0.4m above ground floor level; (iv) one internally illuminated (lettering only) projecting sign measuring 0.89m wide by 0.5m high displayed at a height of 2.75m above ground floor level.	Approved 11.04.2017
16/01281/MDC Vintry	19 - 20 Garlick Hill & 4 Skinners Lane London EC4V 2AU	Particulars and samples of materials to be used on the external faces of the building, details of stonework, windows (including means by which the floor slabs would be obscured), soffits, handrails and balustrades and junctions with adjoining premises pursuant to conditions 15 (a)(part) , (b), (e) (f) and (g) of planning permission dated 18 June 2015 (ref: 14/00973/FULMAJ).	Approved 11.04.2017
17/00035/ADVT Walbrook	27-35 Poultry London EC2R 8AJ	Installation and display: (i) two non-illuminated wall mounted signs measuring 1.05 m high by 1.2 m wide at 2.0m above pavement level; (ii) one non illuminated hanging sign measuring 1.25m high by 1.22m wide at 5.0m above pavement level fixed to an existing bracket on Poultry; (iii) two non-illuminated wall mounted signs measuring 0.325 m high by 0.79m wide at 2.0m above pavement level; (iv) one non illuminated	Approved 09.03.2017

		hanging sign measuring 1.25m high by 1.22m wide at 5m above pavement level fixed to an existing bracket on the on the Princes Street.	
17/00036/LBC Walbrook	27-35 Poultry London EC2R 8AJ	Installation and display of two non-illuminated wall mounted signs and one non illuminated hanging sign on an existing bracket on Poultry and two non-illuminated wall mounted signs and one non-illuminated hanging sign on an existing bracket on Princes Street.	Approved 09.03.2017
17/00115/BANK Walbrook	1 - 6 Lombard Street London EC3V 9AA	Details of works to decorative plaster to ceiling within the ground floor restaurant and temporary strengthening of cantilevered stair pursuant to condition 2 of Transport Works Act Order dated 15/12/15 (reference NPCU/LBC/K5030/74443).	Approved 21.03.2017
16/01315/FULL Walbrook	38A Walbrook London EC4N 8BN	Refurbishment and alterations including the change of use from Shop (A1) to Hospitality Facility (B1), alterations to ground floor facades, new windows, partial infill of an existing lightwell and new roof with recessed plant and ancillary works.	Approved 28.03.2017
17/00094/ADVT Walbrook	27 - 32 Old Jewry London EC2R 8DQ	Retention of two flags measuring 1.5m by 0.8m at a height above ground of 7.2m.	Refused 13.04.2017

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Agenda Item 9

Committee(s)	Dated:
Planning and Transportation	2 nd May 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
17/00022/FULL Aldersgate	Ben Jonson House, Breton House, Thomas More House, Bunyan House And Willoughby House Barbican, Residential Car Park, London, EC2	Variation of condition 7 attached to planning permission TP.7398/C dated 7th December 1962 (Registered Plan Number 4997) to allow the use of 230 car parking bays to "ancillary storage" for use by the residential occupiers and users of the buildings, involving the installation of a total of 331 storage units; 111 at Breton House and Ben Jonson House; 133 storage units at Bunyan House; 57 storage units at Thomas More House and Lauderdale House and 30 storage units at Willoughby House.(REVISED DESCRIPTION)	01/03/2017
17/00251/FULL Aldgate	St. Katherine's House, 2-16 Creechurch Lane, London, EC3A 5AY	Installation of metal guard rail to parapet wall along rear elevation to courtyard.	30/03/2017

17/00130/FULMAJ Bassishaw	Wood Street Police Station, 37 Wood Street, London, EC2P 2NQ	Erection of a nine storey tower, infill of existing courtyard, internal refurbishment, conversion of basements to provide car and cycle parking; refuse and recycling storage; and associated works for police station (sui generis) use (Total new floorspace 2752sq.m GEA).	17/03/2017
17/00128/FULL Bassishaw	London Wall Car Park , London Wall, London, EC2V 5DY	Change of use of part of the London Wall Car Park from public parking (Sui Generis) to enclosed private car parking (Sui Generis) (2051sq.m)	28/03/2017
17/00154/FULL Bassishaw	City Business Library , 5 Aldermanbury, London, EC2V 7HH	Installation of 2 No. cowls on the flat roof of the City Business Library.	29/03/2017
17/00198/FULL Bishopsgate	Open Space, Exchange Square, London, EC2A 2EH	Erection of structure incorporating LED screen for a temporary period between 3rd June 2017 and 3rd September 2017.	10/03/2017
17/00276/FULL Bishopsgate	100 Liverpool Street, London, EC2M 2RH	Application under section 73 of the Town and Country Planning Act 1990 to vary condition 36 of planning permission dated 31 October 2016 (15/01387/FULEIA) to incorporate minor material amendments for the refurbishment and extension of existing buildings including retention of buildings structural frame and construction of new facade and the provision of three additional floors and rooftop plant to provide office (B1) use; retail (A1), flexible use for either retail (A1/A2/A3) or leisure (D2) uses at lower ground, ground and first floor levels; and flexible office (B1) /restaurant (A3) use at 9th floor level; provision of car and cycle parking; hard and soft landscaping; alterations to facilities associated with the bus station; and the provision of other works ancillary to the main building. (Total Floorspace 69,029sq.m (GEA)).	13/03/2017

17/00202/FULL Bishopsgate	Octagon Mall & Land Adjacent To 100 Liverpool Street Including The Fulcrum And Parts of Eldon Street & Blomfield Street, London EC2	Public realm improvement works associated with the 100 Liverpool Street development including the alteration of floor levels and the lowering of the Fulcrum Sculpture located at the western end of Octagon Mall, alterations to the access ramp providing access into Broadgate Circle and changes to the stairs providing access to the Octagon Mall from Eldon Street.	13/03/2017
17/00230/FULL Bishopsgate	1 Finsbury Avenue, London, EC2M 2PA	Refurbishment and extension of the existing building including: (i) Installation of new entrances and alteration to building frontages at ground floor level; (ii) creation of new outdoor terrace fronting Finsbury Avenue; (iii) installation of access doors to existing terraces at levels 1 - 7; (iv) installation of new rooftop level pavilion structure and associated amenity terrace (Class B1); (v) change of use of ground floor from office (Class B1) and retail (A1, A2, A3, A4) to office (Class B1), Leisure (Class D2) and flexible uses for either Class B1, A1, A2, A3, A4 or D2; (vi) change of use of basement floors from leisure (Class D2) and office (Class B1) to office (Class B1), Leisure (Class D2) and flexible uses for either Class B1, A1, A2, A3, A4 or D2; and (vii) provision of disabled car parking and cycle parking and other associated works.	20/03/2017
17/00262/FULL Bishopsgate	4 Devonshire Square, London, EC2	Installation of two retractable awnings to the two windows at ground level and the installation of two wall lights to either side of building entrance door.	24/03/2017
17/00285/FULL Bishopsgate	100 Liverpool Street, London, EC2M 2PY	Installation of a temporary art, comprising a wrap extending from the top of the hoarding to the 6th floor.	31/03/2017

17/00293/FULL Bishopsgate	206 - 210 Bishopsgate, London, EC2M 4NR	Installation of two air conditioning units to the rear building elevation (facing Swedeland Court).	03/04/2017
17/00301/FULL Bishopsgate	Whitecross Place, Broadgate Place, London, EC2M 2PB	Erection of a single temporary retail unit (Use Classes A1, A3-A5) and associated works (29.75sq.m).	04/04/2017
17/00219/FULL Bread Street	One New Change, London, EC4M 9AF	Change of use at part lower ground floor from shop (Class A1) use to gymnasium (Class D2) use [405sq.m GIA]	29/03/2017
17/00215/FULL Bridge And Bridge Without	23-29 Eastcheap, London, EC3M 1DE	Application under section 73 of the Town and Country Planning Act 1990 to remove condition 11 of planning permission 16/00267/FULL dated 24th May 2016 that a further set of doors must be fitted between the entrance to the proposed basement premises and the bottom of the stairs leading into this area and this extra set of doors shall be retained for the life of the premises. These doors must not be left open except in an emergency or for maintenance purposes.	21/03/2017
17/00220/FULL Broad Street	Swedbank House , 42 New Broad Street, London EC2M 1JD	Change of use of part ground floor [91sq.m GIA] from Class B1(a) (office) to flexible Class B1(a) (office) and/or Class D1 (non-residential-institution).	20/03/2017
17/00255/FULL Broad Street	27 Throgmorton Street, London, EC2N 2AQ	Installation of exterior lighting; creation of step free access; removal of existing lift motor room at roof level, and installation of new accessible lift within light well; addition of new services riser within light well; new plant at roof level; infill to existing light well at second floor level with glazed 'winter garden' over at third floor level.	27/03/2017
17/00281/FULL Broad Street	Lower Ground Floor (Rooms 3, 4 And 5), 65 London Wall, London, EC2M 5TU	Change of use of Rooms 3, 4 and 5 of the Lower Ground Floor from office (Use Class B1(A)) to a flexible use of either offices (Use Class B1(A)) or a Health Clinic (Use Class D1) comprising 69.21 square metres.	07/04/2017

17/00208/FULL Candlewick	55 King William Street, London, EC4R 9AD	Erection of flat deck gantry with handrail and access ladder for the siting of additional plant (retrospective) together with the installation of steel framed louvres and the relocation of two satellite dishes.	16/03/2017
17/00151/FULL Castle Baynard	1 Puddle Dock, London, EC4V 3DS	Application under Section 73(a) of the Town and Country Planning Act 1990 to retain works carried out without complying with conditions 5, 7, 11 and 13 of planning permission dated 24 July 2015 (application reference: 15/00536/FULL), which relate to details of alterations to the existing façade, ground floor elevations and office entrances, replacement window framing and glazing units, service entrance gates, window cleaning equipment and garaging, rooftop plant, plant enclosures and other excrescences at roof level, refuse collection and storage facilities and green roofs.	20/02/2017
17/00177/FULL Castle Baynard	12 Gough Square, London, EC4A 3DW	Alterations to the entrance including installation of new doors, lowering the cills of ground floor windows and replacement of light fittings on the north elevation. Alterations to windows on the east elevation. Replacement of bin store door and removal of vents on the west elevation.	03/03/2017
17/00197/FULL Cheap	Saddlers' Hall, 40 Gutter Lane, London, EC2V 6BR	Application under section 73 of the Town and Country Planning Act 1990 to vary condition 14 of planning permission dated 22nd September 2016 (App No 16/00778/FULL) to incorporate minor material amendments at ground floor level and to the windows on the west elevation.	14/03/2017
17/00156/FULL Coleman Street	City Point , 1 Ropemaker Street, London, EC2Y 9AW	Installation of 4 x 600mm diameter dishes at roof level mounted on two steel poles fixed to existing steelwork.	27/02/2017

17/00173/FULL Coleman Street	25 Copthall Avenue, London, EC2R 7BP	Creation of a terrace at 6th floor roof level to include timber decking and new doors to provide access. Conversion of the corner folly at roof level to create an amenity area by installing glazed balustrades. Removal of a redundant gantry housing and creation of 15sq.m additional office floor space. Associated works to include new stone cladding and new windows at 6th floor level to the south elevation to match existing.	15/03/2017
17/00171/FULL Cornhill	Rear of Gibson Hall, 13 Bishopsgate, London, EC2N 3BA	Installation of new building services plant to roof area at rear of Gibson Hall, associated plant screening and replacement masonry wall cladding.	03/03/2017
17/00248/FULL Cripplegate	Golden Lane Community Centre , Golden Lane Estate, London, EC1Y 0RJ	Installation of photovoltaic panels to the roof of the Grade II Listed Golden Lane Estate Community Centre.	24/03/2017
17/00175/FULL Dowgate	Cannon Green Building , 27 Bush Lane, London, EC4R 0AN	Change of use from office (Class B1) to gymnasium (Class D2) at part lower ground floor, part basement level 1 and part basement level 2 and associated alterations at Bush Tower and Thames Tower; associated amendments to the ancillary cycle parking and waste storage provision; external alterations to the approved ground floor and lower ground floor facades of Bush Tower and Thames Tower; and other incidental design works (2,196sq.m).	06/03/2017
17/00266/FULL Dowgate	78 Cannon Street, London, EC4N 6HL	Installation of four condenser units on an existing plant tower and installation of louvres.	28/03/2017

17/00165/FULMAJ Farringdon Within	Morley House, 26 - 30 Holborn Viaduct And City Temple 31 Holborn Viaduct, London, EC1A 2AT	Demolition of 26-30 Holborn Viaduct and the erection of a part ground plus 9 storey and part ground plus 7 storey building for hotel (Class C1) use, with servicing access from Plumtree Court; and change of use of the City Temple lower ground and extended mezzanine floor, with removal of raked gallery and creation of new floorspace at mezzanine levels, to provide flexible office workspace (Class B1) use with associated new and altered windows, entrances doors/canopies, roof plant, and other incidental works (12,450sq.m GEA).	07/04/2017
17/00174/FULL Farringdon Without	Chancery House, 53 - 64 Chancery Lane, London, WC2A 1QS	Installation of 1 condenser unit on a flat roof at 7th floor level.	14/03/2017
17/00233/FULL Farringdon Without	9 - 13 Cursitor Street, London, EC4A 1LL	Installation of new shopfronts, retail and office entrances on Cursitor Street and Took's Court elevations.	20/03/2017
17/00292/FULL Farringdon Without	4 - 7 Lombard Lane, London, EC4	Erection of a one and two storey roof extension to form two residential units (Use Class C3) (161sq.m GIA).	03/04/2017
17/00303/FULL Farringdon Without	St Dunstan In-The-West, Fleet Street, London, EC4A 2HR	Change of use of first floor from office (class B1) to Livery Company courtroom, museum/display (sui generis) (103.5sq.m). Extension of entrance landing, installation of a platform lift and iron railings, and associated alterations.	04/04/2017
17/00307/FULL Farringdon Without	35 Chancery Lane, London, WC2A 1EL	Use of part of the lower ground and ground floor levels for a private sports medical clinic (Use Class D1) in lieu of retail (Use Class A1-A3) (300 sq.m).	11/04/2017
17/00120/FULL Lime Street	36 Great St Helen's, London, EC3A 6AP	Demolition of existing mansard at third floor level and erection of additional storeys at third, fourth, fifth and sixth floor levels to provide nine additional hotel rooms with associated plant at roof level.	29/03/2017

17/00250/FULLR3 Portsoken	75, 79, 85, 89, 95 & 97 Middlesex Street & 2 & 14 Gravel Lane, London, E1 7DA	Change of use from shop use (Class A1) (upper level retail storage) to residential use (Class C3) comprising of nine one bedroom affordable flats at podium level and associated external works.	27/03/2017
17/00073/FULL Tower	2 America Square, London, EC3N 2LU	Installation of shopfront to front elevation and louvres to rear elevation within railway arch.	02/03/2017
17/00239/FULMAJ Tower	Emperor House, 35 Vine Street, London, EC3N 2PX	Demolition of the existing buildings and redevelopment to provide a new mixed use building, comprising offices (Class B1), incubator offices (Class B1), a shop/ cafe unit (Class A1), student/ incubator tenant accommodation and ancillary facilities (sui generis), and exhibition space associated with a Scheduled Ancient Monument (sui generis), arranged over basement, lower ground, ground and parts 6, 12, 13 and 14 upper storeys plus plant; including a new pedestrian route, creation of new public realm; associated parking, servicing, and ancillary plant and storage; and other associated works.	24/03/2017
17/00247/FULL Vintry	61 Queen Street, London, EC4R 1AE	Replacement of entrance screen and doors, and modification of reception window.	24/03/2017
17/00271/FULL Vintry	19 - 20 Garlick Hill & Miniver Place, London, EC4V 2AU	Installation of metal gates to Miniver Place.	28/03/2017
17/00263/FULL Walbrook	1 - 6 Lombard Street, London, EC3V 9AA	Upgrade to existing rooftop base station.	24/03/2017

Committee:	Date:
Planning and Transportation	2 May 2017
Subject: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (132 bedrooms) (3,035sq.m. GIA), restaurant use (Class A3) at part basement and part ground floor (1,090sq.m. GIA) and associated plant areas (2,245sq.m.) (Total Floorspace 7,660sq.m. GIA).	Public
Ward: Farringdon Within	For Decision
Registered No: 14/00300/FULMAJ	Registered on: 27 May 2014
Conservation Area: St Paul's Cathedral	Listed Building: No

Summary

Planning permission is sought for the redevelopment of the site behind the retained facade of 3 - 5 Ludgate Hill to provide a part five, part seven storey building with three basement levels for use as a 132 bedroom hotel (Class C1) with Class A3 retail at part lower ground floors and part ground floor, with associated plant at basement and sixth floor level (total floor space 7,660sq.m GIA).

50 objections have been received across three public consultations from 28 residents and their representatives regarding the proposed development. The objections relate to the loss of office accommodation and local retail uses, the proposed hotel use, the impact on the St. Paul's Cathedral Conservation Area, the capacity of the surrounding streets for the vehicles and pedestrians associated with the development and the potential impact of the development on residential amenity including loss of daylight and sunlight, loss of privacy from overlooking, impact on air quality and increased noise from construction works, the operation of the hotel and its associated plant. The objections are summarised in a table in the body of the report with responses provided in respect of the various issues raised.

The proposed development would result in the loss of 3,381sq.m (GIA) of office floorspace. Office viability information has been provided in support of the application, which demonstrates that continued office use would not be a viable option on this site. This information has been independently verified by consultants on behalf of the City Corporation.

The principle of hotel use on this site is in accordance with Local Plan policies. The proposed servicing arrangements are considered to be acceptable. There is considered to be sufficient capacity in the surrounding streets for the vehicles and pedestrians associated with the development. Retail floorspace would be re-provided in the development to complement the retail offer on Ludgate Hill.

The height, bulk, massing and design of the proposed building would preserve the character and appearance of the St. Paul's Cathedral Conservation Area, through the retention of the facade to Ludgate Hill, suitably varied architectural treatments along the perimeter of the site and carefully designed setbacks at the upper levels of the building.

The building has been designed to sufficiently minimise the potential impact on the amenities of nearby residential occupiers in relation to privacy, overlooking, noise, daylight and sunlight.

The applicant's daylight and sunlight assessment, which has been independently reviewed by Delva Patman Redler on behalf of the City Corporation, demonstrates that the majority of windows and rooms in neighbouring properties would not experience noticeable reductions in daylight and sunlight. Whilst there would be some impacts on daylight and sunlight as a result of the development the majority would be minor in nature and are considered to be acceptable given the densely developed urban nature of the site.

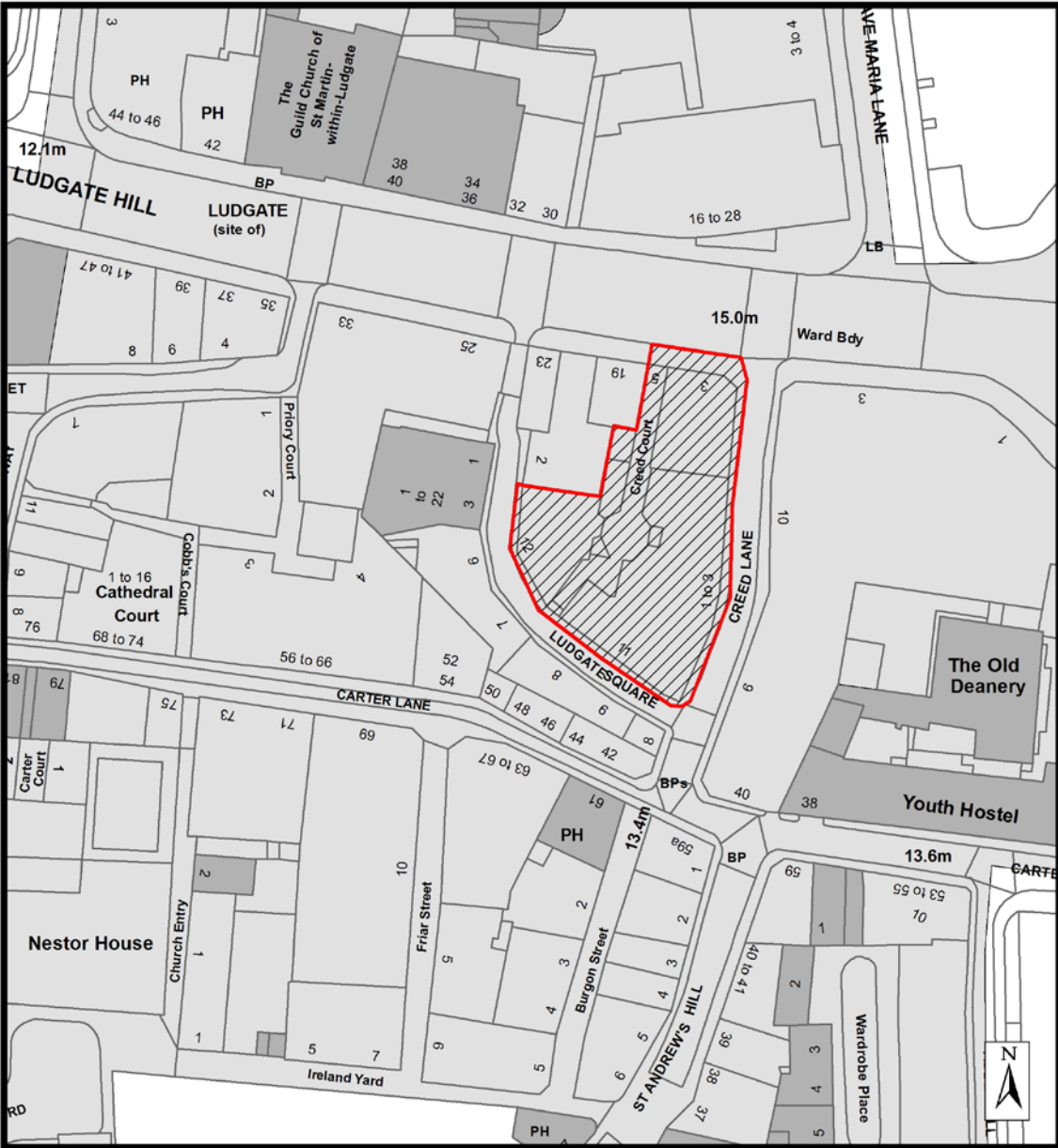
The proposed development is considered to comply with the Development Plan as a whole and to be appropriate subject to conditions, CIL payments and a Section 106 agreement being entered into to cover matters set out in this report.

Recommendation

Planning permission be granted for the above proposal in accordance with details set out in the attached schedule, subject to:

- (i) Planning obligations being entered into as set out in the body of this report, the decision not being issued until such obligations have been executed:
- (ii) That your officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 of the Town & Country Planning Act 1990.



Site Location Plan



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ADDRESS:
Bernard Morgan House

CASE No.
14/00300/FULMAJ

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



DEPARTMENT OF THE BUILT ENVIRONMENT



Main Report

Application Site and Existing Buildings

1. The site is located on the south side of Ludgate Hill and occupies the majority of the street block bounded by Ludgate Hill to the north, Creed Lane to the east and Ludgate Square to the west.
2. The buildings subject to the planning application comprise the Creed Court development of connected buildings constructed between 1986 and 1990. The buildings have frontages at 3 – 5 Ludgate Hill, 1 – 3 Creed Lane and 11 – 12 Ludgate Square, and additional entrances onto Creed Court, an open court partially covered by a glazed walkway. Creed Court is accessed at its northern end via a passageway beneath 3 – 5 Ludgate Hill, and at the southern end through a gated entrance beneath the buildings into Ludgate Square.
3. The existing buildings generally comprise five storeys with four separate office suites of mixed sizes over five ground floor retail units. The office suites are accessed via their own dedicated core from entrances on the street frontages and from lobbies entered from Creed Court. The office suites are currently vacant.
4. 3 – 5 Ludgate Hill was reconstructed behind its 1885 painted stucco facade which also returns for the length of one bay into Creed Lane. The remainder of the street frontages around the site are a varied mix of red or yellow stock brick facades, each a pastiche of the 19th Century commercial buildings formerly on the site, and 1 – 3 Creed Lane which is a building clearly of its time but which itself incorporates architectural references to the 19th Century buildings that it replaced. The buildings form part of the St Paul's Cathedral Conservation Area. The Ludgate Hill frontage forms part of the processional route that's runs from The Strand along Fleet Street, Ludgate Hill to St. Paul's Cathedral and beyond.
5. To the north of the site is 16 – 28 Ludgate Hill, a seven-storey office building with retail at ground floor level. To the east of the site is 1 – 3 St. Paul's Churchyard, a seven-storey office building with retail at ground floor level and 9 and 10 Creed Lane, which contain the Grange Hotel serviced apartments across four and five storeys of accommodation.
6. Immediately to the west of the site, on the opposite side of Creed Court, is Lambert House, a five-storey residential conversion with an additional penthouse floor and retail at ground floor to the Ludgate Hill frontage. To the south and west, 1 – 9 Ludgate Square are residential conversions of three and four storeys with commercial units occupying the ground floors of 6 – 9 Ludgate Square.

Relevant Planning History

7. Consent was granted in August 1985 for demolition in a conservation area for *“Demolition of existing facades to 11 Ludgate Hill, 1, 2, 3, 4, 5, 6 & 7 Creed Lane and 4, 5, 10, 11, 12 & 13 Ludgate Square, together*

with demolition of related buildings complete. Demolition of buildings behind retained and restored facades to 13, 15 and 17 Ludgate Hill.”

8. *At the same time planning permission was granted for “Restoration of facades to 13, 15, 17 & 17A Ludgate Hill. Erection of new facades to 11 Ludgate Hill, 1,2,3,4,5,6 & 7 Creed Lane and 4,5,10,11 & 12 Ludgate Square. Erection of new office accommodation behind the above facades at 1st., 2nd., 3rd & 4th. flr. levels & storage space at basement level. Erection of shops and small units (restaurant/wine bar) ground & basement levels with storage and ancillary space, plus plant at roof and basement levels.”*
9. The above consent and permission relate the existing buildings that are on the application site.
10. There have been several other planning applications for the site but the majority are minor applications for shopfront changes, new plant, satellite dishes, advertisements etc. and are not considered to be relevant to this application.

Proposal

11. Planning permission is sought for:
 - The demolition of the existing buildings behind the retained facade of 3 – 5 Ludgate Hill;
 - The erection of a part five, part seven storey building with three lower ground / basement levels for use as a 132 bedroom hotel use (Class C1) at part basement, part ground and first to sixth floors (132 bedrooms) (3,035sq.m. GIA); with
 - Restaurant use (Class A3) at part lower ground floors and part ground floor (1,090sq.m. GIA);
 - A Class A3 retail unit to Ludgate Hill (75sq.m GIA); and
 - Associated plant areas at lower basement and sixth floor level (2,245sq.m.) (Total Floorspace 7,660sq.m. GIA)
12. The proposed development would have a ground floor entrance at the corner of Ludgate Hill and Creed Lane with further entrances to the corner of Ludgate Square and Creed Lane and a secondary entrance / exit to the proposed restaurant at the eastern end of Ludgate Square. The retail unit (Class A3) to Ludgate Hill would have an independent entrance.
13. A combined restaurant (Class A3) and hotel reception area would occupy the ground floor, with hotel rooms to the upper six levels. Two lower ground floors would be used for restaurant, hotel spa and back of house facilities and the third basement level for plant. The central core would extend up through the building with its top level incorporated into a plant area at roof top level. The remaining areas of roof would be either greened or would provide space for two arrays of photovoltaic panels.

14. Creed Court itself, the pedestrian access into the interior of the street block, is not retained in the proposals. Instead, a central lightwell would provide daylight to a limited number of hotel rooms through translucent windows to the interior of the site. The lightwell would also continue to provide daylight and sunlight to the residential properties within Lambert House, located immediately to the west of the site.

Consultations

15. The application has been advertised on site and in the local press. The residential premises of Lambert House, The Gallery 38 Ludgate Hill, 1 Church Entry, Priory House, 3 St. Andrew's Hill, 36 St. Andrew's Hill, St. Andrew's House, Kings Wardrobe Apartments, The Old Deanery, 1 Wardrobe Place, 3 Ludgate Square, 8 – 9 Ludgate Square, Cathedral Court, 46 – 48 Carter Lane, 50B Carter Lane and 77 Carter Lane have been individually consulted.
16. The applicant has carried out their own public consultation exercise following the submission of the application. Letters were sent to, and meetings have been held with, the residents of Lambert House to discuss the impact of the proposals on their amenity.
17. The views of other City of London departments have been taken into account. Some detailed matters remain to be dealt with by conditions and a Section 106 agreement.
18. Transport for London have not objected to the proposals but have requested that the level of cycle parking provision complies with London Plan Standards and that a Delivery and Service Plan and Construction and Logistics Plan are secured. They have advised that an appropriate taxi rank arrangement be devised for taxis in line with Transport for London's Rank Action Plan (2015).
19. City of London Conservation Area Advisory Committee raised no objection to the proposals.
20. A number of changes have been made to proposals in response to residents' concerns and officer request, which has led to two further consultations; one in 2015, the other in 2016. The changes that have been consulted on sequentially as part of the application are:
 - i. Design amendments to the internal courtyard including the introduction of opaque glazing to all courtyard windows to prevent overlooking, restricted access to the courtyard for maintenance purposes only and the use of white glazed bricks to increase daylight reflectivity within the courtyard;
 - ii. An enlargement of the proposed courtyard area to increase the level of daylight and sunlight to the residential properties in Lambert House above that which was originally proposed. The enlargement resulted in the reduction of hotel rooms proposed from 140 to 132, the movement of the main hotel core southwards within the development and the relocation of the proposed roof top plant area eastwards towards Ludgate Square.

21. A total number of 50 objections have been received across the three consultations periods (22 in 2014; 17 in 2015; 11 in 2016) from 28 residents and / or their representatives. The objections and responses are summarised in the table below:

Representation	No. of comments on this point	Response
The increased massing and height proposed would result in a loss in the daylight and sunlight received by nearby residential properties.	20	The impact on daylight and sunlight to surrounding residential properties is considered acceptable and in accordance with Local Plan policy. This is discussed in more detail in this report.
The proposed roof terrace would have a detrimental impact on residential amenity through increased noise and greater overlooking.	13	The roof terrace has been removed. The roof would only be accessible for maintenance purposes and in emergency. A condition is included to ensure this.
The proposed courtyard would have a detrimental impact on residential amenity through increased noise, overlooking and light spillage.	10	The proposed courtyard would only be accessible for maintenance purposes and in emergency. All proposed windows to the courtyard would be fixed and opaque. Conditions are included to ensure that these matters are secured and maintained.
The sixth-floor hotel rooms facing west onto Ludgate Hill would directly overlook the terraces of Flat 22, 3 Ludgate Square.	1	The windows of the proposed sixth floor facing west onto Ludgate Square would be blind windows that would serve the proposed plant room, which would not result in overlooking of the residential amenity terrace.
The proposed entrances / exits on Ludgate Square would cause considerable noise that would channel up the narrow street.	1	The proposed restaurant doors at ground floor level to Ludgate Square are emergency exits only. A condition is included to ensure this arrangement is maintained. There is a secondary entrance to the restaurant, which serves an entrance lobby to stairs, which is further towards Creed Lane.
The surrounding streets	17	The increase in vehicle traffic would

of Creed Lane and Ludgate Square are not suitable for the increased vehicles or higher volumes of traffic that would result from the development.		be mostly as a result of taxis, with a small increase in servicing trips, which would be to Ludgate Hill and Creed Lane where the entrances and service entrance are located. It is considered that there is sufficient capacity in these areas. Servicing would be restricted outside peak times to avoid the majority of pedestrian movements in these areas.
The servicing requirements for the hotel would create noise during unsociable hours.	2	The servicing hours would be restricted by condition to ensure that there would be no servicing between 23:00 and 07:00.
The hotel use would create more pedestrian and vehicular activity, most notably at evenings and weekends when existing residents would expect a quieter time.	4	The proposed hotel would spread vehicle and pedestrian activity across weekdays and weekends thus partially alleviating congestion at peak times. The majority of activity would be away from the relatively quiet Ludgate Square where the majority of residential properties are located.
The development would result in the loss of office accommodation, which has not been sufficiently justified.	6	The viability information submitted at the various stages of the application has suggested that continued office use would not be viable on this site. An independent assessment of the latest viability appraisal has confirmed that continued office use would not be viable. The loss of office accommodation is therefore considered to be acceptable in principle in accordance with Local Plan policies.
The hotel use is inappropriate; the area is already saturated with Hotels.	17	The site is located close to the City's most important tourist attraction, St. Paul's Cathedral, as well as City Thameslink station. The principle of hotel use on this site is considered to be acceptable and in accordance with Local Plan policies.
The development would result in a loss of mixed uses, including retail.	8	The development would provide 1,090sq.m (GIA) of retail (Class A3) floorspace. The Ludgate Hill frontage of the site is along an identified Retail

		Link, which has a range of retail uses.
A hotel development of the scale proposed would be detrimental to the character of the conservation area.	12	The proposed building has been designed to preserve the character and appearance of the St Paul's Cathedral Conservation Area retaining the facade to Ludgate Hill as part of the proposals. The appearance of the building and its impact on local townscape views are considered to be acceptable.
The proposed glazed bricks to the courtyard would be visually austere and would initially result in glare. They would become dirty and unsightly.	3	The proposed reflective white glazed brickwork is typical of and appropriate to courtyards and lightwells in city centre locations such as this. There are existing white glazed bricks to the southern courtyard elevation of Lambert House, which would be complemented by the proposed brickwork.
The proposed plant will generate an unsuitable level of noise for the neighbouring residential properties.	7	The noise impact assessment submitted with the application confirms that the cumulative noise from the proposed plant would be at least 10dB below the minimum background level at the nearest noise sensitive premises. A condition is included to ensure that this is achieved.
The proposed extraction equipment at roof level will result in noise and odours and a reduction in air quality.	2	The proposed replacement of the existing 20 years old heating plant by modern equipment would have a positive impact on air quality and provide much greater efficiency. All combustion flues would terminate at least one metre above the highest roof of the development to ensure the maximum dispersion of any pollutants.
There would be noise and disruption caused by the demolition and construction works.	7	Conditions are included requiring a scheme of protective works from noise, dust, vibration and other environmental effects during demolition and construction.
The courtyard between Creed Court and Lambert House would be reduced in area.	3	The existing courtyard area is 132sq.m (96sq.m taking account of the high level walkways obstructions). The proposed courtyard area would

		be 115sq.m. The proposed courtyard would be more regular in shape and would be enlarged directly opposite the windows in Lambert House.
The proposed development would be inappropriately larger and higher than the existing building.	11	The proposed development would be lower than the existing buildings towards to Ludgate Hill but higher towards Ludgate Square / Creed Lane. The existing buildings have a maximum roof height of 33.4m (AOD), rising to 36.8m at the top of the highest plant room. The proposed development would have a maximum roof height of 36.5m rising to 38.3m at the top of the plant room. The adjacent Lambert House has a maximum roof height of 37m, rising to 37.8m at the top of the lift overrun.
Views of St. Paul's and the River Thames will be lost as a result of the increase in height of the development.	1	Planning legislation does not afford the right of a private view. However, views of St. Paul's would improve for residents of Lambert House as result of the development.
The proposed development and its basement would adversely affect the structural stability of Lambert House.	1	The Ground Movement Assessment submitted with the application predicts that the potential for damage to the Lambert House would generally be negligible, very slight or slight. The proposed demolition and construction works would ensure that the site is sufficiently reinforced until the new basement structure and upper floors are complete.

Policy Context

22. The development plan consists of the London Plan 2016 and the City of London Local Plan 2015. The London Plan sets out the Mayor's vision for London up to 2036. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix A of this report.
23. The London Plan requires that new development should not adversely affect the safety of the transport network and should take account of cumulative impacts of development on transport requirements. New development is required to be of the highest architectural quality and not to cause harm to the amenity of surrounding land and buildings, in respect of overshadowing, wind and micro climate.

24. 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.
25. There is relevant City of London supplementary planning guidance in respect of: Planning Obligations, the City of London Community Infrastructure Levy Charging Schedule and Protected Views (including St. Paul's Depths). There is relevant Mayoral supplementary planning guidance in respect of Sustainable Design and Construction, Control of Dust and Emissions during Construction and Demolition, and Use of Planning Obligations in the funding of Crossrail and the Mayoral CIL.
26. Government Guidance is contained in the National Planning Policy Framework (NPPF) and the NPPF Practice Guide. Chapter 12 of the NPPF sets out key policy considerations for applications relating to designated and non-designated heritage assets. Other relevant guidance is provided by English Heritage including the documents Conservation Principles, and The Setting of Heritage Assets. Building in Context (EH/CABE) and the PPS5 Practice Guide in respect of the setting of heritage assets.

Considerations

27. 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);
 - For development within or adjoining a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area and its setting (S72 (1) Planning (Listed Buildings and Conservation Areas) Act 1990);
 - 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).
28. Paragraph 131 of the NPPF advises, "In determining planning applications, local planning authorities should take account of:
 - The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - The positive contribution that conservation of heritage assets can make to sustainable communities, including their economic vitality; and

- The desirability of new development making a positive contribution to local character and distinctiveness.”
29. 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...” It further states at Paragraph 2 that:
- “Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise’.
30. It states at Paragraph 7 that sustainable development has an economic, social and environmental role.
31. In considering the planning application before you, account has to be taken of the statutory and policy framework, the documentation accompanying the application, and views of both statutory and non-statutory consultees.

Principal Issues to be considered

32. The principal issues to be considered in the determination of this planning application are:
- The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan.
 - The loss of office accommodation;
 - The principle of hotel development;
 - The appropriateness of the bulk, massing and design of the proposals in the context of the local area and local views;
 - The character of the St. Paul’s Cathedral Conservation Area;
 - The setting of St. Paul’s Cathedral and other heritage assets;
 - Servicing, transport and impact on public highways;
 - The impact on residential amenity and specifically:
 - a) The impact of the proposals on the daylight and sunlight enjoyed by neighbouring residential properties;
 - b) The impact of the proposals on privacy and overlooking;
 - c) The noise impact of the proposed plant;
 - d) The potential impact of the demolition and construction works.
 - The potential impact of the proposed basement extension on the structural stability of neighbouring buildings, St. Paul’s Cathedral and archaeological remains.

Loss of Office Accommodation

33. The proposed development would result in the loss of 3,381sq.m (GIA) of office floorspace. Local Plan policies CS1 and DM1.1 seek to protect office accommodation where it is considered to be suitable for long term viable office use and there are strong economic reasons why loss of that accommodation would be inappropriate. The Office Use Supplementary Planning Document (SPD) sets out detailed criteria for evaluating the long-term viability of office accommodation and requires the submission of a viability appraisal and evidence of marketing in support of an application for change of use.
34. The Local Plan and Office Use SPD were adopted in January 2015. Prior to this, the City Corporation had sought to protect viable office accommodation through draft policies in the emerging Local Plan published in January 2013, although the draft policies carried little weight until they had been considered and endorsed through the Local Plan Public Examination in October 2014. In May 2013, the City of London was granted an exemption from national permitted development rights for the change of use of offices to residential development on the grounds that the City was an office cluster of national importance. This added weight to the emerging policy approach in the draft Local Plan to protect viable office accommodation in the City.
35. Pre-application discussions on the potential redevelopment of Creed Court commenced in 2013. The applicant provided information on the viability of Creed Court as an office location and marketing of the buildings for continued office use in line with the requirements of the draft Local Plan. The evidence indicated that the building would not be a viable office in the longer term.
36. The planning application for hotel development was submitted in April 2014 along with updated viability and marketing evidence and an assessment of the potential for redevelopment for office use. This evidence repeated the view that refurbishment and redevelopment would not be viable and that continued office use would not be a viable option in the longer term.
37. In November 2015, revised and updated viability information was provided by the applicant, in line with the requirements of the now adopted Local Plan and Office Use SPD. This information considered the potential for a light refurbishment of the existing office accommodation, a more comprehensive refurbishment and a redevelopment behind a retained facade to provide Grade A office accommodation. This updated information highlighted the requirement for capital investment to market the building successfully, including a need for new M&E installations, new floors and ceilings, new windows and replacement lighting. The information also highlighted difficulties arising from the lack of a prominent entrance to Ludgate Hill, small and irregular floorplates, substandard floor to ceiling heights and restrictions on the potential for additional floorspace through redevelopment due to St Paul's Heights limitations. The viability appraisals demonstrated that the likely rental level achievable through refurbishment would be

insufficient to provide a viable return to the building owner in the longer term. Whilst there was potential for redevelopment behind a retained facade, the constraints imposed by a lack of a prominent office entrance, differences in levels through the site and the restriction on upwards extension, meant that a significant uplift in floorspace was not deliverable and that any development would not be viable in the longer term.

38. Research undertaken for the City Corporation (Clusters and Connectivity: The City as a Place for SMEs, March 2016) has highlighted the growing importance of small and medium sized enterprises (SMEs) to the City's economy. The applicant was asked to address the potential for Creed Court to provide such accommodation for the SME sector. This further information was provided in October 2016 and identified that light refurbishment of Creed Court would be necessary to provide an attractive location for SMEs, particularly when compared with other accommodation available or planned in the area. The market rent deliverable as a result would be unlikely to be sufficient to meet the costs of refurbishment and provide an acceptable level of return in the longer term. Creed Court would not be able to compete with other locations providing higher quality accommodation for SMEs without comprehensive refurbishment which had already been shown to be unviable in the longer term.
39. In November 2016, a further revised viability appraisal was submitted considering the potential for comprehensive refurbishment of Creed Court for office use, and redevelopment and construction of a new Grade A office building behind a retained facade. The City Corporation appointed independent consultants to review this appraisal. In assessing the applicant's appraisal, the City's consultants sought independent verification of build costs and considered in detail the individual elements of the appraisal. The City's consultants looked at the potential viability on a current day and growth basis and undertook sensitivity analysis of the results, looking at the implications of changes in build costs and office rental values. The City's consultants concluded that both the office refurbishment and office redevelopment options, at current day and assuming growth, generated returns significantly below those that would be expected by a rational developer and that continued office use would not be viable.
40. The loss of office accommodation at Creed Court have been considered over a number of years from pre-application stage through submission of the application and subsequent amendments to detailed proposals for this site. At all stages, the viability information has indicated that continued office use would not be viable on this site. The latest viability appraisal, submitted in November 2016, has been independently assessed by consultants on behalf of the City Corporation and this independent verification has confirmed that continued office use would not be viable. The loss of office accommodation at Creed Court is considered therefore to be acceptable in principle under Local Plan policies CS1 and DM1.1.

Proposed Hotel Use

41. The site is located close to the City's most important tourist attraction, St. Paul's Cathedral, as well as City Thameslink station and St. Paul's Underground Station. The principle of hotel use on this site is acceptable, providing appropriate transport and servicing arrangements are implemented and the amenity of adjoining occupiers is safeguarded.
42. Policy DM 11.3 states that new hotel development will be permitted if it does not prejudice the primary business function of the City and is not contrary to policy DM 1.1, which states that a change of use from office to other uses will be acceptable if a site is no longer suitable for office use. Policy DM 11.3 also states that new hotel development will not be acceptable unless satisfactory arrangements for pick-up/drop-off, services delivery vehicles and coaches, appropriate to the size and nature of the hotel.
43. The applicants have successfully demonstrated through a viability appraisal that the site is not viable for office use. Suitable transport and servicing arrangements have been proposed, which are covered in the relevant section of this report.

Retail Floorspace

44. The Ludgate Hill frontage of the site is along an identified Retail Link which joins Cheapside Principal Shopping Centre (PSC) and Fleet Street PSC. Policy CS20 of the Local Plan seeks to enhance the retail environment in retail links. Policy DM20.2 encourages the provision and will resist the loss of retail frontage and floorspace within the retail links. A mix of shops and other retail uses will be encouraged in the retail links, ensuring that the location and balance of uses does not adversely affect the function of the link, any nearby PSC or their surrounding areas.
45. The existing retail floorspace on site comprises approximately 946sq.m (GIA) at ground and lower ground floors and includes units along Ludgate Hill, Creed Lane and Ludgate Square. It is proposed to replace the existing retail units with 1,015sq.m (GIA) of restaurant (Class C3) space across the ground floor and two basement levels and a retail unit (Class A3) to the Ludgate Hill frontage of the site (75sq.m GIA).
46. The proposed restaurant (Class A3) will maintain the provision of retail floorspace on the site and the proposed retail unit to Ludgate Hill will maintain the retail link between Fleet Street and Cheapside in accordance with Local Plan policy.

Design

Bulk and Massing

47. The overall form of the scheme has been developed with two key factors informing the bulk and massing of the current proposals. These are; the apparent height of the replacement building as seen from street level, and the potential impact of the new building on the

residential amenity nearby residential occupiers in terms of daylight and sunlight.

48. The existing buildings on the site are considered to be of an appropriate height for this particular part of the conservation area. On the Ludgate Hill frontage the site is seen in the middle distance from the churchyard of St Paul's Cathedral at the top of Ludgate Hill as one of the buildings of similar height on the southern side of the street. Closer to, from opposite the site within Ludgate Hill or from the southern end of Ave Maria Lane, this frontage is seen to be a continuation of a longer run of buildings of a similar architectural style with compatible storey heights, cornice lines and parapet heights, etc. An increase in apparent height on this elevation would have been visually unwelcome. The Creed Lane and Ludgate Square elevations of the existing buildings are considered to be of an appropriate scale for this part of the conservation area given the height of the neighbouring buildings and the narrow width of the streets.
49. The massing of the building has been carefully designed to ensure that the street elevations from ground to fourth floor are of a similar height to the existing buildings. Above this level, the fifth, sixth and plant storeys have all been set back so as to be generally out of sight from the street. A stepping downwards in height from six to four stories southwards along Creed Lane has been made to address the sharply falling ground level along the street and to match the height of the new development with the lower height of neighbouring buildings at the south-east corner of the site.
50. In views from the upper levels of neighbouring buildings the elevations have been carefully considered to still read as a coherent design even though the full height of the new building would not be apparent from pedestrian level views. Following much discussion and negotiation, it is considered that the architects have satisfactorily resolved the increase in the overall height of the new building in comparison to the existing buildings whilst maintaining an acceptable appearance in the context of the Conservation Area.
51. The second principle constraint in terms of bulk and mass has been the need to retain acceptable levels of daylight and sunlight to the residential flats in the neighbouring Lambert House. The design and configuration of the upper parts of the building has been significantly amended to take account of these factors.

Architectural Expression

52. Although their internal linkages are more extensive than is apparent from the street, the existing 1980s buildings on the site are externally expressed around the perimeter of the site as a series of distinct facades. The quality of their facing materials is high but some details such as corbel brackets and metalwork which have a 1980s flavour now appear slightly dated.
53. The proposed building would repeat the approach of breaking the facade down into distinctly different elements around the site to reduce

its scale. The existing buildings on the site have been given five related treatments along Creed Lane and three further different treatments along Ludgate Square. The proposals have the same number of facade treatments along each street. A range of alternative architectural options were considered for the current scheme and the approach adopted was developed to best accord with the context and characteristics of the surrounding conservation area.

54. The individual facades would again have a similar appearance to the 19th century warehouse and commercial buildings that occupied the site prior to replacement by the existing buildings. The proposed buildings would be faced in yellow stock or red brick with slate roofs and timber window frames and retail frontages. Traditional details including stone dressings, ground floor glazed bricks, warehouse style doors at upper levels, projecting dormers, etc. would be employed to introduce further variety and interest into the individual facades. At higher level, out of site from the street, upper level roofs and plant enclosures would be faced in zinc.
55. Within the central court a more contemporary architectural language would be adopted. Roof coverings would again be zinc and windows would be metal framed. The outlook of the residents of the neighbouring Lambert House has been given particular attention to improve the quality of views seen from their windows. The glazing of the hotel windows would be opaque to prevent overlooking issues, the courtyard walls would be faced with reflective white glazed brickwork, and trees would be planted at the base of the courtyard to introduce greenery.

London View Management Framework and St. Paul's Heights

56. The Mayor London's View Management Framework (LVMF) is Supplementary Planning Guidance to the London Plan and sets out the strategic context for the protection of identified landmarks. The development falls within the Viewing Corridors and Background Assessment Areas for a number of protected vistas of St Paul's Cathedral but does not rise sufficiently high to breach any of these long distance protected vistas.
57. The site falls within the St Paul's Heights policy area that protects local views of St Paul's Cathedral from within and around the City. The St Paul's Heights height restrictions would restrict the overall height of the proposals to c.40.5m to 42.3m AOD but the townscape considerations that have determined the overall envelope of the building have restricted its maximum height to 38.3m AOD making the proposals fully in accordance with the provisions of the policy.

Setting of St Paul's Cathedral and Local Views within the Conservation Area

58. The existing buildings are mentioned in complimentary terms within the St Paul's Cathedral Conservation Area Character Study and Management Plan. They are considered to be sympathetic to their locality and to "harmonise well with earlier buildings on the street by incorporating traditional proportions and features". The existing

buildings also feature within a number of important views identified in the document. The proposed building has been subject to a comprehensive study of local townscape views, including those referred to in the Conservation Area Character Study to assess its impact on the setting of St Paul's Cathedral and from within the surrounding streets, as per the requirement set out in paragraph 132 of the National Planning Policy Framework (NPPF). The appearance and increased height of the new building across parts of the site has been developed with the aim of avoiding detrimental impacts to the relevant designated heritage assets which in this case comprise the St Paul's Cathedral conservation area and the listed buildings referred to below.

59. With regard to St Paul's Cathedral, views along Ludgate Hill heading eastwards towards the Cathedral would be essentially unchanged. There are plant enclosures at roof level on the existing buildings, the proposed removal of which is considered to be beneficial in views looking back westwards from the Cathedral. The existing buildings are clearly visible in views from the Cathedral's Golden Gallery and Stone Gallery. Although the increased height of the building has been disguised at street level by carefully designed set-backs, the overall height would be evident in views from St Paul's Cathedral, but the degree to which this increased height would be noticeable amongst the surrounding roofscape would be minimal.
60. From other locations around the site, in views from Ave Maria Lane, views looking north and southward along Creed Lane, and looking east and westward along Ludgate Square, there would be a noticeable change in the appearance of this building but it is considered that there would be no detrimental impact on the essential character of these streets. The awkward architectural arrangement of the current buildings as they turn the corner from Creed Lane into Ludgate Square would be improved by the revised manner in which the proposed buildings would address this junction.

Setting of Other Listed buildings

61. A number of other listed buildings are located sufficiently close to the site for their settings to be potentially affected by the proposed development. These buildings include: 1 – 3 Ludgate Square (Grade II) to the west of the site; the Church of St Martin (Grade I) on the northern side of Ludgate Hill; 34 – 40 Ludgate Hill (Grade II) to the northern side of Ludgate Hill; St Paul's Deanery (Grade I) to the east of the site; and the Youth Hostel, 36 Carter Lane (Grade II) to the east of the building. The setting of these buildings would not be adversely affected by the proposals.

Design Conclusion

62. The design of the proposed building has been the subject of much discussion to reduce its impact on the character of the surrounding streets within the St Paul's Cathedral conservation area, to ensure compliance with the provisions of NPPF Paragraph 132 and relevant

Local Plan policies. The appearance of the building and its impact on local townscape views are considered to be acceptable.

Transport and Servicing

63. The Transport Assessment submitted with the application sets out an evaluation of the likely vehicle movements as a result of the development and how the servicing regime would be accommodated to facilitate the redevelopment of the site and the change of use from office (Class B1) to hotel (Class C1) and restaurant (Class A3).
64. The site is located within 300m of St. Paul's London Underground Station and City Thameslink Rail Station. Nine daytime bus services (including one 24 hour service) and seven night-bus services are accessible from the site.
65. Two main pedestrian entrances to the hotel are proposed; one onto Ludgate Hill and one at the corner of Creed Lane and Ludgate Square. An additional entrance to the restaurant is located at the Creed Lane end of Ludgate Square.
66. An average of 76 taxi trips to and from the hotel and restaurant are predicted per day, which is an increase of 71 trips over the existing office and retail use of the site. Taxi trips to the hotel would be distributed throughout the day, with peaks occurring at the beginning of the business day and in the early evening. Taxi trips to the restaurant would occur at lunchtime and late evening so that peak periods for the uses would not coincide. It is anticipated that taxi drop offs would be primarily from Ludgate Hill and also Creed Lane adjacent to the entrances to the building. However, it would not be appropriate to provide a taxi rank in this location.
67. An average of 23 servicing trips to the hotel and restaurant is predicated per weekday. The majority of these trips will be made using a transit type van (15 trips). A proportion of trips would be made using rigid vehicles. A small increase of three service trips per day is predicted compared to existing building trip rates (presuming full occupancy), with an increased proportion of transit type vans.
68. It is proposed to provide an on-road service area on the Creed Lane elevation of the building in approximately the same location as the existing service area, which would feed into a central core to enable servicing throughout the building.
69. Servicing hours would be restricted by condition to ensure that no servicing of the premises is carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. This would satisfactorily remove the potential for noise impact from servicing on neighbouring residential properties during these hours.
70. Further restrictions on servicing times would be between 07:00 and 09:00, 12:00 and 14:00 and 16:00 and 19:00 Monday to Friday to help manage traffic and avoid congestion in the area and to help manage

the safe and convenient movement of pedestrians and cyclists in the area, particularly during peak times.

71. A delivery and servicing plan would be required through the Section 106 agreement.

Cycle parking and facilities

72. Policy DM 16.3 of the Local Plan requires cycle parking provision for hotel development to meet London Plan standards. Policy DM 16.3 states that the City Corporation encourages these standards to be exceeded and encourages on-street cycle parking in suitable locations.
73. A minimum of 24 cycle parking spaces would be provided on site for hotel staff and patrons within a dedicated area at lower ground floor level. Staff shower rooms and changing facilities would be provided adjacent to the cycle parking. The proposed cycle parking provision would conform to London Plan cycle parking standards.
74. A travel plan would be required through the Section 106 agreement.

Pedestrian Movement

75. A pedestrian movement analysis has been submitted with the application. The analysis identifies that overall pedestrian movement in the area around the site is 49% higher during a weekday than the weekend, which is typical of an area dominated by office uses. The weekday movement pattern is typical of central business areas with three clear peaks: the morning, evening and lunch time peaks. The weekend movement rates are comparatively low with activity concentrated along Ludgate Hill.
76. The introduction of a hotel use on the site would spread pedestrian activity across weekdays and weekends thus partially alleviating congestion during weekday peak times. The majority of pedestrian activity is anticipated to continue to be along Ludgate Hill and away from the relatively quiet Ludgate Square, where the majority of residential properties are located.
77. Creed Court, the internal pedestrian walkway through the site would be replaced in the proposed development by a central lightwell. The walkway was designed to provide access to the office suites on the upper floors and does not offer a convenient pedestrian shortcut through the site. The walkway is in private ownership and is designated as permissive path. There are gates at the northern and southern entrances to the walkway, access through which is managed so that the gates are unlocked while the office units are occupied and locked when they are not. On this basis, the incorporation of the walkway into the development is considered to be acceptable.

Access and Inclusive Design

78. Local Plan Policy DM 10.8 Access and Inclusive Design requires that developments meet the highest standards of accessibility and inclusive design. The proposed development would provide level access via the main entrances. There are level changes across the site which would

be addressed at ground floor level through internal ramps, details of which are required by condition.

79. At least 10% of the hotel rooms would be accessible for people with disabilities, which would be required by condition. The proposed pool and spa facilities would be easily accessible with sufficient space for all hotel occupants to manoeuvre. The proposed staff changing areas would incorporate accessible shower and changing facilities adjacent to the standard male and female changing areas.
80. Due to a limited footprint and restricted vehicle access into the site, no disabled car parking spaces are proposed as part of the development. A condition is included requiring the submission of an accessibility management plan prior to the occupation of the hotel including details of accessible car parking provision as well as drop off and collection arrangements for disabled visitors.

Waste Management

81. The proposed development includes a centralised waste store located internally on the lower ground floor. Waste would be stored here and brought up to street level via a service lift for collection from the service area at Creed Lane within the City of London's allocated commercial waste collection times. The proposed waste storage and collection arrangements have been reviewed by the City of London's Community Facilities Manager who has confirmed that they comply with City of London requirements.

Sustainability and Energy

82. The revised Design and Access Statement submitted in 2016 provides evidence that the development is predicted to achieve an "Excellent" rating with a score of 71% using the Other Buildings: Hotel assessment criteria which falls under the SD5076:4.0 BREEAM 2014 New Construction for England. A post construction BREEAM assessment demonstrating that a target rating of 'Excellent' has been achieved would be required to be submitted as soon as practicable after practical completion secured by condition.
83. The revised Design and Access Statement provides evidence that the proposed building has been designed to achieve a 38.2% improvement over the 2013 Building Regulations Part L. This is achieved through building fabric, on site CHP for domestic hot water supply and the use of Aerothermal heat pumps. This complies with the London Plan target of a 35% improvement over the 2013 Building Regulations. The development has been designed to enable connection to a district heating network in the future.
84. The development includes proposals for small areas of green roof across the different roof levels, which would provide opportunities for biodiversity and rainwater attenuation. Further details of the position and size of the green roofs, the type of planting and the contribution of the green roofs to biodiversity and rainwater attenuation are required by condition. Photovoltaic arrays are proposed at roof level, the details of which are required by condition.

Impact on Residential Amenity

85. The site is on the edge of the Carter Lane Residential Area as indicated in the City of London Local Plan. Local Plan Policy DM21.3 Residential Environment states that the amenity of existing residents within identified residential areas will be protected by resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance and requiring new development near existing dwellings to demonstrate adequate mitigation measures to address any potential detrimental impact.

Daylight and Sunlight

86. Local Plan Policy DM10.7 Daylight and Sunlight resists development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's (BRE) guidelines. Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations. Policy DM21.3 requires development proposals to be designed to avoid overlooking and seek to protect the privacy, daylighting and sunlighting levels to adjacent residential accommodation.
87. The BRE guidelines consider a number of factors in measuring the impact of development on daylight and sunlight on existing dwellings:
- Daylight to windows: Vertical Sky Component (VSC): a measure of the amount of sky visible from a centre point of a window. The VSC test is the main test used to assess the impact of a development on neighbouring properties. A window that achieves 27% or more is considered to provide good levels of light, but if with the proposed development in place the figure is both less than 27% and reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable.
 - Daylight Distribution: No Sky Line (NSL): The distribution of daylight within a room is measured by the no sky line, which separates the areas of the room (usually measured in sq. ft) at a working height (usually 0.85m) that do and do not have a direct view of the sky. The BRE guidelines states that if with the proposed development in place the level of daylight distribution in a room is reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important.
 - Sunlight: sunlight levels are calculated for all main living rooms in dwellings if they have a window facing within 90 degrees of

due south. Kitchens and bedrooms are considered less important although care should be taken not to block too much sun. The BRE explains that sunlight availability may be adversely affected if the centre of the window receives less than 25% of annual probable sunlight hours (APSH), or less than 5% APSH between 21 September and 21 March; and receives less than 0.8 times its former sunlight hours as result of a proposed development; and has a reduction in sunlight hours received over the whole year greater than 4% of annual probable sunlight hours.

Daylight and Sunlight Assessment

88. The application is supported by a daylight and sunlight assessment which considers its impact on neighbouring residential properties at 1 – 3 Ludgate Square, 2 Ludgate Square (Lambert House), 6 – 7 Ludgate Square, 8 – 9 Ludgate Square, 46, 48 and 50 Carter Lane.
89. An initial daylight and sunlight assessment was submitted with the application in 2014. The City Corporation commissioned Delva Patman Redler to independently review the assessment. This review indicated a number of significant adverse impacts on the daylight and sunlight received by neighbouring properties, most notably in Lambert House and the applicant was asked to amend the scheme to improve the situation. Revised proposals and a revised daylight and sunlight assessment were submitted in 2016, which were further reviewed by Delva Patman Redler on behalf of the City Corporation. The comments below relate to these latest proposals and not earlier iterations of the proposed development.

1 Ludgate Square

90. This property is located to the west of the site. Of the 31 windows assessed for daylight 30 would achieve BRE compliance for VSC. One window would experience a reduction in VSC of 23.3% and serves a room that has an additional 8 windows that would comply with the BRE guidelines. All rooms meet the BRE's daylight distribution (NSL) standard. The daylight impact is considered to be negligible. The sunlight results would be BRE compliant.

Lambert House, 2 Ludgate Square

91. This residential property is located directly to the west of the site and shares the internal courtyard to Creed Court. 17 windows to the internal courtyard in this property were assessed for daylight. Two would experience a reduction in daylight (VSC) of more than 20%; these losses would be 20.8% and 21.6%, which is marginally above the noticeable level.
92. 15 courtyard facing rooms to nine flats were assessed for daylight distribution (NSL). Of the 15 rooms assessed five would experience reductions in daylight distribution (NSL) that would not technically comply with the BRE guidelines; Three would experience reductions between 23.4 – 30.5%; two would experience reductions of 40.7 and 43% (the windows serving these two rooms would meet the VSC

standard, however). Overall, the reductions in daylight to this property is considered to be minor adverse with a small number of incidences of minor to moderate adverse impact.

93. All 17 windows face within 90 degrees of due south and have been assessed for sunlight. 15 out of the 17 windows would meet the BRE guidelines for APSH. One window, which serves a bedroom, would experience an annual reduction in sunlight from 14% to 6% APSH (a reduction of 57%); the other window, which also serves a bedroom would experience an annual reduction in sunlight from 22% to 16% (a reduction of 27%). It is noted that the windows affected would comply with the BRE guidelines in terms of daylight (VSC). It is also noted that the remaining bedrooms in these properties would comply with the BRE guidelines in terms of sunlight (APSH) and that the living room and kitchens to these flats have windows facing away from the site onto Ludgate Square and would not be affected by the development.
94. Overall, the sunlight impact on the majority of windows at this property would be negligible. Whilst there are two incidences where the sunlight impact to windows would be noticeable the daylight impact to these windows would not be noticeable and the remainder of these properties would not be noticeably affected in either daylight or sunlight terms.
95. It should be noted that there a number of flats within this property that would achieve gains in daylight and sunlight as a result of the proposed development. One window would experience noticeable increases in daylight and sunlight; with a 28.2% increase in VSC and a 45% increase in APSH; the bedroom that the window serves would experience a 47.4% increase in daylight distribution (NSL).

3 Ludgate Square

96. This property is located to the west of the site. Seven of the 24 windows assessed for daylight for this property would not meet the VSC standard and would serve the one room that would not meet the NSL standard. The VSC losses would be between 22% and 28%, the NSL loss would be 33.3%. The room served by the window that does not meet the NSL standard would retain around 60% of its floor area receiving direct sky visibility, which can be considered good for a dense urban location. The reductions in daylight are considered to be of a minor adverse impact. The sunlight results would be BRE compliant.

6 – 7 Ludgate Square

97. These buildings are located to the south west of the proposed development. Planning permission was granted in 2013 to convert the building from office to residential with a commercial unit at ground floor level (ref: 12/00955/FULL). To date, only the residential units on the upper floors have been completed. Of the 43 windows assessed for VSC, 37 would achieve BRE compliance. Five of the six windows that would not achieve compliance would experience technical transgressions of between 20 - 23.5%, marginally above the 20% change that is regarded as noticeable. The remaining window would experience a VSC reduction of 42.9. This window serves a living room,

which is served by five other VSC compliant windows and would comply with the daylight distribution test (NSL).

98. Of the 20 rooms assessed, four would not achieve BRE compliance for NSL. All four rooms would experience between 24 and 35% reductions. Two would retain daylight distribution (NSL) well over 50%, which can be considered good for a dense urban location. Overall the daylight reduction to this property is considered to be of a minor adverse impact.
99. Only 7 Ludgate Square has windows within 90 degrees of due south and all which would meet the BRE guidance for sunlight (APSH).

8 – 9 Ludgate Square

100. These buildings are located immediately to the south of the site and have recently been converted to residential accommodation on the upper floors. Of the 22 windows assessed for VSC, 11 would achieve BRE compliance. Six would experience minor reductions of 20 – 29%, four between 30 – 40% and one would experience a loss of 41.2%. All of these windows currently experience relatively low levels of VSC in the existing condition (all less than 9.9% from a target of 27%), therefore any reduction in daylight would be disproportionately high as a result. In absolute quantum terms, no windows would see a reduction of more than 3.1% VSC. Of the nine rooms assessed only one would not achieve BRE compliance for NSL, with a reduction of 33.99%.
101. The daylight reduction to this property as a result of the development is considered to be mostly minor adverse. Whilst one window and the room it serves would experience a moderate adverse impact, this room is a bedroom, which is considered less important in terms of daylight distribution (NSL).
102. No windows within the property face within 90 degrees of due south, so they have not been assessed for sunlight.

46 Carter Lane

103. This property is located to the south of the site and comprises of commercial units on the lower floors with residential units on the upper floors. One of the two windows assessed in this property would not meet the VSC standard with a reduction of 24.5% from existing. However, where a room has two windows it is appropriate to assess the average loss across both windows and in doing so the VSC standard would be met. In addition, the NSL standard is met. Therefore, the overall daylight impact on this property is considered to be negligible.
104. As the windows within this property do not face within 90 degrees of due south, they have not been assessed for sunlight.

48 Carter Lane

105. The windows and rooms to this property would meet both the VSC and NSL tests. The windows within this property do not face within 90 degrees of due south, so they have not been assessed for sunlight.

50 Carter Lane

106. The property is located to the south of the site. The upper floors are in residential use. The results for this property show that one window out of the two tested would not meet the VSC standard, and both rooms served by the two windows would not meet the NSL standard, with one experiencing a reduction in NSL of 35.65%, the other a reduction of 42.24% (however, the window to this room would meet the VSC standard). The VSC reduction to the window that does not pass is 21.4% below the existing level and is therefore only a marginal breach. The reduction in daylight to these rooms as a result of the development is considered to be minor to moderate adverse.
107. As the windows within this property do not face within 90 degrees of due south, they have not been assessed for sunlight.

Daylight and Sunlight Conclusions

108. The revised daylight and sunlight assessment demonstrates that the majority of windows and rooms assessed would not experience noticeable reductions in daylight and sunlight with high levels of compliance rates of VSC (80% overall), NSL (78%) and APSH (94%).
109. Whilst there will be some impacts on the daylight and sunlight received by neighbouring properties, the majority of these impacts would be minor in nature.
110. The scheme has been revised to enlarge the proposed courtyard area within the development to minimise the daylight and sunlight impact on the adjacent Lambert House. The majority of daylight and sunlight impacts to this building would be negligible with a small number of incidences where there would be reductions in daylight and sunlight. In some instances there would be gains in daylight and probable sunlight as a result of the proposed development.
111. Overall, the daylight and sunlight implications for neighbouring properties are considered to be acceptable given the densely developed urban nature of the site and in accordance with the requirements of Local Plan Policy DM10.7 and DM21.3.

Privacy and Overlooking

112. Objections have been raised by local residents regarding the potential for increased overlooking and a loss of privacy as a result of the proposed development. The concerns raised relate specifically to the potential for overlooking from the restaurant and hotel windows facing the courtyard shared with Lambert House, the courtyard itself and the roof terrace at Ludgate Hill. In response to these concerns all proposed windows to the courtyard have been made fixed and opaque and access to the courtyard and roof has been restricted to maintenance purposes and in the case of emergency only. These design details and restrictions would be controlled by conditions.
113. A further objection was raised that the additional sixth floor of hotel rooms facing west onto Ludgate Hill would directly overlook the terraces of Flat 22, 3 Ludgate Square. The windows of the proposed

sixth floor facing west onto Ludgate Square would be blind windows that would serve the proposed plant room, which would not result in overlooking of the residential amenity terrace.

Noise

114. Policy DM15.7 of the Local Plan requires that the layout, orientation and use of buildings should be designed such that operational noise does not adversely affect neighbours, particularly noise sensitive land uses such as residential units. Any potential noise conflict between existing activities and new development should be minimised, with mitigation measures introduced where the avoidance of noise conflicts is impractical.
115. The proposed development has been designed to mitigate the noise impact on neighbouring residential properties. The proposed courtyard shared with Lambert House would only be accessible for maintenance purposes and in emergency. The windows to the shared courtyard would be fixed and opaque. The main entrances to the development would be to Ludgate Hill and the corner of Creed Lane and Ludgate Square away from residential properties. The servicing area would be on Creed Lane in place of the existing, away from the existing residential properties.
116. The proposed restaurant use (Class A3) would replace the existing retail units at ground and lower ground floor, including a drinking establishment (Class A4) which is located at the corner of Ludgate Square and Creed Lane.
117. The amenity roof terrace included in the original proposal has been removed and replaced with an area of green roof which would only be accessible for maintenance purposes and in emergency.

Noise Impact of Plant

118. Policy DM15.7 requires that developers will need to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
119. The existing building contains an array of roof top plant rooms around the existing courtyard that is shared with Lambert House. The proposals include basement level plant and a rooftop plant enclosure to be located in a similar location to the existing rooftop plant rooms at the south-east corner of the courtyard.
120. The Environmental Noise Survey Report submitted with the application sets out the findings of an acoustic background noise level survey and identifies the measures that will be undertaken to ensure the new plant will operate at 10dB below current minimum background levels, including the selection of low-noise plant, the use of an external acoustic enclosure to the plant and atmospheric duct-mounted attenuators, where necessary, on air moving plant.
121. A condition has been included requiring the noise level from any plant be maintained at 10dB(A) or more below the minimum background

level at the nearest sensitive receptors, including nearby residential premises.

Air Quality

122. Policy DM15.6 of the Draft Local Plan provides guidance on air quality and highlights that developers are required to consider the impact of their proposals on air quality and where appropriate provide an Air Quality Assessment. The whole of the City of London is classed as an Air Quality Management Area for nitrogen dioxide (NO₂) and particulates (PM₁₀).
123. Localised pollutant emissions to air are anticipated as a result of the proposed boiler plant, particularly from the proposed on-site Combined Heat and Power (CHP) unit. However, the replacement of the existing 20 years old heating plant by modern equipment would have a positive impact on air quality and provide much greater efficiency.
124. Conditions are recommended to ensure that all combustion flues terminate at least one metre above the roof of the development to ensure the maximum dispersion of pollutants. The proposed flues to the development would terminate at seventh floor roof level so as to be sufficiently away from any neighbouring residential windows.
125. Further conditions would be imposed to control the nitrogen oxide (NO_x) emission levels from any on-site plant installed within the building. An Air Quality Neutral Assessment would be required to be submitted before the development commences to ensure that the development is at least air quality neutral, or if it is not that a scheme of mitigating the air quality impact is submitted and approved in writing by the City Corporation as Local Planning Authority.

Mitigating the impact of construction works

126. Conditions have been included requiring the submission of details of a scheme for the protection of nearby residents and commercial occupiers from noise, dust and other environmental effects during demolition and construction. The scheme would be required to adhere to the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites.
127. Further conditions have been included requiring the submission of deconstruction and construction logistics plans to manage all freight vehicle movements to and from the site during demolition of the existing buildings and the construction of the development. The logistics plans will be required to include relevant measures from the Mayor of London's Construction Logistics Plan Guidance for Developers issued in April 2013, and specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Cyclist Safety (CLOCS) Standard for Construction Logistics, Managing Work Related Road Risk.

St Paul's Depths

128. The site is within the area prescribed by the City of London (St. Paul's Cathedral Preservation) Act. The Act controls works involving deep

excavations in the vicinity of the Cathedral which may result in subsidence of the foundations and risk to the structure of the Cathedral. The existing building has one basement and the proposed scheme would have three basement levels and new foundations. As deep level works are proposed and in accordance with the Act, the Dean and Chapter have been consulted.

129. A Structural Report, Basement Impact Assessment and Ground Movement Assessment have been submitted with the application and it is proposed to carry out supplementary ground investigation, but this is not yet programmed. The Basement Impact Assessment concludes that the construction of the proposed basement shall have no adverse effects on St Paul's Cathedral. The Dean and Chapter have responded that following the supplementary ground investigation the findings of the report would need to be reviewed in the light of the new information, and confirmation of whether this would change the applicant's conclusion in relation to the effects of the development on St. Paul's Cathedral. It is only then that the Dean and Chapter would be in the final position to complete their recommendation in respect of the Act.
130. Conditions are attached to cover supplementary ground investigation, details of the basements and lower ground floor, foundations and piling configuration. This is to ensure that that no subsidence, harm or risk of danger is caused to the foundations or structure of St. Paul's Cathedral and this may require modification of the basement areas and foundation design.

Ground Movement Assessment

131. The Ground Movement Assessment submitted with the application considers the effects of the proposed basement construction on the adjacent building at Lambert House. The assessment predicts that the potential for damage to the Lambert House would generally be negligible, very slight or slight.
132. It is anticipated that monthly monitoring would take place at least weekly during groundworks and daily where excavation against critical areas is underway. The separate phases of work, including demolition, piling and the subsequent excavation of the proposed basement structures would in practice be separated by a number of weeks which would allow any necessary curing to take place.

Archaeology

133. The site is in an area of significant archaeological potential where remains from the Roman to the post medieval may be expected. It is adjacent to a major Roman road leading into the city and within the north eastern area of the Norman Montfichet's Tower. A Historic Environment assessment and a report of the first phase of archaeological evaluation have been submitted with the application.
134. The existing building has a single basement at differing levels which has affected potential archaeological survival. The potential is low in the deeper basement area and moderate elsewhere. The first phase of

archaeological evaluation has provided additional information on archaeological potential. This indicates low survival with potential for deep cut features to survive below the basement floor slab. Further evaluation is planned and the results of this work would inform the design of an appropriate mitigation strategy. The survival of any archaeological features would have the potential to understand further the character and features of Montfichet's Tower.

135. Conditions are attached to cover archaeological evaluation, a programme of archaeological work and foundation design.

Planning Obligations and Community Infrastructure Levy

136. The development would require planning obligations in a Section 106 agreement to mitigate the impact of the proposal and make it acceptable in planning terms and to contribute to the improvement of the City's environment and facilities. It would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.
137. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
138. The planning obligations and CIL contributions are set out below.

Mayoral CIL and Planning Obligations

Liability in accordance with the Mayor of London's policies	Contribution	Forwarded to the Mayor	City's charge for administration and monitoring
Mayoral Community Infrastructure Levy payable	£60,350	£57,936	£2,414

Net liability on the basis of the CIL charge remaining unchanged and subject to variation.

The Crossrail contribution has been calculated using the method provided in annex 4 for mixed use development, in the Mayor of London SPG "Use of Planning Obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy."

The total Crossrail contribution under the proposed calculation is less than the amount under the existing calculation. Therefore, there is no Crossrail payment due.

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution	Available for allocation	Retained for administration and monitoring
City CIL	£90,525	£85,999	£4,526
City Planning Obligation Affordable Housing	£24,140	£23,899	£241

City Planning Obligation Local, Training, Skills and Job Brokerage	£3,621	£3,585	£36
City Planning Obligation Monitoring Charge	£2,500	Nil	£2,500
Total liability in accordance with the City of London's policies	£120,786	£113,483	£7,303

City's Planning Obligations

139. The obligations set out below are required in accordance with the City of London's Planning Obligations Supplementary Planning Document (SPD). They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

- Highway Reparation and other Highways obligations
- Delivery and Servicing Management Plan
- Hotel Management Plan
- Travel Plan
- Local Training, Skills and Job Brokerage Strategy (Construction & End Use)
- Public Realm
- Local Procurement
- Carbon Offsetting
- Utility Connections
- Coach Parking and Drop-Offs

140. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations as necessary.

Monitoring and Administrative Costs

141. A 10 year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.

142. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

Site Specific Mitigation

143. The City will use CIL to mitigate the impact of development and provide necessary infrastructure but in some circumstances it may be necessary additionally to seek site specific mitigation to ensure that a development is acceptable in planning terms. Other matters requiring mitigation are still yet to be fully scoped.

Conclusion

144. The proposed redevelopment of the site would result in the loss of 3,381sq.m (GIA) of office floorspace. The applicants have successfully demonstrated through an office viability appraisal that the site is not viable for office use. The appraisal has been independently verified by consultants on behalf of the City Corporation.
145. The Creed Court site is appropriate in principle for hotel development located close to St. Paul's Cathedral and a variety of public transport links. The proposed servicing arrangements for the development are considered to be acceptable and there is considered to be sufficient capacity in the surrounding streets for the vehicles and pedestrians associated with the development. Retail floorspace would be re-provided in the development to complement the retail offer on Ludgate Hill and to ensure that the Retail Link between Fleet Street and Cheapside is maintained.
146. The height, bulk, massing and design of the proposed building would preserve the character and appearance of the St. Paul's Cathedral Conservation Area, through the retention of the facade to Ludgate Hill, suitably varied architectural treatments along the perimeter of the site and carefully designed setbacks at the upper levels of the building.
147. The building has been designed to sufficiently minimise the potential impact on the amenities of nearby residential occupiers in relation to privacy, overlooking, noise, daylight and sunlight. In particular, revisions have been made to the internal courtyard to ensure there is no overlooking of adjoining residential buildings and the building has been designed to concentrate activity away from nearby residential properties. The applicant has agreed to conditions limiting access to the courtyard and roof space within the development for maintenance and emergency only.
148. The applicant's daylight and sunlight assessment, which has been independently reviewed by Delva Patman Redler, demonstrates that the majority of windows and rooms in neighbouring properties would not experience noticeable reductions in daylight and sunlight. Whilst there would be some impacts on daylight and sunlight as a result of the development the majority would be minor in nature and are considered to be acceptable given the densely developed urban nature of the site.
149. The proposed development is considered to comply with the Development Plan as a whole and to be appropriate subject to conditions, CIL payments and a Section 106 agreement being entered into to cover matters set out in this report.

Background Papers

Internal

Memo 01 September 2016 Department of Markets and Consumer Protection

External

Minutes 10 July 2014 City of London Conservation Area Advisory Committee

Letter 16 December 2014 BRE

E-mail 11 August 2016 Environment Agency

E-mail 22 August 2016 Thames Water

E-mail 08 September 2016 Transport for London

Letter 16 September 2016 Delva Patman Redler

Summary Assessment for Financial Viability February 2017 Gerald Eve

Letter 18 April 2017 Oliver Caroe, Surveyor to the Fabric

Residents' Objections

Letter undated Andrew Sanilitro

Letter undated Mr. M. Rimmer

Letter 30 June 2014 Mr. Peter T. G. Phillips

Letter 02 July 2014 Sir Brian Langstaff

Letter 03 July 2014 Mr. K. Rimmer

Letter 03 July 2014 Matthew Rimmer

E-mail 03 July 2014 Michael Tang

Online 04 July 2014 Sir Brian Langstaff

Letter 05 July 2014 Deborah Langstaff

Letter 05 July 2014 Nicola Bell

Letter 06 July 2014 Mrs. J. L. Rimmer

E-mail 07 July 2014 Niklaus and Cilgia Föh

Letter 07 July 2014 Mr. J. Colombano and Ms. M. L. Kirk

Letter 07 July 2014 Dr. Y. Oliver

Online 08 July 2014 Alderman Vincent Keaveny

E-mail 08 July 2014 Dr. Y. Oliver

Online 08 July 2014 Dr. Y. Oliver

Letter 08 July 2014 Gilbert Holbourn

E-mail 09 July 2014 Clare James

E-mail 10 July 2014 Ann Holmes

Online 11 July 2014 Ms Nicola Bell
Online 14 July 2014 Mr. Roshan De Alwis
E-mail 14 July 2014 Robert Meyrick
Online 30 July 2014 Miss Louise McCollough
Online 30 July 2014 Miss Emma Daykin
Online 31 July 2014 Mr. Andrew Powell
Online 31 July 2014 Mr. Rich Murton
Letter 07 March 2015 Mr. K. Rimmer
Letter 08 March 2015 J Stacey
Letter 10 March 2015 Mrs. J. L. Rimmer
Letter 12 March 2015 Syntegra Consulting
Letter 13 March 2015 Nicola Bell
E-mail 15 March 2015 Michael Tang
E-mail 16 March 2015 Nara Corominas
E-mail 17 March 2015 Julian Dacie and Pauline A Smith
Letter 17 March 2015 Bill Ellson
Online 17 March 2015 Ms. Anne Dunmore
Letter 17 March 2015 Dr. Y. Oliver
Letter 17 March 2015 Sir Brian and Lady Langstaff
Online 18 March 2015 Mr. Joe Colombano
Letter 18 March 2015 Mr. J. Colombano and Ms. M. L. Kirk
E-mail 18 March 2015 Robert Meyrick
Online 18 March 2015 Miss Louise McCullough
Letter 18 March 2015 Nick and Max Bailey
E-mail 20 March 2015 Ann Holmes
Letter 17 August 2016 Mr. K. Rimmer
E-mail 17 August 2016 Robert Meyrick
Letter 24 August 2016 Nicola Bell
Letter 26 August 2016 Mrs. J. L. Rimmer
E-mail 29 August 2016 Michael Tang
Online 30 August 2016 Mr. Nicholas Bailey
Letter 30 August 2016 Sir Brian and Lady Langstaff
E-mail 31 August 2016 Ms. Y. Tan
Letter 31 August 2016 Matthew Rimmer
Online 31 August 2016 Mr. Joe Colombano

E-mail 13 September 2016 Ann Holmes
Letter 31 October 2016 Syntegra Consulting

Application Documents

Existing Drawings

Report on First Phase of Evaluation October 2013 MOLA

Letter 09 November 2016 GIA

Hotel Management Plan undated Hotel Indigo

Historic Building Report March 2014 Donald Insall Architects

Environmental Noise Survey Report 28 March 2014 Hilson Moran

Delivery and Servicing Plan 28 March 2014 JMP Consultants Limited

Transport Statement 28 March 2014 JMP Consultants Limited

Historic Environment Assessment 19 March 2014 MOLA

Planning Statement March 2014 DP9

Townscape and Visual Impact Assessment March 2014 Tavernor
Consultancy / Hayes Davidson

Urban Design Spatial Assessment Space Syntax

Air Quality and Flood Risk/Drainage Statements 14 April 2014 Hilson Moran

Structural Report March 2014 undated Michael Alexander Consulting
Engineers

Planning Access Statement 28 July 2014 Proudlock Associates

Daylight and Sunlight Report 17 June 2016 GIA

Acessibility Management Plan undated Proudlock Associates

Design Statement undated Stephan Reinke Architects

Summary Assessment for Financial Viability 08 February 2017 Dominvs
Group

Ground Movement Assessment Report February 2017 Michael Alexander
Consulting Engineers

Basement Impact Assessment March 2017 Michael Alexander Consulting
Engineers

Appendix A

London Plan Policies

Policy 4.5 Support London's visitor economy and stimulate its growth, taking into account the needs of business as well as leisure visitors and seeking to improve the range and quality of provision.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

provide parking for disabled people in line with Table 6.2

meet the minimum cycle parking standards set out in Table 6.3

provide for the needs of businesses for delivery and servicing.

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

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

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

Policy 7.6 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.

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

elements of World Heritage Sites as seen from designated Viewing Places.

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

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

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

Relevant Local Plan Policies

CS1 Provide additional offices

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

DM1.1 Protection of office accommodation

To refuse the loss of existing (B1) office accommodation to other uses where the building or its site is considered to be suitable for long-term viable office use and there are strong economic reasons why the loss would be inappropriate. Losses would be inappropriate for any of the following reasons:

- a) prejudicing the primary business function of the City;
- b) jeopardising the future assembly and delivery of large office development sites;
- c) removing existing stock for which there is demand in the office market or long term viable need;
- d) introducing uses that adversely affect the existing beneficial mix of commercial uses.

DM1.3 Small and medium business units

To promote small and medium sized businesses in the City by encouraging:

- a) new accommodation suitable for small and medium sized businesses or occupiers;
- b) office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units;
- c) continued use of existing small and medium sized units which meet occupier needs.

CS2 Facilitate utilities infrastructure

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

DM2.1 Infrastructure provision

- 1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction

and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.

- 2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:
 - a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
 - b) reasonable gas and water supply considering the need to conserve natural resources;
 - c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;
 - d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
 - e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.
- 3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.
- 4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

CS4 Seek planning contributions

To manage the impact of development, seeking appropriate developer contributions.

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.

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.

DM10.2 Design of green roofs and walls

- 1) To encourage the installation of green roofs on all appropriate developments. On each building the maximum practicable coverage of green roof should be achieved. Extensive green roofs are preferred and their design should aim to maximise the roof's

environmental benefits, including biodiversity, run-off attenuation and building insulation.

- 2) To encourage the installation of green walls in appropriate locations, and to ensure that they are satisfactorily maintained.

DM10.3 Roof gardens and terraces

- 1) To encourage high quality roof gardens and terraces where they do not:
 - a) immediately overlook residential premises;
 - b) adversely affect rooflines or roof profiles;
 - c) result in the loss of historic or locally distinctive roof forms, features or coverings;
 - d) impact on identified views.
- 2) Public access will be sought where feasible in new development.

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.

DM10.7 Daylight and sunlight

- 1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.
- 2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

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.

CS11 Encourage art, heritage and culture

To maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Destination Strategy.

DM11.3 Hotels

Proposals for new hotel and apart-hotel accommodation will only be permitted where they:

- a) do not prejudice the primary business function of the City;
- b) are not contrary to policy DM1.1;
- c) contribute to the balance and mix of uses in the immediate locality;
- d) do not result in adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts;
- e) provide satisfactory arrangements for pick-up/drop-off, service delivery vehicles and coaches, appropriate to the size and nature of the hotel or apart-hotel;
- f) are inclusive, providing at least 10% of hotel rooms to wheelchair-accessible standards;
- g) ensure continuing beneficial use for historic buildings, where appropriate.

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.

DM12.2 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.

DM12.4 Archaeology

1. To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.
2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.
3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

CS13 Protect/enhance significant views

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

CS15 Creation of sustainable development

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

DM15.1 Sustainability requirements

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.
2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:
 - a) BREEAM or Code for Sustainable Homes pre-assessment;
 - b) an energy statement in line with London Plan requirements;
 - c) demonstration of climate change resilience measures.
3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.

4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.
5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.
2. For all major development energy assessments must be submitted with the application demonstrating:
 - a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
 - b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
 - c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;
 - d) anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.
2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered
3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.

4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

DM15.4 Offsetting carbon emissions

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated on-site will need to be offset using "allowable solutions".
2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.
3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

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.

DM15.8 Contaminated land

Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.

CS16 Improving transport and travel

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

DM16.1 Transport impacts of development

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications

during both construction and operation, in particular addressing impacts on:

- a) road dangers;
 - b) pedestrian environment and movement;
 - c) cycling infrastructure provision;
 - d) public transport;
 - e) the street network.
2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

DM16.2 Pedestrian movement

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.
2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:
 - a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
 - b) the shortest practicable routes between relevant points.
3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.
4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.
5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.
6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

DM16.3 Cycle parking

1. On-site cycle parking must be provided in accordance with the local standards set out in Table 16.2 or, for other land uses, with the

standards of the London Plan. Applicants will be encouraged to exceed the standards set out in Table 16.2.

2. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.

DM16.4 Encouraging active travel

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.
2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

DM16.5 Parking and servicing standards

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.
2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.
3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.
4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.
5. Coach parking facilities for hotels (use class C1) will not be permitted.

6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.
7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

CS17 Minimising and managing waste

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

DM17.1 Provision for waste

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.
2. On-site waste management, through techniques such as recycle sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

DM18.2 Sustainable drainage systems

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.
2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.
3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

DM19.2 Biodiversity and urban greening

Developments should promote biodiversity and contribute to urban greening by incorporating:

- a) green roofs and walls, soft landscaping and trees;
- b) features for wildlife, such as nesting boxes and beehives;
- c) a planting mix which encourages biodiversity;

- d) planting which will be resilient to a range of climate conditions;
- e) maintenance of habitats within Sites of Importance for Nature Conservation.

CS20 Improve retail facilities

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

DM20.2 Retail links

To encourage the provision and resist the loss of retail frontage and floorspace within the Retail Links. A mix of shops and other retail uses will be encouraged in the Links, ensuring that the location and balance of uses does not adversely affect the function of the Link, any nearby PSC or their surrounding areas.

DM20.3 Retail uses elsewhere

To resist the loss of isolated and small groups of retail units outside the PSCs and Retail Links that form an active retail frontage, particularly A1 units near residential areas, unless it is demonstrated that they are no longer needed.

CS21 Protect and provide housing

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

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: 14/00300/FULMAJ

Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London

Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (132 bedrooms) (3,035sq.m. GIA), restaurant use (Class A3) at part basement and part ground floor (1,090sq.m. GIA) and associated plant areas (2,245sq.m.) (Total Floorspace 7,660sq.m. GIA).

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 A scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during demolition shall be submitted to and approved in writing by the Local Planning Authority prior to any demolition taking place on the site. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme.
REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.
- 3 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall include relevant measures from Section 3 of the Mayor of London's Construction Logistics Plan Guidance for Developers issued in April 2013, and specifically address

the safety of vulnerable road users through compliance with the Construction Logistics and Cyclist Safety (CLOCS) Standard for Construction Logistics, Managing Work Related Road Risk. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that demolition works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition work commencing in order that the impact on the transport network is minimised from the time that demolition starts.

- 4 The stability of the structure to remain must, throughout the period of demolition and reconstruction, be assured before any works of demolition begin, taking into account any rapid release of stress, weather protection, controlled shoring, strutting, stitching, reinforcement, ties or grouting as may occur or be necessary.
REASON: To ensure the stability of the structure to be retained in accordance with the following policy of the Local Plan: DM12.2.
- 5 The building(s) shall not be demolished (unless otherwise permitted by the Local Planning Authority in the circumstances identified in this condition) before a contract or series of contracts for the carrying out of substantial works of redevelopment have been made and planning permission has been granted for the redevelopment for which the contracts provide. Such contracts shall include the construction of all foundations, above ground framework and floor structures. Works of demolition may be permitted prior to the completion of the contract(s) if the Local Planning Authority is satisfied that the site is required for archaeological investigation and the developer has submitted evidence to show that development will proceed upon completion of the investigation.
REASON: In the interest of visual amenity and to ensure that the site is not left vacant indefinitely in accordance with the following policy of the Local Plan: DM12.2.
- 6 Before any works hereby permitted are begun an Air Quality Assessment demonstrating that the development is at least air quality neutral shall be submitted to and approved in writing by the Local Planning Authority. If the development is not at least air quality neutral, a scheme of mitigating the air quality impact shall be submitted to and approved in writing by the Local Planning Authority prior to the development taking place.
REASON: In order to positively address air quality in accordance with the following policy of the Local Plan: DM15.6.
- 7 Unless otherwise agreed in writing with the Local Planning Authority, archaeological evaluation shall be carried out in accordance with the

Written Scheme of Investigation for an Archaeological Evaluation dated 12 July 2013.

REASON: To ensure that an opportunity is provided for the archaeology of the site to be considered and recorded in accordance with the following policy of the Local Plan: DM12.4.

- 8 No works except demolition to basement slab level shall take place until the developer has secured the implementation of a programme of archaeological work to be carried out in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.
REASON: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are understood to exist in accordance with the following policy of the Local Plan: DM12.4.
- 9 No works except demolition to basement slab level shall take place before details of the foundations and piling configuration, to include a detailed design and method statement, have been submitted to and approved in writing by the Local Planning Authority, such details to show the preservation of surviving archaeological remains which are to remain in situ.
REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
- 10 Ground Investigation shall be carried out in accordance with a timetable and scheme of such investigation work submitted to and approved in writing by the Local Planning Authority before any commencement of Ground Investigation work and a report of the work submitted to the Local Planning Authority within 4 weeks of completion of the investigation work.
REASON: To ensure that the impact of the development foundations and basements and lower ground floor is considered in relation to the preservation of the foundations and structures of St. Paul's Cathedral in accordance with the following policies of the Local Plan: CS 12 and DM12.4.
- 11 Before any works hereby permitted are begun, following supplementary ground investigation works, details of the basements and lower ground floor, foundations and piling configuration, to include a detailed design and method statement, shall be submitted to and approved in writing by the Local Planning Authority, such details to show that no subsidence, harm or risk of danger is caused to the foundations or structure of St. Paul's Cathedral.

REASON: To ensure the preservation of the foundations and structure of St. Paul's Cathedral in accordance with the City of London (St Paul's Cathedral Preservation) Act 1935 and the following policies of the Local Plan: CS12 and DM 12.1.

- 12 A scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction shall be submitted to and approved in writing by the Local Planning Authority prior to any construction work taking place on the site. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction 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: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to construction in order that the impact on amenities is minimised from the time that the construction starts.

- 13 Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall include relevant measures from Section 3 of the Mayor of London's Construction Logistics Plan Guidance for Developers issued in April 2013, and specifically address [driver training for] the safety of vulnerable road users through compliance with the Construction Logistics and Cyclist Safety (CLOCS) Standard for Construction Logistics, Managing Work Related Road Risk. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to construction work commencing in order that the impact on the transport network is minimised from the time that construction starts.

- 14 Before any construction works are begun a site survey and survey of highway and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority indicating the proposed finished floor levels at basement and ground floor levels in relation to the existing Ordnance

Datum levels of the adjoining streets and open spaces. The development shall be carried out in accordance with the approved survey unless otherwise agreed in writing by the local planning authority.

REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 15 No piling or construction of basements using penetrative methods shall take place until it has been demonstrated that there would be no unacceptable risk to below ground utilities infrastructure, details of which shall be approved in writing by the Local Planning Authority in liaison with Thames Water before such works commence and the development shall be carried out in accordance with the approved details.

REASON: To ensure that below ground utilities infrastructure is protected in accordance with the following policy of the Local Plan: DM2.1.

- 16 The refuse collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers.

REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.

- 17 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

- (a) particulars and samples of the materials to be used on all external faces of the building including the ground and upper level surfaces and courtyard elevations;
- (b) details of the proposed new facade(s) including typical details of the fenestration and entrances;
- (c) details of the different facade treatments and courtyard elevations;
- (d) typical details of stonework;
- (e) details of ground floor elevations including shopfronts;
- (f) details of the ground floor entrances;
- (g) details of windows and external joinery;
- (h) details of dormer windows;
- (i) details of soffits, hand rails and balustrades;
- (j) details of all alterations to the existing retain facade;
- (k) details of junctions with adjoining premises;

- (l) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level;
- (m) details of plant and ductwork to serve the A3 / C1 use(s);
- (n) details of the rooftop plant enclosure;
- (o) details of all ground level surfaces including materials to be used;
- (p) details of external surfaces within the site boundary including hard and soft landscaping;
- (q) details of service entrance doors to Creed Lane;
- (r) details of rainwater drainage and measures for the prevention of rainwater run-off onto the public highway;
- (s) details of the removal, storage, restoration and relocation of the cartouche to Creed Lane;
- (t) details of the internal access ramps at ground floor level including ramp lengths, gradients and level changes.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM10.8, DM12.2.

- 18 Unless otherwise approved in writing by the Local Planning Authority, before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details.

REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DM10.1.

- 19 The development shall be designed to allow for the retro-fit of heat exchanger rooms to connect into a district heating network if this becomes available during the lifetime of the development.

REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.

- 20 A post construction BREEAM assessment demonstrating that a target rating of 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted as soon as practicable after practical completion.

REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.

- 21 Details of the position and size of the green roof(s), the type of planting and the contribution of the green roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
- 22 Before any construction works hereby permitted are begun details of rainwater harvesting and grey water recycling systems shall be submitted to and approved in writing by the local planning authority.
REASON: To improve sustainability and reduce flood risk by reducing potable water demands and water run-off rates in accordance with the following policy of the Local Plan: CS18. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 23 Details of the position, size and arrangement of the photovoltaic panel installation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.
REASON: To assist the environmental sustainability of the development in accordance with the following policies of the Local Plan: CS10, CS15, DM10.1, DM15.3.
- 24 Unless otherwise approved by the LPA there must be no building, roof structures or plant above the top storey, including any building, structures or plant permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.
REASON: To ensure protection of the view of St Paul's Cathedral and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS14, DM10.1 DM12.1.
- 25 No part of the roof areas or courtyard shown on the drawings hereby approved shall be used or accessed by occupiers of the building, other than in the case of emergency or for maintenance purposes.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 26 No live or recorded music that can be heard outside the premises shall be played.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 27 No servicing of the premises shall be carried out between the hours of:
(i) 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays; or
(ii) 07:00hrs and 09:00hrs, 12:00hrs and 14:00hrs, 16:00hrs and 19:00hrs, Mondays to Fridays.
Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.
REASON: To manage traffic, avoid congestion and manage the safe and convenient movement of pedestrians and cyclists in the area and to reduce air and noise pollution, in accordance with the following policies of the Local Plan: DM15.7, DM15.7, DM16.1, and DM16.2.
- 28 Unless otherwise approved by the Local Planning Authority the doors and windows to any restaurant on the Ludgate Square frontages shall be kept closed. The doors may be used only in an emergency or for maintenance purposes.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 29 Self-closing mechanisms must be fitted on the doors at Ludgate Square and Creed Lane before the Class A3 and C1 use(s) commences and shall be retained for the life of the premises. The doors must not be left open except in an emergency or for maintenance purposes.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 30 The two sets of 'means of escape doors' to Ludgate Square shown the drawings hereby approved must not be opened or left open except in an emergency or for maintenance purposes.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 31 A further set of doors must be fitted between the hotel entrance doors at the corner of Ludgate Square and Creed Lane and this extra set of doors shall be retained for the life of the premises. These doors must not be left open except in an emergency or for maintenance purposes.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 32 No doors, gates or windows at ground floor level shall open over the public highway.
REASON: In the interests of public safety
- 33 (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.
(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.
(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.
REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 34 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.
- 35 Before the development hereby permitted is begun a detailed site investigation shall be carried out to establish if the site is contaminated and to determine the potential for pollution of the water environment. The method and extent of this site investigation shall be agreed in writing with the Local Planning Authority prior to commencement of the work. Details of measures to prevent pollution of ground and surface water, including provisions for monitoring, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The development shall proceed in strict accordance with the measures approved.
REASON: To prevent pollution of the water environment in accordance with the following policy of the Local Plan: DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 36 No cooking shall take place within any Class A3 or C1 use(s) hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by

the Local Planning Authority. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.

REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.

- 37 Any generator on the site shall be used solely on intermittent and exceptional occasions when required in response to a life threatening emergency or an exceptional event requiring business continuity and for the testing necessary to meet that purpose and shall not be used at any other time. At all times the generator shall be operated to minimise noise impacts and emissions of air pollutants and a log of its use shall be maintained and be available for inspection by the Local Planning Authority.

REASON: To minimise adverse air quality in accordance with policies DM15.6 and DM 21.3 of the Local Plan and policies 7.14 B a and c of the London Plan.

- 38 Unless otherwise agreed in writing by the local planning authority all combustion flues must terminate at least 1m above the highest roof in the development in order to ensure maximum dispersion of pollutants. REASON: In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and in accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2015 and the Local Plan DM15.6.

- 39 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.

- 40 A. No CHP plant in the thermal input range 50kWth to 20MWth with NOx emissions exceeding that specified in Band B of Appendix 7 to the GLA Sustainable Design and Construction Supplementary Planning Guidance published April 2014 (or any updates thereof) shall at any time be installed in the building.

B. Prior to any CHP plant coming into operation the following details must be submitted to and approved in writing by the Local Planning Authority:

1. The results of an emissions test demonstrating compliance with Part A of this condition and stack discharge velocity carried out by an accredited laboratory/competent person; and

2. An equipment maintenance schedule demonstrating that the emission standard would always be met.

C. The CHP plant shall at all times be maintained in accordance with the approved schedule.

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

- 41 Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 20 pedal cycles. The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.
REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3.
- 42 Changing facilities and showers shall be provided adjacent to the bicycle parking areas and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.
REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.4.
- 43 Provision shall be made for disabled people to obtain access to the building via the principal entrance without the need to negotiate steps and shall be maintained for the life of the building.
REASON: To ensure that disabled people are able to use the building in accordance with the following policy of the Local Plan: DM10.8.
- 44 At least 10% of the hotel rooms hereby permitted shall be constructed to be accessible for people with disabilities, details of which shall be submitted to and approved in writing by the local planning authority and all development pursuant to this permission shall be carried out in accordance with the approved details and maintained for the life of the development.
REASON: To ensure that the development will be accessible for people with disabilities in accordance with the following policies of the London Plan and City of London Local Plan: Policy 4.5, DM10.8.
- 45 Prior to the occupation of the hotel an Accessibility Management Plan shall be submitted to and approved by the Local Planning Authority including details of accessible car parking provision for disabled visitors to the building. Such provision shall thereafter be operated in accordance with the approved Accessibility Management Plan (or any amended Accessibility Management Plan that may be approved by the Local Planning Authority) for the life of the building.

REASON: To ensure that adequate car parking provision is made for disabled users of the hotel in accordance with the following policy of the Local Plan: DM10.8.

- 46 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, Site Plan, Drawing nos. A1100, A1101, A1102, A1103, A1104, A1105, A1106, A2100 Revision V21, A2101 Revision V24, A2102 Revision V23, A2103 Revision V22, A2104 Revision V21, A2105 Revision V21, A2106 Revision V21, A2107 Revision V21, A2108 Revision V21, A2109 Revision V22, A2110 Revision V21, A2111 Revision V22, A2112 Revision V21, A3000 Revision V22, A3001 Revision V22, A3002 Revision V21, A3003 Revision V21, A3004 Revision V21, A3005 Revision V21, A3100 Revision V21, A3101 Revision V21, A3102 Revision V21, Written Scheme of Investigation for an Archaeological Evaluation, MOLA, 12 July 2013.
- 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 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 Section106 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.

- 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.

- 3 Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.
- 4 Developers are encouraged to install non-combustion renewable technology to work towards energy security and carbon reduction targets in preference to combustion based technology.

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

Advice on a range of measures to achieve the best environmental option on the control of pollution from standby generators can be obtained from the Department of Markets and Consumer Protection.

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

- 5 Excavation within the vicinity of St. Paul's Cathedral requires separate approval from the Cathedral under the City of London (St. Paul's Cathedral Preservation) Act 1935. The area where St Paul's Depths approval is required is shown on the City's web site. Developers are advised to contact the Dean and Chapter of St Paul's Cathedral for an informal discussion: The Registrar, Chapter House, St Paul's Churchyard, London, EC4M 8AD (020 7246 8350) registrar@stpaulscathedral.org.uk. Application can be made directly to the Dean and Chapter of St Paul's Cathedral or via the Development Division, Department of the Built Environment, City of London, EC2P 2EJ.

Andrew Sanalidro
6 Priory House
3 Friar Street
London
EC4V5DT



Dear Sir,

Re: Planning Application 14/00300/FULMAJ- Creed Court 3 -5 Ludgate Hill, 1-3 Creed Lane & 11-12 Ludgate Square London EC4A 7HA

On behalf of myself and other residents I must strongly object to the above planning application. I also wish to register my dismay that until yesterday I was totally unaware of and not been notified or consulted about this application and that none of the residents in my apartment block were aware of it. In no particular order of strength I would make the following comments:-

Servicing

Servicing of the hotel seems to depend upon a 'lay-by' sort of arrangement in Creed Lane, which will lead to increased traffic and the inevitable traffic danger of obstruction, congestion, nuisance, disturbance etc which will have harmful effects on the amenity of local residents.

Due to the above Grange St Pauls Hotel Apartments in Creed Lane cannot service their site from Creed Lane and trolley items delivered elsewhere to their lift in the basement at Carter Lane. This will not be possible for the 3 Hotel entrances and retail entrance proposed. Furthermore Creed Lane is a one way street (except for cycles) and servicing, deliveries arrivals and departures for a Hotel this size or indeed any size will inevitably produce traffic jams, disturbances and nuisance for local residents and create even more of a rat run in streets including Deans Court where the Bishop of London and his family are in residence.

Protection of office space

A material consideration and aim of the draft Local plan is to protect small, affordable office suites in the City, for use by small or 'start up' firms servicing larger businesses. We understand such space has been disappearing over the past few years as sites get redeveloped or listed buildings get changed into residential use and neither we local residents nor the Corporation want the City to provide space only for the large mega-firms or business concerns. Accordingly we also want to provide and more importantly to retain a quantity of small, individual type office space such as this site currently delivers. Accordingly loss of this site to alternative use is not warranted and would be a most regrettable and regressive step.

Retail

The scheme replaces some good retail space currently on this site with hotel ancillary retail (ie bars and restaurant) which really isn't retail at all, and which certainly cannot be classified as retail use class A1 or A2, which some of the present accommodation on the site could be. There is therefore a

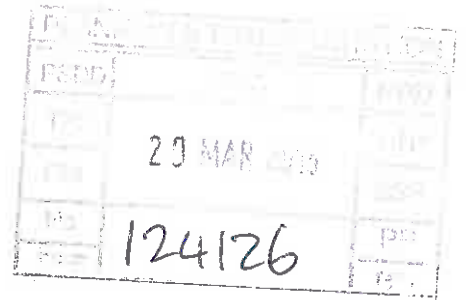
loss of genuine retail use and possible lack of proper 'active' frontage if the hotel ground floor operates from behind curtains or blinds. We residents already suffer from a myriad of restaurants and bars in Carter Lane and any with an entrance in Creed Lane will cause even further disturbance, nuisance and loss of amenity.

For the above planning reasons we wish to register our strong objections to this scheme and request that consent be revised. In addition we request that you re-consult local residents on this application as it is clear that any communications that have allegedly been sent have not reached us and particularly the local residents in closest proximity to the above site.

Yours faithfully,

Andrew Sanalidro

Planning Department
Attention: Liam Hart
City of London
P.O.Box 270
Guildhall
London
EC2P 2EJ



Dear Mr Hart

Your Ref: 14/00300/FULMAJ

I refer to the above referenced planning application and list my objections as follows:

1. **Specific to Lambert House, 2 Ludgate Square BRE guidelines for the daylight and sunlight report have NOT been met by a huge margin. These findings have been hidden in the submission:**

VSC – Vertical Sky Component

65% of rooms do not meet BRE guidelines some by 40%+

NSL – No Sky Line

40% of windows do not meet BRE guidelines, including 27% which transgress by 40%+

APSH – Annual Proable Sunlight Hours

67% of rooms do not meet BRE guidelines

65% of windows do not meet BRE guidelines

Eliminate the massing on the site and many of these issues disappear.

2. **Per Residential Environment “the amenity of existing residents...needs protecting”. This is not being achieved in the non compliance for Lambert House by large percentage points in relation to the BRE guidelines.**
3. **ADF has been utilised by GIA, as per the BRE guidelines this form of measurement should be specifically excluded.**
4. **GIA have chosen to ask Dr Littlefair selective questions about BRE rather than to get him to do a full assessment of the proposal. Selective and leading questions provide no independence in the application and should be excluded.**



5. The increased massing on the site is unnecessary particularly to the south of the proposed development with the increased height and proposed plant room. Per policy "demonstrate mitigation measures to address detrimental impact" has not been achieved. Greatly increasing massing on the site makes no sense and greatly impacts Lambert House, 2 Ludgate Square
6. Reference is made in the planning application to bedrooms overlooking the development and being of "less importance". To be clear I utilise one of my rooms on a mixed use basis. I own my own company and hence utilise this space as my office.
7. I find it difficult to understand the logic of another hotel in the City of London. In this direct vicinity we already have a large number of hotels – Grange St Paul's, Grange St Paul's Suites, Club Quarters, the Youth Hostel, The Crowne Plaza, Premier Inn, as well as many short stay apartments including the Kings Wardrobe. Per the new plan adopted by the City of London on 15th January 2015 my understanding is that additional hotels are undesirable.
8. It has not been proven by the developers that the current office space is not viable. It is imperative that different types of office space remain in the City of London.
9. The proposal of a roof terrace 6.2m away from windows at Lambert House is unacceptable. The noise pollution (no noise assessment has been provided) will severely impact the amenity of existing residents.
10. It is stated that the windows of 2 Ludgate Square "can only theoretically benefit from morning sunlight" and "it is unlikely that any APSH (Annual Proable Sunlight Hours) would penetrate deep into the rooms". This is an incorrect statement for my apartment as sunlight penetrates both rooms (and further into my apartment). This was one of the main reasons I purchased my apartment and DM 10.1 New development "The amount of daylight and sunlight received has an important effect on the general amenity of dwellings". My amenity as an existing resident needs to be protected as this would be lost with the proposed increased massing on the site.

Your sincerely,

(Mr.) M. Rimmer

Flat 13, Lambert House,

2 Ludgate Square, London. EC4M 7AS

14 / 00300

Flat 2
3 St Andrews Hill
London EC4V 5BY

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

30th June, 2014

ACKNOWLEDGED

For the attention of Mr Liam Hart

Dear Sirs,

**Town and Country Planning Act
Creed Court, 3-5 Ludgate Hill**

04 JUL 2014	
No	121960
FILE	

I have been a resident of St Andrews Hill and a customer of premises in Ludgate Square (the tailors and the café) since 1998.

During my time as a resident in the St Pauls/Blackfriars locality, I have witnessed a steady increase in the number of premises offering accomodation (e.g. the Grange Hotel and its annex), or food and drink (too numerous to list). This trend is in danger of ruining the attractions of the locality as a mixed area of shops, offices and residential (in addition to a reasonable number of bars and restaurants). The buildings to be demolished are very much part of the basic and traditional mixed use of the area and the proposed hotel will further exacerbate the excessive number of bars and restaurants.

I would therefore like to register my objection to the proposed development.

Yours faithfully,

P.T.G.Phillips

From Sir Brian Langstaff

Flat 5, Lambert House
2, Ludgate Square,
LONDON EC4M 7AS
2nd July 2014

Department of the Built Environment,
City of London,
PO Box 270,
Guildhall,
LONDON EC2P 3EJ

Fao Ted Rayment

BY POST and EMAIL ATTACHMENT

Dear Mr Rayment,

Application 14/00300 (Creed Court and Ludgate Hill): Objection

Summary

We have a residential flat at Flat 5, on the second floor of Lambert House, 2 Ludgate Square, EC4M 7AS. Two of our habitable rooms overlook what is currently an atrium/open void, surrounded by offices which are quiet and usually unoccupied at night, and have sunlight by day.

Our (1) **light**, (2) **privacy**, (3) **noise levels** and (4) **general amenity** will be seriously threatened by the proposed (over)development.

There is no good reason to depart from Planning principles, from BRE guidance, and (especially as the City of London) being a standard bearer for setting standards of good urban planning, especially since the need for further hotel development of this mass is dubious and not established by empirical evidence; nor is it good practice to grant permission for development which so affects existing legal rights to light that legal action is then required to enforce them (which if taken would, simply, prevent the development in its proposed form)

Detail

(1) LIGHT

The daylight/sunlight report is flawed. It simply considers neither the staircase windows, nor (more significantly perhaps) 4 windows to habitable rooms which in addition to the 10 it does consider would be seriously affected. These are south facing windows, at the rear of nos. 4, 8, 12 and 15. The original plans of the development show that at least one of these is a kitchen: even if the others are bedrooms (and I do not know) they are habitable rooms, which is the criterion which matters.

What it does show, despite this, is that so far as our flat is concerned (Windows W1/702 and W2/702) –

- (a) We shall lose 100% of the sunlight we currently enjoy (the ASPH has a 100% reduction)
- (b) Suffer a vertical sky component reduction of 29.72% and 24.57% respectively (*beyond the maximum permitted to be compliant with BRE, which is 20%*).
- (c) Suffer a loss of average daylight factor - 0.99% and 1.15%. The neighbour below us falls even further below BRE, which provides for a **minimum** of 1% for bedrooms. (*NB this cannot be dismissed by vague references to "It is sometimes questioned whether the use of ADF is valid..." as the report argues – who questions it? On what basis? The report itself accepts that neither the British Standard nor CIBSE question it, but, instead, adopt it*)
- (d) NSC : 27.7% and 41.6% reductions (below BRE maximum 20%)

The report recognises that the windows at 2nd floor level already have low VSC values, and notes that "any reduction results in a disproportionate percentage change". This is not a reason to be dismissive of the change: what it means is that the change is particularly significant in percentage terms. The fact that premises may have low light is no argument for diminishing it to a significant further proportionate extent. We note, in passing, that the windows above ours all experience reductions in VSC between 25.2 and 29.37% - well beyond BRE compliance limits.

The proposed mitigation for this does not hold water: the report reads -

"...For example, in an historic city centre a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings"

Note the qualification – that the new matches the existing. Here, the proposed massing is in excess of the height and proportions of the existing buildings, and does not simply match it. The massing is two storeys higher to the south of Lambert House.

The report argues: *"Clearly if a room which is being designed for a new development is deemed to have sufficient light against the British Standards, then it should equally follow for a room assessed in a neighbouring existing building."*

Why does this follow? The answer is it does not: the daylight analysis should be measuring the impact of the new massing on existing daylight provision, not commenting on, or providing a view on, the existing design of the neighbouring buildings. If someone had built a home that optimised natural daylighting for reasons of well-being, environmental sustainability and to reduce energy use and utilities costs, then surely it is not acceptable to overshadow them to the minimum standards, thus rendering those principles null and void.

The report argues that (somehow) bedrooms are less important than other rooms, and it should be assumed that the windows are those of bedrooms. This cannot be accepted: although BRE minima are slightly lower for bedrooms such a distinction is not otherwise made by official guidance, and verges on the unprofessional. The room is a habitable room – that is what counts. The use of it made by the occupant should not matter. As it happens, we know that when the first owner occupied the flat below us (No 1) he used one of the rooms as a dining room/study, and not as a bedroom, and this use is plainly open to any resident.

(2) NOISE

Emerging Policy DM 15.7 of the Draft Local Plan relates to noise pollution, and highlights that the layout, orientation and use of buildings should be designed such that operational noise does not adversely affect neighbours, particularly noise sensitive land uses such as residential units and any potential noise conflict between existing activities and new development.

The atrium below us creates significant noise at times, because noise funnels up the void between the back of Creed court and the back of Lambert house. Because of the office use of the buildings, and the time they are easily accessible through Creed Court, this does not create a significant problem, intrusive though it can be over short periods. The noise we do get, however, is despite a degree of acoustic shielding created by the glass cover to the atrium and walkway.

The proposed design is unspecific as to the likely use of the new space – but it seems as if it will be an area annexed to Reception at the hotel, so cannot easily be shut off and made subject to Planning undertakings. We suspect it will be used for sitting out in/ drinking/ talking, all of which will occur from early morning till late in the evening after what would normally be closing time for a pub. The applicants should be specific as to this, and should provide an acoustic assessment of the impact of the design (we cannot see one). If the design were changed such that the noise would be restrained below, say, acoustic glass, it might be possible to ameliorate this – but this is for the applicants to propose, and at present the application breaks both the planning policy set out above, and Part 4 of Core Strategy Policy CS15, which requires development to positively address issues associated with (inter alia) the protection of the City's quiet areas and quiet times of day for businesses (daytime) **and residents (night time)**.

(3) PRIVACY

Our bedroom windows will be overlooked, by hotel windows. The design puts them closer by some margin than the current offices.

London Plan Policy 7.6 provides:

“Environment and Residential Amenity

5.50. Developments are required to consider and mitigate any potential negative impacts on the amenity of surrounding land and buildings in relation to privacy and overshadowing”

This says it all, but it is not just words: we understand that London councils take privacy very seriously: indeed, they are bound to do so not least because of the impact of Article 8 of ECHR, as scheduled to the Human Rights Act 1998.

Unless the design is changed, we shall require to keep net/muslin curtains up at all times of the day – further diminishing light, as a consequence of our need for privacy which we value, and the current arrangement provides significantly.

(4) GENERAL AMENITY

A result of the proposed building, with its effect on light, will mean an increase in the extent of our use of lighting, the problems of noise and light intrusion at night (affecting sleep when the rooms are used as bedrooms), the need to ensure visual privacy, and all the difficulties that might come with policing planning conditions as to noise etc., - as well as lesser considerations such as a reduction in our ability to have sunlight for indoor plants! Further, if the atrium is used for food service and/or if cooking vents open into it, there will potentially be unpleasant smells.

It will be bad enough having the development under construction – it must please be a planning condition that work does not begin before 0800, nor continue after 1700 during that phase

Need For Development And Design Changes

These serious consequences, affecting our light, privacy, noise and amenity, in breach of the Draft Plan and good planning principles, are a consequence of the desire to pack the site full of hotel rooms. As a result, the massing is very considerably greater than the present. This in itself is objectionable, but the justification is said to be a need for hotel accommodation in an area of London in which there is also a need for office accommodation. We query whether the need for hotel accommodation is actually as pressing as the applicants suggest – within the last few years, Crowne Plaza has opened off New Bridge Street; as has a new Premier Inn, just behind New Bridge Street, between that and Salisbury Square; and as has the Grange St.Paul's Hotel off Carter Lane/Godliman street. All this is in addition to the Club Quarters opposite the proposed development in Ludgate Hill, the King's Wardrobe (serviced short-stay apartments) off Carter Lane just behind Creed Court, and (for the less well-heeled) the YHA in Cater Lane. There is no paucity of hotel or similar accommodation. We note there is no empirical evidence to show the occupancy levels of these hotels, which should be a first step in assessing need for more accommodation at the expense of office space.

If a hotel is to be built, the damaging aspects of the design can be ameliorated to prevent the damage to our property as we have described it. The size of a bedroom can be stripped out of the wall opposite our affected windows, and the increase to 7 storeys at the South reduced (there is no principled reason why it should exceed the present height); privacy can also be addressed in part by redesign of the overlooking windows. Noise can be subject to sufficient acoustic constraint, and a redesign of the atrium from being a circulation area, or the provision of sufficient guarantees by way of planning condition to ensure that the area is not used at times which would conflict with neighbouring residential use.

Concluding Observations

We are seriously concerned about the impact of the proposed development. In its conflict with neighbouring residential property such as ours it does not meet planning standards. We are not die-hard opponents of some development in principle (though require to be convinced of the need for it) but adamant that unless each of light, noise, privacy and general amenity is addressed satisfactorily the plan should be rejected.

Yours faithfully,

Sir Brian Langstaff

14 / 00300

07 JUL	
No	121970
FILE	

ACKNOWLEDGED

Planning Department
Attention: Liam Hart
City of London
P.O. Box 270
Guildhall
London
EC2P 2EJ

3 July 2014

Dear Sir,

Your Ref: 14/00300/FULMAJ

I refer to the above referenced Planning Application for a hotel on Ludgate Square/Ludgate Hill/Creed Lane and enclose my objections to this Application for your consideration.

(Mr) K. Rimmer

Flat 13
Lambert House
2 Ludgate Square
London
EC4M 7AS



Re: PLANNING APPLICATION 14/00300/FULMAJ – PROPOSED NEW HOTEL ON LUDGATE HILL/LUDGATE SQUARE/CREED LANE

I submit the following objections to the above Application in the form of Comments based on the document "St. Paul's Cathedral Conservation Area, Character Summary & Management Strategy" adopted by the City of London Corporation 22 March 2013.

Page references are to the above-mentioned document.

Building Heights

Page 20. "Buildings within the conservation area are largely consistent in height according to each street."

Comment: At present the highest point on Ludgate Square is the 5th floor of Lambert House, which is a pent house set back from the building line so that it is not visible from street level. The proposed hotel is generally being built to this highest level and above. Thus, the height profile will be increased substantially and will be visible from street level. It would seem that a modest concession on building height on Lambert House is being used to increase the height generally on the Square. Should this be allowed it will act as a precedent for further planning applications to increase the heights of nearby buildings, perhaps even on the other side of Ludgate Square. To establish a trend of increasing building heights would be seriously detrimental to the conservation area.

Page 20. "Buildings on Ludgate Square form an interesting grouping as they reduce in height from Ludgate Hill to the junction with Creed Lane."

Comment: Much of the gradual reduction in height will be eliminated under this Application with only minor reductions close to the junction with Creed Lane.

Ludgate Square & Creed Lane

Page 24. "A curved lane (Ludgate Square) through a passage between the grand warehouses of Ludgate Hill, provides a transition to the domestic scale of Creed Lane and Carter Lane....."

Comment: The "transition" will be virtually eliminated under this Application to be replaced by a single building considerably higher than existing buildings. (See comments re building heights above). The increased building height will also have a substantial effect on residents on the west side of Ludgate Square. At this time of year apartments in 1 & 3 Ludgate Square have the benefit of direct sunlight at around 10.00 a.m. This will be significantly affected by the proposed additional height in the Application.

Page 29. "On Ludgate Hill and around the cathedral the streets and spaces are filled with workers and visitors at all times of the week, whilst narrower streets can remain tranquil and virtually deserted."

Comment: Ludgate Square is at present a tranquil street but will no longer be so with a large hotel, including an entrance to the hotel. The additional footfall will change the ambience of the Square completely.

Management Strategy – Planning Policy

Page 38. The Civic Amenities Act 1967 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.”

Comment: While I understand that “preservation” does not mean that there can be no change I do not believe that this Application can be considered an “enhancement” because the Ludgate Square elevation is proposed to change from a gradual stepping down from north to south to one where the elevation will increase in height and essentially continue at that height for most of the length of the Square. This is a very retrograde step in a conservation area.

Transport

Page 41. “Much work has already been done in reducing motor traffic in the City, including in the St. Paul’s Conservation Area.”

Comment: If the Corporation’s policy is to reduce traffic in the St. Paul’s area this Application will have a substantial adverse effect on that policy simply because it will be a busy hotel primarily serviced, for customers and supplies, by motor traffic.

Page 42. “Ludgate Square and Carter Lane west of Creed Lane are pedestrian zones. Motor vehicles are prohibited from Carter Lane between 8 a.m. and 6 p.m. Monday – Friday and from Ludgate Square at all times except for loading. Access for cyclists in both pedestrian zones is maintained at all times.”

Comment: To build a hotel in this location, with the constant arrival and departure of guests, other customers and delivery vehicles, will destroy this aspect of current policy by substantially increasing motor traffic.

Page 42. “As motor vehicle through traffic is further reduced, opportunities to enhance the environment for pedestrians and cyclists to move and linger and enjoy the spaces will further increase.”

Comment: If a hotel is built it will have precisely the opposite effects to what is intended because motor traffic will increase, thus reducing opportunities to enhance the environment for pedestrians and cyclists who will be significantly less likely to enter the area let alone linger in generally narrow streets unsuitable for mixing pedestrians and cyclists with motor vehicles.

Condition of the Conservation Area

Page 45. “Potential pressures on the area have been identified as new development, utilities replacement works, and the impact of road traffic.....The condition of the Conservation Area is judged to have improved in recent years, and is expected to further improve in coming years.

Comment: If potential pressures on the area have already been identified as “new development..... and the impact of road traffic” it is hard to see how a new hotel can be anything but seriously detrimental to the area in both respects.

While I agree that the area has improved in recent years it is hard to see how the proposed new hotel contributes to the expectation that the area is “to further improve in coming years.” As stated

elsewhere above, the hotel will damage the elevations on Ludgate Square and Creed Lane and cause increased motor traffic to the detriment of cyclists and pedestrians, all in an area part pedestrianised and generally consisting of narrow roads with severe vehicle restrictions.

Page 45. "Planning applications (will) be judged against local, regional and national policies and guidance identified above, and loss of buildings and features that contribute to the character of the area will be resisted accordingly."

Comment: It seems to me that the Application for a hotel is contrary to the above policies and guidance for the reasons stated in my above "Comments," particularly those relating to building heights and motor traffic. In addition, I would suggest that the demolition of the buildings in Ludgate Square will reduce the attraction of the Square as part of a Conservation Area which, by its very nature, should seek to retain a major proportion of the existing buildings. Furthermore, the tailors shop and the hairdressers (which will be demolished under the Application) provide services which have been well used by residents and people who work in the area for 25 years and 15 years respectively. These are precisely the types of business that add character to the area as well as providing desirable services.

Taking a broader view, I would have thought that it was a national policy to develop the City's primary function as the nation's major wealth-creating location. However, having worked in The Old Deanery, Deans Court, during the 1990's one of the most obvious changes since that time is that the area now appears to be much more geared towards tourism than business. There are now several hotels nearby, Grange St. Paul's, Crowne Plaza, Premier Inn Blackfriars and Club Quarters, Ludgate Hill, plus many more restaurants, cafes, sandwich shops etc., all primarily aimed at the tourist trade. It seems to me that this area has many advantages for business, which are not being fully utilised for that purpose. There are excellent transport links, with nearby stations at Blackfriars, City Thameslink, St. Paul's and Mansion House and numerous bus services on Ludgate Hill and Farringdon Street. I believe that a better use of any development on Ludgate Hill/Ludgate Square/Creed Lane would be to refurbish the existing buildings for use as offices, perhaps with some residential aspect, in order to re-generate business activity.

In addition to my objections above related to the document adopted 22 March 2013 by the City of London Corporation I have the following objections based on my understanding of the Planning Application and its likely effects on residents of Lambert House, 2 Ludgate Square. I appreciate that decisions can only be made based on planning law and related legislation and I admit to having no specialist knowledge of such matters. However, if the Applicant has any intention of being a "good neighbour" or if the city Corporation is able in any way to protect residents' reasonable concerns I would suggest that the following matters be considered:

1. The External Building Services Plant is situated very close to Lambert House, 2 Lambert Square, and I am concerned that it will cause noise and/or smells as well as being unsightly. Ideally, this should be sited further away from Lambert House, 2 Ludgate Square.
2. The proposed Rooftop Terrace is close to and overlooks windows of Lambert House, 2 Ludgate Square. I am concerned about the privacy and noise aspects of this area, particularly as it is likely to be used for many hours of the day.
3. There are proposed hotel bedroom windows overlooking the internal courtyard that appear to be extremely close to windows in Lambert House, 2 Ludgate Square. This seems to me to be wholly unreasonable.

4. The Daylight and Sunlight Report appears to be incomplete in that it covers only 10 of the 17 windows that face the internal courtyard.
5. The present internal courtyard is generally quiet, but even if only 2 people are conversing in normal tones the noise funnels up the well and is very intrusive at 4th floor level and presumably at other levels of Lambert House, 2 Ludgate Square. If this area became frequently used for conversation or other noise-generating activity the effect on residents of Lambert House would be considerable, particularly given the extensive hours that a hotel operates. The fact that the Application substantially reduces the area of the internal courtyard might even exacerbate the noise-funnel problem. I would suggest that this matter be given serious attention at this stage rather than result in constant complaints to the Council of noise disturbance. Perhaps consideration could be given to putting some form of roof on to contain any noise.

In summary, I would say that siting a hotel of this size in the Conservation Area is completely inappropriate based on its proposed height and on the resulting increase in motor traffic in an area of narrow streets, one way streets and pedestrian sections, intended to encourage cyclists and pedestrians to linger and enjoy the unique ambience of the area.

Furthermore, several important aspects of the Application appear contrary to the Character Summary & Management Strategy adopted by the City Corporation on 22 March 2013.

(Mr.) K. Rimmer
Flat 13
Lambert House
2 Ludgate Square
London
EC4M 7AS

3 July 2014

14 / 00300

Flat 13
Lambert House
2 Ludgate Square
London
EC4M 7AS

July 3, 2014

ACKNOWLEDGED

Planning Department
Attn: Liam Hart
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

03 JUL 2014

Your Ref: 14/00300/FULMAJ

Location: Creed Court 3 – 5 Ludgate Hill, 1 – 3 Creed Lane and 11 – 12 Ludgate Square, London EC4M 7AA

Dear Sir,

I would like to raise my objections to the above planning application. I feel that it is inappropriate based on the following:

Change of Use – I believe that the loss of office space is an issue. The City's role should be to protect the overall stock of existing office accommodation. I do not believe that it is appropriate that this site be subject to a change of use to a hotel.

Accessibility – development will generate significant amounts of vehicular and personal movement, and the Application does not accommodate the efficient delivery of goods, supplies and guests. The majority of roads in the area are subject to yellow line restrictions and waiting is not allowed at any time, although loading is permitted. Ludgate Square is a pedestrian zone, restricting vehicular access to service vehicles in a southbound direction only. Whereas Creed Lane is indeed a "lane" where direction is limited in a northbound direction only and both have footway widths which are already narrower than the guidelines set. Also, Carter Lane is pedestrian only, between 8am and 6pm Monday to Friday. According to the core strategy the city has defined its highway hierarchy to further reduce the adverse impacts of motor vehicle traffic. This proposal does not create a safe and secure layout and will result in conflicts between traffic, cyclists and pedestrians. Per the Application, servicing the hotel (including the restaurant) will have a considerable adverse impact on Creed Lane and surrounding streets. It would seem more appropriate to provide off street servicing as any vehicle larger than a transit van would cause an obstruction. Per the Application, the proposed hotel will generate 2-

\$

6 taxi pickups/drops offs every 30 minutes. The surrounding streets simply cannot cope with this increase with average dropping off times of 3 minutes 48 seconds.

Increase in floor space – Inappropriate increase in floor space from 4,850m² to 8,735m² – I do not believe that the bulk, scale and massing on this site is appropriate to the setting, amenities and surrounding buildings. It will impact the conservation area as this proposal does not contribute to the balance and mix of uses in the immediate locality. As an example in Ludgate Square we currently have an independent tailor who has been located here for over 25 years as well as an independent hairdresser who has been located here for over 15 years. With this new development both businesses would be closed and their premises demolished, in effect extinguishing the individuality that both premises materially contribute to the area. These are desirable tenants providing services that are well used and who should be encouraged, not eliminated. The proposals will alter the character of Ludgate Square to its detriment as part of a Conservation area.

Daylight and Sunlight report – has not been done correctly. Analysis has only been done on 10 affected windows at Lambert House, 2 Ludgate Square when in fact 17 windows (or even 23 windows should communal space be considered) should have been analysed as they are all directly affected and this includes a kitchen which has a higher BRE guideline allocation. Therefore the current representations are completely incorrect and should be deemed null and void. (Looking at the current assessment for the 10 rooms, for No Sky Line (NSL) all rooms experience a reduction of between 28.9% and 45%, far beyond the 20% BRE guidelines and for Annual Probable Sunlight hours (APSL) 9 of the 10 windows experience BRE transgressions which are fairly significant).

External building services plant – has been situated on the 6th floor at the highest point on the development directly next to bedroom windows at Lambert House, 2 Ludgate Square. Nothing has been done to maximise separation from noise sensitive properties, and no demonstration has been shown in regard to background noise levels associated with the new plant and equipment.

Rooftop terrace public space – little mention has been made about this in the submission and the usage. In the report “Hotel Need Assessment” it states on page ii a “destination rooftop and restaurant” In the hotel management plan no mention has been made, though the restaurants on the ground floor and lower ground floor hours of use are 6am to midnight. The proposed terrace will have direct views into the windows of Lambert House, additionally is it appropriate that a public space on a high floor should be built and used next to a residential development? I have serious concerns as to the noise and disturbance and overlooking which will be completely intolerable.

July 3, 2014

Page 3

Location of bedroom windows – in the proposal it appears that some hotel windows in the internal courtyard will be situated very close to bedroom windows in Lambert House, 2 Ludgate Square. This will lead to a lack of privacy and overlooking. There must be rules about how close these hotel windows can be situated to existing residential properties. I would also hope that all hotel windows that face the internal courtyard are non-opening windows and for the linen cupboards, bathrooms and internal stairwells that overlook the internal courtyard that they have frosted glass.

Internal Courtyard – currently the internal courtyard is used as a business entrance with gates which are secured and locked of an evening. Additionally, the courtyard currently has a glazed partial cover over it so as to provide protection from the weather. The Application appears to reduce the internal courtyard area by 50%. Is this appropriate, as this also diminishes the daylight and sunlight for Lambert House, 2 Ludgate Square? It also appears to utilise it as a public open space with no cover provided to mitigate noise pollution. The present internal courtyard is generally quiet. It is noticeable that if 2 people hold a conversation outside of the partial glazed cover the noise can be very intrusive. I fear that given the extensive hours that a hotel operates and this became well used for conversation or other noise-generating activity, the effect on residents of Lambert House would be considerable – loss of daylight and sunlight, noise and disturbance and light pollution.

Height – The highest point for the proposed development is 39,445 and adjacent to my bedroom window. The current highest point is 36,830 which is unobtrusive and a very small part of the overall rooftop design. The density in height for the proposed development is extreme in that the heights for the majority of the roof top are 39,443, 38,765, 38,655 and 36,795 all of which enclose (by the reduction in 50% from the current internal courtyard size) and overlook the internal courtyard with 17 residential windows from Lambert House, 2 Ludgate Square. The loss of daylight or sunlight and overshadowing would be extreme. The design has not been well thought out and the layout and density impacts are too great. These heights simply need to be reduced.

Yours faithfully,

Matthew Rimmer
Flat 13, Lambert House
2 Ludgate Square
London
EC4M 7AS

Ball, Matthew

14 / 00300

From: PLN - Comments
Subject: FW: Planning Application Reference 14/00300/FULMAJ

From: Michael Tang [REDACTED]
Sent: 03 July 2014 00:10
To: PLN - Comments
Subject: Planning Application Reference 14/00300/FULMAJ

03 JUL 2014

Dear Mr Hart

Planning Application Reference 14/00300/FULMAJ

My name is Michael Tang and my property is Flat 1, Lambert House, 2 Ludgate Square, London EC4M 7AS

ACKNOWLEDGED

I am writing to register an objection to the planning application for Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA (14/00300/FULMAJ)

My objections are

- (1) There will be a reduction in natural light in the rooms, which are beyond the BRE guidelines
- (2) The impact of an increase in the levels of noise has not been fully assessed
- (3) A loss of privacy

Reduction in natural light beyond BRE guidelines

My flat has two windows which overlook the central courtyard in Creed Court. There will be an unacceptable reduction in daylight. This fact is confirmed in the Daylight and Sunlight Report. The decrease in light for the two windows are measured as

- Decrease of 39.43% and 36.5% based upon Vertical Sky Component (VSC),
- Decrease of 27.55% and 25.16% based upon Average Daylight Factor (ADF),
- Decrease of 42.4% and 25% sq ft loss based upon Daylight Distribution Analysis
- 100% loss of Annual Sunlight Hours

Additionally, the Report recognises that the overall absolute change based upon VSC will have a disproportionate impact on my property. We will experience decreases beyond suggested No Skyline (NSL) guidelines, failing to achieve 2011 BRE compliance. It will also fail to meet the BRE compliance for minimum ADF values of 1% post-construction.

Increase in levels of noise

The Environmental Noise Survey fails to recognise that 2 Ludgate Square is a residential property which adjoins the proposed development. The measurements taken fail to reflect the impact of the increased external plant noise on the flats facing inward to the central courtyard in Creed Court, in particular those at the lower level. The points at which the measurements were taken are not in this courtyard in Creed Court.

Additionally, the location of the "high performance trickle ventilators to elevations facing Ludgate Square and the Central Courtyard" will likely project noise upwards and towards the rooms in 2 Ludgate Square. Again, there is a disproportionate impact on the flats at the lower level. No account has been taken of this increased noise nor the visual impact of trickle ventilators immediately outside our windows.

The proposed location of the restaurant is next to the property. The noise from the restaurant is likely to be exacerbated by the narrow nature of Ludgate Square forcing the noise to be channelled towards the property. The restaurant will be open daily until 12 midnight.

Loss of privacy

There will be a loss of in privacy due to the hotel rooms facing 2 Ludgate Square, with potential views into our rooms, especially at night and on weekends – which is not the case at present. The average occupancy rate is projected to be 81.6% throughout the week which will result in a significant increase in people. Further, there will be light pollution at night, especially from additional streetlights, hotel rooms and corridors.

This is a major commercial development which will have a significant impact on a residential property immediately next to it and I believe that these matters need to be addressed. Can you please acknowledge receipt of this mail.

Many thanks.

Yours sincerely

Michael Tang

Ball, Matthew

From: PLN - Comments
Subject: FW: Comments for Planning Application 14/00300/FULMAJ

From: PLN - Comments
Sent: 04 July 2014 09:50
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

ACKNOWLEDGED

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

Comments were submitted at 9:49 AM on 04 Jul 2014 from SIR BRIAN LANGSTAFF.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (140 bedrooms) (5,465 sq.m.), restaurant use (Class A3) at part basement and part ground floor (995 sq.m.) and associated plant areas (860 sq.m.).

04 JUL 2014

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: SIR BRIAN LANGSTAFF
Email: [REDACTED]
Address: FLAT 5, LAMBERT HOUSE 2 LUDGATE SQUARE LONDON

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:

- Noise
- Residential Amenity
- Traffic or Highways

Comments: I have submitted a detailed letter of objection, but have not yet had an acknowledgement. In summary: We have a residential flat at Flat 5, on the second floor of Lambert House, 2 Ludgate Square, EC4M 7AS. Two of our habitable rooms overlook what it currently an atrium/ open void, surrounded by offices which are quiet and usually unoccupied at night, and have sunlight by day. Our (1) light, (2) privacy, (3) noise levels and (4) general amenity will be seriously threatened by the proposed (over)development. Our rights to light are to be breached. There is no good reason to depart from Planning principles, from BRE guidance, and (especially

as the City of London) being a standard bearer for setting standards of good urban planning, especially since the need for further hotel development of this mass is dubious and not established by empirical evidence; nor is it good practice to grant permission for development which so affects existing legal rights to light that legal action is then required to enforce them (which if taken would, simply, prevent the development in its proposed form) We will lose 100% existing direct sunlight, have reductions in VSC and ADF considerably below BRE guidelines; in breach of planning policy DM 15.7 of the Draft Local Plan there will be unacceptable noise intrusion; in breach of London Plan Policy 7.6 privacy will be interfered with in particular by overlooking windows; and, as it happens, in an area already teeming with traffic small local lanes, or overcrowded Ludgate Hill will have to cope with additional hotel traffic. In short, we shall be overshadowed, overlooked, overexposed to noise, and over-trafficked by the proposed overdevelopment (7 storeys high, adding two to the existing, and building a side wall nearer to our bedroom windows, where the massing should broadly be in line with the existing but is proposed to be much greater), for which there is no clear evidence of demand at the expense of office space.

From Deborah Langstaff

14 / 00300

Flat 5, Lambert House
2, Ludgate Square,
LONDON EC4M 7AS
5th July 2014

Department of the Built Environment,
City of London,
PO Box 270,
Guildhall,
LONDON EC2P 3EJ

05 JUL 2014

ACKNOWLEDGED

Dear Sirs,

Application 14/00300 (Creed Court and Ludgate Hill): Objection

My husband and I own Flat 5, Lambert House, 2 Ludgate Square. The proposed development next to our flat will come uncomfortably close to our two bedroom windows. The combined effect of that and the extra height to the South will deprive us of light. I am happy to provide access to the flat so that you may assess this for yourselves.

The outside lower ground space below the windows will generate noise, as it will be funnelled up between the proposed building and our block of flats.

The proposed building will have bedroom windows overlooking ours, which will affect our privacy.

The applicants suggest that there is a need for hotel space in this part of central London. Has any survey been done of the need for this? An indication of what might be found, if one were, is a sample survey of my own. Yesterday morning, I enquired of three hotels in the immediate vicinity of the proposed building. I asked each for 3 double rooms, for three nights, the weekend of Friday 11th. – Sunday 13th. They all had vacancies. This is in the height of the summer season, and only one week away....

A further problem of hotel use is the effect (drop offs/picks ups etc), on traffic flow which is already near breaking point on Ludgate Hill.

If there really is need for hotel use, which I doubt, then the building should be on a smaller scale, further away from the back of Lambert House, with safeguards in place against noise, loss of privacy, and intrusion from lighting etc.

Yours faithfully,

Deborah Langstaff

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Liam Hart
Department of the Built Environment
PO Box270
Guild Hall
London ECA2PJ 2EJ

Nicola Bell
Flat 14
Lambert House
2 Ludgate Square
London EC4M 7AS

5th July 2014

Dear Mr Hart

Planning Application ref.14/00300/FLMA

I wish to express my concerns and objection to the proposals on the proposed development which has major impact on the residents of Lambert House.

- 1.Massing the proposed building is large and there are already two hotels in close proximity.
- 2.Overlooking from the proposed hotel rooms and terrace area.
- 3.Overshadowing caused by the increased height of the building.
- 4.Loss of daylight and sunlight.
- 5.Materials to be used which include white glazed bricks in the light well which would likely cause reflections and glare to Lambert House.
- 6.The impact on the important local historic environment.
- 7.Pedestrian safety would surely be affected during demolition,construction and by service vehicles.

To explain further please consider the following concerns:-

- 1 Within the planning submission the loss on natural light seems to be considered inevitable.
- 2.The drawings (plans and elevations) available for viewing at The Guild Hall are confusing,difficult to understand and too faint to see the true impact on the skyline and the effect on Lambert House.
- 3.The proposed roof top terrace said to provide views of historic London sites may well impose problems from lighting,noise smoke and overview of residential property.It also implies high elevations.
- 4.Service vehicles,narrow streets,noise smoke,fumes,24 hour operation give rise to major concerns.
- 5.Roof top plant noise and fumes from extract systems yet to be designed must have some adverse impact.

6. If the developer needs the special acoustic glazing units for the hotel to provide suitable internal noise levels, will he provide the same for the residents of Lambert House at his cost?
7. The proposals refer to the 5th Floor Level of Lambert House and seem to assume all floors are the same layout. This should be investigated and confirmed or otherwise.
8. There is likely to be an increase in ambient noise levels and detrimental impact on air quality.
9. The proposals gloss over the intrusion and degradation for Lambert House and appear to be unavoidable and of no concern.
10. Will the developer provide indemnity for adverse effects to Lambert House and provide suitable acceptable accommodation at his cost for residents during the most intrusive periods of work.
11. Perhaps I could offer what may be a more acceptable counter proposal that could include an office development linked to residential property at the southern end of Creed Lane, Carter Lane and Ludgate Square to be more suited to the preservation of the historic Old London with narrow streets and a feeling of village life with a blend of facilities in the Ludgate Hill Conservation Area.
12. Finally please advise me when the Planning Committee will review the application so that if possible I, or a representative can attend.

Nicola Bell a resident of Lambert House.

Planning Department
 Attention: Liam Hart
 City of London
 P.O. Box 270
 Guildhall
 London ECP 2EJ

ACKNOWLEDGED

6th July 2014

Dear Sir,

YOUR REF: 14/00300/FULMAJ – Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square

In reference to the above Planning Application I enclose my objections to the Application for your consideration:-

The Proposed Building Plan for a Hotel instead of the existing Office. Creating a conflict between residential and commercial in an historic, conservation area of St. Paul's London.

There are already sufficient hotels in the St. Paul's Conservation Area. Grange St. Paul's, Godliman Street, Grange St. Paul's Serviced Suites, Creed Lane, Club Quarters, Ludgate Hill, Y.H.A, Carter Lane, The King's Wardrobe serviced apartments off Carter Lane. These are contained in a small area around Lambert House, 2 Ludgate Square. There is not sufficient evidence to suggest any more Hotels are needed. It would also be more appropriate for the Hotels to be located away from residential areas.

There are more hotels on the perimeter of this conservation area.

This Proposed Plan brings a lot more vehicles into the area which are pedestrian zones. Motor vehicles are prohibited from Carter Lane between 8 a.m. and 6 p.m. from Monday to Friday and from Ludgate Square at all times except for loading. Access for cyclists to both pedestrian zones is maintained at all times. Carter Lane east of Godliman Street is a route for use by pedal cycles and pedestrians only. The Corporation states that "In adopting the Core Strategy the City has refined its highway hierarchy to further reduce the adverse impacts of motor vehicle traffic, including the valued character of the City's conservation areas." The effects of another large hotel would appear to be contrary to this stated strategy.

The Application alters the Character of Ludgate Square taking away shops which add to the amenities there. Also Ludgate Square is entered by an Arch from 23 Ludgate Hill which leads into a narrow passage opening into a small cobbled lane. It allows unloading but because of the small entrance any larger vehicle than a small van grazes the brickwork under the Archway. Lambert House exits directly onto the lane. There is no pavement. The lane is particularly quiet and tranquil and is ideal for residents living there. The Archway is also a good viewing point for pedestrians to stand and take photographs of St. Paul's Cathedral. If the proposed hotel use vehicles under this Archway it would be a hazard for pedestrians and cyclists and take away the peacefulness of the lane. All Lambert

House residents have wooden sash opening windows so quietness is of importance from living room, bedroom and kitchen windows.

The narrow lanes and alleys of Ludgate Square (which is not a Square), Carter Lane, Deans Court and Creed Lane are prime historic tourist areas and unsuitable for any additional traffic. They should be left as they are and not bring about a massive, bulky height and density hotel, which far exceeds the present office height of 4 floors. Creed Lane could become a service area for Dustcarts, Coaches, Taxis and Delivery Lorries, exacerbating the noise levels and pollution and spoiling a tourist area which is mostly for pedestrians and cyclists.

The existing building can easily remain at its present height and be refurbished to bring it up to date. Small/medium offices are always in demand for the smaller business, and makes good economic sense for the City of London. Office hours are by far better for residents and as they do not work at weekends in comparison to a 24 hours working hotel

The proposed building has 7 and a bit floors and 3 basements. The bit floor is the PLANT placed close to the windows of Lambert House, 2 Ludgate Square. The residents windows open on to the internal atrium and I am concerned about pollution and air quality that will enter the windows. (steam, ventilation for the City's Sewer Network, noise etc.) No details of the PLANTS WORKING is given on the Application.

Residential and hotels are not a good mix because of lack of privacy for residents, increase of noise, pollution, and additional bulk and heights. Not forgetting this is a Conservation Area.

Yours faithfully,

Mrs. J. L. Rimmer
Flat 13
Lambert House
2 Ludgate Sqaure
London
EC4M 7AS

2 pages.

Ball, Matthew**From:**
Subject:PLN - Comments
FW: Planning Application ref.14/00300/FULMAJ**From:** Niklaus Fähr [REDACTED]
Sent: 07 July 2014 09:49
To: Chipperfield, Rob
Cc: Hart, Liam; PLN - Comments
Subject: Planning Application ref.14/00300/FULMAJ

07 JUL 2014

ACKNOWLEDGED

Dear Mr Chipperfield

Thank you for receiving us in your office on Friday 27.6.2014.

As owners of Flat 9 (3rd floor), Lambert House, 2 Ludgate Square since the year 2000 we herewith express our main observations concerning the Creed Court Project (14/00300/FULMAJ) as follows :

1. Proposed new Public Courtyard

The project seems to create a courtyard accessible for guests and staff of the hotel as well as for visitors of the bar. This would produce odour and smoke and noise during day and nighttime. The noise will echo from the walls in this narrow courtyard in front of our bedrooms. The impact on our wellbeing would be very negative and is in our opinion intolerable.

There is neither air-conditioning nor recirculated air-circulation system in our flat and it is therefore essential that we are able to keep the windows open. We think that any proposed courtyard should be as wide as possible to allow fresh air from outside and should be inaccessible to hotel guests and staff. We therefore suggest that if planning permission is granted there should be strict limits on the use in order to mitigate the most negative impact on the enjoyment of our flat.

2. Daylight and Sunlight Report

This report shows an obvious change to the worse for our flat, below the accepted standards. The report wipes this away saying we have to tolerate this in the urban area which is unacceptable and ignores our acquired right of light for the present level. The report seems to us to be highly unprofessional because it describes the effects on 10 windows but in fact ignores many more in Lambert House.

3. Size of the Hotel

The application shows a planned hotel with 140 bedrooms. We think in this historical and small area there is space only for a small boutique hotel, i.e. not more than say 50 to 80 bedrooms. There are surely enough hotel rooms in the immediate area with the Grange and Club Quarters only a few yards away. The planned development would be out of character with the local area and would cause an imbalance against residential properties in the local neighbourhood and would make Lambert House a very small island.

4. Rooftop Destination Bar

We fear such a bar will have a most negative impact on our flat by noise and people watching our bedrooms which not only affects our privacy but could cause a security problem too. We therefore suggest that it should not be permitted, but if it is, then there should be strict limits on its use in order to mitigate its impact and appropriate screening is erected on the roof to ensure users cannot see into the flats.

5. Entrance doors

From a transport statement we learned an additional entrance door is planned from Ludgate Square but the drawings only show two escape doors to Ludgate Square. We presume that there will be no entrance door from Ludgate Square because this would lead to noise and smoke impact on the residential flats on both sides of Ludgate Square. To be clear Ludgate Square is a pedestrian zone, restricting vehicular access to service vehicles in a southbound direction only.

6. Effects of the Rebuilding procedures

Our flat will be affected on two sides by the demolition and rebuilding process. We fear the stability of our building could be damaged by this project. We propose the developer has to engage an independent specialist to inspect and document the original state of Lambert House including all flats in the house prior to start the works. The developer should be obliged to monitor permanently the condition of Lambert House. During the works regular inspections of Lambert House and its flats shall be provided. Damages to the Lambert House and/or its flats have to be repaired by the developer in any case. Therefore, the developer shall provide insurance indemnity for any defects caused by the works.

7. Dust, Noise and Vibrations during the works

We fear dust, noise and vibrations during the works could be unbearable for us (retired people) and for our grandchildren (1-8 years). It is very important to mitigate the negative effects on our property by strict conditions which we suggest the Council to impose. Or will the developer be obliged to offer us and provide suitable, acceptable alternative accommodation during the work ?

In conclusion the Creed Court Project (14/00300/FULMAJ) is not acceptable for us. We expect that this project will not be approved by the relevant authorities or attached with conditions to an approval to prevent any negative influence for the area of Ludgate Square and to compensate all affected residents.

Thank you very much in advance for considering our concerns. Please keep us informed by email about the next steps.

Kind regards

Niklaus and Cilgia Föh
Flat 9, Lambert House
2, Ludgate Square
London EC4M 7AS

[Redacted signature]

Mr. J. Colombano and Ms. M L Kirk
 Flat 16, Lambert House
 2 Ludgate Square
 London EC4M 7AS

For contacts please use: [REDACTED]

FAO Mr Liam Hart,
 Planning Officer
 Development Division (west),
 Dept. of the Built Environment
 City of London Corporation,
 PO BOX 270
 Guildhall,
 London, EC2P 2EJ

ACKNOWLEDGED

07 JUL 2014

7TH July 2014

Dear Mr Hart,

RE: Planning application 14/00300/FULMAJ at Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square, London, EC4M 7AA - OBJECTION

I write to you as the owner of Flat 16, Lambert House, 2 Ludgate Square in relation to lodging a formal objection to the above proposal on the grounds of excessive mass and bulk of the proposal, noise and disturbance, loss of daylight/sun light, overlooking and privacy concerns, the need for a hotel in place of offices and the adverse impact of the scheme on both the St Paul's Cathedral conservation area and the Ludgate Hill conservation area.

Summary of concerns

Each of the concerns will be addressed in turn, however in summary the scheme is considered unacceptable in its impact and therefore fails to comply fully with the City of London Corporation's planning policies and guidance. The proposed increase in mass and bulk adjacent to the bedroom windows of Flat 16 would result in an unduly overbearing impact on the outlook from these windows. The proposed terrace is likely to be used for hotel guests as a smoking area and for outdoor gatherings thereby resulting in noise and general disturbance/ nuisance to the occupiers of the adjacent flats including No. 16. In addition to this, users of the terrace could look directly into the windows of our property and the neighbours below (also bedroom/ habitable room windows) and our private terrace. The proposed scheme results in a substantial reduction in daylight and sunlight received by our flat. We argue that there is no substantial evidence showing a need for a hotel on this site and the fact that the offices are not viable. Finally we argue that the very nature of the proposal and associated impacts will adversely affect the character and appearance of the conservation areas the scheme is located in.

Mass and Bulk

Policy CS10 (Design) of the City of London's Core Strategy (2011) states that the Corporation will promote a high standard and sustainable design of buildings and having regard to their surroundings by 'Ensuring that the bulk, scale, massing, quality of materials and height of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and

spaces. In addition to this draft DM Policy 10.1 (New Development) states that the Corporation will require all developments to be of a high standard of design and to avoid harm to the townscape and public realm by ensuring that 'the bulk and massing of schemes are appropriate in relation to their surroundings...'

It is difficult to ascertain from the submitted drawings the exact increase in height of the proposed hotel; it can reasonably be estimated to be somewhere between 1.2m and 1.7m, however as the applicant has not provided like for like comparisons in terms of floor levels and comparative sections this cannot be confirmed. This is worrying as I would question the need for this approach which appears somewhat contrived. Even if the increase was just over a metre, due to the proximity of the proposed plant to flat 16 (it would adjoin our property at a perpendicular angle) the new higher structure would overbear on our property resulting in a sense of enclosure and an unneighbourly relationship which is considered unacceptable and fails to comply with the aforementioned policies.

Noise, Nuisance and Disturbance

The City of London draft Policy DM 15.7 (Noise and light pollution) states that '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.' In addition to this draft Policy DM 10.3 (Roof gardens and terraces) states that the Corporation will encourage high quality roof gardens and terraces where they do not 'immediately overlook residential properties'.

There are two concerns over the submitted application in regards to noise. Firstly the use of the atrium, although unknown, is likely to be frequented by guests of the hotel for the purposes of dining, drinking, chatting etc and as a communal gathering spot. There may even be live entertainment if the weather permits as is common with several higher end hotels in the city. This is likely to result in noise from these activities being channelled up the void between the back of Creed Court and the rear of Lambert House resulting in disturbance to the occupiers of these flats including flat 16. This impact will be exacerbated through the activity occurring in the evening till midnight and possibly beyond, at a time when the majority of neighbouring occupiers will be asleep.

The second concern is the use of the newly created terrace at roof level. At present the site contains plant housing/rooms opposite the bedroom windows of flat 16. The proposal includes the provision of a roof terrace that would measure approximately 6.2m from the habitable room windows in the eastern flank elevation of our flat facing the new development. As with the use of the new courtyard space for the hotel, guests are likely to congregate on the roof terrace for social activities such as drinking and smoking resulting in general noise, disturbance and nuisance to our flat to the detriment of our amenity and quality of life within the flat. As such this element of the proposal is considered unacceptable and conflicts with the Corporation's policies mentioned above.

Daylight and Sunlight

The City of London Saved UDP Policy ENV36 and draft Policy DM 10.7 (Daylight and sunlight) of the Emerging Local Plan (December 2013) state that the Corporation will look to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.

Subsequently the BRE guidance, as noted by the authors of the 'Daylight and Sunlight' report submitted as part of the application, advises that an alteration to the Vertical Sky Component (VSC) daylight and No Sky Line (NSL) of less than 20% is considered by the BRE to be reasonable and likely to be unnoticeable by the occupant. In addition to the VSC and NSL, the Annual Probable Sunlight Hours (APSH) is another BRE-approved criterion for assessing the amount of sun available in both summer and winter for each given window which faces 90 degrees of due south.

The calculations provided in the report do not appear to have been calculated from a visit of the neighbouring properties affected and thereby cannot provide the most accurate results. Notwithstanding this the report notes that there will be a loss of 49% for sunlight received for one of the bedroom windows of which equates to a 100% loss of sunlight in winter as a result of the proposed development. In regards to the VSC of flat 16 (top floor) the bedroom window closest to the proposed plant room would suffer an alteration of 25.8%, clearly greater than the 20% threshold as stipulated in the BRE guidance. The resulting loss of daylight and sunlight is considered unacceptable and would significantly harm the amenity and enjoyment of our property and is therefore considered non-compliant with the Corporation's relevant daylight and sunlight policies.

A further point to note is that within the report the authors state that the guidelines indicate that they should be interpreted flexibly in City Centre locations 'if new developments are to match the height and proportions of existing buildings'. This is misleading as the scheme is clearly going to be higher and bulkier than the existing and therefore it could be argued that the guidance may not be relevant in which case the scheme would fail to comply with most of the BRE guidelines intended for schemes matching the existing bulk and height. Finally it is somewhat alarming to read on page 12 of the submitted Daylight and Sunlight Report that No 2, Ludgate Square of which our flat is one of the properties in this block, would be adversely affected by the development as per the following 'Most properties around the site would only experience small BRE transgressions to their daylight and sunlight; however 2 Ludgate Square would experience reductions beyond the suggestions within the BRE guidelines. Due to the location of this building, these reductions will most certainly be unavoidable if there is to be any increase in massing on the Creed Court site'.

We consider that the above is unacceptable and the scheme has failed to comply with BRE guidance as stipulated in the report.

Overlooking and Privacy

London Plan Policy 7.6 states that 'Developments are required to consider and mitigate any potential negative impacts on the amenity of surrounding land and buildings in relation to privacy and overshadowing'. In addition to this the draft Policy DM 10.3 (Roof gardens and terraces) states that the Corporation will 'encourage high quality roof gardens and terraces where they do not immediately overlook residential properties'. This is strengthened by Saved Policy HOUS 10 (Overlooking and Daylighting) which states 'To require where practicable that the privacy, outlook and daylighting levels of residential accommodation is respected by the form of adjacent development'.

The proposed floor plan showing Level 6 referenced 'A2109 Rev V09' illustrates a proposed terrace accessed from the eastern side of the building and by all of the guests and visitors to the hotel and not only those with rooms at this level. The terrace would measure a distance of approximately

6.2m from the bedroom windows along the east elevation of flat 16 and would be adjacent to the private terrace serving our flat along its south-eastern elevation. In the absence of any details regarding the use of the terrace and screening along the western elevation, there are legitimate concerns that, in addition to potential noise and disturbance, as covered earlier in this report, occupiers of the terrace could directly look into the bedroom windows of our property to the significant detriment of our amenity.

Our specific concerns in regards to the relationship between the proposed terrace and the bedrooms are two-fold. Firstly we are concerned over the fact that our young daughters sleep in both of the bedrooms facing the proposed terrace and any overlooking from the terrace by strangers into their bedrooms while they are occupied is an unnerving thought for us and would be the case for any parent of young children. Additionally we are very concerned that our young children will be exposed, on a regular basis to people smoking, drinking, perhaps using foul language when inebriated and general antics associated with adult behaviour. This should not be the case and we should as family should be able to enjoy the basic right of peace, privacy and safeguarding of our children.

In regards to the part of the proposed terrace adjacent to our terrace there is only a small waist-high railing separating our property from the proposed hotel. In the absence of a formal garden, our modest terrace is the only outdoor amenity space provision for us to enjoy, which has been especially designed for the children to include a small play table and sand box. We would be most concerned at not only hotel guests and visitors looking into this area but potentially also strangers engaging in conversation with our children and worse still crossing over to our side given the limited safeguarding of the existing boundary treatment. Overall the proposed terrace would be a direct invasion of our privacy, an infringement on the safety of our children and significantly harmful to our amenity and enjoyment of our home, such that we may have to consider moving to another home where we feel safe and can raise a young family. Needless to say, we feel that this element of the scheme would fail to comply with the council's relevant policies and guidance.

Hotel Need and Loss of Offices

Draft Policy DM 1.1 (Protection of office accommodation) states that the Corporation will refuse the loss of existing (B1) office accommodation to other uses where the building or its site is considered to be suitable for long-term viable offices and there are strong economic reasons why the loss would be inappropriate. The Office Redevelopment Viability Study (March 2014) submitted as part of the planning application does not, in our view, fully justify the loss of the current office use. The information presented illustrates that in its current state the offices would still yield a return of 7%. In this case little work would need to be done. The author of the report compares the return of £15 rent per sq. ft. to that of between £45 and £67.50 per sq. ft achieved by new 'Grade A' offices at nearby Basinghall Street, London Wall and High Holborn. However, whilst the newer offices attract a higher rent the report has not mentioned the build cost for these offices which would equally be high and would surely eat significantly into the Gross Development Value (GDV); this would affect the overall profit achieved in real terms. Finally the marketing information presented does not provide appendices illustrating the individual adverts placed for each of the publications/websites mentioned. Without tangible figures demonstrating the site has been marketed at a 'fair market rent' for a suitable period of time it is difficult to accept that the office use is no longer viable, except

to justify the office loss for an alternative use that will generate more profit for the site owners and nothing else. In this respect the scheme fundamentally fails to comply with the Corporation's policy aimed at protecting offices and the scheme is therefore considered unacceptable on these grounds.

Draft Policy DM 11.3 (Hotels) states that 'Proposals for new hotel and apart-hotel accommodation will only be permitted where they are not, amongst other factors, contrary to policy DM 1.1 and do not result in adverse impacts on the amenity of neighbouring occupiers'. It is evident from the previous sections of this objection letter/statement that as the hotel would adversely affect the amenity of neighbours the hotel proposal conflicts with aforementioned policy. Furthermore given the lack of justification for the loss of the office use the scheme again fails to comply with the hotels policy.

It is noted from the report to support the hotel development submitted with the application that 21 sites with planning permission to either extend or redevelop for hotel use are highlighted as either not ready or not yet having implemented the planning consent. The report argues that there is a distinct lack of 4-5 star hotels within the vicinity (1 mile radius from the application site), which in our view is plainly false as a non-exhaustive list as per the following illustrates at least 6 such hotels:

- Grange, St Pauls Hotel (Luxury 5-Star) located at 10 Godliman Street, EC4V 5A
- Crowne Plaza London- The City (5-Star) located at 19 New Bridge Street, EC4V 6DB
- Threadneedles Hotel (Boutique 5-Star) located at 5 Threadneedles Street, EC2R 8AY
- Club Quarters St Pauls (4-Star) located at 24 Ludgate Hill, EC4M 7DR
- The Kings Wardrobe (Full-Serviced Residences 5-Star) located at 6 Wardrobe Place, EC4Y 1LL
- Apex Temple Court Hotel (4-Star) located at 1-2 Sejeants Inn, Fleet Street, EC4Y 1LL

The fact that any extant planning permissions haven't been implemented on the above or any other hotels or sites within the vicinity should not prejudice the decision to grant permission for another hotel in the area on the basis that others have not been built. The Corporation have clearly allowed hotel development in the hope that that these will eventually be built but cannot be responsible for ensuring they are built; this would go beyond the scope of the planning permission and indeed the planning process. Additionally there is nothing preventing the applicant from receiving permission and 'banking' the site as a speculative investment- adding to the several other sites that have not implemented consents for the same reason.

A final point to note on this matter is one of the importance of the Corporation listening to local resident's views; over the years the Corporation sends us questionnaires on how we would like to see the city improved and meet the needs and aspirations of residents, especially families. The Corporation claims that every effort has been made to ensure that there is a balance between commercial and residential uses and the provision of green urban spaces and public services for young families. In this respect the proposed scheme undermines the City of London Corporation's own goals and aims. In terms of a need for hotel development on this site, the application does not, in our view, suitably justify this and therefore this aspect of the scheme is considered unacceptable and fails to comply with the Corporation's relevant policies. Moreover a new hotel in this location with an increased bulk as proposed would truly have an adverse impact on the 'soul' of the neighbourhood thereby appearing out of keeping with the character and appearance of the surrounding area.

Adverse Impact on Conservation Area

Both our property and the application site fall within both the Ludgate Hill and St Paul's Cathedral Conservation Area. Draft Policy DM 12.2 (Development in Conservation Areas) of the Corporation's Local Plan states that 'Demolition in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area'. Saved UDP policy ENV 11 supports this stating that the Corporation shall look to 'resist the demolition of buildings which make a positive contribution to the character or appearance of a conservation area and to encourage their sympathetic refurbishment.'

The scheme proposes the retention of only a façade and will involve significant demolition of the existing building which would not comply with the Corporation's relevant policies as above. We are concerned that the impact of the proposed development including the increase in traffic, increase in the bulk and volume of the replacement building and the general intensification of activity on this site on a 24-hour basis will harm the overall balanced and unique character of both the conservation areas. In this regard the scheme is considered unsympathetic to the conservation areas it is located in and fails to comply with the Corporation's relevant policies.

Conclusions

It is our view that, for the reasons highlighted above, the proposed hotel development at this site is considered unacceptable and fails to comply with the Council's relevant policies and BRE guidance. If the Council is minded to approve the application we would suggest further evidence in respect of the loss of office use and the need for a hotel at this site. We would like to see revised plans demonstrating details of adequate screening to overcome the overlooking issues and noise mitigation from the use of the terrace and courtyard below. We would also like to see further details of a noise survey carried out from our flat as the nearest noise-sensitive receptor and any measures to reduce any new plant noise. I would ask that this information is requested from the applicant at the earliest opportunity and we are provided with a chance to study this information and comment in good time before a decision is reached.

I trust the above is clear, however, should you require further clarification please do not hesitate to contact either myself or my wife, Marie Louise by email at the following address: joe_colombano@yahoo.co.uk. As per our earlier telephone and email conversations we would still like to invite you to our flat to assess the impact the proposal will have on our property in greater detail.

Yours Sincerely,



Mr J Colombano and Ms M L Kirk
(Owners of Flat 16, Lambert House)

For the attention of Mr. Liam Hart, Planning Department,

City of London, P.O. Box 270, Guildhall, London EC2P 2EJ via email to liam.hart@cityoflondon.gov.uk

07 July 2014

Dear Mr. Hart,

RE: Your reference – 14/00300/FULMAJ, Demolition of existing buildings behind retained façade to 3 Ludgate Hill to provide a 7-storey building for hotel use, restaurant use and associated plant areas

Having viewed the proposals and relevant documents regarding the proposed demolition of the current building and proposed development of a new hotel, I am extremely concerned about all the potential problems the demolition and development will likely bring. I am the owner of one of the residential flats in Lambert House, 2 Ludgate Square, whose building will be directly adjoining to this proposed hotel development.

The first major concern is the likely reduction of daylight to our building and other existing surrounding residential buildings. Therefore I read with great interest the Daylight and Sunlight Report prepared by Gordon Ingram Associates (GIA) on behalf of the client, Dominiv's Living Ltd. I have found the assumptions they had based their report on, to be misleading. GIA made no attempt to hide the fact that it was difficult for them to obtain floor plans of the affected neighboring properties. A comparison of the existing and proposed daylight and sunlight levels was completed by GIA to advise on potential light changes impacted by the proposed new development.

On page 24 of the pdf version of the Daylight and Sunlight Report available to view online at your website, it states that the "BRE handbook provides the formula for calculating the average daylight factor (ADF)" in order to determine reasonably the extent of interior daylighting. To compare for example, kitchens are recommended to require double the ADF than bedrooms, as shown in the table on page 25. However, pages 12 and 13 assume that two thirds of the windows of Lambert House affected by the light well are bedroom windows, with the remaining third "to serve circulation space". This assumption is wrong in the case of my property because the windows belong to the kitchen and the bathroom.

Page 21 explains the two other main methods of measurement recommended by the BRE handbook for calculating daylight to existing residential properties: Vertical Sky Component (VSC) and No Sky Contours (NSC). Page 23 goes further to even point out the advantages and disadvantages of these methods. VSC may give a quick indication of the lighting potential but "does not take into account the window size, room size or room use". NSC, being "very dependent upon knowing the actual room layouts", "does take into account the number and size of windows to a room, but does not give any quantitative or qualitative assessment of the light in the rooms, only where sky can or cannot be seen".

This then led me to scrutinize page 44, the Appendix 4, Daylight and Sunlight Table of Results. My building is Lambert House, 2 Ludgate Square. The first table displays VSC and ADF data together, with the view as explained on page 25 that VSC serves as an initial guide if room layout and uses are not reasonably known, as opposed to ADF where room layout and uses are either known or predicted. As mentioned before, GIA does not have the entire building floor plans for Lambert House.

The VSC data on page 47 show VSC mathematical values for light hitting the windows to be decreasing when going from existing building layout to proposed development. All the values are shown to be decreasing except for two stairs windows listed as W3/703 and W3/704 (these can be viewed on a diagram on page 40). This would make sense because those two stairs windows are on the top two floors of my building. So effectively, the proposed new hotel development is shown here to have an adverse daylighting impact on my building, especially on the lower floors.

The ADF data on the same page 47 also show ADF mathematical values for light hitting the windows to be decreasing when going from existing building layout to proposed development. Again, the only exceptions are

the stairs windows (W3/702), (W3/703) and (W3/704) (these can be viewed on a diagram on page 40). Therefore, this is another indicator of the adverse daylighting impact on my building, especially on the lower floors.

Reviewing the No-Sky-Line (NSL) data on page 48 again leads to similar conclusions for my building.

Reviewing the Annual Probable Sunlight Hours (APSH) data on page 52 also leads to similar conclusions for my building. I am actually more alarmed to see data listed as 100% annual loss for 5 windows when going from existing building layout to proposed development, with most hovering above 50% annual loss. There is only one exception, W3/704, i.e. the fourth floor stairs.

In fact, this Daylight and Sunlight Report by GIA acknowledges on page 13 the limited daylight already received currently in the light well, affecting the flats in my building. However, their very flawed assumption that "as the rooms in question are understood to be bedrooms, the BRE states that sunlight to bedrooms is considered to be less important". As I mentioned already, my flat windows facing the light well are those of the kitchen and bathroom. You must also consider the possibility that other flat windows are like mine, or the possibility that the rooms may have started out as bedrooms but have now experienced the change in use to, for example, a study.

From our point of view as resident and owner, I am also very concerned about the noise disturbances caused by demolition and construction of a new building adjoining my building. The noise disturbances will not abate if the proposed hotel development does go ahead, because as you can imagine, a fully functioning hotel with restaurant services would have an endless stream of hotel guests coming and going, along with transport like taxis and coaches serving the hotel. The noise disturbances would continue with the logistical supply side of the hotel business.

Another major concern would be the traffic caused by the logistical supply side of the hotel business. It will be difficult for vehicles larger than a transit van to service the hotel, using the Ludgate Square entrance, as mentioned in the Delivery and Servicing Plan Part 2, listed in the proposal. Their proposal is to use Creed Lane. As you know, Creed Lane is only a one-way street. Realistically, it will be hard to coordinate deliveries and servicing on a one-way street. Page 7 of this plan suggests "an average of 23 daily servicing trips predicted" for this proposed hotel development, with the majority serviced by transit vans. Any passing by other vehicles may require mounting the kerb. Surely this would impact adversely on the pedestrian safety.

In addition, the Delivery and Servicing Plan Part 1 does state on page 15 that "a delivery and servicing survey was undertaken on 20th June 2013, between 07:00 and 11:00 hours... on Creed Lane and along the Site's frontage on Ludgate Hill". Why was this survey carried out only on one day and for only 4 hours? In fact, it was taken on a Thursday over a year ago.

A 140-bed hotel would generate a great deal of refuse, and refuse vehicles will be the largest vehicle type to service the hotel. This in turn will exacerbate the traffic conditions of the surrounding areas.

Therefore I feel these concerns should be addressed. Thank you for looking into my objections and I look forward to hearing from you.

Yours sincerely,

Dr. Y. Oliver

Flat 15, Lambert House, 2 Ludgate Square, London EC4M 7AS

Wells, Janet (Built Environment)

From: PLN - Comments
Sent: 08 July 2014 18:56
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

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

Comments were submitted at 6:56 PM on 08 Jul 2014 from Alderman Vincent Keaveny.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (140 bedrooms) (5,465 sq.m.), restaurant use (Class A3) at part basement and part ground floor (995 sq.m.) and associated plant areas (860 sq.m.).

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Alderman Vincent Keaveny

Email: [REDACTED]

Address: Members' Room Guildhall London

Comments Details

Commenter Type: Councillor

Stance: Customer objects to the Planning Application

Reasons for comment:

- Noise
- Residential Amenity
- Traffic or Highways

Comments: I write to object to the proposed development of a hotel on the Creed Court/Creed Lane/Ludgate Square site. The development of a seven storey (plus plant) building for use as a 140 room hotel is highly unsuitable for a constricted site in a Conservation Area adjacent to a residential building, Lambert House. The development will adversely affect the light and privacy enjoyed by its residents. The size and bulk of the building is out of keeping with surrounding buildings. The operation of the plant on the new building will significantly affect nearby residents day and night, introducing noise and smells which are not currently a concern for them. I note that the proposed development includes an atrium courtyard and a roof terrace. Both aspects of the proposal are likely to have a serious impact on the residents of Lambert House when operational, with noise and nuisance arising from numbers of people congregating in these areas, especially in the evening and late at night.

As has been observed by other objectors, the roof terrace would also impinge on the privacy of bedrooms in adjacent flats. The increase in vehicle traffic in Ludgate Square (even if only for deliveries and drop offs) will have a serious adverse effect on the characterful and tranquil nature of this Conservation Area. The narrow entrance to Ludgate Square from an extremely busy point in Ludgate Hill, and the absence of pavement in parts of Ludgate Square, means that any significant increase in traffic will create a real danger for residents, passers by and road users such as cyclists. The general increase in traffic that a hotel of this size will bring in the Creed Lane and Carter Lane will have noticeable adverse effect on the residents and businesses in the nearby streets, which are narrow and ill suited for any significant volume of vehicle traffic. In this respect, the development runs counter to the Character Summary & Management Strategy adopted by the Corporation in March 2013.

Wells, Janet (Built Environment)

From: PLN - Comments
Sent: 08 July 2014 17:10
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

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

Comments were submitted at 5:09 PM on 08 Jul 2014 from Dr. Y. Oliver.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (140 bedrooms) (5,465 sq.m.), restaurant use (Class A3) at part basement and part ground floor (995 sq.m.) and associated plant areas (860 sq.m.).

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Dr. Y. Oliver
Email:
Address: Flat 15, Lambert House, 2 Ludgate Square London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

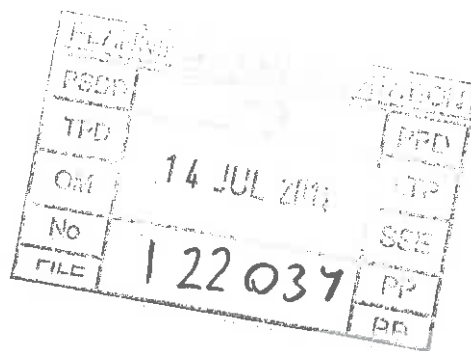
Reasons for comment:

- Noise
- Residential Amenity
- Traffic or Highways

Comments: I object to this planning application and have emailed you my concerns in my objection letter to you via PLNComments@cityoflondon.gov.uk, and I hope you have received my email. Essentially, my main concerns are the noise disturbances caused by the demolition of the current building, the construction and running of the proposed hotel development. Other main concerns include the traffic, especially the vehicles servicing the site and hotel, and the increased refuse storage and collection. I look forward to you addressing my objection letter.

Flat 19
3 Ludgate Square
London
EC4M 7AS

July 8th 2014



Planning department
City of London
Guildhall
London
EC2P 2EJ

Attn: Liam Hart,
Ref Planning Application 14/00300

Dear Sirs,

I bought the above 4th floor flat in 2001, from new. I have lived here continuously since then.
I am most concerned about the proposal to allow a hotel in this alley.
I have read the comments, and objections on line, and can only fully endorse all the points made.

It seems to me a disastrous idea. I cannot believe that the city would contemplate allowing this.

My key objections are as follows:

1. This is an historic conservation area
2. The plan is for a large hotel, and includes raising the height of the buildings in this area. This is quite inappropriate.
3. It will destroy the peace and the quality of our residential area, which has already suffered from recent changes.
4. Access for the potential number of visitors to the hotel is a potential nightmare.
5. The impact on the values of all residents' properties would be significant.

I would be seriously disappointed to see this application supported by my City Council.
A retrograde step indeed.

Gilbert Holbourn



Wells, Janet (Built Environment)

From: PLN - Comments
Subject: FW: Planning Application Ref 14/00300/FULMAJ

From: Clare James
Sent: 09 July 2014 09:26
To: PLN - Comments; Hart, Liam
Subject: Planning Application Ref 14/00300/FULMAJ

Planning Application Ref 14/00300/FULMAJ

I am writing in my capacity as Common Councilman for the Ward of Farringdon Within with my comments on the abovementioned planning application which has been drawn to my attention by a number of residents in the immediate vicinity.

I share residents' concerns over the sheer bulk and mass of the proposed building. There would appear to be an unacceptable loss of daylight and sunlight affecting certain residents and a loss of privacy from overlooking from users of the roof terrace.

There are already a number of hotels in this area. In addition there are longstanding issues resulting from the night time economy in the area. The addition of the proposed hotel will only act to exacerbate the potential for late night noise and disturbance to residents.

Kind regards

Clare James

Common Councilman for the Ward of Farringdon Within
Members' Room
Guildhall



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Please consider the environment before printing this email.

Ball, Matthew

14 / 00300

From: Pln - CC - Development Dc
Subject: FW: Email Regarding PT_LH/14/00300/FULMAJ COL:02635606

From: Ann Holmes [REDACTED]
Date: 10 July 2014 09:00:23 BST
To: liam.hart@cityoflondon.gov.uk
Subject: PT_LH/14/00300/FULMAJ

ACKNOWLEDGED

10 JUL 2014

Dear Mr. Hart

I write to object to the planning application for building a hotel on Ludgate Hill (your ref **PT_LH/14/00300/FULMAJ**). I write both as a Common Councilman for, and a resident of, Farringdon Within, the ward within which the proposed development is situated.

This development seems to me not to respect the rights of significant numbers of local residents, especially their right to quiet enjoyment of their homes.

As well as noise disturbance, the proposed scheme looks as though it would also create unacceptable levels of light loss and overlooking for some flats.

I think the need for a hotel in this location is questionable. If such a need is deemed to exist, I think these plans need to be taken back to the drawing board, and a scheme proposed which does not disadvantage residents, in the way the present proposals appear to.

I should be grateful if you would acknowledge receipt of this objection.

Yours sincerely

Ann Holmes

Flat 1, 43 Bartholomew Close, EC1A 7HN

Adjei, William

From: PLN - Comments
Sent: 11 July 2014 20:52
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

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

Comments were submitted at 8:52 PM on 11 Jul 2014 from Ms Nicola Bell.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (140 bedrooms) (5,465 sq.m.), restaurant use (Class A3) at part basement and part ground floor (995 sq.m.) and associated plant areas (860 sq.m.).

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Ms Nicola Bell

Email: [REDACTED]

Address: 14 Lambert House 2 Ludgate Square London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:

- Noise
- Residential Amenity
- Traffic or Highways

Comments: I have already submitted a detailed objection and a shorter version on_line to this site.I have received confirmation of the direct objection made to Mr.Liam Hart (planning officer concerned) and do not understand why no reference is available here.Please investigate.Please reply to [nicola](#) [REDACTED]

Adjei, William

From: PLN - Comments
Sent: 14 July 2014 12:20
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

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

Comments were submitted at 12:19 PM on 14 Jul 2014 from Mr Roshan De Alwis.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (140 bedrooms) (5,465 sq.m.), restaurant use (Class A3) at part basement and part ground floor (995 sq.m.) and associated plant areas (860 sq.m.).

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Mr Roshan De Alwis

Email: [REDACTED]

Address: 11 Lambert House 2, Ludgate Square London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:
- Noise
- Residential Amenity

Comments: I strenuously object. This development would pose a huge detrimental impact on the quality of life for the individual residents in the surrounding area. The demolition and construction of such tall building will have a massive impact on dust and pollution for all residents and local employees. Equally disturbing is the impact terms of light. A 7 storey building would significantly diminish the already restricted light into neighbouring buildings.

From: Hart, Liam
Sent: 14 July 2014 10:19
To: PLN - Comments
Subject: FW: Your Ref. 14/00300/FULMAJ; Creed Court / Creed Lane / Ludgate Square, St Pauls.

Dear Sir,

I write in connection with the hotel development proposed in the application referenced above, and wish to associate myself with the many objections already registered with you. My concerns relate to the residential building at Lambert House, 2 Ludgate Sq. EC4M 7AS.

I would briefly summarise my objections as follows:-

1. This location is a very special part of the St. Pauls and Ludgate Hill Conservation Areas. I accept this doesn't mean no changes ever, but if conservation means anything it must be to retain the existing mixed character and use of the immediate locale. A hotel on this scale, occupying most of the block must surely be contrary to the aims of any Conservation Area designation.

2. Traffic Flow. This is already, and reasonably so, an area of traffic limitations and pedestrian zones. The limousine / taxi movements that might be expected with a hotel on this site must be quite in-appropriate for the streets in this neighbourhood. This would apply not only to guests but also those other visitors attending conferences, events etc. I can also imagine the R/H and L/H manoeuvres from and into Ludgate Hill can only add to the congestion often seen there.

3. Logistics. As an extension to point (2) the daily delivery of supplies into such a tight location must inevitably add to the general level of noise, nuisance and hazard. The removal of waste (also daily I assume) would contribute further to the loss of amenity as well as the right to peaceful and quiet enjoyment. Based upon a number of personal experiences I assume most of these movements would be during "un-social hours".

ACKNOWLEDGED

4. Noise. I have seen the many comments about the atrium / courtyard. I am likely to be less directly affected by these problems but still have concerns that noise could travel around the corridors of Lambert House with negative impacts not currently felt. The proposal for a Rooftop Bar does cause concern however. In addition to normal clientele it will surely be used for events as well – including after midnight. The consequent noise / music will certainly pose a disturbance to neighbouring residents.

Much the same has to be said in relation to the plans to locate the external services plant. This is totally unsuitable for residents' peaceful enjoyment of their homes generating noise 24/7 I assume.

5. Right to daylight. My flat is less directly affected by this consideration but I fully support the comments you have received from residents whose rights and objections have been extensively set before you.

6. Noise, disturbance, dirt and dust during the demolition / construction period. This is a self-evident objection I believe. In general I support any plan to re-develop behind an existing façade where it retains the historic character of a location. This is no exception, but it seems such an approach adds to the duration of a project, creating a timeline which residents should not be expected to suffer from.

If re-development / modernisation is needed, then in such a sensitive area as this it should occur within the existing structures and layouts and ideally with a continuation of the existing mixed uses.

I will look forward to hearing from you in due course and to learning of the key dates in the progress of this application.

Yours sincerely

Robert Meyrick

(Flat3, Lambert House

2, Ludgate Sq.)

Ball, Matthew

From: PLN - Comments
Subject: FW: Comments for Planning Application 14/00300/FULMAJ

From: PLN - Comments
Sent: 30 July 2014 19:21
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

30 JUL 2014

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

Comments were submitted at 7:21 PM on 30 Jul 2014 from Miss Louise McCullough.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (140 bedrooms) (5,465 sq.m.), restaurant use (Class A3) at part basement and part ground floor (995 sq.m.) and associated plant areas (860 sq.m.).

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Miss Louise McCullough
Email: [REDACTED]
Address: Lamb Building Temple London

Comments Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Reasons for comment:

- Noise
- Residential Amenity
- Traffic or Highways

Comments: I am a Barrister who often cuts through from St Paul's tube station to Temple or comes from the Bailey for social amenity. The proposed development would lead to increased traffic in the narrow side roads both during the building works and thereafter which would be detrimental to the present amenity. I cannot see the need for further hotel accommodation in this space bearing in mind both the Grange hotel and its apartments and at the other end of the spectrum the YHA. There are a considerable number of restaurants already in the area and I do not see that the proposed development enhances the vicinity at all.

From: PLN - Comments
Subject: FW: Comments for Planning Application 14/00300/FULMAJ

From: PLN - Comments
Sent: 30 July 2014 22:19
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

30 JUL 2014

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

Comments were submitted at 10:18 PM on 30 Jul 2014 from Miss Emma Daykin.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (140 bedrooms) (5,465 sq.m.), restaurant use (Class A3) at part basement and part ground floor (995 sq.m.) and associated plant areas (860 sq.m.).

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Miss Emma Daykin
Email: Not specified
Address: 45 Canadian Avenue London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

- Noise
- Residential Amenity
- Traffic or Highways

Comments: I write to object to the proposed development of a hotel on the Creed Court/Creed Lane/Ludgate Square site. The development of a seven storey (plus plant) building for use as a 140 room hotel is highly unsuitable for a constricted site in a Conservation Area adjacent to a residential building, Lambert House. The development will adversely affect the light and privacy enjoyed by its residents. The size and bulk of the building is out of keeping with surrounding buildings. The operation of the plant on the new building will significantly affect nearby residents day and night, introducing noise and smells which are not currently a concern for them. I note that

the proposed development includes an atrium courtyard and a roof terrace. Both aspects of the proposal are likely to have a serious impact on the residents of Lambert House when operational, with noise and nuisance arising from numbers of people congregating in these areas, especially in the evening and late at night. As has been observed by other objectors, the roof terrace would also impinge on the privacy of bedrooms in adjacent flats. The increase in vehicle traffic in Ludgate Square (even if only for deliveries and drop offs) will have a serious adverse effect on the characterful and tranquil nature of this Conservation Area. The narrow entrance to Ludgate Square from an extremely busy point in Ludgate Hill, and the absence of pavement in parts of Ludgate Square, means that any significant increase in traffic will create a real danger for residents, passers by and road users such as cyclists. The general increase in traffic that a hotel of this size will bring in the Creed Lane and Carter Lane will have noticeable adverse effect on the residents and businesses in the nearby streets, which are narrow and ill suited for any significant volume of vehicle traffic. In this respect, the development runs counter to the Character Summary & Management Strategy adopted by the Corporation in March 2013.

From: PLN - Comments
Subject: FW: Comments for Planning Application 14/00300/FULMAJ

From: PLN - Comments
Sent: 31 July 2014 09:13
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

31 JUL 2014

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

Comments were submitted at 9:13 AM on 31 Jul 2014 from Mr Andrew Powell.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (140 bedrooms) (5,465 sq.m.), restaurant use (Class A3) at part basement and part ground floor (995 sq.m.) and associated plant areas (860 sq.m.).

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Mr Andrew Powell

Email: [REDACTED]

Address: Flat 3 16 Lymington Road London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

- Noise
- Residential Amenity
- Traffic or Highways

Comments: I am very concerned that this development will have a significant and irreversible impact on the conservation area.

Ball, Matthew

From: PLN - Comments
Subject: FW: Comments for Planning Application 14/00300/FULMAJ

From: PLN - Comments
Sent: 31 July 2014 13:54
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

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

Comments were submitted at 1:54 PM on 31 Jul 2014 from Mr Rich Murton.

31 JUL 2014

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (140 bedrooms) (5,465 sq.m.), restaurant use (Class A3) at part basement and part ground floor (995 sq.m.) and associated plant areas (860 sq.m.).

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Mr Rich Murton
Email: [REDACTED]
Address: 27 westrovia court 5 moreton st london

Comments Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Reasons for comment:

- Noise
- Residential Amenity
- Traffic or Highways

Comments: I work at Old Bailey, the area is already highly congested. Another hotel (which I really don't think is needed) would exacerbate this area which is already continually blocked. Its a hugely popular bus route with many routes running regular services and as a result is continually blocked as a result of the A201 junction. In addition am concerned it would commercialise and spoil that conservation area

Department of Planning and Transportation
 Attention: Liam Hart
 City of London
 P.O.Box 270
 Guildhall
 London
 EC2P 2EJ

7 March 2015.



Dear Mr. Hart,

YOUR REF: 14/00300/FULMAJ

I refer to the above referenced Planning Application for a hotel on Ludgate Hill/ Ludgate Square/ Creed Lane and submit my Objections for your consideration.

INTRODUCTION

My objections are given below in the following format:

ACKNOWLEDGED

1. comments on the letter dated 23 February 2015 from GIA accompanying the Daylight and Sunlight report.
2. Comments on the Daylight and Sunlight Report with specific reference to Section 2, Executive Summary, and Section 9, Conclusions.
3. Further comments on other aspects of the Daylight and Sunlight Report.
4. Reference to Policies in the City of London Plan adopted 25 January 2015.
5. Comment relating to "St. Paul's Cathedral Conservation Area, Character Summary and Management Strategy" adopted by the City of London Corporation 22 March 2013.

OBJECTIONS

1. Comments on the letter dated 23 February 2015 from GIA accompanying the Daylight and Sunlight Report

The letter states that the review of the Daylight and Sunlight report implications "has been undertaken by reference to the standards and criteria within the 2011 BRE by Dr. Littlefair which is the primary authority in these matters."

In addition, GIA has submitted a copy of a letter from Dr. Littlefair dated 16 December 2014, in support of their case.

I am prepared to accept GIA's statement that the BRE and Dr. Littlefair are accepted as expert in this area.

That being so, I do not think it acceptable for GIA to use BRE/Dr. Littlefair's guidance when it suits them, but to disregard it when it does not suit them. For example, on page 5 of the Daylight and Sunlight Report it is stated "the BRE states that the ADF method should only be considered in new build accommodation....." No. 2 Ludgate Square is 15 years old and yet GIA has used the ADF method as part of its review of all 17 windows under consideration. This is not acceptable and the fact that they suggest that they have used "reasonable assumptions" in this connection is hardly convincing, because they are not impartial in this matter.



I would suggest that, based on BRE/Dr. Littlefair's expertise, all reference to ADF should be ignored.

2. Comments on the Daylight and Sunlight Report with specific reference to Section 2,

Executive Summary, and Section 9, Conclusions

Section 2 Executive Summary.

Paragraph 2.

It is stated "....due to the existing low levels of daylight especially within the lower levels of the building" i.e. of 2, Ludgate Square.

This reference to "existing low levels of daylight " is definitely not true of the 4th floor, where one of the main features of our flat is how light it is. Indeed, this was a major reason for purchasing the flat.

Also, this statement cannot be true of the penthouse on the floor above.

We have enclosed several photographs taken in December 2014 and February 2015 as evidence of very high levels of sunlight to our flat.

Paragraph 3.

It is stated that " The final window located at the fourth floor which would experience a 24% alteration, marginally above the 20% suggested by BRE"

It is not correct to say that this is marginally above BRE guidance. It is 4% above the 20% guidance. Thus, it is 20% above the guidance level, which is substantial.

Paragraph 4.

Re NSL results, for 2, Ludgate Square. Although 60% of rooms achieve BRE guidance levels, 40% do not, including 27% which transgress BRE guidance by 40+%.

GIA goes on to state " This is not surprising as any increase in massing would result in reductions in NSL to this property." This is undoubtedly correct; the main problem with this planning application is the increase in massing; which is very much to the detriment of residents of 2, Ludgate Square. Eliminate the massing and many of the problems for residents disappear.

Paragraph 6.

It is stated that the windows of 2, Ludgate Square "can only theoretically benefit from morning sunlight ," and "it is unlikely that any APSH received to the windows would penetrate deep into the rooms."

This is simply not true. We have several photographs taken in December 2014 and February 2015 showing sunlight penetrating the full depth of our bedrooms (Flat 13, 4th floor, R1/704 and R2/704) and beyond. Some photographs are enclosed, for your information.

Paragraph 7.

GIA concedes that many of the windows and rooms of 2, Ludgate Square would experience BRE transgressions in VSC and NSL. **Actually, in VSC 65% do not meet BRE guidance, some by 40+%, and for NSL, 40% do not meet BRE guidance, including 27% which transgress guidance by 40+%. For APSPH 65% of windows and 67% of rooms do not meet BRE guidance.**

GIA then attempts to use ADF results to mitigate these transgressions of BRE guidance even though BRE guidance expressly states that that ADF should be applied only to new builds, which does not apply to 2, Ludgate Square, which was built in 2000.

GIA itself notes that 11 of the 15 bedrooms would experience BRE transgressions i.e. 73%. GIA repeats the statement that 2, Ludgate Square currently receives "low levels of sunlight." This is patently not true of the upper floors and, in any case, is not a reason to increase mass on the adjoining site to substantially reduce sunlight to any existing residents.

Section 9, Conclusions

In paragraph two it is stated that Stephan Reinke Architects have designed a scheme to ensure that daylight and sunlight impacts are kept to a minimum.

This is untrue in that the principal feature of the scheme is the greatly increased mass proposed for the site, which is to the substantial detriment of its nearest neighbours in the residential building of 2, Ludgate Square.

GIA goes on to quote the compliance rates of VSC (85%), NSL (71%) and ASPH (81%) in support of their statement. However, I would suggest that the VSC, NSL and ASPH tables have been designed specifically to distract attention from the fact that 2, Ludgate Square, the nearest neighbour and a residential one at that, is substantially outside BRE guidance in every aspect under consideration. This has been done by including in the tables properties in Carter Lane that are hardly affected by the proposed scheme, thus exaggerating the total compliance figures that they choose to quote.

Consider each table, as follows;

Table 01, Vertical Sky Component

Of 61 windows other than those in 2, Ludgate Square, all but 1 meets BRE guidance **BUT 11 of 17 windows in 2, Ludgate Square, i.e. 65%, do not meet BRE guidance, some by 40+%.**

Table 02, No Sky Line

Although 71% meet BRE guidance **40% of windows in 2, Ludgate Square do not meet guidance, including 27% which transgress BRE guidance by 40+%**

Table 03, Annual Probable Sunlight Hours

While 81% of all windows meet BRE guidance, **65% of those in Ludgate Square do not.**
While 63% of all rooms meet BRE guidance, **67% of those in 2, Ludgate Square do not.**

It should be noted that, in the Daylight and Sunlight Report, Appendix 1, page 1, GIA states "There are many instances of planning applications being refused due to impact on daylight and sunlight on neighbouring properties," and, "in central London practically all Local Authorities expressly state

they will not permit or encourage developments which create a material impact on neighbouring buildings...."

I would suggest that the above levels of non compliance with BRE guidance, as far as 2, Ludgate Square is concerned, are irrefutable evidence of material impact to the detriment of all residents of that building. Consequently, the application should be rejected on this basis alone.

3. Further Comments on other aspects of the Daylight and Sunlight Report.

1. On page 10 of the Daylight and Sunlight Report it is stated that an important part of the design element of the proposed courtyard is "the inclusion of white glazed bricks to the facade which are highly reflective to ensure that the flats facing the site receive as much light as possible."

I would make three points in that regard;

- (i) the ADF method, which takes into account reflective light, should not be admissible because the BRE states that the ADF method should only be considered in new build accommodation, whereas 2, Ludgate Square is 15 years old.
- (ii) At present flats overlooking the courtyard look out onto a good quality brick and tile facade which is probably as attractive as is possible in the circumstances, whereas a vista of white glazed brick would be horrible aesthetically, being reminiscent of a Victorian public convenience.
- (iii) White glazed bricks would in any case soon become dirty and even more unsightly, and would lose substantial elements of reflectivity.

2. On page 11 of the Daylight and Sunlight Report it states " due to the orientation of this building whereby the windows are facing almost fully east, any sunlight received will be unlikely to penetrate deep into the room. It should therefore be noted that any sunlight reduction to the rooms within this property (2, Ludgate Square) will most probably be at window reveals rather than deep within the room."

This is simply not true. We have several photographs taken in December 2014 and February 2015 showing sunlight penetrating the full depth of our bedrooms and beyond (Flat 13, Fourth Floor, R1/704 and R2/704). Indeed, one of the main reasons for purchasing the flat was that it is flooded with light. (Photographs enclosed)

4. Reference to Policies in the City of London Plan adopted 25 January 2015.

There are three policies in the above Plan that relate directly to this planning application as it affects existing residents.

1. Policy DM 21.3 Residential Environment.

The policy states " the amenity of existing residents within identified residential areas will be protected...."

Our property is in the identified residential area of Carter Lane and should be protected.

The policy requires new developments near existing dwellings " to demonstrate adequate mitigation measures to address detrimental impact."

Excessive massing on the site would appear to be contrary to this policy, even after the recent efforts at mitigation.

The policy states "All development proposals should be designed to avoid overlooking and seek to protect privacy, day lighting and sun lighting levels to adjacent residential accommodation."

Excessive massing, which is the main feature of this plan, actually causes all the things which this policy states should be designed out of such plans, as far as 2, Ludgate Square is concerned.

The policy states "The cumulative impact of individual developments on the amenity of existing residents will be considered."

We already have a major hotel, Grange St. Paul's, that hotel's separate suites in Creed Lane, the Youth Hostel, in Carter Lane, the King's Wardrobe serviced apartments, Carter Lane, and the Club Quarters Hotel, Ludgate Hill, either in, or in very close proximity to, what is an "identified residential area." To build another substantial hotel seems excessive in an area identified for further residential development.

2. Policy 3.21 Housing

The policy states at 3.21.2 "In recent years most new residential development has been located in or near existing residential areas. This allows greater opportunities for creating peaceful areas and a high quality residential environment. It avoids potential conflict with commercial and office uses, and the areas are more easily serviced with facilities required by residents."

Surely the building of a hotel in what is a small area specifically designated as desirable for residential development is contrary to the above policy so recently adopted by the City of London. It would cause significantly more vehicular traffic and resultant noise and disturbance to residents who have chosen to live in a Conservation Area, which is unsuited to additional traffic because of narrow roads and pedestrianised areas. In addition, the building of a hotel will substantially reduce the area available to create further residential accommodation in what is, after all, an "identified residential area."

3. Policy DM 10.7 Daylight and Sunlight

The Policy states in paragraph one: "To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings to unacceptable levels, taking into account BRE guidelines."

I believe that my comments and analysis of the Daylight and Sunlight report on pages 2 - 6 of this letter show clearly that the proposed development will reduce noticeably the daylight and sunlight available to residents of 2, Ludgate Square and that there are many substantial transgressions of BRE guidelines, often by in excess of 40%.

There are three other Policies in the City of London Plan, less directly related to existing residents, which are worthy of more detailed consideration.

1. Policy DM 11.3 Hotels

The Policy states that Proposals for new hotels will only be permitted where they:

(i) do not prejudice primary business functions of the City.

The loss of B1 office space is prejudicial to the primary business function of the City.

(ii) are not contrary to Policy DM 1.1

The proposed hotel would be contrary to Policy DM 1.1 in that it introduces a use i.e. hotel accommodation, that adversely affects the existing beneficial mix of commercial use in that the area is already well provided with hotel rooms, serviced apartments etc.

(iii) contribute to the balance and mix of uses in the immediate locality.

The proposed hotel would not contribute to the balance and mix of uses in the immediate locality because, as stated above, there is no lack of hotel and related accommodation. It would also reduce B1 office space and the possibility of further residential development.

(iv) do not result in adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts.

The proposed hotel would result in major adverse impacts on the residents of 2, Ludgate Square, particularly related to reductions in daylight and sunlight due to proposed massing on the site.

(v) provide satisfactory arrangements for pick up/drop off, service delivery vehicles and coaches appropriate to the size and nature of the hotel.

It is doubtful if arrangements for servicing the hotel, in all its aspects, could be considered satisfactory in an area of pedestrianised, narrow and one-way streets in what is, after all, a Conservation area and an "identified residential area."

2. Policy DM 1.1 Protection of Office Accommodation

The Policy is;

" To refuse loss of existing B1 offices to other uses where the building or its site is considered suitable for long-term office use and there are strong economic reasons why the loss would be inappropriate for any of the following reasons:"

(i) prejudice to the primary business function of the City.

The loss of office space for use as a hotel in an area that already has substantial hotel and other types of accommodation is prejudicial to the primary function of the City.

(ii) introducing uses that adversely affect the existing beneficial mix of commercial uses.

It is introducing yet another hotel into an area which is already well supplied with what is essentially tourist accommodation in an area which has already seen a considerable loss of office accommodation to restaurants and other tourist facilities. This is an area designated as an "identified residential area" and, if there is any change of use, it would be beneficial if it was mixed residential and office use, and retained the two small businesses, a hairdresser and a tailor, that will be lost to Ludgate Square under the current proposal.

3. Policy DM 10.1 New Development

The Policy states at 3.10.39 " The amount of daylight and sunlight received has an important effect on the general amenity of dwellings..... and the energy efficiency of buildings."

From my comments and analysis of the Daylight and Sunlight Report on pages 2 - 4 of this letter it is evident that this planning application will have a major detrimental effect on the amenity of the residents of 2, Ludgate Square with regard to light.

For those living at the higher levels, which receive much sunlight morning and afternoon there will be a significant negative effect on energy efficiency given the substantial reduction in sunlight that would result from the extensive massing that is proposed.

5. Comment relating to "St. Paul's Cathedral Conservation Area, Character Summary and Management Strategy" adopted by the City of London Corporation 22 March, 2013.

On page 45, re the Condition of the Conservation Area, it states "Potential pressures on the area have already been identified as new development, utilities replacement works, and the impact of road traffic.....The condition of the Conservation Area is judged to have improved in recent years, and is expected to further improve in coming years."

Comment: If potential pressures on the area have already been identified as "new development.....and the impact of road traffic" it is hard to see how a new hotel can be anything but seriously detrimental to the area in both aspects.

While I agree that the area has improved in recent years it is hard to see how the proposed new hotel contributes to the expectation that the area is "to further improve in coming years." The hotel will damage the elevations on Ludgate Square, as result of excessive massing, and cause increased motor traffic to the detriment of cyclists and pedestrians, all in an area part pedestrianised and generally consisting of narrow roads with severe vehicle restrictions.

Yours Sincerely,



(Mr.) K. Rimmer

Flat 13
Lambert House
2, Ludgate Square
London
EC4M 7AS

BEDROOM R1/704



Sent from my iPhone

In the Daylight & Sunlight Report, Section 2 Executive Summary it states in Paragraph 6 that the windows of 2, hudgete Square "can only theoretically benefit from morning sunlight," and "it is unlikely that any APSH received to the windows would penetrate deep into the rooms."

This is simply not true, as ~~it~~ is clearly shown above, and is a major professional error or a distortion of the truth.

[REDACTED] from desk of Bedroom R1/704



Sent from my iPhone

In the Daylight & Sunlight Report, Section 2 Executive Summary, Paragraph 6, it states that the windows of 2, Ludgate Square "can only theoretically benefit from morning sunlight," and "it is unlikely that any APSH received to the windows would penetrate deep into the rooms."

As clearly shown above the sunlight at 9.13am on 23/2/15 has penetrated the full length of Bedroom R1/704 and beyond to the far wall of the entrance hall.

~~3-4-6~~

BEDROOM R2/704 23/2/15 9-34 am





DECEMBER 2014

08:55 HOURS

SKYLINE FROM

BEDROOM R1/704

THIS SKYLINE WILL DISAPPEAR
BECAUSE OF MASSING ON HOTEL
SITE AND ELIMINATE SUNSHINE
SHOWN IN ATTACHED PHOTOS



21/9/2014

13-42 HOURS

SKYLINE FROM

BEDROOM R1/704

THIS SKYLINE WILL DISAPPEAR
DUE TO MASSING ON HOTEL SITE



JUNE 2014

18-11 HOURS

SKYLINE FROM

BEDROOM R1/704

Flat 19

3 Ludgate Square

London EC4M 7AS

8th March 2015

PLANNING PERMISSION	
PD00	12 JAR 12/15
TP0	
DM	
NO	
FILE	12 6049
RPD	
LTP	
SUL	
OP	
OT	

ACKNOWLEDGED

Dear Sir / Madam

Location Creed Court 3-5 Ludgate Hill, 1-3 Creed Land And 11-12 Ludgate Square London EC4M 7AA

Having considered the proposal for planning permission at the above location, I wish to make a strenuous objection to the proposed development on the

The height of the proposed structure would have a significant impact on the light within our apartment - given it is significantly taller than the existing structure.

I hope that you will give consideration to this objection and limit the height of the new build to the existing structure.

Regards

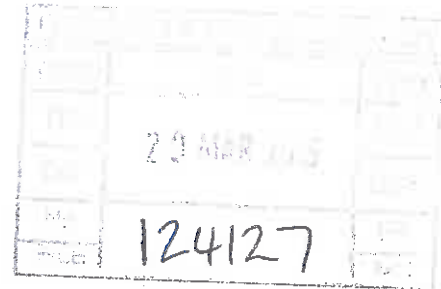
J Stacey

dp

Planning Department
Attention: Liam Hart
City of London
P.O. Box 270
Guildhall
London
EC2P 2EJ

10th March 2015

Dear Mr. Hart,



YOUR REF: 14/00300/FULMAJ

I refer to the above referenced Planning Application for a change of **use from office to hotel**.
Location: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane, and 11 - 12 Ludgate Square, London
EC4M 7AA

My objections are as follows:-

DM 21.3 Residential Environment page 177 states that **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.**

REFLECTIVE LIGHT can contain **little heat content** whereas at the present time windows W1/704 and W2/704 provide sunlight which produces heat to the rooms, especially welcome in the winter months. This **energy** cuts the fuel bills.

The proposed building mass will substantially reduce light to residents of 2, Ludgate Square. While this would be somewhat offset by replacing the existing brick and tile with white glazed bricks this would be unattractive and provide only a marginal amount of reflective light. Over time these proposed white glazed bricks will weather causing the bricks to darken with lichen and pollution thereby **reducing any proposed reflection.**

In any event **reflective light relates to ADF** which, according to **BRE guidance**, only applies to new build whereas 2 Ludgate Square is an existing building.

OVERSHADOWING. The proposed 38950 mm mass plant build on the SE corner of the proposed plan will cause overshadowing of the windows and darken the interior of 2 Ludgate Square to the severe detriment of residential amenity. Photograph enclosed.

**GIA DAYLIGHT AND SUNLIGHT REPORT
EXECUTIVE SUMMARY SECTION. Page 2 and 3**

It is stated that any increase in massing would lead to non-compliance with the BRE Guide Lines relating to sunlight received by 2 Ludgate Square. **This non-compliance with BRE Guide Lines is not caused by proximity of 2 Ludgate Square to the site as is stated by Gia but by the excessive massing proposed in this planning application.** Gia refers to "low levels of

sunlight" in 2 Ludgate Square. This is certainly not true of my flat on the 4th floor and cannot be true of the penthouse on the 5th floor. Whilst flats on lower floors have lower levels of light it is not appropriate to damage their amenity by excessive massing on the adjacent site.

Dr. Littlefair's letter of 16th December 2014. Although a recognised expert on BRE his comments are based on what Gia has chosen . As such they are generic and do not reflect his opinion on this specific Planning Application.


If this application goes ahead we will loose the skyline , sunlight, daylight to our windows.

Roof Terraces do not mix well with residential neighbours even if there are time limits on the gathering of people. Inevitably there will be wedding parties, office parties participating. Can you certainly say they will all leave at 8 p.m. I doubt very much this will happen; which is likely to result in frequent complaints to the City of London.

Ludgate Square is a small lane with attractive facades and is cohesive with offices, residential and several independent shops. It will be substantially detrimental to the Conservation area to build a hotel on a large site out of proportion to the local environment.

In addition to the above objections I shall be obliged if you will take into consideration of the objections raised in my letter dated 6th July, 2014. A copy of which is attached.

yours sincerely,



Mrs. J.L. Rimmer
Flat 13
Lambert House
2 Ludgate Square
London
EC4M 7AS

5 enc: photos

①



LUDGATE SQUARE :
PROPOSED DEMOLITION OF THESE
INDEPENDANT SHOPS AND OFFICES
WHICH WILL BE DETRIMENTAL
TO RESIDENTS.

2



ARCHWAY

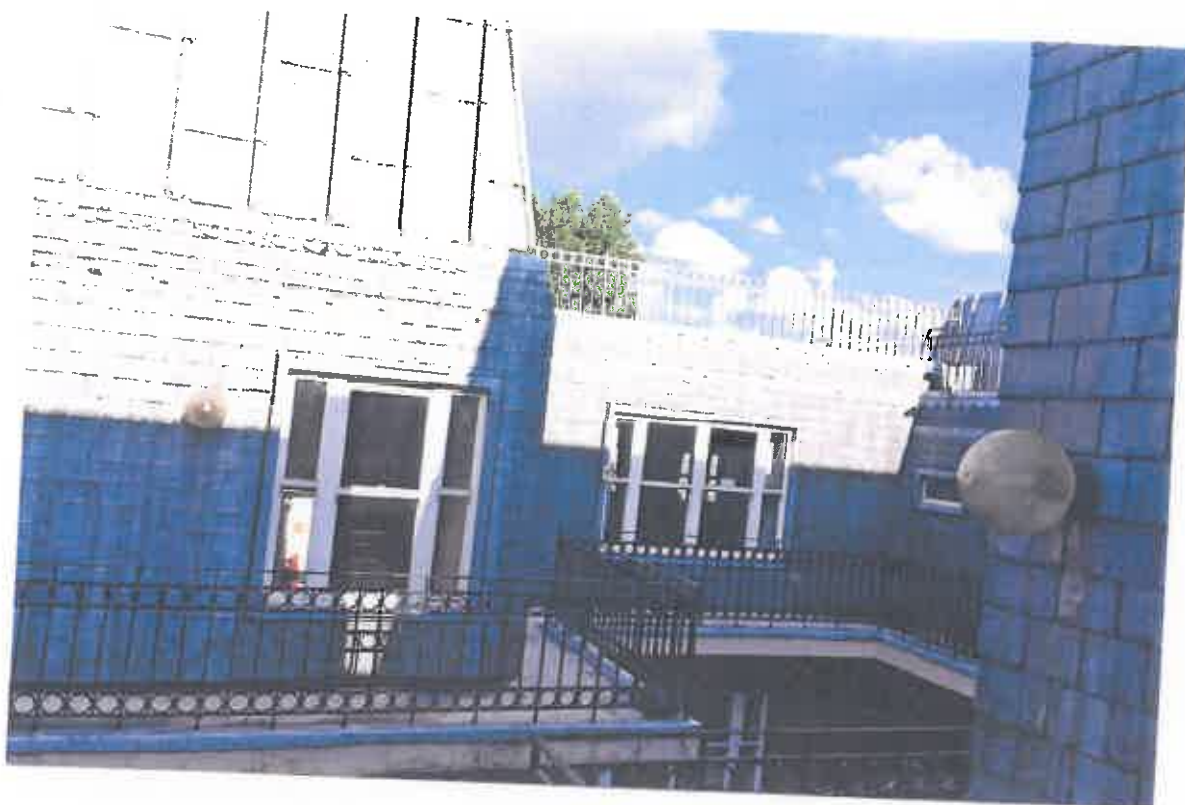


UPPER LUDGATE SQUARE:

FURTHER PROPOSED DEMOLITION
OF SHOPS AND OFFICES

VIEW LOOKING TOWARDS 2 LUDGATE SQ.
AND ARCHWAY LEADING TO LUDGATE HILL

3



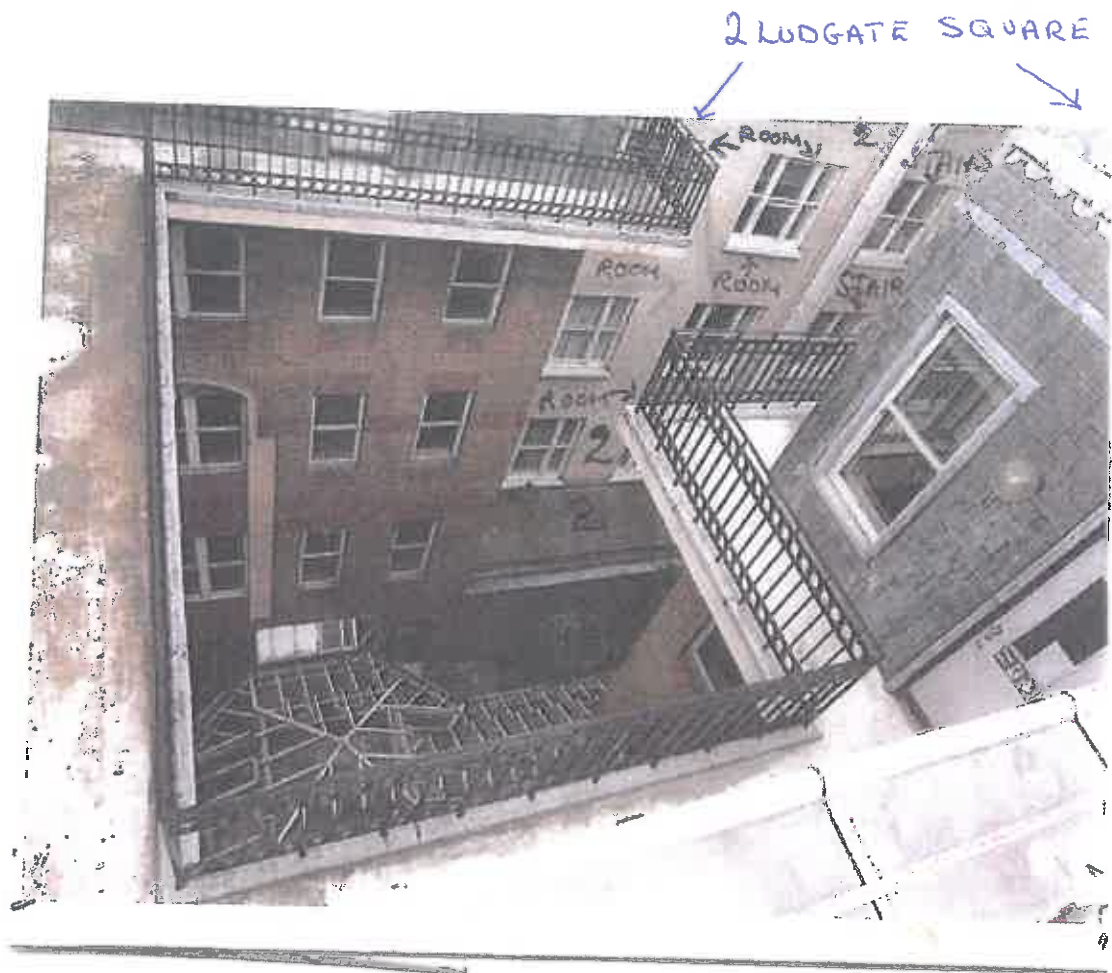
JUNE 2014 TIME ' 18:11 HOURS
SKYLINE FROM BEDROOM R1/704

④



DECEMBER 2014 TIME 08:55 HOURS
SKYLINE FROM BEDROOM R1/704
THIS SKYLINE WILL DISAPPEAR
WITH PROPOSED HOTEL PLANT

(5)



The proposed plant infill of 38950
in the S.E. courtyard will cause
substantial Overshadowing of
2 Ludgate Square

1
copy of original

Planning Department
Attention: Liam Hart
City of London
P.O. Box 270
Guildhall
London EC2P 2EJ

6th July 2014

Dear Sir,

YOUR REF: 14/00300/FULMAJ – Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square

In reference to the above Planning Application I enclose my objections to the Application for your consideration:-

The Proposed Building Plan for a Hotel instead of the existing Office. Creating a conflict between residential and commercial in an historic, conservation area of St. Paul's London.

There are already sufficient hotels in the St. Paul's Conservation Area. Grange St. Paul's, Godliman Street, Grange St. Paul's Serviced Suites, Creed Lane, Club Quarters, Ludgate Hill, Y.H.A, Carter Lane, The King's Wardrobe serviced apartments off Carter Lane. These are contained in a small area around Lambert House, 2 Ludgate Square. There is not sufficient evidence to suggest any more Hotels are needed. It would also be more appropriate for the Hotels to be located away from residential areas.

There are more hotels on the perimeter of this conservation area.

This Proposed Plan brings a lot more vehicles into the area which are pedestrian zones. Motor vehicles are prohibited from Carter Lane between 8 a.m. and 6 p.m. from Monday to Friday and from Ludgate Square at all times except for loading. Access for cyclists to both pedestrian zones is maintained at all times. Carter Lane east of Godliman Street is a route for use by pedal cycles and pedestrians only. The Corporation states that "In adopting the Core Strategy the City has refined its highway hierarchy to further reduce the adverse impacts of motor vehicle traffic, including the valued character of the City's conservation areas." The effects of another large hotel would appear to be contrary to this stated strategy.

The Application alters the Character of Ludgate Square taking away shops which add to the amenities there. Also Ludgate Square is entered by an Arch from 23 Ludgate Hill which leads into a narrow passage opening into a small cobbled lane. It allows unloading but because of the small entrance any larger vehicle than a small van grazes the brickwork under the Archway. Lambert House exits directly onto the lane. There is no pavement. The lane is particularly quiet and tranquil and is ideal for residents living there. The Archway is also a good viewing point for pedestrians to stand and take photographs of St. Paul's Cathedral. If the proposed hotel use vehicles under this Archway it would be a hazard for pedestrians and cyclists and take away the peacefulness of the lane. All Lambert

Copy

2

House residents have wooden sash opening windows so quietness is of importance from living room, bedroom and kitchen windows.

The narrow lanes and alleys of Ludgate Square (which is not a Square), Carter Lane, Deans Court and Creed Lane are prime historic tourist areas and unsuitable for any additional traffic. They should be left as they are and not bring about a massive, bulky height and density hotel, which far exceeds the present office height of 4 floors. Creed Lane could become a service area for Dustcarts, Coaches, Taxis and Delivery Lorries, exacerbating the noise levels and pollution and spoiling a tourist area which is mostly for pedestrians and cyclists.

The existing building can easily remain at its present height and be refurbished to bring it up to date. Small/medium offices are always in demand for the smaller business, and makes good economic sense for the City of London. Office hours are by far better for residents and as they do not work at weekends in comparison to a 24 hours working hotel

The proposed building has 7 and a bit floors and 3 basements. The bit floor is the PLANT placed close to the windows of Lambert House, 2 Ludgate Square. The residents windows open on to the internal atrium and I am concerned about pollution and air quality that will enter the windows. (steam, ventilation for the City's Sewer Network, noise etc.) No details of the PLANTS WORKING is given on the Application.

Residential and hotels are not a good mix because of lack of privacy for residents, increase of noise, pollution, and additional bulk and heights. Not forgetting this is a Conservation Area.

Yours faithfully,

Mrs. J. L. Rimmer
Flat 13
Lambert House
2 Ludgate Sqaure
London
EC4M 7AS

2 pages.

FAO Mr Liam Hart,
Planning Officer,
Department of the Built Environment,
City of London,
PO Box 270,
Guildhall,
London EC2P 2EJ

Dear Mr Hart,

12th March 2015

Letter of Objection: Application Reference No. 14/00300/FULMAJ
Proposed development at Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square, London EC4M 7AA

Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (140 bedrooms) (5,465 sq.m.), restaurant use (Class A3) at part basement and part ground floor (995 sq.m.) and associated plant areas (860 sq.m.).

We write today on behalf of our client, Mr J Colombano and Ms M L Kirk who reside at Flat 16, Lambert House, 2 Ludgate Square, neighbouring the proposal. We have been contacted by our client after concerns were raised that the proposed development will infringe on the daylight and sunlight currently enjoyed by their property (as laid down in the BRE "Site layout planning for daylight and sunlight: a guide to good practice", 2011 by PJ Littlefair).

Our client Mr J Colombano through his letter to City of London dated 7th July 2014 raised some issues regarding daylight, sunlight matters subsequent to a development being submitted to the Council. The proposed scheme has since been modified by Stephen Reinke Architects and a revised daylight and sunlight report has also been submitted by GIA. We have reviewed this revised report, and comment as follows.

Although we acknowledge that the architects have incorporated further improvements following the consultation on the planning application we have made a comparison between the first and second analysis. The table below shows that overall the revised scheme improves the VSC results from 0.07% up to 13.54%. The revised scheme will further impact 4 surfaces with additional VSC losses ranging from 0.02% to 1.29%.

Whilst we concur that the revised scheme will improve the VSC results compared to the first analysis we still have some major concerns regarding the impact on surrounding properties.

Vertical Sky Component

Room	Window	Vertical Sky Component Existing	Proposed (1st analysis)	Proposed (2nd analysis)	Difference
46 CARTER LANE					
R1/820	W1/820	13.06	12.39	12.23	-1.29
R1/820	W4/820	78.42	75.49	75.54	0.07
48 CARTER LANE					
R2/830	W2/830	22.60	19.34	19.31	-0.16
R2/830	W5/830	83.04	80.20	80.18	-0.02
50 CARTER LANE					
R3/810	W3/810	11.96	9.55	9.51	-0.42
R1/811	W4/811	27.22	23.64	23.67	0.13
3 LUDGATE SQUARE					
R1/100	W1/100	3.59	3.61	3.75	3.88
R1/100	W2/100	3.70	3.78	3.93	3.97
R1/100	W3/100	3.12	3.12	3.32	6.41
R1/101	W1/101	6.27	6.16	6.37	3.41
R1/101	W2/101	5.71	5.70	5.90	3.51
R1/101	W3/101	5.49	5.38	5.65	5.02
R1/101	W4/101	5.01	4.95	5.17	4.44
R1/102	W1/102	9.56	8.88	9.10	2.48
R1/102	W2/102	8.91	8.34	8.57	2.76
R1/102	W3/102	8.59	7.89	8.25	4.56
R1/102	W4/102	7.96	7.42	7.66	3.23
Room	Window	Vertical Sky Component Existing	Proposed (1st analysis)	Proposed (2nd analysis)	Difference
R1/103	W1/103	14.64	12.84	13.09	1.95
R1/103	W2/103	13.94	12.25	12.51	2.12
R1/103	W3/103	13.50	11.82	12.12	2.54
R1/103	W4/103	12.66	11.12	11.40	2.52
R1/104	W1/104	22.42	18.76	19.01	1.33
R1/104	W2/104	22.88	19.19	19.42	1.20
R1/104	W3/104	22.23	18.57	18.85	1.51
R1/104	W4/104	21.67	18.08	18.35	1.49

R1/104	W5/104	24.15	20.54	20.79	1.22
R1/104	W6/104	20.39	16.93	17.20	1.59
R1/104	W7/104	21.63	18.04	18.30	1.44
R1/105	W19/105	79.87	79.52	79.53	0.01
R2/105	W1/105	32.29	32.25	32.26	0.03
1 LUDGATE SQUARE					
R2/100	W4/100	2.44	2.43	2.53	4.12
R2/100	W5/100	2.12	2.11	2.25	6.64
R2/100	W6/100	0.99	0.96	1.09	13.54
R2/100	W7/100	0.37	0.37	0.37	0.00
R2/101	W5/101	3.84	3.73	3.87	3.75
R2/101	W6/101	3.56	3.45	3.58	3.77
R2/101	W7/101	3.30	3.22	3.38	4.97
R2/101	W8/101	2.99	2.97	3.07	3.37
R2/101	W9/101	0.64	0.64	0.64	0.00
R2/101	W10/101	0.47	0.47	0.47	0.00
R2/102	W5/102	6.34	5.84	5.99	2.57
R2/102	W6/102	5.89	5.47	5.60	2.38
Room	Window	Vertical Sky Component Existing	Proposed (1st analysis)	Proposed (2nd analysis)	Difference
R2/102	W7/102	5.50	5.15	5.31	3.11
R2/102	W8/102	4.99	4.75	4.86	2.32
R2/102	W9/102	1.18	1.18	1.18	0.00
R2/102	W10/102	0.87	0.87	0.87	0.00
R2/103	W5/103	10.48	9.32	9.51	2.04
R2/103	W6/103	9.80	8.88	9.03	1.69
R2/103	W7/103	9.24	8.50	8.66	1.88
R2/103	W8/103	8.45	7.93	8.04	1.39
R2/103	W9/103	2.44	2.44	2.44	0.00
R2/103	W10/103	1.78	1.78	1.78	0.00
R2/104	W8/104	17.39	14.94	15.14	1.34
R2/104	W9/104	18.04	15.71	15.87	1.02
R2/104	W10/104	16.84	14.97	15.14	1.14
R2/104	W11/104	16.07	14.61	14.75	0.96
R2/104	W12/104	19.01	17.36	17.49	0.75
R2/104	W13/104	14.66	13.64	13.77	0.95
R2/104	W14/104	16.21	15.10	15.20	0.66
R2/104	W15/104	5.64	5.64	5.64	0.00
R2/104	W16/104	4.58	4.58	4.58	0.00
2 LUDGATE SQUARE					

R1/701	W1/701	4.54	2.75	2.95	7.27
R2/701	W2/701	4.63	2.94	3.09	5.10
R1/702	W1/702	7.37	5.18	5.53	6.76
R2/702	W2/702	8.06	6.08	6.29	3.45
R1/703	W1/703	14.06	9.93	10.54	6.14
Room	Window	Vertical Sky Component Existing	Proposed (1st analysis)	Proposed (2nd analysis)	Difference
R2/703	W2/703	14.42	12.98	13.20	1.69
R1/704	W1/704	24.29	17.31	18.39	6.24
R2/704	W2/704	24.10	23.99	24.32	1.38
R1/705	W1/705	34.49	25.80	27.26	5.66
R2/705	W2/705	35.00	31.91	32.15	0.75
19 LUDGATE HILL					
R4/701	W4/701	5.19	N/A	2.74	N/A
R4/701	W5/701	4.96	N/A	2.63	N/A
R4/702	W4/702	8.13	N/A	4.89	N/A
R4/702	W5/702	7.93	N/A	4.78	N/A
R4/703	W4/703	12.04	N/A	8.93	N/A
R4/704	W4/704	19.01	N/A	16.51	N/A

The executive summary of GIA's report dated 13th November 2014 makes it clear that "in relation to the daylight and sunlight impacts to adjoining properties, 2 Ludgate Square would be the most affected, which is not surprising given its close proximity to the site". We question why the revised scheme still includes an increase in massing (compared to the existing site) to the south of this property, which will clearly result in losses of daylight and sunlight. The following statement from the GIA report reiterate even more this concern "Due to these low existing levels of daylight and sunlight, they are very sensitive to any increase in massing on the Creed Court site and any reduction most often leads to non-compliance if the BRE guidelines are strictly applied". Although the existing levels are already poor it is not a justifiable reason to make these levels even poorer.

Paragraph 2.2.7 of the BRE guide "Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice (2011)" states that ***"If the VSC, with the new development in place, is both less than 27% and less than 0.8 times its former value, occupants of the existing building will notice the reduction in the amount of skylight. The area lit by the window is likely to appear more gloomy, and electric lighting will be needed more of the time."***

With the proposed development in place:

- * 60% of the windows at 2 Ludgate Square failed to meet the above criteria
- * 71% of the windows at 19 Ludgate Hill failed to meet the above criteria
- * 50% of the windows at 50 Carter Lane failed to meet the above criteria



50 Carter Lane

-

2 Ludgate Square and 19 Ludgate Hill

- * We do not agree with GIA's statement as to whether any occupier would notice such a change in VSC. As per the BRE criteria above, we can confirm that occupants at 2 Ludgate Square, 19 Ludgate Hill and 50 Carter Lane will notice the reduction in the amount of skylight available.

Regarding the No-Sky Line criteria (NSL), here again with the proposed development in place:

- * 30% of the windows at 2 Ludgate Square failed to meet the above criteria for good daylight distribution
- * 60% of the windows at 19 Ludgate hill failed to meet the above criteria for good daylight distribution
- * 100% of the windows at 50 Carter Lane failed to meet the above criteria for good daylight distribution

It is correct that BRE states that bedrooms are less Important, however they still need to be analysed. It does not mean they can be ignored and we express our concern at GIA's statement that the impact "is not surprising as any increase in massing on the Creed Court site (to the south) would results in reduction in NSL to this property". The proposed increase in height and proposed plant room are unreasonable in this case and would have a detrimental impact on the surrounding properties in terms of daylight. Our statement is supported by the below BRE paragraph 2.2.9:

"If, following construction of a new development, the no-sky line moves so that the area of the existing room, which does receive direct skylight, is reduced to less than 0.8 its former values this will be noticeable to the occupants, and more of the room will appear poorly lit."

- * We note that 80% of the rooms at 2 Ludgate Square, 19 Ludgate Hill and 50 Carter Lane which are already adversely impacted in terms of VSC will also be adversely impacted in terms of NSL. These rooms will look darker and gloomier if the proposed scheme was built and we add this is in contravention of the City of London Policy DM 10.7.

The Policy DM 10.7 Daylight and sunlight aims to prevent development which would noticeably reduce the daylight and sunlight available to nearby dwelling and open spaces to unacceptable levels, taking account of the BRE's guidelines.

- * The proposed scheme will be higher and bulkier than the existing site and will significantly harm the surrounding properties at 2 Ludgate Square, 19 Ludgate Hill and 50 Carter Lane and is therefore non-compliant with the Council's Policy.

Another type of assessment which was carried out by GIA, called ADF, takes into account reflective light. For the purposes of the assessment, the internal layouts of the properties at 2 Ludgate Square, 19 Ludgate Hill and 50 Carter Lane must be known. According to the report, some floor plans of 2 Ludgate Square were obtained from the Land Registry, however, there is no evidence of these floor plans in the report. The accuracy of the ADF assessment is therefore questionable as we believe no site survey was carried out on this property and no contact was made with the owners in order to gain access to the impacted flats and take accurate measurements. For a development of this size we would expect accurate details/information and not assumptions. We therefore require that a proper assessment is carried out at the properties at 2 Ludgate Square, 19 Ludgate Hill and 50 Carter Lane.

Another concern we have is the actual use of the ADF assessment in the report. The following ADF criteria based upon room usage were used in the assessment:

- 2% ADF for kitchen
- 1.5% ADF for living/dining room
- 1.0% ADF for bedroom

Whilst we can agree with these values, we cannot concur with the use of the ADF assessment in this situation. In the BRE guide, the above ADF criteria can be found in paragraph 2.1.8 under the chapter 2.1 New Development. We confirm that the properties at 2 Ludgate Square and 19 Ludgate Hill are not new developments but existing buildings.

The ADF methodology should not be used on existing buildings. The BRE guide states in Appendix F, paragraph F6 ***"In assessing the loss of light to an existing building, the VSC is generally recommended as the appropriate parameter to use. This is because the VSC depends only on obstruction, and is therefore a measure of the daylight environment as a whole. The average daylight factor (ADF) (Appendix C) also depends on the room and window dimensions, the reflectance of interior surfaces and the type of glass, as well as the obstruction outside. It is an appropriate measure to use in new buildings because most of these factors are within the developer's control"***. As previously mentioned, no site survey was carried out and all the ADF results submitted appear to be only based on assumptions as shown in the report page 5 (5.0 Assumptions).

BRE guide paragraph F7 also states ***"Use of ADF for loss of light to existing buildings is not generally recommended"***.

BRE guide paragraph F8 points out that there are some situations where meeting a set ADF target value with the new development in place could be appropriate as a criteria for loss of light:

- i. where the existing building is one of a series of new buildings that are being built one after another, and each building has been designed as part of the larger group
→ **Not applicable on this project**
 - ii. as a special case of (i), where the existing building is proposed but not built. A typical situation might be where the neighbouring building has received planning permission but not yet been constructed
→ **Not applicable on this project**
 - iii. where the developer of the new building also owns the existing nearby building and proposes to carry out improvements to the existing building (e.g. by increasing window sizes) to compensate for the loss of light. However, where there is a long-term occupier of the existing building it would be appropriate for there to be no reduction in ADF, or at worst only a small reduction.
→ **Not applicable on this project**
 - iv. where the developer of the new building also owns the existing nearby buildings and the affected rooms are either unoccupied or would be occupied by different people following construction of the new building"
→ **Not applicable on this project**
- * Following the above comments, we are of the opinion that *Appendix 5 "Detailed ADF Report"* of GIA's report is irrelevant in this case and the results should therefore not be taken into consideration.

Regarding the sunlight assessment we concur that all main living rooms of dwellings should be analysed if they have a window facing within 90° of due South. Kitchens and bedrooms are indeed less important as stated by BRE (paragraph 3.2.3) although care should be taken not to block too much sun. In this context, we bring to your attention that with the proposed development in place:

- * 80% of the windows at 2 Lugdate Square failed to meet the criteria for good sunlighting
- * 43% of the windows at 19 Lugdate hill failed to meet the criteria for good sunlighting

The BRE sunlight test is a three stage process and all aspects must fail for loss of sunlight to be an issue as stated in paragraph 3.2.11:

- 1) The total APSH is <25%, or the winter APSH is <5%.**
- 2) The window received less than 0.8 times its former APSH in either period.**
- 3) Has a reduction in sunlight over the whole year greater than 4% of APSH.**

The results show that the development fails the BRE sunlight tests for the properties at 2 Ludgate Square and 19 Ludgate Hill.

Overall, and as per GIA's conclusion, many of the windows and rooms to 2 Ludgate Square and 19 Ludgate Hill will experience BRE transgressions in VSC, NSL and sunlight levels following implementation of the proposed scheme. We therefore consider that the development failed to comply with the BRE guidance and is therefore unacceptable. In summary,

- 1) The scheme failed to meet the VSC criteria for 2 Ludgate Square, 19 Ludgate Hill and 50 Carter Lane.**
- 2) The scheme failed to meet the NSL criteria for 2 Ludgate Square, 19 Ludgate Hill and 50 Carter Lane.**
- 3) The scheme failed to meet the sunlight criteria for 2 Ludgate Square and 19 Ludgate Hill.**
- 4) The ADF assessment is based on too many assumptions and is irrelevant in this case.**
- 5) No site survey was carried out on the properties at 2 Ludgate Square and 19 Ludgate Hill and no contact was made with the owners.**

We respectfully request that no decision is made in favour of the application until the applicant further improves the design and demonstrates that there are no adverse impact in terms of VSC and sunlight levels on the properties at 2 Ludgate Square and 19 Ludgate Hill. The revised scheme improves the daylight/sunlight results, however, as demonstrated in this report, this is not by a sufficient amount. Due to the location of the building, the impact on surrounding properties like 2 Ludgate Square and 19 Ludgate Hill will be unavoidable if there is to be any increase in massing on the Creed Court site (to the south).

With respect to GIA's letter dated 23rd February 2015, whilst we appreciate the list of improvements, we focus on the effects on 2 Ludgate Square.

GIA's letter:

In summary, the effects on 2 Ludgate Square are as follows:

- There are some daylight (Vertical Sky Component (VSC) and No Sky Line (NSL)) reductions beyond the guidelines suggested by the BRE Handbook. There would be a 35% VSC compliance rate and a 60% NSL compliance rate. However, white glazed bricks means 80% of rooms facing the courtyard will experience better daylight levels (using ADF measurement).

It appears that 2 Ludgate and 19 Ludgate Hill were considered as one building. In that case, we can agree with GIA that there would be a 65% VSC non-compliance rate and 40% NSL non-compliance rate. As stated in this report, the use of ADF as a criteria is irrelevant here and should not be taken into consideration for existing buildings as per the BRE guidance.

- Whilst there would be some sunlight losses the BRE letter attached clarifies in a detailed analysis "Normally we would not include loss of sunlight to bedrooms; and loss of sunlight to bedrooms would not be treated as a material issue....". In terms of the compliance rate for APSh, this is 35% following construction of the proposed scheme.

We would like to reiterate BRE clearly states that kitchens and bedrooms are indeed less important although care should be taken not to block too much sun. The assessment shows that on 2 Ludgate Square and 19 Ludgate Hill we have annual sunlight losses ranging from 25% to 100% which are well above the 20% reduction allowed by BRE. With regards to the winter sunlight, all impacted windows will experience 100% loss of sunlight during winter months as a result of the proposed development.

The letter attached from Dr Paul Littlefair only recites the BRE guidance. Indeed, this letter supports our previous comments in the sense that **"Site layout planning for daylight and sunlight: a guide to good practice" states that sunlight loss is only significant if the reduction of sunlight received over the whole year is greater than 4% of annual probable sunlight hours"**. This is demonstrated in the table below:

Room	Window	Room Use	Existing Annual APSH	Proposed Annual APSH	Reduction	Impacted ?
2 LUDGATE SQUARE						
R1/701	W1/701	BEDROOM	3	0	3.0	NO
R2/701	W2/701	BEDROOM	6	0	6.0	YES
R1/702	W1/702	BEDROOM	6	0	6.0	YES
R2/702	W2/702	BEDROOM	13	0	13.0	YES
R1/703	W1/703	BEDROOM	11	0	11.0	YES
R2/703	W2/703	BEDROOM	24	11	13.0	YES
R1/704	W1/704	BEDROOM	26	7	19.0	YES
R2/704	W2/704	BEDROOM	40	30	10.0	YES
R1/705	W1/705	BEDROOM	49	30	19.0	YES
R2/705	W2/705	BEDROOM	56	50	6.0	YES
19 LUDGATE HILL						
R4/701	W4/701	BEDROOM	10	3	7.0	YES
R4/701	W5/701	BEDROOM	10	4	6.0	YES
R4/702	W4/702	BEDROOM	15	11	4.0	NO
R4/702	W5/702	BEDROOM	16	9	7.0	YES
R4/703	W4/703	BEDROOM	21	22	1.0	NO
R4/704	W4/704	BEDROOM	38	43	5.0	NO
R5/704	W5/704	BEDROOM	20	28	8.0	NO

→ 12 out of 17 windows (71%) at 2 Ludgate Square and 19 Ludgate Hill will experience loss of annual sunlight greater than 4%.

The last paragraph of Dr Paul Littlefair's letter states:

Your email also explained that the courtyard part of the proposed building would be clad in white glazed bricks to reflect extra light to the nearby windows. The vertical sky component, which is the basis for the BRE guidance) does not take account of reflected light. However, having light coloured external surfaces does increase the daylight to neighbouring windows and could offset the loss of light. One way to check this would be to carry out a detailed analysis using software

We reiterate that ADF methodology should not be used on existing buildings. The BRE guide states in Appendix F, paragraph F6 and F7, ***"In assessing the loss of light to an existing building, the VSC is generally recommended as the appropriate parameter to use" [...]*** ***"Use of ADF for loss of light to existing buildings is not generally recommended"***. Paragraph F8 points out that there are some situations where meeting a set ADF target value with the new development in place could be appropriate as a criteria for loss of light however, they do not apply to this project.

For the reasons above, the proposed development is considered unacceptable and fails to comply with the BRE guidance which Council follows regarding the impact on daylight and sunlight to nearby dwellings. We respectfully request a revised scheme is submitted that will comply with the BRE guidelines specially on the buildings at 2 Ludgate Square and 19 Ludgate Hill.

We would be grateful if you could acknowledge receipt of this letter. Should you wish to discuss any aspect please do not hesitate to contact the writer.


We look forward to hearing from you.

Yours sincerely,

Florian Cassandro
Sustainable Design Engineer

Liam Hart
Department of the Built Environment
PO Box 270
Guild Hall
London ECA2PJ 2EJ

Nicola Bell
Flat 14
Lambert House
2 Ludgate Square
London EC4M 7AS



13 March 2015

Dear Mr Hart

Planning Application ref. 14/00300/FLMA Revised Scheme.

I assume that all previous comments and objections will, where relevant, be reconsidered with regard to the revised application.

Destruction of the local historic environment is of prime concern and the existing mix of office, residential, and small retail business should be retained.

Massing of the revised building plans to the southern elevation will inevitably be detrimental to light levels within the courtyard area. Even a small percentage decrease to already admitted lower than recommended levels will be significant and should not be approved. It seems that the planning so far is based upon assumptions of the use of the residential areas of Lambert House and not confirmed to be accurate. Should this be investigated?

Noise from the proposed plant rooms and roof top terrace is a major concern and since there seems not to be any ambient noise level readings/recordings for the courtyard area, upon which to base any future complaints seems to be negligent. Are there any details of the noise levels for the proposed plant items?

Potential glare from the proposed white glazed tiles on some elevations although possibly will increase some light levels, could easily be a source of nuisance. Have any glare calculations been submitted please?

Security at roof top level is a serious concern and details of any proposals would be appreciated as easy access to Lambert House must be prevented.

Nicola Bell a resident of Lambert House.

ACKNOWLEDGED

Adjei, William

From: Hart, Liam
Sent: 16 March 2015 10:11
To: DBE - PLN Support
Subject: FW: Creed Court - Reference 14/00300/FULMAJ

Dear Mr Hart

I am writing to register an objection to the planning application for Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square, London EC4M 7AA (14/00300/FULMAJ)

In my original objection, I raised concerns relating to

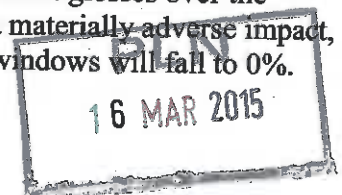
- A reduction in natural light in the rooms which are beyond the BRE Guidelines
- An increase in the levels of noise
- A loss of privacy

ACKNOWLEDGED

The recent re-submission of the Daylight and Sunlight Report fails to address my concerns regarding the loss of daylight. The proposed increase in the height of the new building above the existing level at the south of the development will reduce the size of the existing lightwell and will restrict the daylight and sunlight entering the lightwell. The report acknowledges this fact and concludes that "the increased massing to the south will result in a loss of daylight and sunlight to the windows within the current lightwell". The report further acknowledges that, regarding the Vertical Sky Component (VSC) and No Sky Line (NSL), there are reductions which are beyond the BRE Guidelines.

For Flat 1, Window R1/701 suffers a reduction in VSC of 35% which exceeds the BRE Guidelines of less than 20%. The NSL has a reduction of 44%, again this is greater than the BRE Guidelines of less than 20%. For Window R2/701, the reduction in VSC is 33% and NSL is 23.7%. Both reductions are greater than the BRE Guidelines of 20%. Indeed, for R2/701, the Annual Probable Sunlight Hours (ASPH) falls from 6% to 0%. This is not acceptable. The assumption that these rooms are bedrooms is incorrect as they are used as a study and a living area which are occupied for much of the day. I would also add that reflected light is not the same as natural daylight. The same extent of loss of daylight and sunlight are also suffered by the other residents of 2 Lambert Square and the report notes that 11 of the 15 rooms would suffer reductions beyond the BRE Guidelines.

In the conclusion of the report (Section 9), the statement that there is a high compliance rate of VSC, NSL and ASPH is only justified by including the existing or planned residential properties of 1, 6-7 and 8-9 Ludgate Square and 50 Carter Lane which are not materially impacted. This statement glosses over the highly detrimental impact on 2 Ludgate Square, which is the only property with a materially adverse impact, due to its close proximity and shared lightwell. Indeed, the ASPH for one of my windows will fall to 0%.



With reference to the new City of London Plan (adopted in January 2015), I believe that the City of London Corporation should consider the amenity problems created by this proposed development on existing residents and act to protect the existing housing and amenities in the residential area of Carter Lane. I would further question the requirement for another hotel in the St Paul's area, given the number of existing hotels and serviced apartments in the immediate area. These include the Grange Hotel (which has 433 rooms), the Crown Plaza Hotel in New Bridge Street (205 rooms), the Premier Inn in Dorset Rise, Apex Temple Court Hotel in Fleet Street (184 rooms), the Travelodge Hotel in St Swithin's Lane and the serviced apartments at Club Quarters on Ludgate Hill and Kings Wardrobe. Additionally, given the narrowness of Carter Lane, Creed Lane and Ludgate Square, it would be difficult to provide access for service delivery vehicles and taxis without causing congestion and disruption to the residential area around Carter Lane.

The proposed changes to the application do not address my original objections and it is difficult to understand how the developers believe the changes have improved the situation regarding the daylight and sunlight issues.

Yours sincerely

Michael Tang

Flat 1
2 Ludgate Square
London
EC4M 7AS

Adjei, William

From: Corominas, Nara [REDACTED]
Sent: 16 March 2015 22:31
To: PLN - Comments
Subject: 14/00300/FULMAJ - NARA COROMINAS OBJECTION

Dear Liam,

I would like to object to the above planning application on the basis of the following:

Height of the hotel:

- I do not believe the size of the hotel is adequate for the location that it is in, next to St. Pauls Cathedral. It would contribute to deteriorating the architectural landscape.
- All existing buildings are on average 4 floors high so I am not sure why the hotel has the privilege to overtake this historic height.

Size of the hotel:

- The size of the hotel is enormous. This area is primarily a mix of residential and office based properties, therefore these proposals would lead to significant 'massification' of the area. The area, surrounded by the emblematic Cathedral, should remain a low density area.
- In my opinion, St Paul's Cathedral should remain the tallest construction. The hotel would be too close to the Cathedral and would likely diminish its historical magnificence as has been the case with other churches spotted around London.

Daylight and sunlight report:

- I believe the amount of proposed light lost by the residents of Lambert House in 2 Ludgate Square is so material, it cannot be ignored. Purchasing a flat next to St. Pauls Cathedral is a privilege at the expense of hard work to be able to do so. Therefore, to think that the enjoyment of our own residences will be greatly compromised on account of hotel guests, who come and go, is unacceptable.
- In addition, the amount of sunlight coming into the flat was paramount in purchasing my property at Lambert House.

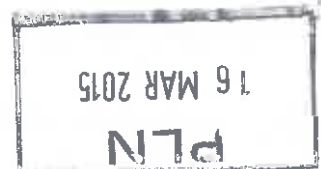
Rooftop bar:

- I am not sure a rooftop bar next to residences is appropriate due to the noise and disturbances that would be caused.
- In addition, the proposed bar would overlook directly into the windows of Lambert House which would completely devalue our properties.
- How is there certainty that that 8pm curfew will be respected in the long term?

Thank you in advance for considering my concerns

Nara Corominas
Flat 9, Lambert House
2 Ludgate Square
EC4M 7AS

ACKNOWLEDGED



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Adjei, William

From: [REDACTED]
Sent: 17 March 2015 17:44
To: PLN - Comments
Cc: Julian Dacie
Subject: FAO Liam Hart re Creed Court planning

Re: your ref 14/00300/FULMAJ

Town and Country Planning Act 1990

Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square, London EC4M 7AA

We own one of 20 residential flats in Priory House, which is within the conservation area which will be significantly affected by this development, particularly at weekends. We object strongly to the proposal for the Hotel on the following grounds:

1. Traffic and pollution.

There are estimated to be 23 Service Delivery events every 24 hours, (10 of which will be between 2 and 8am) as well as taxi pick up and drops offs associated with guests arriving and departing from 150 rooms. We note that there is no estimate of likely taxi movements anywhere in the planning submission. The traffic count included with the submission reported 52 movements in Creed Lane between 7 and 11am which is likely to be the busiest part of the day for traffic. An estimate of 150 current traffic movements in 24 hours does not seem unreasonable to us. An increase in traffic of 23 hotel servicing movements and perhaps 75 taxi movements in 24 hours would represent an almost 40% increase of traffic in Creed Lane. This makes the statement in the pollution report that 'traffic counts are anticipated to remain unchanged' and that 'impact on local air quality will be negligible' incredible. There is no estimate in the planning submission of any changes to traffic movements in Ludgate Square, which is virtually traffic free at present. The passage of small vans and taxis through this narrow street is likely to be increase considerably with resultant impact on air quality.

In addition to worsening air quality, the proposed development is likely to cause traffic hazards to pedestrians. When Creed Lane is blocked by refuse vehicles or box vans, which is likely to be 5 times a day according to the planning report, each taking 'up to 20 minutes on average to unload', there will be a temptation for vehicles on Carter Lane to drive straight through the westerly end of Carter Lane to avoid delay. This is supposed to be pedestrians only between 8 am and 6pm.

If taxis or transit type panel vans are parked in Creed Lane to service the Hotel, larger vehicles will need to mount the kerb to pass them. The swept path analyses in the delivery and servicing plan show refuse and box van type vehicles passing a London Taxi with very tight margins, without the need to mount the kerb. However these analyses included inaccurate dimensions for the vehicles. For example, the width of a TX4 taxi is 2.036m including mirrors, a Vito taxi is 2.241m including mirrors, considerably more than the width figure used in the swept path analysis of 1.749m. Accordingly the swept path analyses cannot provide an accurate indication of the likelihood of obstruction to the roadway of Creed Lane. It seems likely that it will be routine for larger vehicles to mount the pavement to avoid obstruction on Creed Lane.

Will consideration could be given to the provision of bollards on the pavement of Creed Lane to stop this temptation? Similarly could a retractable bollard or similar device be used to physically prevent traffic abusing the pedestrianised western end of Carter Lane between 8am and 6 pm?

According to Craig Stansfield of City Of London Transport Strategy Dept the servicing of this proposed hotel will have a 'considerable adverse impact on Creed Lane and surrounding streets'. We see no evidence that any changes proposed to the plans subsequent to this statement have ameliorated this impact substantially.

ACKNOWLEDGED

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2. Character of the conservation area.

The area around Carter Street, Creed Lane, Friar Street etc will be significantly changed by the presence of

another Hotel in the area, particularly at weekends. The peace and character of the area will undoubtedly be changed for the worse.

We have read the report from Daniel Watney about the financial non viability of using the space for offices. It remains unclear to us as to whether the assumptions from which the conclusions have been derived can be justified. We are not convinced, despite the conclusions of the report, that a change of use is inevitable. We cannot see a compelling reason for the Planning Authorities to agree a change of use that will mean that the local residents will see a reduced quality of life and that the conservation area will be spoilt. We would request that even at this late stage, the planning authorities reject this application.

Julian Dacie
Pauline A Smith

17 Priory House
6 Friar Street
London EC4V 5DT

Your ref: 14/00300/FULMAJ

Bill Ellson
13 Reginald Road
LONDON
SE8 4RS

17th March 2015

OBJECTION

City of London Corporation
Department of Planning & Transportation

Dear Sirs,

**Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane & 11-12 Ludgate Square,
LONDON EC4M 7AA**

At page 10 of the applicant's 'Office Redevelopment Viability Study' it is claimed that "The purchase of the property was predicated on the fact that the office floors could achieve £15.00 per sq ft;..." The notion that the property was purchased by the applicants with the intention of continuing to rent out the property as offices is simply not true.

The Dominvs Group purchased the property from Aviva Life & Pensions UK Ltd on 20 November 2012, registered with the Land Registry on 13 Dec 2012¹ and "a series of pre application submissions and meetings" with CoLC town planners regarding redevelopment commenced in January 2013².

The Dominvs Group are hoteliers with premises in Aberdeen, Darlington, Dumfries and Sheffield. They also own a number of industrial estate properties. The only other London offices shown on their website³, namely Willow House, 17-23 Willow Place SW1P 1JH, in fact received planning permission, for change of use to residential & ancillary works, from City of Westminster in January this year (CoW ref:14/02816/FUL).

The 'Office Redevelopment Viability Study' also states that (predicated on a rent of £15 per sq ft) the property is valued at £10.6 million. The Land Registry record that Dominvs paid Aviva £15,230,000 for the property. The study goes on to state that Dominvs had only managed to find two tenants at rents of £6 and £7.50 per sq ft. If that is correct then, based on the applicant's own methodology, they should have paid somewhere around £4.24 - £5.3 million for the property.

That Dominvs have, on the face of it, paid three times what the property is actually worth to them is their problem, not that of neighbouring residents nor that of the City of London Corporation.

¹ Title NGL665744 (Land Registry titles are PUBLIC documents than can be obtained by anybody on payment of a nominal fee)

² Box 5 'Application for Planning Permission' signed by DP9 on 27 May 2014, stamped received by CoLC same day.

³ <http://dominvsgroup.com/commercial/> (accessed 17 Mar 2015)



At the time that Dominvs purchased the property the Development Plan for the City of London might have looked kindly on an application for change of use from offices to a hotel at the above location, but if Dominvs instructed professional advisors they would have been warned that policies can and do change.

In March 2013 CoLC published *Taking Stock: The Relationship Between Businesses and Office Provision in the City*. This study by Ramidus Consulting Limited stated at page 1:

"A vital ingredient of the City's ability to adapt to change has been the pool of smaller, less highly specified and lower cost buildings available to smaller occupiers. In the City, smaller buildings are concentrated in Conservation Areas, and they tend to provide older, less flexible and lower quality accommodation compared to modern Grade A space."

at page 17, Figure 2.7 identifies those parts of City as where small offices are clustered, which unsurprisingly highlights the area where the property is located. And at page 66 the report states:

"The movement toward larger, more highly specified buildings, and the types of occupiers that they support, is a key part of the City's global role. But balance is crucial. And a vital ingredient of the City's ability to adapt to change has been the pool of smaller, simpler and lower cost buildings available to occupiers whose business models demand a more diverse stock of buildings."

In January this year CoLC adopted the new Local Plan, under which the application falls to be decided. Unsurprisingly the Local Plan, informed by *Taking Stock*, does not look kindly on the application.

Policy DM 11.3 Hotels (p103) is explicit that proposals for new hotel accommodation will only be permitted where they do not prejudice the primary business function of the City; and they are not contrary to policy DM1.1; and they do not result in adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts; provide satisfactory arrangements for pick-up/drop off, service delivery vehicles and coaches, appropriate to the size and nature of the hotel.

Policy DM 1.1 Protection of office accommodation (p35) is direct and forceful, it is: To refuse the loss of existing (B1) office accommodation to other uses where the building or its site is considered to be suitable for long-term viable office use and there are strong economic reasons why the loss would be inappropriate. Losses would be inappropriate for any of the following reasons: prejudicing the primary business function of the City; or, removing existing stock for which there is demand in the office market or long term viable need; or, introducing uses that adversely affect the existing beneficial mix of commercial uses.

I would note in regard of 'adverse impacts on the amenity of neighbouring occupiers' that local resident Sir Brian Langstaff has submitted an informed and forceful objection. Perhaps the applicants should be reminded that planning permission is not a license to commit a nuisance.

The application is contrary to the Development Plan for the City of London and should be refused.

I note that Alderman Keaveny, Ann Holmes CC & Clare James CC have all objected to the application and I shall be forwarding this letter to them, copying in the other ward members.

I trust that I will be informed when the matter comes before the Planning and Transportation Committee.

Yours faithfully

Bill Ellson

From: PLN - Comments
Sent: 17 March 2015 16:11
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

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

Comments were submitted at 4:10 PM on 17 Mar 2015 from Ms Anne Dunmore.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (140 bedrooms) (5,465 sq.m.), restaurant use (Class A3) at part basement and part ground floor (995 sq.m.) and associated plant areas (860 sq.m.). (REVISED SCHEME)

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Ms Anne Dunmore

Email: [REDACTED]

Address: Offices, 1 - 3 Ludgate Square, London EC4M 7AS

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:

- Noise
- Residential Amenity
- Traffic or Highways

Comments: Unsuitable location for large scale development in narrow quiet residential street which is currently pedestrian access only.



For the attention of Mr. Liam Hart, Planning Department,

City of London, P.O. Box 270, Guildhall, London EC2P 2EJ via email to liam.hart@cityoflondon.gov.uk

17 March 2015

ACKNOWLEDGED

Dear Mr. Hart,

RE: Your reference – 14/00300/FULMAJ, Demolition of existing buildings behind retained façade to 3 Ludgate Hill to provide a 7-storey building for hotel use, restaurant use and associated plant areas

Having viewed all the proposals and relevant documents regarding the proposed demolition of the current above-mentioned building and proposed development of a new hotel in its place, I still strongly object to it all. The proposed revisions and even the sunlight animation video still have not addressed in full my concerns brought up in my first objection letter to you dated 07 July 2014.

I am the owner of one of the residential flats in Lambert House, 2 Ludgate Square, whose building will be directly adjoining to this proposed hotel development.

My first concern is the reduction of light into my property caused by this proposed hotel development:-

- My flat sits on the fourth floor of Lambert House, 2 Ludgate Square, and it does overlook the current courtyard. The increase in mass and change in structure will definitely adversely impact the light my flat currently receives.
- In addition, it is obvious that the analysts instructed by the proposed hotel owners, Dominiv's Living Ltd., called Gordon Ingram Associates (GIA), did NOT read my previous objection letter dated 07 July 2014. I will again state my case.
 - According to the revised Daylight and Sunlight Report prepared by GIA and dated 13 November 2014, the Report once again assumed and highlighted one of my windows facing the courtyard to be a bedroom, as can be viewed on Figure 2, page 10, and again on page 15. This information is absolutely FALSE because that room is my kitchen. Also, the next window along and in front of the balcony is my bathroom. I have already pointed this out in my previous letter.
 - It is important for me to point this out again because one of their main arguments is stated on page 11. "It should be noted that all site facing windows serve bedrooms and the 2011 Building Research Establishment (BRE) suggests that sunlight amenity to bedrooms is of less importance". So this particular argument can go out of the window!
 - According to BRE guidelines, kitchens are recommended to require double the ADF than bedrooms.
 - In fact, page 2 sees GIA summarizing that at Lambert House, "of the 15 rooms assessed, 11 would experience losses in Annual Probable Sunlight Hours (APSH) beyond the suggested BRE guidelines".
 - Thus, if GIA does not pay attention to my concerns raised in my previous objection letter, then I am likely to believe they will not pay attention to concerns raised by other residents. With the long time period of several months passing since the previous public consultation



taking place last summer, they did not effectively check with all the residents whether their windows would truly be bedroom windows.

- If they can continue to make the assumption that my windows overlooking the courtyard are bedroom windows, then why can't I hold my assumption that all my neighbours' windows in my building are kitchen and bathroom windows?
- You must also consider the possibility that other flat windows are like mine, or the possibility that the rooms may have started out as bedrooms but have now experienced the change in use to, for example, a study.

Page 10 of the same revised GIA Daylight and Sunlight Report actually did point out that "although the BRE suggests that the Average Daylight Factors (ADF) method of assessment should only be used for new build accommodation, as we have managed to obtain floor plans of this building and as the ADF method of assessment considers reflective light, this assessment has been included for this property", Lambert House, 2 Ludgate Square.

- Lambert House should not be considered new build any longer, because it is older than ten years old, at least.
- Obviously, the GIA is manipulating the use of BRE to suit their needs, and that this revised Daylight and Sunlight Report is biased. GIA will obviously be in full support of its client, the commissioning company, Dominiv's Living Ltd.

In fact, page 18 of the GIA report states that GIA admits the following conclusions:-

- "2 Ludgate Square would experience reductions beyond the suggestions within the BRE guidelines".
- In addition, "due to the location of this building, these reductions (in daylight and sunlight) would most certainly be unavoidable if there is to be any increase in massing on the Creed Court site".
- To support this, the Daylight and Sunlight tables of results in Appendix 4 in this report shows that my flat will experience 13% loss in Vertical Sky Component (VSC) for my kitchen window (labelled as R4/704).
 - According to the BRE handbook for calculating daylight to existing residential properties, the disadvantage of using VSC may give a quick indication of the lighting potential but "does not take into account the window size, room size or room use".
- In addition, GIA admits that the Annual Probable Sunlight Hours (APSH) investigation will see a huge reduction in annual % loss in sunlight for Lambert House, 2 Ludgate Square. The flats on all the floors below me will experience 100% reduction, which is absolutely UNACCEPTABLE. I am actually more alarmed to see data listed as 100% annual loss for 5 windows when going from existing building layout to proposed development, with most hovering above 50% annual loss.

This means that GIA report cannot base their conclusions appropriately on averages. Page 18 sees GIA and Stephan Reinke Architects supporting a scheme that is "reflective in the high compliance rates of Vertical Sky Component (VSC) at 85 %, No Sky Line (NSL) at 71 % and Annual Probable Sunlight Hours (ASPH) at 81 %". Their conclusions are based on the inclusion of data regarding other buildings that will not be directly overlooking the hotel courtyard, such as 1 and 3 Ludgate Square, and 46, 48 & 50 Carter Lane.

Therefore, the revised Daylight and Sunlight Report by GIA, commissioned by Dominiv's Living Ltd. is misleading.

My next concern is actually the choice of white glazed bricks proposed to be used in the new hotel development. Page 10 of the GIA report states the following: "an important design element of the proposed courtyard is the inclusion of white glazed bricks on the proposed façade which are highly reflective to ensure that the flats facing the site receive as much light as possible".

- The highly reflective appearance of these bricks can lead to uncomfortable glare. Appendix 5 (detailed ADF report) already shows the proposed reflectance to be 70 %, compared to the current 20 %.
- In a letter by Gordon Ingram of GIA addressed to Mr. Hart of the Planning Department at the City of London, dated 06 February 2015, Mr. Ingram mentioned the following:
 - On page 1, Stephan Reinke Architects have proposed that "all courtyard hotel windows will be opaque frosted windows... and will be non-opening".
 - Therefore, any discomfort from potential glare caused by these bricks will not be experienced by the hotel residents and staff.
 - However, for all of Lambert House residents, our windows can open and are not opaque frosted, thereby affected adversely by the glare. On extremely sunny days, this glare is likely to be blinding.
- On the other hand, white glazed bricks will get dirtier faster and rain streaks will be more evident. This would not be aesthetically pleasing at all.

My next concern is the proposed further improvements to the courtyard by the architects, as discussed in the same letter by Mr. Ingram of GIA:-

- "Trees will be planted in the base of the courtyard". However, "access will not be possible (other than for maintenance) from the hotel to the courtyard".
- If access is not going to be possible, what is the need for trees?
 - Is the idea of planting trees to encourage future access to the courtyard because the trees have to be maintained?
 - Is this going to be an excuse so that one day, the courtyard will be opened up to hotel residents and staff?
 - Realistically, any access for the purpose of maintenance can eventually become access for hotel staff and/or residents to have cigarette breaks? This can then become a nuisance especially in terms of noise, with people chatting being magnified louder in a confined space. I have on occasion been able to hear people's conversations in the current courtyard. My flat is on the fourth floor of Lambert House.
- My other point is that there has been no discussion of the type of trees proposed to be planted.
 - Are the trees being grown in containers or will they be grown in the ground that they can quickly cause damage to the foundations of surrounding buildings? Will the roots of the trees damage the foundations of our building and even the hotel?

- Any damage will increase our already high service charges because our managing agents will have to spend time investigating and dealing with it.
- Will the roots be able to reach the sewers thereby causing potential significant damage too? The worst case scenario will be the sewers overflowing and leaking, very unhygienic to the public and smelly. The hotel is proposing to accommodate 140 rooms.
- How tall will these trees get? Will they get so tall eventually that they could block the light into our building, especially the flats on the floors below mine?

The same letter by Mr. Ingram of GIA proposes that the terrace on the roof level will be landscaped to prevent users from looking into the courtyard.

- There is no mention of any safety barrier to prevent anybody, especially children, from wandering away and falling into the courtyard.
- There is nothing to stop anybody from throwing anything into the courtyard. Food and beverages will be served on the roof terrace, I assume. There is nothing to stop anybody from throwing garbage or broken glass into the courtyard.
- The letter states on page 1 that 'terrace on the roof will be closed at 8pm (Monday – Sunday)'. There is no mention of what time it will be opened up. Will it be opened in the early hours of the mornings, 1am perhaps?

One concern not addressed is the congestion and noise of traffic and people in this and the surrounding areas, as discussed below:-

- Already, St. Paul's Cathedral is national and well-loved landmark, visited by hordes of tourists daily. The congestion is already present, made evident by tour guide buses, taxis and other transport. Because St. Paul's Cathedral sits on Ludgate Hill, and a few meters away, Ludgate Square can be entered from Ludgate Hill at a slightly lower elevation, I find many people standing in front of the Ludgate Square entrance posing for photographs and/or taking photographs.
- Directly in front of St. Paul's Cathedral, you also have a very busy, well-used pedestrian crossing on Ludgate Hill, nearby Creed Lane. Ludgate Square can be entered from Ludgate Hill, and it continues onto Creed Lane.
- At the moment, Ludgate Square is a very quiet street. There are three main residential buildings, nos. 1, 2 and 3 Ludgate Square, surrounded by a few shops and offices, plus a pub. Creed Lane is also a quiet street, and there is already a small hotel boutique on this street.
- Both Ludgate Square and Creed Lane are very short one-way streets. None of the proposals and their amendments adequately address how to maintain these peaceful streets, free of congestion and noise.
- Demolition and construction of proposed buildings will of course bring more congestion and noise, as well as pollution.
- The proposed hotel, once opened, will of course add more congestion and noise.
 - It will have to be serviced in various ways, from linen supply vehicles to food and beverages suppliers.

- In addition, the hotel guests will require transport to and from the hotel.
- It will not be practical to have a taxi rank, at the front of the hotel building on Ludgate Hill or at the back of the building on Ludgate Square or even at the side on Creed Lane.
- If that is the case, the hotel is likely to have hotel staff at various points outside attempting to summon taxis or limousine drivers.
- Ludgate Hill is already congested with tourist traffic, tour buses, taxis, supply vehicles, etc. At various times of the day, one can easily observe many stopping by for various reasons.
- Realistically, the hotel guests cannot be expected to maintain the peaceful atmosphere of the areas at all hours. This hotel will have restaurant dining areas open to its resident and non-resident guests. As it is part of a service industry, its main objective is to serve its customers in a good timely manner and in a profitable manner. Any noise complaints will take time for the hotel to address, and I believe the hotel and its partners will be more sympathetic to its paying clientele. In addition, guests will be free to come and go to frequent other amenities, and there is no realistic way to prevent any returning guests from being disruptive.

My next concern not yet addressed, is that of the amount of servicing this hotel will need, eg. in terms of linen, food, beverages and waste:-

- The proposed hotel development will likely see its servicing carried out on Ludgate Square and Creed Court.
- Both streets are one-way and narrow. It will be impossible to park a service vehicle for unloading and loading, and expect pedestrians and residents to squeeze safely past any vehicle and hotel staff at work. There is not enough room for this, especially since all three residential buildings, 1 – 3 Ludgate Square, occupy the entrance of Ludgate Square at the Ludgate Hill end. Realistically, any service vehicle will need to stay at least a few minutes to do any meaningful work.
- A 140-room hotel is likely to accommodate regular visits by their service suppliers.
- Also, any storage of refuse is likely to be situated at the back of the hotel on Ludgate Square, basically away from the Ludgate Hill. A 140-room hotel would generate an immense amount of refuse. This in turn would lead to a greater number of pick ups by refuse collection vehicles. As Ludgate Square is one-way only, its entrance, at the Ludgate Hill end, is limited by a low-level arch and a narrow entrance. Thus, small refuse collection vehicles can only be used to service the hotel and will make many regular visits.

In summary, from my point of view as resident and owner, I worry about the congestion and the noise disturbances caused by demolition and construction of a new building adjoining my building. The noise disturbances will not abate if the proposed hotel development does go ahead, because as you can imagine, a fully functioning hotel with restaurant services would have an endless stream of hotel guests coming and going, along with transport like taxis and coaches serving the hotel. The noise disturbances and traffic congestion would continue with the logistical supply side of the hotel business.

In reality, it will be difficult for vehicles larger than a transit van to service the hotel, using both Ludgate Square and Creed Lane. Realistically, it will be hard to coordinate deliveries and servicing on a one-way street. At the previous public consultation, page 7 of the Delivery and Servicing Plan Part 2 suggests “an average of 23 daily

servicing trips predicted" for this proposed hotel development. Any passing by other vehicles may require mounting the kerb. Surely this would impact adversely on the pedestrian safety.

This proposed hotel development, in fact, will have an adverse impact on the daylight and sunlight entering Lambert House.

Therefore I feel all these concerns listed here must be addressed. Thank you for looking into my objections and I look forward to hearing from you.

Yours sincerely,

Dr. Y. Oliver

Flat 15, Lambert House, 2 Ludgate Square, London EC4M 7AS

Sir Brian and Lady Langstaff,
Flat 5, Lambert House,
2, Ludgate Square,
London EC4M 2AS
17th. March 2015

City Planning Officer,
(Fao Liam Hart)
City of London,
PO Box 270
Guildhall
London EC2P 2EJ



Dear Sirs,

Creed Court Development EC4M 7AA: Your ref: 14/00300/FULMAJ

ACKNOWLEDGED

Thank you for your letter inviting observations on the revised proposal.

My wife and I took the opportunity last November of viewing the model of the proposal, listening to the architect, planning agent, developer, and light analysis consultant, and seeing the plans in somewhat larger scale than can be achieved on a computer screen. Our conversations were without prejudice, at Mr. Graham's request, so I shall not refer to them.

All the revisions now proposed were then on offer, though the revised light report was not then available.

Unfortunately, the proposed revisions do not meet the central objections we raised in our previous letters of objection: they make a number of improvements, such as those in respect of frosted glass, removal of low-level balcony, tree planting, and restriction of access, which are welcome in so far as they go, but which do not address the following, which are the result of what is both inappropriate and over-development of the site:

- (1) the reduction of light;
- (2) the massing of the scheme
- (3) encroachment
- (4) evening noise
- (5) the lack of need in the area for more hotel space (especially at the expense of offices)
- (6) increased traffic movement (the factor perhaps most open to debate, since the comparison must be with office use: but we think it probable)
- (7) loss of visual amenity/neighbourliness.

I shall deal with the bullet points on each after some general comments.

First, the revised proposal is for a rectangular light well, replacing an attractively irregular and considerably larger courtyard. It is to be glazed in white reflective tiles. Whereas no doubt typical of many New York light-wells (the architect is American), this makes it visually austere, and uncomfortably reminiscent of public facilities. But most concerning of all is the degree of encroachment upon the present courtyard



space. The light well is significantly smaller than the existing courtyard. In order to make the space regular in shape, the square plan section to the North East corner of the present courtyard is to be removed. However, apart from its removal, the east side wall of the whole atrium is to move nearer to our building than the present wall by about a metre – this is not immediately obvious looking at the plans, because the plans of the existing show the edge of the balconied walkway misleadingly in thick black line as if it were the edge of the present building, when it is not: instead this balcony juts out over the present building line. Not only will the wall move in from the East, but that to the South will advance so as to be at right angles with the corner of our flats 1, 5, 9, 13. Instead of the eye being taken naturally to the right, as we look out of our windows, we look into something reminiscent of a public facility, albeit leavened by the tracery of green leaf trees below, with a wall immediately to our right. It is this encroachment, coupled with the additional height to the South, which is both un-neighbourly and reduces light: it is an indictment of the scheme that it demands white tiling (with its unpleasant resonance) in order not to reduce our light even further.

Second, the proposed building is significantly (and unnecessarily) higher to the South. The plans supplied with the light report record the heights. The highest point of the existing in the SW is put at 34640, though the building immediately to the right on looking out of our window is 36830. The highest proposed is now 38950 in the SW – i.e. it is 4.2 metres higher than the current SW block, and 2.1 metres higher in respect of the building stack immediately to our right – though this existing stack extends for only a few feet, and is now to be built at over 38 metres height across the entire southern side of the light well, next to our windows.

Third, all this is actually unnecessary for there to be a hotel. It is not a given that any development should be bigger than its predecessor. If, for instance, the developer were prepared to forego the stack of 6 bedrooms one on top of the other that is responsible for much of the encroachment (perhaps putting the escape route there), and reduce the height of its plant room, many of the objections would have much less substance.

Turning to my bullet points:

(1) LIGHT: The wording of the latest report does its best to disguise, but cannot avoid the fact that the plan reduces our light, the level of which is already tenuous, below BRE guidelines applicable to the effect on existing development. This should be sufficient on its own as a planning consideration to require rejection of the development as planned.

However, ever to get to these estimated levels of light the author had made questionable assumptions. First, contrary to his understanding, I had thought that the windows facing south into the courtyard gave onto living rooms. Second, I know that at least one occupant has used a room facing on to the courtyard as a dining room/study, not as a bedroom – and we have ourselves considered this possibility in the past with one of our bedrooms. I am surprised the report makes statements about the present and assumed intended use of the rooms without even asking their occupants. No attempt has been made to come to our flat to ask questions, take readings etc.

The latest daylight report states "In summary, many of the windows and rooms to 2 Ludgate Square would experience BRE transgressions in VSC and NSL following implementation of the proposed scheme". It also states "Of the 15 rooms assessed, 11 would experience losses in APSH beyond the suggested BRE guidelines". Taking our own flat as an example, I suggest it is too dismissive to imply that reductions for our two windows which face the courtyard of (respectively) 24.97% and 21.96% (for VSC), losses of 43.9% and 17.8% respectively (on the "Daylight Distribution Analysis", which I note is not mentioned as such in dealing with the text on page 12 relating to Flat 5), and a *complete* loss of sunlight (!!) are not of particular significance. They are to us: and I do not doubt similar losses will be to other flat holders

Whilst some rooms will have no change in Average Daylight Factor (ADF), others will show a marginal improvement. However, ADF is used commonly for assessing the adequacy of new development, rather than the impact of a development on existing buildings. Clearly a marginal change for some rooms in this measurement does not excuse a failure to comply with BRE guidelines for Visible Sky Component, No-Sky Line, and also Annual Probable Sunlight Hours

As justification for the transgressions the daylight report states "Due to the location of this building, these reductions would most certainly be unavoidable if there is to be any increase in massing on the Creed Court site." I would suggest that the simple way to avoid such transgressions would be to avoid increasing the massing in an already dense piece of urban fabric.

The design team have attempted "to improve the overall amenity of the courtyard", and their attempts are appreciated, but unfortunately they have not succeeded. It is surprising in a factual report to find the following subjective conclusion: "The proposed cladding is white glazed brick to match 2 Ludgate Square which would be more aesthetically pleasing for the occupiers and the size and shape of the light well is designed to enhance the sense of enclosure." The aesthetics are clearly questionable, and I would be surprised if any existing residents wanted an increased sense of being "enclosed" or surrounded by an encroaching new behemoth.

There seems little point in granting permission for a development which it may almost inevitably attract a right-to-light injunction.

(2) MASSING: Simply too great, as can be shown by comparing the footprint of the present courtyard with the proposed, the height of the South East corner with the existing, and the additional storey(s).

(3) ENCROACHMENT See above, in my first point. Neighbourliness is an important planning concept in urban areas: it makes this objection one of real significance.

(4) EVENING NOISE Office use is generally very quiet, especially at night. Hotel use is always noisier, especially in the late evening: and it is at that time when residential accommodation most values the absence of noise.

(5) LACK OF NEED for an hotel. As I pointed out in my earlier letter the area is very well served by hotel and short-term (holiday) lets. Office accommodation has, if anything, given way to some residential use, and should be preserved.

(6) INCREASED TRAFFIC MOVEMENTS: inevitable, though to some extent dependent on the size of the hotel. This one is "going for big".

(7) LOSS OF VISUAL AMENITY/NEIGHBOURLINESS: See my three general points above.

The objections I raised in my earlier letter, and that submitted by my wife, still stand: please have regard to them, albeit in the context of the revised proposals.

In summary, the changes made are not new to us, are cosmetic rather than central to the scheme, and provide no compelling answer to the points we raise above. The features that give rise to them are not necessary for development on the site.

Yours faithfully,

Brian Langstaff
Deborah Langstaff

Hampson, Rebecca

From: PLN - Comments
Sent: 18 March 2015 13:38
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

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

Comments were submitted at 1:37 PM on 18 Mar 2015 from Mr Joe Colombano.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (140 bedrooms) (5,465 sq.m.), restaurant use (Class A3) at part basement and part ground floor (995 sq.m.) and associated plant areas (860 sq.m.). (REVISED SCHEME)

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Mr Joe Colombano

Email: [REDACTED]

Address: Flat 16 Lambert House 2 Ludgate Square, London

Comments Details**ACKNOWLEDGED**

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:
- Noise
- Residential Amenity

Comments: Please see objection letter sent today (18/03/2015) to plncomments@cityoflondon.gov.uk and to the case officer Liam Hart



FAO Mr Liam Hart
 Planning Officer,
 Development Division (west)
 Dept. of the Built Environment
 City of London Corporation,
 PO BOX 270,
 Guildhall,
 London, EC2P 2EJ

Mr J Colombano and Ms M L Kirk
 Flat 16
 Lambert House
 2 Ludgate Square
 London
 EC4M 7AS

ACKNOWLEDGED

18th March 2014

Dear Mr Hart

RE: Re-consultation on revised plans and information for planning application 14/00300/FULMAJ
 at Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square, London, EC4M 7AA

Thank you for re-consulting us on the revised plans and information in respect of the above development in your letter dated 27th February 2015. Further to our written objection to the above scheme sent to you in July last year, we have stated our case for objecting to the most recent updates and amendments to the proposal and kindly request that this is considered as part of the decision-making process. For ease of reference we have detailed our concerns directly relating to the summary of the changes that are proposed as per you letter.

Closure of the roof terrace at 8pm (Mon-Sun)

The City of London adopted Policy DM 15.7 (Noise and light pollution) states that '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.' In addition to this Policy DM 10.3 (Roof gardens and terraces) states that the Corporation will encourage high quality roof gardens and terraces where they do not 'Immediately overlook residential properties'.

The revised scheme proposes to close the roof terrace at 8pm Monday through to Sunday. Whilst this would make a difference at night time, we cannot understand how this can still be acceptable given the distance of only 6.2m from terrace to the habitable room windows in the eastern flank elevation of our flat facing the new development. This was a concern that was highlighted and detailed in our objection to the originally submitted scheme (see appendix). Our working and lifestyle patterns are such that we may be at home during the day time or weekends and will still be subjected to guests congregating on the roof terrace for activities such as drinking and smoking resulting in general noise, disturbance and nuisance to our flat to the detriment of our amenity and quality of life within the flat. This element of the proposal remains unacceptable, despite the reduction in the hours it will be accessed and therefore conflicts with the Corporations now adopted policies mentioned above.



Notwithstanding the above concerns of allowing a terrace in this location in the first instance, we question the ability of the Corporation to enforce that the terrace is cleared of guests by 8pm daily; it would be very easy for guests to remain on the terrace until after this time and given that most authorities are stretched in terms of staff numbers and workload we cannot imagine that this issue will be a high priority for planning enforcement officers. It is also partly for this reason that a terrace should not be created in this location.

Trees are proposed to be planted in the base of the courtyard and no access to the courtyard for guests (only for maintenance purposes)

The revised scheme proposes trees to be planted in the atrium, also referred to by the proposed developer as the courtyard. However, the 4 no. trees shown on the latest plans were already proposed as part of the original submission – we fail to understand how this element is a revision and why this was included on the letter as part of the re-consultation exercise. Notwithstanding this issue, these trees appear to be a token gesture that does little to improve the situation for the neighbouring residents in terms of noise from social activities of guests; laughing, music, chatter etc.

The policy requires a noise assessment to be conducted to satisfy any potential harm by way of noise that a proposed development could have on the surrounding area; this has clearly not been addressed as part of the revised scheme. The concerns remains that the noise generated by guests at this level is likely to channel up the void between the back of Creed Court and the rear of Lambert House resulting in disturbance to occupiers of these flats including ours at No. 16.

A further revision noted in the re-consultation letter to residents was the fact that there will be no access to the courtyard for guests – this will be only for maintenance purposes. Having reviewed the plans we find it hard to believe that a supposedly high-end hotel would not provide their guests with an external amenity area at ground level. It would be reasonable for a guest to perhaps want some fresh air or enjoy a drink outside or make a phone call without either having to leave the building i.e. go onto the main road which is noisy or access the roof terrace at the sixth – floor level to do this. We suspect that the developers will probably add an external door once consent has been granted – perhaps even without permission. In this regard we feel that whilst the aims of the revised approach are amicable and will help the noise situation somewhat, a question mark remains over whether this will be the case in reality.

Landscaping of the of the terrace at roof level to prevent users from looking in to the courtyard and all windows to adjacent courtyard to be non-opening and obscure glazed

London Plan Policy 7.6 states that 'Developments are required to consider and mitigate any potential negative impacts on the amenity of surrounding land and buildings in relation to privacy and overshadowing'. In addition to this the now adopted Policy DM 10.3 (Roof gardens and terraces) states that the Corporation will 'encourage high quality roof gardens and terraces where they do not immediately overlook residential properties'.

The revised scheme appears to focus more on protecting the views from the courtyard into the neighbouring properties than preventing overlooking from the roof terrace into the windows of these properties – this seems do little to reduce significantly the impact on our property. Details of landscaping for the proposed terrace have not been provided. We would like to know the exact

location and density of the screening and how significant this will be in reducing overlooking and privacy issues.

As mentioned in our original objection letter we are worried that the creation and use of the proposed terrace could lead to an overlooking of our amenity area and our young daughter's bedrooms and the fact that the activities associated with the terrace i.e noise, drinking, possibly smoking and general adult banter and frolics could be harmful to our daughters' well being. Notwithstanding the fact that we are opposed to any sort of terrace development in this location, the absence of screening details is a concern and in this regard this element of the scheme cannot be supported by us.

The developers claim that the proposed screening will prevent the overlooking from the terrace to the courtyard- perhaps a better approach would be to design screening that would prevent overlooking into other residents bedroom windows. The proposed obscure glazing will help to prevent overlooking to the court yard, however, from our perspective this does nothing to improve privacy and being overlooked by hotel guests. As such our concerns detailed previously in respect of privacy and overlooking still stand.

The hotel courtyard elevations would be finished in white glazed brick to improve light reflectivity

Policy DM 10.1 (New development) requires proposals to be of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling and that appropriate, high quality and durable materials are used. In addition to this Policy DM 12.2 (Development in conservation areas) states that development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.

Having viewed the online information including the You Tube video and day/sun light projections, we remain concerned that simply changing the material choice would not improve the day light and sunlight received by the neighbouring properties. Whilst this is covered in some detail below, we consider that the developers are again making a token gesture to improve aesthetics/cladding of the proposal to secure consent. We oppose this change and consider it to have minimal impact on the improvement of day and sunlight. We also consider that changing the finish would be detrimental to the designs aims of development within conservation areas. The proposed choice of material would appear very modern looking and does not appear sympathetic to the character and appearance of the conservation area and the surrounding residential buildings. In this regard the scheme is unacceptable and does not comply with the Corporation's relevant design and conservation/heritage policies.

Reduction in roof top bulk away from east elevation of Lambert House to the south elevation of Lambert House

Policy CS10 (Design) of the City of London's Core Strategy (2011) states that the Corporation will promote a high standard and sustainable design of buildings and having regard to their surroundings by 'Ensuring that the bulk, scale, massing, quality of materials and height of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces'. Additionally, adopted Policy DM 10.1 (New Development) states that the Corporation will require all developments to be of a high standard of design and to avoid harm to the townscape and public realm by ensuring that 'the bulk and massing of schemes are appropriate in relation to their surroundings...'

The reduction in the roof top bulk away from the east elevation of Lambert House to the south elevation of this building was noted in the letter to the case officer Liam Hart on 23rd February 2015 by the developer's appointed consultants rather than being noted on the re-consultation letter. Having reviewed the revised plans, there appears to be very little change in terms of bulk and massing which is still a major concern. Our initial objections to this element remain in that due to the proximity of the proposal to our flat, the new structure would overbear on our property resulting in a sense of enclosure and an unneighbourly relationship which is considered unacceptable and fails to comply with the above policies.

Updated daylight and sunlight report

The City of London's adopted DM Policy CS10 10.7 (Daylight and sunlight) states that the Corporation will look to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open space to unacceptable levels, taking into account the BRE's guidelines. We noted in our original objection that the scheme as proposed did not fully comply with the BRE guidelines and hence failed to adhere to the Council's relevant policy as mentioned above.

The developers provided a revised day light/sun light assessment based on some of the small changes that have been proposed such as those highlighted above. However we have taken the liberty of commissioning independent acoustic experts, Syntegra Consulting, to review the revised report which has, incidentally, now been revised twice from that of the original submission. The report and assessment, prepared by Syntegra, attached in the appendix of this letter demonstrates that the revised scheme would still have an unacceptable impact in terms of day and sunlight reduction on the neighbouring properties.

The report queried why the developer's appointed day/sunlight consultants selectively chose to refer to BRE guidance only where it met their needs and chose to ignore other elements of the guidance where this would not have supported the revised scheme. It was quite clear that the applicant's consultants were referring to the existing buildings as new development rather than as existing buildings for the purposes of attempting to comply with respective lighting levels and standards. The methodology used by the applicant's consultants was also queried as one which was not most suited to this particular case. Syntegra's report concludes that the proposed development as revised would be unacceptable and failed to comply with the BRE guidance which the Corporation follows and that 'We (Syntegra) respectfully request a revised scheme is submitted that will comply with the BRE guidelines specially on the buildings at 2 Ludgate Square and 19 Ludgate Hill'.

Conclusions

We consider that the revised scheme does not overcome the concerns raised in our initial letter of objection to the originally submitted proposal and would like you to consider this letter in conjunction with our original letter (appendix 1) and the daylight/sunlight assessment of the developer's updated sunlight/daylight statement we have commissioned by independent experts (appendix 2). We still wait to see adequate screening measures to prevent overlooking into our property and noise mitigation measures to prevent disturbance from the roof terrace. We would also like to have assurances that the courtyard/atrium at ground level will not be accessed by hotel guests.

Our initial views in respect of the need for hotel development in this principally residential area still stand (see appendix 1). The area does not need new hotel development which will undoubtedly affect the intrinsic character of the area. As you are aware the draft DM policies referred to under the original objection are now adopted as of January 2015 and hence the greatest amount of 'weight' should be afforded to these policies over and above any other guidance of superseded policies. The developer has not provided additional information in respect of demonstrating that the current offices on site are not viable – this was a point raised under the original objection and is something which is required by Policy DM 1.1 (Protection of office accommodation). Likewise further to listing the nearby hotels in the area to exemplify that there are plenty of high-end hotels in the vicinity, the developer has not demonstrated the real need for a hotel in this area – we would like to see more information on this element.

The revised scheme, much like the original, appears contrived and unsympathetic to the area. It would harm the amenity of the surrounding properties, the occupiers of whom live here partly because they enjoy the character and peacefulness of vicinity. The scheme has little regard for the surrounding and introduces a use that would be better suited elsewhere. We therefore respectfully request that the scheme is refused on the grounds of the concerns highlighted above as failure to do so would not be in the public interest.

I trust the above is clear, however, should you require further clarification please do not hesitate to contact either myself or my wife, Marie Louise by email at the following address

[REDACTED]

I look forward to hearing from you and hope that you can support refusal of the application.

Yours Sincerely

Mr J Colombano and Ms M L Kirk

(Owners of Flat 16, Lambert House)

FAO Mr Liam Hart
Planning Officer,
Development Division (west)
Dept. of the Built Environment
City of London Corporation,
PO BOX 270,
Guildhall,
London, EC2P 2EJ

Mr J Colombano and Ms M L Kirk,
Flat 16,
Lambert House,
2 Ludgate Square,
London,
EC4M 7AS,

7TH July 2014

Dear Mr Hart

RE: Planning application 14/00300/FULMAJ at Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane
and 11-12 Ludgate Square, London, EC4M 7AA.

I write to you as the owner of Flat 16, Lambert House, 2 Ludgate Square in relation to lodging a formal objection to the above proposal on the grounds of excessive mass and bulk of the proposal, noise and disturbance, loss of daylight/sun light, overlooking and privacy concerns, the need for a hotel in place of offices and the adverse impact of the scheme on both the St Paul's Cathedral conservation area and the Ludgate Hill conservation area.

Summary of concerns

Each of the concerns will be addressed in turn, however in summary the scheme is considered unacceptable in its impact and therefore fails to comply fully with the City of London Corporation's planning policies and guidance. The proposed increase in mass and bulk adjacent to the bedroom windows of Flat 16 would result in an unduly overbearing impact on the outlook from these windows. The proposed terrace is likely to be used for hotel guests as a smoking area and for outdoor gatherings thereby resulting in noise and general disturbance/ nuisance to the occupiers of the adjacent flats including No. 16. In addition to this, in the absence of adequate screening, users of the terrace could look directly into the windows of our property and the neighbours below (also bedroom/ habitable room windows) and our private terrace. The proposed scheme results in a substantial reduction in daylight and sunlight received by our flat. We argue that there is no substantial evidence showing a need for a hotel on this site and the fact that the offices are not viable. Finally we argue that the very nature of the proposal and associated impacts will adversely affect the character and appearance of the conservation areas the scheme is located in.

Mass and Bulk

Policy CS10 (Design) of the City of London's Core Strategy (2011) states that the Corporation will promote a high standard and sustainable design of buildings and having regard to their surroundings by 'Ensuring that the bulk, scale, massing, quality of materials and height of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and

spaces. In addition to this draft DM Policy 10.1 (New Development) states that the Corporation will require all developments to be of a high standard of design and to avoid harm to the townscape and public realm by ensuring that 'the bulk and massing of schemes are appropriate in relation to their surroundings...'

It is difficult to ascertain from the submitted drawings the exact increase in height of the proposed hotel; it can reasonably be estimated to be somewhere between 1.2m and 1.7m, however as the applicant has not provided like for like comparisons in terms of floor levels and comparative sections this cannot be confirmed. This is worrying as I would question the need for this approach which appears somewhat contrived. Even if the increase was just over a metre, due to the proximity of the proposed plant to flat 16 (it would adjoin our property at a perpendicular angle) the new higher structure would overbear on our property resulting in a sense of enclosure and an unneighbourly relationship which is considered unacceptable and fails to comply with the aforementioned policies.

Noise, Nuisance and Disturbance

The City of London draft Policy DM 15.7 (Noise and light pollution) states that '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.' In addition to this draft Policy DM 10.3 (Roof gardens and terraces) states that the Corporation will encourage high quality roof gardens and terraces where they do not 'immediately overlook residential properties'.

There are two concerns over the submitted application in regards to noise. Firstly the use of the atrium, although unknown, is likely to be frequented by guests of the hotel for the purposes of dining, drinking, chatting etc and as a communal gathering spot. There may even be live entertainment if the weather permits as is common with several higher end hotels in the city. This is likely to result in noise from these activities being channelled up the void between the back of Creed Court and the rear of Lambert House resulting in disturbance to the occupiers of these flats including flat 16. This impact will be exacerbated through the activity occurring in the evening till midnight and possibly beyond, at a time when the majority of neighbouring occupiers will be asleep.

The second concern is the use of the newly created terrace at roof level. At present the site contains plant housing/rooms opposite the bedroom windows of flat 16. The proposal includes the provision of a roof terrace that would measure approximately 6.2m from the habitable room windows in the eastern flank elevation of our flat facing the new development. As with the use of the new courtyard space for the hotel, guests are likely to congregate on the roof terrace for social activities such as drinking and smoking resulting in general noise, disturbance and nuisance to our flat to the detriment of our amenity and quality of life within the flat. As such this element of the proposal is considered unacceptable and conflicts with the Corporation's policies mentioned above.

Daylight and Sunlight

The City of London Saved UDP Policy ENV36 and draft Policy DM 10.7 (Daylight and sunlight) of the Emerging Local Plan (December 2013) state that the Corporation will look to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.

Subsequently the BRE guidance, as noted by the authors of the 'Daylight and Sunlight' report submitted as part of the application, advises that an alteration to the Vertical Sky Component (VSC) daylight and No Sky Line (NSL) of less than 20% is considered by the BRE to be reasonable and likely to be unnoticeable by the occupant. In addition to the VSC and NSL, the Annual Probable Sunlight Hours (APSH) is another BRE-approved criterion for assessing the amount of sun available in both summer and winter for each given window which faces 90 degrees of due south.

The calculations provided in the report do not appear to have been calculated from a visit of the neighbouring properties affected and thereby cannot provide the most accurate results. Notwithstanding this the report notes that there will be a loss of 49% for sunlight received for one of the bedroom windows of which equates to a 100% loss of sunlight in winter as a result of the proposed development. In regards to the VSC of flat 16 (top floor) the bedroom window closest to the proposed plant room would suffer an alteration of 25.8%, clearly greater than the 20% threshold as stipulated in the BRE guidance. The resulting loss of daylight and sunlight is considered unacceptable and would significantly harm the amenity and enjoyment of our property and is therefore considered non-compliant with the Corporation's relevant daylight and sunlight policies.

A further point to note is that within the report the authors state that the guidelines indicate that they should be interpreted flexibly in City Centre locations 'if new developments are to match the height and proportions of existing buildings'. This is misleading as the scheme is clearly going to be higher and bulkier than the existing and therefore it could be argued that the guidance may not be relevant in which case the scheme would fail to comply with most of the BRE guidelines intended for schemes matching the existing bulk and height. Finally it is somewhat alarming to read on page 12 of the submitted Daylight and Sunlight Report that No 2, Ludgate Square of which our flat is one of the properties in this block, would be adversely affected by the development as per the following 'Most properties around the site would only experience small BRE transgressions to their daylight and sunlight; however 2 Ludgate Square would experience reductions beyond the suggestions within the BRE guidelines. Due to the location of this building, these reductions will most certainly be unavoidable if there is to be any increase in massing on the Creed Court site'.

We consider that the above is unacceptable and the scheme has failed to comply with BRE guidance as stipulated in the report.

Overlooking and Privacy

London Plan Policy 7.6 states that 'Developments are required to consider and mitigate any potential negative impacts on the amenity of surrounding land and buildings in relation to privacy and overshadowing'. In addition to this the draft Policy DM 10.3 (Roof gardens and terraces) states that the Corporation will 'encourage high quality roof gardens and terraces where they do not immediately overlook residential properties'. This is strengthened by Saved Policy HOUS 10 (Overlooking and Daylighting) which states 'To require where practicable that the privacy, outlook and daylighting levels of residential accommodation is respected by the form of adjacent development'.

The proposed floor plan showing Level 6 referenced 'A2109 Rev V09' illustrates a proposed terrace accessed from the eastern side of the building and by all of the guests and visitors to the hotel and not only those with rooms at this level. The terrace would measure a distance of approximately

6.2m from the bedroom windows along the east elevation of flat 16 and would be adjacent to the private terrace serving our flat along its south-eastern elevation. In the absence of any details regarding the use of the terrace and screening along the western elevation, there are legitimate concerns that, in addition to potential noise and disturbance, as covered earlier in this report, occupiers of the terrace could directly look into the bedroom windows of our property to the significant detriment of our amenity.

Our specific concerns in regards to the relationship between the proposed terrace and the bedrooms are two-fold. Firstly we are concerned over the fact that our young daughters sleep in both of the bedrooms facing the proposed terrace and any overlooking from the terrace by strangers into their bedrooms while they are occupied is an unnerving thought for us and would be the case for any parent of young children. Additionally we are very concerned that our young children will be exposed, on a regular basis to people smoking, drinking, perhaps using foul language when inebriated and general antics associated with adult behaviour. This should not be the case and we should as family should be able to enjoy the basic right of peace, privacy and safeguarding of our children.

In regards to the part of the proposed terrace adjacent to our terrace there is only a small waist-high railing separating our property from the proposed hotel. In the absence of a formal garden, our modest terrace is the only outdoor amenity space provision for us to enjoy, which has been especially designed for the children to include a small play table and sand box. We would be most concerned at not only hotel guests and visitors looking into this area but potentially also strangers engaging in conversation with our children and worse still crossing over to our side given the limited safeguarding of the existing boundary treatment. Overall the proposed terrace would be a direct invasion of our privacy, an infringement on the safety of our children and significantly harmful to our amenity and enjoyment of our home, such that we may have to consider moving to another home where we feel safe and can raise a young family. Needless to say, we feel that this element of the scheme would fail to comply with the council's relevant policies and guidance.

Hotel Need and Loss of Offices

Draft Policy DM 1.1 (Protection of office accommodation) states that the Corporation will refuse the loss of existing (B1) office accommodation to other uses where the building or its site is considered to be suitable for long-term viable offices and there are strong economic reasons why the loss would be inappropriate. The Office Redevelopment Viability Study (March 2014) submitted as part of the planning application does not, in our view, fully justify the loss of the current office use. The information presented illustrates that in its current state the offices would still yield a return of 7%. In this case little work would need to be done. The author of the report compares the return of £15 rent per sq. ft. to that of between £45 and £67.50 per sq. ft achieved by new 'Grade A' offices at nearby Basinghall Street, London Wall and High Holborn. However, whilst the newer offices attract a higher rent the report has not mentioned the build cost for these offices which would equally be high and would surely eat significantly into the Gross Development Value (GDV); this would affect the overall profit achieved in real terms. Finally the marketing information presented does not provide appendices illustrating the individual adverts placed for each of the publications/websites mentioned. Without tangible figures demonstrating the site has been marketed at a 'fair market rent' for a suitable period of time it is difficult to accept that the office use is no longer viable, except

to justify the office loss for an alternative use that will generate more profit for the site owners and nothing else. In this respect the scheme fundamentally fails to comply with the Corporation's policy aimed at protecting offices and the scheme is therefore considered unacceptable on these grounds.

Draft Policy DM 11.3 (Hotels) states that 'Proposals for new hotel and apart-hotel accommodation will only be permitted where they are not, amongst other factors, contrary to policy DM 1.1 and do not result in adverse impacts on the amenity of neighbouring occupiers'. It is evident from the previous sections of this objection letter/statement that as the hotel would adversely affect the amenity of neighbours the hotel proposal conflicts with aforementioned policy. Furthermore given the lack of justification for the loss of the office use the scheme again fails to comply with the hotels policy.

It is noted from the report to support the hotel development submitted with the application that 21 sites with planning permission to either extend or redevelop for hotel use are highlighted as either not ready or not yet having implemented the planning consent. The report argues that there is a distinct lack of 4-5 star hotels within the vicinity (1 mile radius from the application site), which in our view is plainly false as a non-exhaustive list as per the following illustrates at least 6 such hotels:

- Grange, St Pauls Hotel (Luxury 5-Star) located at 10 Godliman Street, EC4V 5A
- Crowne Plaza London- The City (5-Star) located at 19 New Bridge Street, EC4V 6DB
- Threadneedles Hotel (Boutique 5-Star) located at 5 Threadneedles Street, EC2R 8AY
- Club Quarters St Pauls (4-Star) located at 24 Ludgate Hill, EC4M 7DR
- The Kings Wardrobe (Full-Serviced Residences 5-Star) located at 6 Wardrobe Place, EC4Y 1LL
- Apex Temple Court Hotel (4-Star) located at 1-2 Sejeants Inn, Fleet Street, EC4Y 1LL

The fact that any extant planning permissions haven't been implemented on the above or any other hotels or sites within the vicinity should not prejudice the decision to grant permission for another hotel in the area on the basis that others have not been built. The Corporation have clearly allowed hotel development in the hope that that these will eventually be built but cannot be responsible for ensuring they are built; this would go beyond the scope of the planning permission and indeed the planning process. Additionally there is nothing preventing the applicant from receiving permission and 'banking' the site as a speculative investment- adding to the several other sites that have not implemented consents for the same reason.

A final point to note on this matter is one of the importance of the Corporation listening to local resident's views; over the years the Corporation sends us questionnaires on how we would like to see the city improved and meet the needs and aspirations of residents, especially families. The Corporation claims that every effort has been made to ensure that there is a balance between commercial and residential uses and the provision of green urban spaces and public services for young families. In this respect the proposed scheme undermines the City of London Corporation's own goals and aims. In terms of a need for hotel development on this site, the application does not, in our view, suitably justify this and therefore this aspect of the scheme is considered unacceptable and fails to comply with the Corporation's relevant policies. Moreover a new hotel in this location with an increased bulk as proposed would truly have an adverse impact on the 'soul' of the neighbourhood thereby appearing out of keeping with the character and appearance of the surrounding area.

Adverse Impact on Conservation Area

Both our property and the application site fall within both the Ludgate Hill and St Paul's Cathedral Conservation Area. Draft Policy DM 12.2 (Development In Conservation Areas) of the Corporation's Local Plan states that 'Demolition in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area'. Saved UDP policy ENV 11 supports this stating that the Corporation shall look to 'resist the demolition of buildings which make a positive contribution to the character or appearance of a conservation area and to encourage their sympathetic refurbishment.'

The scheme proposes the retention of only a façade and will involve significant demolition of the existing building which would not comply with the Corporation's relevant policies as above. We are concerned that the impact of the proposed development including the increase in traffic, increase in the bulk and volume of the replacement building and the general intensification of activity on this site on a 24-hour basis will harm the overall balanced and unique character of both the conservation areas. In this regard the scheme is considered unsympathetic to the conservation areas it is located in and fails to comply with the Corporation's relevant policies.

Conclusions

It is our view that, for the reasons highlighted above, the proposed hotel development at this site is considered unacceptable and fails to comply with the Council's relevant policies and BRE guidance. If the Council is minded to approve the application we would suggest further evidence in respect of the loss of office use and the need for a hotel at this site. We would like to see revised plans demonstrating details of adequate screening to overcome the overlooking issues and noise mitigation from the use of the terrace and courtyard below. We would also like to see further details of a noise survey carried out from our flat as the nearest noise-sensitive receptor and any measures to reduce any new plant noise. I would ask that this information is requested from the applicant at the earliest opportunity and we are provided with a chance to study this information and comment in good time before a decision is reached.

I trust the above is clear, however, should you require further clarification please do not hesitate to contact either myself or my wife, Marie Louise by email at the following address, [REDACTED]. As we are living in New York on a work based assignment, should regular mail be necessary, I would appreciate if this were sent care of my neighbour, Mr Matthew Rimmer at Flat 13, Lambert House, 2 Ludgate Square, EC4M 7AS. As per our earlier telephone and email conversations we would still like to invite you to our flat to assess the impact the proposal will have on our property in greater detail.

Yours Sincerely,

Mr J Colombano and Ms M L Kirk

(Owners of Flat 16, Lambert House)

Hampson, Rebecca

From: Hart, Liam
Sent: 18 March 2015 17:37
To: DBE - PLN Support
Subject: FW: 14/00300/FULMAJ: Creed Court / Creed Lane / Ludgate Sq., St Pauls.

Dear DBE PLN support,

Please can you register the below objection.

Thank you,

Liam

Liam Hart
 Senior Planning Officer
 Development Division
 Department of the Built Environment
 City of London
 Telephone 0207 332 1795
www.cityoflondon.gov.uk

ACKNOWLEDGED

From: Robert Meyrick [REDACTED]
Sent: 18 March 2015 17:15
To: Hart, Liam
Subject: 14/00300/FULMAJ: Creed Court / Creed Lane / Ludgate Sq., St Pauls.

Dear Mr Hart,

I write further to my formal objection, sent by email on 9th July 2014.

Since that date, a number of reports and submissions have been issued but, in my view, none of these succeeds in overcoming my earlier objections and thus justifying planning consent. Accordingly I am still opposed to the application.

Apart from focussing on aspects of design and construction I cannot see that the applicants have adequately addressed:-

- the disputed need for more hotel accommodation in that locale,
- traffic congestion in a pedestrianized zone and conservation area
- late night / early morning deliveries and removals
- dirt, noise and disruption during any demolition / construction phases.

By way of re-affirmation I am copying my earlier email below and trust the Committee will heed the views and opinions of other local residents and reject the application accordingly.

With Kind regards



Dear Sir,

I write in connection with the hotel development proposed in the application reference above, and wish to associate myself with the many objections already registered with you. My concerns relate to the residential building at Lambert House, 2 Ludgate Sq. EC4M 7AS.

I would briefly summarise my objections as follows:-

1. This location is a very special part of the St. Pauls and Ludgate Hill Conservation Areas. I accept this doesn't mean no changes ever, but if conservation means anything it must be to retain the existing mixed character and use of the immediate locale. A hotel on this scale, occupying most of the block must surely be contrary to the aims of any Conservation Area designation.

2. Traffic Flow. This is already, and reasonably so, an area of traffic limitations and pedestrian zones. The limousine / taxi movements that might be expected with a hotel on this site must be quite in-appropriate for the streets in this neighbourhood. This would apply not only to guests but also those other visitors attending conferences, events etc. I can also imagine the R/H and L/H manoeuvres from and into Ludgate Hill can only add to the congestion often seen there.

3. Logistics. As an extension to point (2) the daily delivery of supplies into such a tight location must inevitably add to the general level of noise, nuisance and hazard. The removal of waste (also daily I assume) would contribute further to the loss of amenity as well as the right to peaceful and quiet enjoyment. Based upon a number of personal experiences I assume most of these movements would be during "un-social hours".

4. Noise. I have seen the many comments about the atrium / courtyard. I am likely to be less directly affected by these problems but still have concerns that noise could travel around the corridors of Lambert House with negative impacts not currently felt. The proposal for a Rooftop Bar does cause concern however. In addition to normal clientele it will surely be used for events as well – including after midnight. The consequent noise / music will certainly pose a disturbance to neighbouring residents.

Much the same has to be said in relation to the plans to locate the external services plant. This is totally unsuitable for residents' peaceful enjoyment of their homes generating noise 24/7 I assume.

5. Right to daylight. My flat is less directly affected by this consideration but I fully support the comments you have received from residents whose rights and objections have been extensively set before you.

6. Noise, disturbance, dirt and dust during the demolition / construction period. This is a self-evident objection I believe. In general I support any plan to re-develop behind an existing façade where it retains the historic character of a location. This is no exception, but it seems such an approach adds to the duration of a project, creating a timeline which residents should not be expected to suffer from.

If re-development / modernisation is needed, then in such a sensitive area as this it should occur within the existing structures and layouts and ideally with a continuation of the existing mixed uses.

I will look forward to hearing from you in due course and to learning of the key dates in the progress of this application.

Yours sincerely

Robert Meyrick

(Flat3, Lambert House

2, Ludgate Sq.)

Hampson, Rebecca

From: PLN - Comments
Sent: 18 March 2015 15:09
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

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

Comments were submitted at 3:08 PM on 18 Mar 2015 from Miss Louise McCullough.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (140 bedrooms) (5,465 sq.m.), restaurant use (Class A3) at part basement and part ground floor (995 sq.m.) and associated plant areas (860 sq.m.). (REVISED SCHEME)

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Miss Louise McCullough
Email: [REDACTED]
Address: Lamb Building Temple London

ACKNOWLEDGED

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

- Noise
- Residential Amenity
- Traffic or Highways

Comments: I have objected already to the original scheme and it seems to me that the revised scheme does not cure the chief mischief that yet another hotel in this historical and residential area is not required. Further there will be considerable loss of light and amenity for local residents who have expressed their own objections but which I endorse. Whether the windows in the proposed development are glazed or not there will be "overlooking" and loss of privacy for local residents. The proposed roof terrace is going to be open til 8 pm 7 days a week. I cannot imagine how disruptive this will be for local residents during the working day and at weekends. I thoroughly deprecate this unnecessary development and would recommend it is rejected in toto.



Nick and Max Bailey
Flat 22
3 Ludgate Square
London EC4M 7AS

Your Ref: 14/00300/FULMAJ

Wednesday 18 March 2015

ACKNOWLEDGED

Dear Liam Hart

I am writing to you as the owner of neighbouring property Flat 22, 3 Ludgate Square to object to the above application on the following grounds:

Adverse affect on the residential amenity of our property at Flat 22, 3 Ludgate Square. The proposed development will result in our roof terrace and that of our neighbouring property Flat 21, being directly overlooked by two new stories of continually occupied hotel bedrooms, (see photographs on following pages) where we are only currently overlooked by offices not occupied at evenings and weekends. What is currently a relatively private and secluded outside space will become continually overlooked resulting in an unacceptable loss of privacy and amenity for both our own and neighbouring properties.

Noise. Ludgate Square is currently a quiet street, however its unusual narrowness, preserving as it does the medieval proportions it has had for centuries, has the effect of funneling and amplifying even low levels of noise, so that on summer's evenings, when large numbers of people congregate outside the Duchess pub at the Creed Lane end, the noise levels on our roof terrace are at least loud enough to make conversation difficult. The proposal to have a restaurant running almost the entire length of the street with the associated comings and goings; as well as the traffic of guests in and out of the hotel; taxis, deliveries and other associated noise will render our outside space as good as unusable for quiet relaxation and conversation.

Visual impact of the development: the addition of two stories the entire length of Ludgate Hill and an additional service level on the roof creates an unacceptably bulky and overbearing impression, out of scale with the surrounding buildings.

Density of development. The proposed building is the third significant development to be considered in the immediate area around Ludgate Square since we moved into our property in August 2013. The first at 5 Ludgate Square, a residential development adding an additional floor, was already approved at the point we purchased our property. The second, to add an additional floor of office space at 65 Carter Lane directly overlooking our property has recently been approved - and now this proposal. This is a mixed residential area and a

conservation area and yet it seems that we are to be surrounded by almost continual development for the foreseeable future.

Adverse effect on the character and appearance of a conservation area. The small area between Ludgate Hill and the river Thames boasts some of the few streets remaining in London where the Medieval street pattern is preserved. Ludgate Square and the surrounding streets are also rare survivors of Second World War bombing in this part of the City of London. The character of Ludgate Square in particular, with the roofline falling away from six stories at the Ludgate Hill end, down to a more human, domestic scale at the opposite end is essential to the character of the street, as is the mix of residential property with small service businesses such as a tailor's, hairdressers, delicatessen and pub. This mix reflects the combination of domestic quarters and small commercial concerns that have been characteristic of this part of London since the middle ages.

The effect of a development of the scale and nature of the one proposed will be irrevocably to tear out and destroy the unique and peaceful character of this very special part of the City of London, replacing it with an anonymous, corporate identikit urban hotel such as might be found anywhere in the world from Madrid to Dubai. The 'preservation' of the façade is in effect no such thing, since the development will along its entire length greatly exceed the current height of the building, completely overpowering the scale and character of the original Victorian buildings with an insensitively designed overbearing insult to their balance and charm.

I hope you will give these objections and those of the many other residents of Ludgate Hill who feel similarly the most serious and sober consideration in respect of this egregious proposal.

Please see following page for photographic references.

Yours Faithfully,

Nick Bailey

Existing view of proposed development site from roof terrace of Flat 22, 3 Ludgate square



Impact of proposed development



Hassall, Pam

To: Hassall, Pam
Subject: FW: Creed Court Hotel Application 14/00300/FULMAJ

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

From: Hart, Liam
Sent: 20 March 2015 13:30
To: DBE - PLN Support
Subject: FW: Creed Court Hotel Application 14/00300/FULMAJ

Dear DBE PLN Support,

Please can you register, print and acknowledge the below objection?

Thank you,

Liam

Liam Hart
Senior Planning Officer
Development Division
Department of the Built Environment
City of London
Telephone 0207 332 1795
www.cityoflondon.gov.uk

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

From: Ann Holmes Sent: 20 March 2015 13:26
To: Hart, Liam
Subject: Creed Court Hotel Application 14/00300/FULMAJ

Dear Liam

I wish to register my objection to the Creed Court Hotel Application 14/00300/FULMAJ for

I think the loss of light, which would result, for residents at Lambert House, makes the current proposals unacceptable.

Residents themselves have argued in far greater detail than I would be able to, but I have visited flats in Lambert House and am convinced that the current proposal would cause considerable loss of amenity to residents.

I should be grateful if you would acknowledge receipt of this email.

Many thanks

Ann Holmes

Common Councilman for Farringdon Within.

Flat 1
43 Bartholomew Close



Department of Planning and Transportation
City of London
P. O. Box 270
Guildhall
London
EC2P 2EJ

17 August 2016

Attention: Mr. Liam Hart

Dear Mr. Hart,

YOUR REF. 14/00300/FULMAJ

PLANNING		TRANSPORTATION	
POST	CFO	PPD	
270		LTP	
02 SEP 2016		DSE	
PC		PP	
FILE	123806	DD	

I have previously written two letters of objection (dated 3 July 2014 and 7 March 2015) to the above planning application. This is my third letter of objection.

It seems to me that, over the past two years, we have made little progress. The developer has been persuaded to make minor amendments to the planning application but in its essentials it remains unchanged and subject to all the objections that I have made previously, which still stand, and which I do not intend to repeat here in detail.

The facts are that I am the part owner of a flat (13 Lambert House, Ludgate Square) in a Conservation Area which is also an "identified residential area." According to several City of London policies, quoted in detail in my previous letters, residents in such areas are to be given some protection from developments that damage their amenity.

I would suggest that the above application damages our amenity in several ways, as follows;

1. Massing immediately adjacent to Lambert House, particularly relating to the height of the proposed development, remains substantial, even after minor modifications to the original plan, with detrimental affects relating to Daylight and Sunlight on the existing residents of what is a wholly residential property. The proposal to use white glazed bricks to enhance reflectivity is unwelcome because such bricks are unsightly and would soon become dirty, thus reducing their already marginal effect.
2. Massing also will affect residents because of noise and lack of privacy from the intended public use of so called green areas on the roof.
3. Creed Lane is a one way road accessed from Carter Lane and Ludgate Square, neither of which is suitable for large vehicles or high volumes of traffic. In addition, the hotel is to have three entrances/exits on Ludgate Square which will cause considerable noise, the effect of which will be exacerbated because the Square is very narrow with relatively high walls which channel sounds upwards to the detriment of residents.

There are three policies in the City of London Plan adopted 25 January 2015 that relate directly to this planning application as it affects existing residents, as follows:

ACKNOWLEDGED

Policy DM 21.3 Residential Environment.

This policy states "the amenity of existing residents within identified residential areas will be protected." Our property is in the identified residential area of Carter Lane. Thus, our amenity must be protected, according to this policy.

The policy also states "All development proposals should be designed to avoid overlooking and seek to protect privacy, day lighting and sun lighting levels to adjacent residential accommodation." The application does not meet these criteria as far as Lambert House is concerned.

Policy 3.21 Housing.

This policy refers to the advantages of new residential development being located near existing residential areas and to the opportunities this provides for creating "peaceful areas and a high quality residential environment." I would suggest that building a hotel in a designated residential environment will have the opposite affects for residents than is intended by this policy i.e. less peaceful and a poorer quality residential environment.

In the Design Statement the developer states "there is a key opportunity to activate Ludgate Square and support weekend activities. The area as a whole can be activated in connection with the variety of hospitality offers" Thus, the hotel is intended to create more foot and vehicular traffic at evenings and weekends, the very times when existing residents, living in an "identified residential area," would expect to enjoy a generally quieter and more relaxing atmosphere than exists in the city during business hours.

Policy DM 11.3 Hotels

Part of this policy states that hotels will not be allowed where they are contrary to Policy DM 1.1. The proposed hotel would be contrary to that policy because it introduces a use, i.e. a hotel, that adversely affects the existing beneficial mix of commercial use. It does so because the immediate area is already well provided with hotel rooms, serviced apartments etc. and the construction of the proposed hotel requires the destruction of a large amount of B1 office space. Already this proposed development has caused the closure of two popular local businesses, a hairdresser and a tailor.

The policy also states that a hotel will not be allowed if it is likely to cause adverse impacts on the amenity of neighbouring occupiers. It is evident from the items listed above that this proposed hotel has many negative impacts on neighbouring occupiers, particularly its closest neighbours, in Lambert House.

The proposed hotel is a large development relative to the size of the "identified residential area" and would be better developed as a mix of offices, flats and small shops. This would be much more in keeping with its surroundings and its situation in a Conservation Area.

Yours sincerely,



(Mr.) K. Rimmer

Flat 13
Lambert House
2, Ludgate Square
London
EC4M 7AS

Adjei, William

From: Hart, Liam
Sent: 17 August 2016 16:28
To: DBE - PLN Support
Subject: FW: Your Ref. 14/00300/FULMAJ; Creed Court / Creed Lane / Ludgate Square, St Pauls.

From: Robert Meyrick [mailto:]
Sent: 17 August 2016 16:25
To: Hart, Liam
Subject: Re: Your Ref. 14/00300/FULMAJ; Creed Court / Creed Lane / Ludgate Square, St Pauls.

Dear Sir,

I write in connection with the hotel development proposed in the application referenced above, and wish to associate myself with the many objections already registered with you. My concerns relate to the residential building at Lambert House, 2 Ludgate Sq. EC4M 7AS.

I would briefly summarise my objections as follows:-

1. This location is a very special part of the St. Pauls and Ludgate Hill Conservation Areas. I accept this doesn't mean no changes ever, but if conservation means anything it must be to retain the existing mixed character and use of the immediate locale. A hotel on this scale, occupying most of the block must surely be contrary to the aims of any Conservation Area designation.
2. Traffic Flow. This is already, and reasonably so, an area of traffic limitations and pedestrian zones. The limousine / taxi movements that might be expected with a hotel on this site must be quite in-appropriate for the streets in this neighbourhood. This would apply not only to guests but also those other visitors attending conferences, events etc. I can also imagine the R/H and L/H manoeuvres from and into Ludgate Hill can only add to the congestion often seen there.
3. Logistics. As an extension to point (2) the daily delivery of supplies into such a tight location must inevitably add to the general level of noise, nuisance and hazard. The removal of waste (also daily I assume) would contribute further to the loss of amenity as well as the right to peaceful and quiet enjoyment. Based upon a number of personal experiences I assume most of these movements would be during "un-social hours".
4. Noise. I have seen the many comments about the atrium / courtyard. I have concerns that noise could travel around the corridors of Lambert House with negative impacts not currently felt. Any proposal for publicly accessible space does cause concern however. In addition to normal clientele it will surely be

ACKNOWLEDGED

used for events as well – including after midnight. The consequent noise / music will certainly pose a disturbance to neighbouring residents.

Much the same has to be said in relation to the plans to locate the external services plant. This is totally unsuitable for residents' peaceful enjoyment of their homes generating noise 24/7 I assume.

5. Right to daylight. My flat is less directly affected by this consideration but I fully support the comments you have received from residents whose rights and objections have been extensively set before you.

6. Noise, disturbance, dirt and dust during the demolition / construction period. This is a self-evident objection I believe. In general I support any plan to re-develop behind an existing façade where it retains the historic character of a location. This is no exception, but it seems such an approach adds to the duration of a project, creating a timeline which residents should not be expected to suffer from.

If re-development / modernisation is needed, then in such a sensitive area as this it should occur within the existing structures and layouts and ideally with a continuation of the existing mixed uses.

I will look forward to hearing from you in due course and to learning of the key dates in the progress of this application.

Yours sincerely

Robert Meyrick

(Flat3, Lambert House

2, Ludgate Sq.)

Liam Hart
Senior Planning Officer
Development Division
Department of the Built Environment
City of London

24 August 2016

Dear Liam

Re: Planning Application 14/00300/FULMAJ
Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane, 12 Ludgate Square

I wish to object to the planning permission application on the grounds of the following:

- I expect the Planning Authority to act with all due diligence when considering this revised application
- all the previous objections for scheme 1 should be included where relevant

Also to be considered again with due diligence are;

1. The City of London Local Plan dated January 2015 in all relevant detail.
2. The massive imposition of demolition, site clearance and construction of new property. Noise vibration, pollution and of course traffic are major concerns for the residents. There has not so far been any mention of possible compensation arrangements.
3. The proposal flies in the face of the previous statement made by the design team that a reduction of the number of Hotel rooms would make the scheme financially non viable.
4. As far as I am aware, there is no proposal regarding the timeline for which this needs to be considered.

Yours sincerely

Nicola Bell
14 Lambert House
2 Ludgate Square

City Planning Officer
Attention: Liam Hart
City of London
P.O.Box 270
Guildhall
London EC2P 2EJ

26th August 2016

Ref:14/00300FULMAJ

1 of 4 pages.

Dear Sirs

Proposed Change of Use from Office to Hotel
3-5 Ludgate Hill, 1-3 Creed Lane and
11-12 Ludgate Square

PPD	113807	PPD
THD		LTP
COM	11 2 SEP 2016	SSE
FILE		PP
		DD

My objections are as follow:-

Ludgate Square is a narrow lane and the proposed building 11 to 12 will cover three quarters of the narrow lane. The height of the build will be +38.95 metres. Towering over the other properties in the lane of 30 metres. Reducing their Daylight and Sunlight.

The Internal Light Well of 2 Ludgate Square
Courtyard Plan A0105.

The original measurements are not here only what the developer proposes by cutting out the irregular shape. The measurements should stay as they are in the Office Block.

The existing walk through from Ludgate Hill to Ludgate Square is not shown on the Ground Floor Plan. Historically this was a public right of way. Is this not still the case?

No overall measurement is shown on existing Plan for the walk through.

City of London Plan 2015 Section DM15.6 AIR QUALITY

There is a smoke stack, flues and venting of the proposed kitchen probably producing odours and noise onto the internal Light Well which will be unpleasant and a nuisance with the windows open in 2 Ludgate Square.

A2113 (v16 8.8.16)

ACKNOWLEDGED
113807

Has DUCTS, SMOKE EXTRACT UNIT, FLUES and the PLANT next to and opposite 2 Ludgate Square windows these should also be assessed for Noise and Nuisance which affects the residents on the Internal Light Well. I note 2014 there was a noise assessment by the developer, but this seems entirely based on the proposed hotel.

A2100 V16 (8.8.16 Proposed Lower Ground Floor - 3 Plan

A CHP PLANT ROOM is proposed in the third basement.

Gov.UK Guide to CHP. Up to date guidelines should apply for the safety of all concerned including noise and emissions via the Internal Light Well which will damage the amenities of the residents of 2 Ludgate Square. The potential problem of flooding in a basement might also be a concern.

TERRACE

DM10.3 Roof Gardens and terraces

A2109 VO9 (6.8.16) Proposed Drawings Level 6 Plan

This Terrace is an intrusion on the privacy of the residents, particularly the children of 2 Ludgate Square. The Terrace overlooks the INTERNAL LIGHT WELL. The Terrace is directly opposite the windows of Flat 16, and overlooks down and into all the other windows of 2 Ludgate Square.

The Roof Terrace will not mix well with residential neighbours even if there are time limits on the gathering of people. Inevitably there will be social functions generating considerable noise only a few metres from residential windows. Can you certainly say they will all leave at 8 p.m. I doubt very much this will happen; which is likely to result in frequent noise and nuisance complaints to the City of London.

Amongst attractions of Flat 13 are a view of the top of St. Paul's Cathedral and across the river. Both will be lost if this application is approved.

DM 21.3 Residential environment

This Policy relates to protecting the amenity of existing residents in an identified residential area.

It seems to me that in all areas of this policy including, noise, fumes and smells, pedestrian and vehicle movements, overlooking, privacy, sunlight and daylight the application to build a hotel is entirely contrary to the stated policy. Indeed, by its very nature as a 24 hour a day, 365 days per year business a hotel is extremely damaging to residential amenity whereas small business offices and shops tend to operate standard business hours leaving evenings and weekends quieter for residents.

3.21.16 "The avoidance of overlooking of residential accommodation is a consideration in the design and layout of both new residential buildings and other development..." In this case avoidance of overlooking residential accommodation can be achieved by reducing the mass/bulk/height of this proposed hotel or by keeping the existing Office of 4 levels.

DM 21.3

REFLECTIVE LIGHT can contain **LITTLE HEAT CONTENT** whereas at the present time windows W1/704 and W2/704 provide sunlight which produces heat to the rooms, especially welcome in the winter months. This energy cuts the fuel bills.

The proposed building mass will substantially reduce light to residents of 2, Ludgate Square. The proposed white glazed bricks would be extremely unattractive. **Reflective light relates to ADF** which, according to **BRE guidance, only applies to new build whereas 2 Ludgate Square is an existing building.**

OVERSHADOWING. The proposed 38950 mm mass plant build on the SE corner of the proposed plan will cause overshadowing of the windows and darken the interior of 2 Ludgate Square to the severe detriment of residential amenity.

MY OBJECTION WITH THIS APPLICATION IS THAT FLAT 13 Looks East and South over the internal courtyard. GIA say East. The assessment is incorrect. Page 18. This page also refers to Flat 5 as well as 13???????

Figure 05 - Photo and Window Map of 2 Ludgate Square. Page 11. Gia Daylight/Sunlight 6912 17/06/2016 with 5 appendixes.

The photo is misleading on the direction of St. Paul's in the skyline. The Cathedral cannot be seen from this direction over Flat 15. It is further up the road. Thereby given the wrong impression of the compass points. So if the **ASSESSMENTS WERE CARRIED OUT ON THIS BASIS ALL MUST BE WRONG.**

Flat 13 receives high levels of sunlight. Photographs were sent with my letter of 10th March 2015 and were put online. Please look and read.

If this application goes ahead we will lose the skyline, sunlight, daylight to our windows.

Dr. Littlefair's letter of 16th December 2014. Although a recognised expert on BRE his comments are based on what Gia has chosen. As such they are generic and do not reflect his opinion on this specific Planning Application.

Page 3

TRANSPORT

**Core Strategic Policy CS16: Public Transport Streets and Walkways.
Development Management Policies DM16.1
DM16.2**

The proposed hotel:- Entrance door Creed Lane\Ludgate Hill. To avoid going around the circuit of Godllman Street, Carter Lane, bottom of Creed Lane the drivers will park on Ludgate Hill on the corners of Creed Lane for the people to alight. Causing blockages. The servicing vehicles might use Deans Court but Godllman Street is wider, therefore, the route will be Godllman Street, Carter Lane, Creed Lane. Coaches and larger vehicles would need to use this route.

For the Entrance door on Ludgate Square the drivers will use Godllman Street or Deans Court into Carter Lane, and even Ludgate Square which is very narrow. Notice there will be a considerable traffic build up at the bottom of Creed Court, Ludgate Square and Carter Lane. There will be an increase in congestion, vehicle emissions, noise of slamming car doors, noisy people all within a pedestrian zone with increasing danger to the pedestrians. The noise will filter up Ludgate Square which is a quiet tranquil lane causing a nuisance to the residents there, and in Carter Lane and St. Andrew's Hill, 24 hours, 7 days a week.

Ludgate Hill has plenty of pollution from the vehicles, however it is not appropriate to use this circuit of vehicles into the back lanes of St. Paul's and Ludgate Hill Conservation Area. The fact is there will be a considerable increase of vehicles, which will cause great negative impact to this area.

Notice now how the character of the area will be changed.

Please include where applicable my letters of 10th March 2015 and 6th July, 2014.

References for 1st paragraph of my letter:-

Building heights of Ludgate Square 12/00072/FUL, 13/00457/MDC, 12/00755/FUL, 14/00078/NMA, 12/00955/FUL, for 1 to 3, 6 to 7, 8, 8 to 9. Applicant same name.

+ Maps and Daylight and Sunlight Report by Abba Energy Ltd for 8-9 Ludgate Square

Yours sincerely,



(Mrs.) J.L. Rimmer
Flat 13
Lambert House
2, Ludgate Square
EC4M 7AS

Weils, Janet (Built Environment)

From: DBE - PLN Support
Subject: FW: Creed Court, 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square, London EC4M 7AA (14/00300/FULMAJ)

From: Michael Tang [
Sent: 29 August 2016 22:28
To: Hart, Liam
Subject: Creed Court, 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square, London EC4M 7AA (14/00300/FULMAJ)

Dear Mr Hart

I am writing to register an objection to the revised planning application for Creed Court, 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square, London EC4M 7AA (14/00300/FULMAJ).

I live in Flat 1, 2 Ludgate Square, London EC4M 7AS. My flat overlooks the courtyard and the proposed hotel development and, as a result, suffers a significant reduction in the levels of daylight and sunlight. The reduction in the levels of daylight and sunlight are as a direct result of the increase in the height of the building to six floors.

Despite amendments to the design of the courtyard, the increased height of the proposed development continues to result in a decrease in the levels of light beyond the BRE guidelines in the rooms in my flat. The levels of reduction of daylight and sunlight are not acceptable.

My flat is at the lowest level and, as a consequence suffers the worst reduction in the levels of light. From the Daylight and Sunlight report, for my flat, window R1/701 suffers a NSL reduction of 40.7% and window R2/701 a reduction of 23.4%. These levels of reductions are beyond the BRE guidelines.

I challenge the other findings in the Daylight and Sunlight Report for VSC and APSH. I find it hard to understand how it concludes that the reduction in APSH is within an acceptable amount for my flat and yet for the flat directly above mine, the readings are 0% for winter APSH and 6% annual APSH. In fact, in their previous report, the APSH values for my flat fall from 6% to 0%. I believe my levels of APSH to be 0%, which is unacceptable.

Yours sincerely

Michael Tang

Hassall, Pam

To: Hassall, Pam
Subject: FW: Comments for Planning Application 14/00300/FULMAJ

From: PLN - Comments
Sent: 30 August 2016 16:55
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

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

Comments were submitted at 4:54 PM on 30 Aug 2016 from Mr Nicholas Bailey.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (132 bedrooms) (3,035 sq.m. GIA), restaurant use (Class A3) at part basement and part ground floor (1,090 sq.m. GIA) and associated plant areas (2,245 sq.m.) (Total Floorspace 7,660 sq.m. GIA) (REVISED ENLARGED COURTYARD SCHEME).

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Mr Nicholas Bailey

Email:

Address: Flat 22 3 Ludgate Square London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment: - Noise
- Residential Amenity

Comments: The bulk and scale of this development are entirely out of keeping with the unique and fragile character of Ludgate Square, one of the few intact pre WWII streets in the area. At the Creed Court end of the street, the building will be three stories higher than

the facade, although stepped back - a scale which makes a mockery of the status of this street in a conservation area, with its particular emphasis of the stepped roof heights, falling away from Ludgate Hill. This character of the local street, having persisted since pre-Victorian times, would be lost forever.

The building of yet another hotel in an area that is already exceptionally well supplied with hotel accommodation, including Club Quarters and Grange St Paul's within just yards of the proposed development, represents an unnecessary over-commercialisation of the area, and in particular Ludgate Square, which have hitherto preserved its character, rare and consequently precious in the City of London, of mixed residential and independent retail use. An extremely large hotel, catering to already well served international and business travellers, will rob the immediate vicinity of St Paul's of one of its last community streets where people live, work and shop - surely this character is one of the primary reasons international travellers come to St Paul's, and would not wish it to be vandalised to serve already-met accommodation needs.

The continual inevitable noise and disruption associated with the running of a large hotel, with regular deliveries, large amounts of refuse generated as well as the continual comings and goings of guests, the noise of revellers and restaurant goers all represent an unacceptable intrusion, disruption and disturbance to the many people who call Ludgate Square their home. Ludgate Square is an extremely narrow street, and sound is amplified upwards - even ordinary conversation in the street can be easily heard through our fifth floor window at 3 Ludgate Square, for example.

From Sir Brian and Lady Langstaff

Flat 5, Lambert House
2. Ludgate Square
LONDON EC4M 7AS
30th. August 2016

Department of the Built Environment,
City of London,
PO Box 270,
Guildhall,
LONDON EC2P 3EJ

fao Liam Hart

Dear Sirs

14/00300/FULMAJ

We write to object to the proposed development.

Before the previous plan for an hotel on the Creed court site was withdrawn, we met twice with the developers, their architects and advisors. We are grateful that, in one respect, the concerns expressed by residents of 2 Ludgate Square have been listened to – the revision of the plan for the courtyard (called an “extension” though it is actually a reduction on the existing). However, the salesman’s trick of proposing what is unacceptable, withdrawing and then submitting an improved revision does not in itself make the new plan acceptable. The application must be judged for what it is, not how it has been improved: and it remains an overwritten¹ application for over-development which would have serious consequences for light, noise, privacy, and traffic flows without there being a demonstrable need for it.

LIGHT - The validity of an expert report can be tested by the principles it adopts, the assumptions the expert makes, and the absence of inherent bias. On these tests, the GIA Report is flawed. First, it appears to express as a principle that because in an urban environment there may often be a reduction of light below BRE guidelines, a further reduction is therefore more acceptable! The converse is true – what little we have becomes all the more important to preserve, since it is already below generally appropriate illumination. The principle as stated otherwise justifies ignoring BRE guidelines in the centre of any city.

It assumes that “development” means an increase in the height of proposed buildings over the existing: to accept this would lead to creeping increase in the height of buildings round St.Pauls, adversely affecting light to existing buildings. Increased size does not necessarily equal improvement.

The report still relies on “reasonable assumptions” – eg as to the use of and size of rooms, which it states are appropriate where it has not been possible to gain access. But we have not been asked for access, and made this point when the original report was submitted; and also remind² GIA that at least one flat in 2 Ludgate Square has had one of the “bedrooms” in use as a dining room/study. The author has not taken resident’s comments into account.

The third last paragraph of its “Conclusions” not only repeats the salesman’s trick referred to above, but also comments on the aesthetics of the scheme – since this is NOT within

¹ See eg para 3.1. Design and Access Statement, and several references to “animating the public realm” – i.e. people may go to use a hotel if it’s there. It’s a hotel, not a rival to St.Paul’s – come on!

² The point was made in earlier representations. GIA’s report ignores it.

§
69/09

the expertise of a light consultant, it indicates a desire to "sell" the scheme. It adds to this sense of inherent bias by asserting that cladding the lightwell in white brick would be "more aesthetically pleasing" for the occupiers of No.2 Ludgate Square, without any basis for the assertion – moreover, it is actually contrary to the views expressed by the residents when they met the developers to discuss the previous plans, since residents said they thought the white bricks had a public convenience aesthetic. GIA further assert that the lightwell "is designed to enhance the sense of enclosure". Since any lightwell is by definition an enclosure, this is meaningless sales talk.

It follows that the report cannot be taken as fully independent and impartial: and though we cannot comment on the *scientific* methodology itself, given the inherent biases shown in the report itself and the approach it takes it is safe to conclude that the reductions in light it finds will be stated at a minimum: there must be concern the actual might well be more – we note, here, that the current report does not give any calculation of ADF as such (Cf. the report supporting the original plan).

Nonetheless, even on GIA's figures, our master bedroom will lose ALL its sunlight in winter, and at least 2/3 overall; the daylight distribution is to be such that we shall lose nearly a half (to one room), and around a sixth of the daylight (to the other) yet this is a reduction from *what is already at a low base*. The reduction in NSL (already poor) is nearly half. This remains unacceptable, and should not be approved.

NOISE The previous proposal was for a courtyard/lightwell to which we were assured there would be no access for hotel guests. It is now proposed to use the courtyard for "...a series of attractive hotel offers and independent A3 uses"³, and the drawings show figures in the space. This suggests a reversal of the previous proposal, such that the courtyard is now to be used by hotel guests. If so, the effect will be to create a funnel of noise from low level up and past our windows, instead of the relative peace and quiet we now enjoy.

SUMMARY The effects on light, and potential interference with habitat, are a consequence of the proposed building being higher than the existing, and it expanding horizontally towards 2 Ludgate Square. It does not need to be so – the site can be sustainably reconfigured without the effects of which we complain. The application remains a proposal for over-development of the site. In all other respects, we repeat our earlier comments.

Yours,

Sir Brian and Lady Langstaff.

³ 27/73 Design and Access statement, para. 4.4

Adjei, William

From: [REDACTED]
Sent: 31 August 2016 23:08
To: PLN - Comments
Subject: Fw: Objection letter

[REDACTED]

Dear Mr. Hart,

Re:- Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use, Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA. (Your ref: 14/00300/FULMAJ)

We would like to object to the above proposal. Having reviewed the recent documents, here are our objections:-

- there has been no mention of any proposal of servicing times for the new premises. Services can include loading and unloading of goods from vehicles, and can also include collection of refuse. This is to avoid obstruction of the Ludgate Square and surrounding streets, including Creed Lane, plus safeguarding the amenity of residents of adjacent premises.
- We question the impact of demolishing any existing building located next to or within St. Paul's Cathedral Conservation Area, to create a larger premise for hotel use. We are in support of your planning office core strategy policies such as CS12 (conserve or enhance heritage assets). In fact, we are not convinced by the Design and Access Statement by Stephan Reinke Architects, describing the front facade of my building (2 Ludgate Square) and adjacent current premises as "a consequence of 1980s poor historical mimicry to create separate buildings", see page 12 on the statement.
- This leads us to the next matter, increased congestion in Ludgate Square and surrounding areas. We enjoy leisurely strolls along these beautiful, clean and peaceful medieval streets, and we are concerned about the future overcrowding on the public realm. Page 17 on that statement already confirms our concerns, ie. that week nights and weekends will see an increase in movement and noise. Will the taxis come through a Ludgate Square for example to pick up or drop off hotel guests since the main hotel entrance is proposed to be on Creed Lane?
- 132 rooms along with restaurant facilities will require heavy use of the proposed waste storage facilities. These facilities appear to be on Creed Lane. We are concerned about these 1100 litre waste containers being wheeled onto these small streets, obstructing the public realm and crowding these streets. We are also not thrilled with the huge volume of waste generated by the hotel, thereby very concerned about potential increase in pests.
- the proposed large internal stoned courtyard is being designed for public access. What guarantees can you provide regarding noise? This will adversely affect all of us next door in 2 Ludgate Square. We doubt that honey locust trees can absorb much noise. At the moment, during summer time, when it's hot, it is very easy to hear people very well and follow their conversations when they are in the current courtyard.
- the Architect proposed drawings showed on page 15 that the hotel terrace on Level 6 will be located next



to our flat. What about the noise? What are the purposes of this terrace, and when are the opening times?

- the Daylight and Sunlight report is still based on an unchanged assumption, please see page 5, ie. the authors have not sought access to neighbouring properties.

- this light report showed the daylight and sunlight results on page 50 on Appendix 03. Page 53 shows our window, W4/704, listed as a bedroom window, but this is our kitchen window. It also shows our other window, W5/704, listed as another bedroom window, but this is our bathroom. I am going to lose about 4% in daylight vertical sky component according to this report, when this hotel is in place. Page 58 shows us that we will lose about 13% in sunlight during the winter, when this hotel is in place.

- lastly, we are worried about the air quality being affected by the proposed demolition works. How long will these proposed works last?

Thank you for giving us the opportunity to comment.

Yours sincerely,

Ms. Y. Tan
Flat 15, Lambert House, 2 Ludgate Square

Matthew Rimmer

Flat 13 Lambert House
2 Ludgate Square
London EC4M 7AS

31 August 2016

Liam Hart
Department of the Built Environment
City of London

Dear Liam,

Please accept this letter as my objection to the proposed Creed Court Development also please consider my previous objection letters as they are still valid.

My objections are as follows with reference to the City of London Local Plan dated January 2015.

1. Policy DM 1.1 Protection of office accommodation and policy DM 1.3 Small and medium sized business units - this needs to be consider by yourselves

2. Policy DM 10.1 New development

The bulk and massing of the scheme is inappropriate, and does not take into considerations the surrounding buildings particularly 2 Ludgate Square.

To be clear the proposal is for a reduction in the existing footprint of the inner courtyard from 132m² to 115m² while at the same time massing on the south elevation to completely overshadow our homes and directly in contravention of BRE guidelines

The development has also increased in height at its highest point to the south and with the positioning of a plant room which seems totally unreasonable

3. DM 10.3 Roof gardens and terraces

The proposed terrace will immediately overlook residential premises as it is directly next to Flat 16 raising security concerns as well as the ability to look down at the apartments on lower floors.



4. DM 10.7 Daylight and Sunlight

Policy states: "To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings"

1. Assumptions and opinions have been made by the GIA in their daylight and sunlight report with inconsistencies and incorrect information still being published.
 - 1.1. For example reference is made to all rooms looking onto the inner courtyard as being bedrooms. This is factually incorrect, for example Flat 15 their kitchen and bathroom overlook the inner courtyard.
 - 1.2. GIA have utilised ADF (Average Daylight Factor) measurement which is in direct contravention to BRE guidelines and should not be used on existing buildings.
 - 1.3. "An enlarged courtyard has been proposed" - this is incorrect. the courtyard size is being reduced from 132m² to 115m²
 - 1.4. "We have not sought access to adjoining properties...we have made reasonable assumptions to the internal layouts of the rooms". Residents have always made clear the availability of our properties by all parties to get correct/gather precise information. Assumptions are unhelpful and in the most part incorrect and flawed
 - 1.5. NSL (No Sky Line) fails by 40% at 2 Ludgate Square, 50% at 8 Carter Lane and 100% at 50 Carter Lane
 - 1.6. VSC (Vertical Sky Component) 65% fails at 2 Ludgate Square, 100% at 8 Ludgate Square, 50% at 46 Carter Lane and 50% at 50 Carter Lane

5. DM 11.3 Hotels

The proposed hotel is contrary to policy DM 1.1 and will not contribute to the balance in the immediate facility. Ludgate Square has gone from office buildings to now primarily residential with the conversion of 6 - 7 Ludgate Square and 8-9 Ludgate Square into short term apart/hotel. We are already saturated with hotels nearby Grange St Pauls, Grange Suites and Club Quarters (both being directly opposite the proposed development). Apex Hotel, Premier Inn, Crowne Plaza etc

Residential amenity is not being protected

6. DM 12.2 Development in a conservation area

We are in the St Paul's conservation area the area will not be preserved or enhanced through this development. It will be to the detriment of resident

I do not see how this scheme can progress or be supported by the City of London when it contravenes so many policies and guidelines.

Yours sincerely

A black rectangular box redacting the signature of Matthew Rimmer.

Matthew Rimmer

Hassall, Pam

To: Hassall, Pam
Subject: FW: Comments for Planning Application 14/00300/FULMAJ

From: PLN - Comments
Sent: 31 August 2016 11:55
To: PLN - Comments
Subject: Comments for Planning Application 14/00300/FULMAJ

Planning Application comments have been made. A summary of the comments is provided below.
Comments were submitted at 11:54 AM on 31 Aug 2016 from Mr Joe Colombano.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square, London EC4M 7AA

Proposal: Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (132 bedrooms) (3,035 sq.m. GIA), restaurant use (Class A3) at part basement and part ground floor (1,090 sq.m. GIA) and associated plant areas (2,245 sq.m.) (Total Floorspace 7,660 sq.m. GIA) (REVISED ENLARGED COURTYARD SCHEME).

Case Officer: Liam Hart
[Click for further information](#)

Customer Details

Name: Mr Joe Colombano
Email:
Address: Flat 16 Lambert House, 2 Ludgate Square London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment: - Residential Amenity

Comments: A letter raising objections to the scheme, in particular the acceptability of the daylight/sunlight received to neighbours as a result of the proposal, has been prepared on my behalf by Syntegra Consulting and

DAP Planning and Architecture. This was sent earlier today as per the stated deadline directly to the email address of the case officer, Liam Hart. Please refer to this document which forms my formal objection to the latest revisions on this project.

Adjei, William

From: Hart, Liam
Sent: 13 September 2016 10:50
To: DBE - PLN Support
Subject: FW: Objection to application 14/00300/FULMAJ

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

From: Ann Holmes
Sent: 13 September 2016 10:40
To: Hart, Liam
Subject: Objection to application 14/00300/FULMAJ

Dear Liam

It seems to me that significant problems of daylight and sunlight still remain and I would like to record my objections to this application.

Many thanks

Ann Holmes
Common Councilman for Farringdon Within

Sent from my iPad

ACKNOWLEDGED



FAO Mr Liam Hart,
Planning Officer,
Department of the Built Environment,
City of London,
PO Box 270,
Guildhall,
London EC2P 2EJ

Received.
31/10/16

Dear Mr Hart,

31 October 2016

Letter of Objection: Application Reference No. 14/00300/FULMAJ
Proposed development at Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square, London EC4M 7AA

Demolition of existing buildings behind retained facade to 3 Ludgate Hill to provide a 7 storey building for hotel use (Class C1) at part basement, part ground and 1st to 6th floors (132 bedrooms) (3,035 sq.m.), restaurant use (Class A3) at part basement and part ground floor (1,090 sq.m.) and associated plant areas (2,245 sq.m.).

We write today on behalf of our client, Mr J Colombano and Ms M L Kirk who reside at Flat 16, Lambert House, 2 Ludgate Square, neighbouring the proposal. We have been contacted by our client after concerns were raised that the proposed development will infringe on the daylight and sunlight currently enjoyed by their property (as laid down in the BRE "Site layout planning for daylight and sunlight: a guide to good practice", 2011 by PJ Littlefair).

Our client Mr J Colombano through his letter to City of London dated 8th July 2014 and 19th March 2015 raised some issues regarding daylight and sunlight matters subsequent to a planning application being submitted to the Council. The proposed scheme has since been modified by Stephen Reinke Architects and a revised daylight and sunlight report has also been submitted by GIA. We have reviewed this revised report, and comment as follows.

With respect to GIA's letter dated 17th June 2016, whilst we appreciate the list of improvements, we examined the impact to the surrounding buildings and especially focused on the effects on 2 Ludgate Square. Although we acknowledge that the architects have incorporated further improvements following the consultation on the planning application, we still have some concerns regarding the impact on surrounding properties.

According to GIA's Daylight and Sunlight report dated 17th June 2016, 2 out of 17 windows (highlighted in yellow in the below table) at 2 Ludgate Square will fail to meet the BRE Sunlight criteria. However, we have scrutinised it and found out the actual number of windows that the occupants are likely to notice a loss of sunlight and see the impact would be 12 as shown in the Sunlight Result below, Appendix 03 of GIA's Daylight and Sunlight report.



As mentioned in the BRE guide "Any reduction in sunlight access below this level (more than 25% of APSH or more than 5% of APSH in the winter months) should be kept to a minimum. If the available sunlight hours are both less than the amount above and less than 0.8 times their former value, either over the whole year or just in the winter months (21 September to 21 March), then the occupants of the existing building will notice the loss of sunlight."

Further to the above statement, even though the overall annual loss of 10 windows (W1/701, W4/701, W5/701, W1/702, W4/702, W5/702, W1/703, W1/704, W2/704, W4/703) is not greater than 4%, the occupants will notice the loss of sunlight to their homes as the centre of the windows will receive less than 25% of APSH or 5% WPSH and receive less than 0.8 times its former sunlight hours either period. Furthermore, the more care needs to be taken into the design not to block any of sunlight on these windows in the situations that the existing values are already low and slight changes of the skyline can adversely affect to these windows.

Table 03 – Annual Probable Sunlight Hours (APSH)

Address	Number of Windows	Meet BRE Guidance	Number of Rooms	Meet BRE Guidance
3 Ludgate Square	24	23	7	7
2 Ludgate Square	17	15	15	13
1 Ludgate Square	31	29	5	5
46 Carter Lane	N/A	N/A	N/A	N/A
48 Carter Lane	N/A	N/A	N/A	N/A
50 Carter Lane	N/A	N/A	N/A	N/A
6-7 Ludgate Square (residential being implemented)	11	11	2	2
8-9 Ludgate Square (residential has been implemented)	N/A	N/A	N/A	N/A
Total	83	78 (94%)	29	27 (93%)

N/A = Not Applicable

VSC result (GIA's Daylight Sunlight report, 8.0 Surrounding Properties, p12)

SUNLIGHT ANALYSIS

Room	Window	Room Use	Flat Number	Existing		Window Proposed		Winter Loss	Annual Loss	Winter % Loss	Annual % Loss	Room		Winter Loss	Annual Loss	Winter % Loss	Annual % Loss
				Winter APSH	Annual APSH	Winter APSH	Annual APSH					Winter APSH	Annual APSH				
2 LUDGATE SQUARE																	
R1/701	W1/701	BEDROOM		6	3	0	0	0	3	0.00	100.00	0	3	0	0	0.00	100.00
R2/701	W2/701	BEDROOM		0	5	0	4	0	5	0.00	20.00	0	5	0	4	0.00	20.00
R3/701	W3/701	BEDROOM		1	10	0	6	1	4	100.00	40.00	0	5	0	4	0.00	20.00
R4/701	W4/701	BEDROOM		1	9	0	5	1	3	100.00	55.56	0	5	0	4	0.00	20.00
R1/702	W1/702	BEDROOM		0	6	0	2	0	4	0.00	66.67	1	11	0	7	100.00	36.36
R2/702	W2/702	BEDROOM		2	14	0	8	2	6	100.00	42.86	0	6	0	2	0.00	66.67
R3/702	W3/702	BEDROOM		3	15	0	12	3	3	100.00	80.00	2	14	0	6	100.00	57.14
R4/702	W4/702	BEDROOM		4	15	0	12	4	3	100.00	80.00	2	14	0	6	100.00	57.14
R1/703	W1/703	BEDROOM		0	11	0	8	0	3	0.00	72.73	5	19	0	15	100.00	21.05
R2/703	W2/703	BEDROOM		4	22	0	16	4	6	100.00	72.73	0	11	0	8	0.00	27.27
R3/703	W3/703	BEDROOM		2	25	0	26	2	1	100.00	4.00	4	22	0	16	100.00	27.27
R2/704	W2/704	BEDROOM		10	40	4	37	6	3	15.00	7.50	2	25	0	26	100.00	4.00
R1/705	W1/705	BEDROOM		12	50	6	47	6	3	20.00	16.00	12	50	6	42	60.00	16.00
R2/705	W2/705	BEDROOM		18	56	16	15	2	1	22.22	1.79	18	56	16	15	22.22	1.79
R3/705	W3/705	BEDROOM		7	22	3	25	4	4	57.14	18.18	7	22	3	25	57.14	18.18
R4/704	W4/704	BEDROOM		15	38	13	45	2	7	26.32	18.42	15	38	13	45	26.32	18.42
R5/704	W5/704	BEDROOM		7	22	9	32	2	10	22.22	45.45	7	22	9	32	22.22	45.45

Sunlight result (GIA's Daylight Sunlight report, Appendix 03, p58)

In addition, the BRE guideline clearly suggests that bedrooms should be considered to analyse the impact on the daylighting distribution in the rooms although bedrooms are less important. The table shows that 5 out of 15 rooms will fail to meet the BRE NSL criteria and areas beyond the no sky line will be dark and gloomy and supplementary electric lighting will be needed.

As mentioned in the BRE guideline, "If following construction of a new development, the no sky line moves so that the area of the existing room, which does receive direct skylight, is reduced to less than 0.8 times its former value this will be noticeable to the occupants, and more of the room will appear poorly lit".

Further to the above statement, especially 3 rooms (R1/701, R4/701, and R1/702) on the first and second floor at 2 Ludgate Square will experience more than 30% loss (30.52% to 42.96%) as shown in the table below. Therefore, the reduction of skylight will be severely noticeable to the occupants and the natural lighting condition of rooms will be significantly poor.

DAYLIGHT DISTRIBUTION ANALYSIS

Room/ Floor	Room Use	Flat Number	Whole Room	Prev sq ft	New sq ft	Loss sq ft	%Loss
2 LUDGATE SQUARE							
R1/701	BEDROOM		121.25	60.72	36.00	24.72	40.71
R2/701	BEDROOM		102.81	43.80	33.54	10.26	23.43
R4/701	BEDROOM		140.41	50.88	42.90	18.58	30.52
R1/702	BEDROOM		121.25	88.32	50.38	37.95	43.06
R2/702	BEDROOM		102.81	55.71	47.77	8.94	13.76
R4/702	BEDROOM		160.36	79.99	56.70	22.21	28.15
R1/703	BEDROOM		121.25	100.94	94.06	14.89	13.67
R2/703	BEDROOM		102.81	80.30	95.22	-13.92	-17.12
R4/703	BEDROOM		160.36	68.37	66.96	1.41	2.06
R1/704	BEDROOM		121.25	119.74	108.97	10.77	8.99
R2/704	BEDROOM		102.81	102.46	102.46	0.00	0.00
R4/704	BEDROOM		82.11	75.67	75.63	0.06	0.09
R5/704	BEDROOM		99.81	59.05	87.08	-27.98	-47.38
R1/705	BEDROOM		87.70	85.81	85.81	0.00	0.00
R2/705	BEDROOM		85.71	84.53	84.53	0.00	0.00

No-Sky Line result (GIA's Daylight Sunlight report, Appendix 03, p56)

Even though the total failing percentage at 2 Ludgate Square has been reduced and the VSC result has been improved, several flats will still be adversely impacted by the proposed development and their right to enjoy daylight and sunlight will be infringed.

We would be grateful if you could acknowledge receipt of this letter. Should you wish to discuss any aspect please do not hesitate to contact the writer.

We look forward to hearing from you.

Yours sincerely,

Yunok Choi
Sustainable Design Engineer

yc@syntegragroup.com

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Committee(s):		Date(s):
Planning and Transportation Committee		02 May 2017
Subject: Barbican and Golden Lane Estates: Proposed Conservation Area		Public
Report of: Carolyn Dwyer		For Decision
<p style="text-align: center;"><u>Summary</u></p> <p>The Barbican and Golden Lane Estate Residents Association have requested that a new conservation area is designated by the City to include the Barbican and Golden Lane Estates and surrounding area.</p> <p>This report sets out the steps to be followed for consideration of a new conservation area, describes the existing conservation area designations in the City and the planning context.</p>		
<p>Recommendation(s)</p> <p>Members are asked to:</p> <ul style="list-style-type: none"> • Note the report • agree that assessment and analysis of the proposed area would be carried out in accordance with policy and national guidance • consider the results of this work and if a conservation area should be designated 		

Main Report

Background

1. The Barbican and Golden Lane Residents Associations have approached the City with a proposal for a new conservation area. They state that 'there are an increasing number of new developments that are due to affect the setting of the area's listed buildings and a conservation area would help control the massing and appearance of those developments and also allow more consideration of proposed demolition of buildings within the area'. They have, on 4th April 2017, suggested a boundary for the conservation area as London Wall, Aldersgate Street, Baltic Street, Golden Lane, Chiswell Street and Moor Lane and a map is attached in Appendix A. This would incorporate the existing Brewery Conservation Area. They have initiated a public campaign in support of this proposal and a petition has been set up which currently has approximately 730 signatures. To date, the petition has not been submitted formally to the City.

2. The City has a statutory duty under section 69(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to consider whether it should designate conservation areas which are defined as 'areas of special architectural or historic interest, the character of which it is desirable to preserve or enhance'. There are 26 conservation areas in the City which cover 35.8% of the area. Section 69(2) of the Planning (Listed Buildings and Conservation Areas) Act states that 'It shall be the duty of a local planning authority from time to time to review the past exercise of functions under this Section and to determine whether any parts or further parts of their area shall be designated as conservation areas; and if they so determine, they shall designate those parts accordingly'.
3. In the exercise of planning functions, the City is required to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas and to prepare proposals for their preservation and enhancement. Guidance is contained in the City of London Local Plan, the National Planning Policy Framework and the 1990 Act.
4. The designation of a conservation area brings the demolition of buildings within the area under the control of the local planning authority, in the absence of a planning permission. Permitted development rights are more restricted and there is greater control over work to trees. The Mayor of London's powers are unchanged whether the development is within or outside a conservation area.
5. A comprehensive review of conservation areas was last carried out in 2007. It is anticipated that the next review would be undertaken following completion of the current programme of Conservation Area Character Summary and Management Guidelines SPD's, which is likely to be in 2-3 years. SPD's are in place for 16 conservation areas.

Current Position

6. The City has previously carried out reviews of conservation area status on a comprehensive basis. This has been beneficial as the City is a tight geographical area with a range of areas of different and varying character and has enabled robust, justifiable proposals to be made. It is important that designation boundaries are precise and clear to avoid potential uncertainty.
7. It would be possible to consider a specific area of the City to determine if any parts of that area should be designated as a conservation area and this would be in accordance with national guidance.

Options

8. A review of the proposed conservation area would include assessment and analysis of the area as a whole using national guidance and criteria. It would include assessment of the existing statutory designations in and adjoining the area and if appropriate, would include defining boundaries of an area or areas considered to be of special architectural and historic interest.

Following this assessment a report of the results would be prepared for your decision. In the event that members felt that conservation area designation of a whole or part of the area had merit, public consultation would be carried out. There is no requirement to carry out consultation; however it is supported as

good practice. Comments would be taken into account and reported to Committee to decide if conservation area designation is appropriate.

Corporate & Strategic Implications

9. The City of London Local Plan is undergoing review. It will set out the type of development that is considered appropriate within and affecting conservation areas and include boundaries on the policy map. Decisions on the designation and boundaries of conservation areas are separate from the Local Plan process.

Conclusion

10. The Barbican and Golden Lane Residents Associations have approached the City with a proposal for a new conservation area. The City has a statutory duty under section 69(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to consider whether it should designate conservation areas which are defined as 'areas of special architectural or historic interest, the character of which it is desirable to preserve or enhance'. It is proposed to assess the area proposed and report the findings to Committee and if the Committee decide designation has merit, to carry out public consultation.

Appendices

Appendix A

Map of area proposed by Barbican and Golden Lane Residents Associations as a conservation area

Kathryn Stubbs

Assistant Director Historic Environment

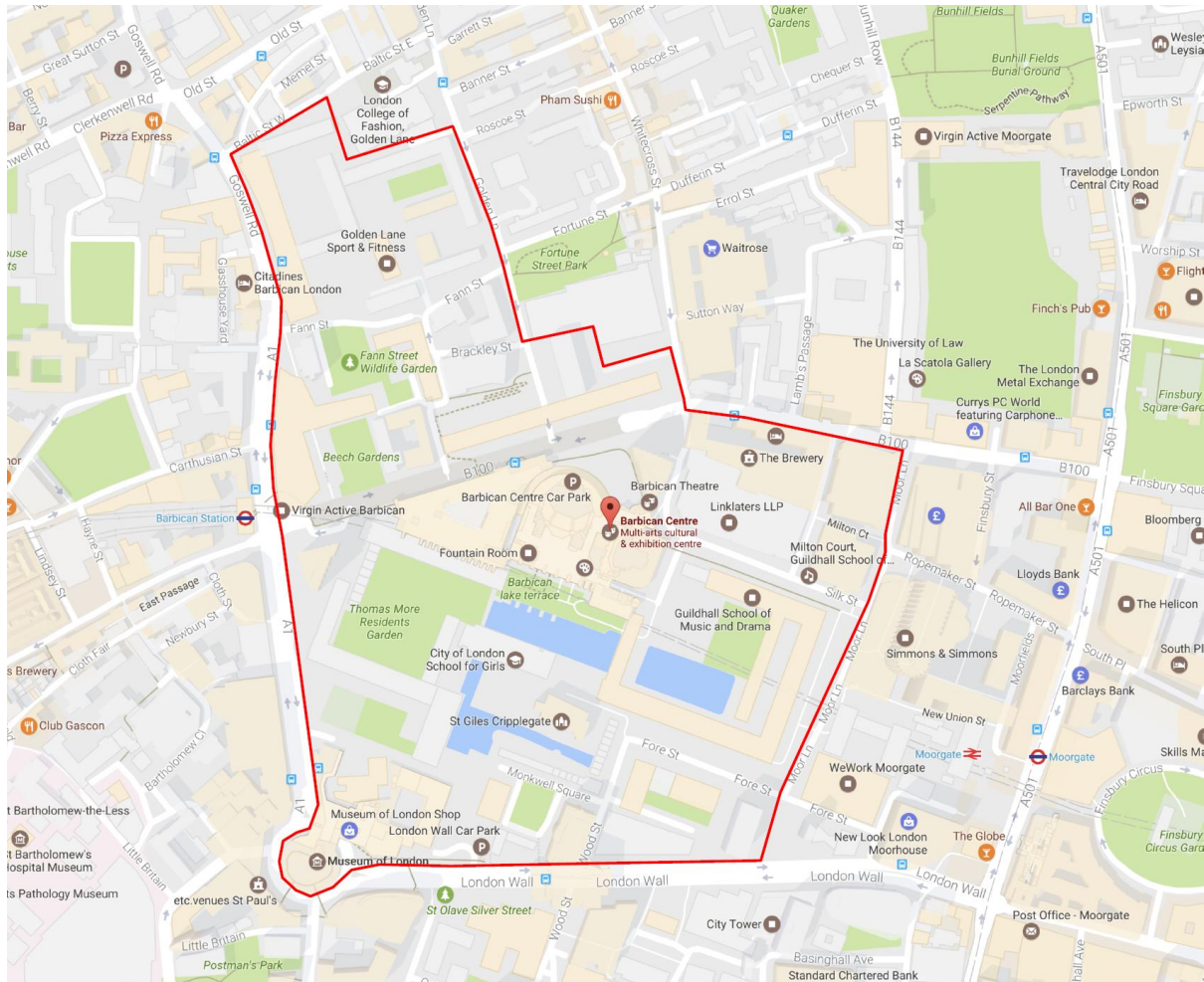
T: 020 7332 1447

E: Kathryn.stubbs@cityoflondon.gov.uk

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Appendix A

Map of area proposed by Barbican and Golden Lane Residents Associations as a conservation area



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Committee:	Date:
Planning and Transportation	2 May 2017
Subject: Bernard Morgan House 43 Golden Lane London EC1Y 0RS Demolition of existing building, retention of existing basement and construction of new residential building to provide 99 dwellings, together with ancillary car parking, hard and soft landscaping and associated works (Total Floorspace 11,113 sq.m. GIA).	Public
Ward: Cripplegate	For Decision
Registered No: 16/00590/FULL	Registered on: 5 July 2016
Conservation Area:	Listed Building: NO

Summary

Planning permission is sought for the redevelopment of the site for 'Demolition of existing building, retention of existing basement and construction of new residential building to provide 99 dwellings, together with ancillary car parking, hard and soft landscaping and associated works (Total Floorspace 11,113 sq.m. GIA).'

The development comprises the demolition of the existing building and the construction of a new residential building. The height of the proposed building would range from ten storeys opposite Cripplegate House to six/eight storeys opposite Bowater House, and would reduce in height along Brackley Street from ten storeys to four storeys in the southwest corner. Of the 99 private flats proposed ten would be studio flats, 41 would be one-bedroom flats (including two duplex flats), 39 would be two-bedroom flats (including ten duplex flats) and nine would be three-bedroom flats (including two duplex flats).

A total of 182 representations have been received across the three rounds of consultations objecting to the application. The objections are summarised in a table in the body of the report with responses provided in respect of the various issues raised. The issues raised include the lack of on-site affordable housing; design and the impact on listed buildings and non-designated heritage assets; the impact on residential amenity including daylight and sunlight, overlooking, dominance and loss of outlook; noise; congestion; loss of trees and the impact on biodiversity; air pollution; and the impact on public

services, A petition has been received from Cobalt Building residents objecting to the application. The petition contains 51 signatures. 16 representations have been received in support of the application.

The site is appropriate for residential development, in principle, as it is adjacent to existing residential areas, the Golden Lane Estate, the Barbican Estate and other residential buildings at the Cobalt Building and Tudor Rose Court. The density of the proposed development is higher than the density recommended in the London Plan's Density Matrix but this density is considered to be acceptable in this instance.

It is proposed that a cash-in-lieu payment towards affordable housing of £4.5m is paid by the developer. This level of contribution is below the target set by the Local Plan but it is the maximum feasible and viable contribution that could be made and therefore is acceptable under Local Plan policy CS21 and the London Plan. The cascading height, bulk and mass of the proposed building responds to its context, transitioning the height between Cripplegate House and the Barbican podium, and the Golden Lane Estate. The appearance of the building would complement those buildings, without seeking to mimic or detract from them. The proposal would preserve the setting of the Barbican (listed building and registered landscape), Cripplegate House and the Jewin Chapel, and cause limited less than substantial harm to the setting of the Golden Lane Estate, which would be outweighed by the public benefits.

The City Corporation appointed BRE to independently review the applicant's daylight and sunlight assessment. Whilst there will be some impact on daylight and sunlight to neighbouring properties, these impacts are generally minor in nature and acceptable given the densely developed urban nature of the site. Similarly, although sunlight to existing open spaces and shadowing of these spaces would worsen as a result of this scheme, these impacts are overall minor. Whilst many rooms within the proposed development fall below the BRE guidance, this is due to existing structures and surrounding buildings. The proposed pocket park would be poorly sunlit in March and June principally because of large obstructions to the south.

The building has been designed to take account of its impact on neighbouring residential properties in relation to overlooking, dominance and enclosure and loss of outlook is considered to be acceptable.

The proposal complies with the standard for new residential accommodation outlined in the London Plan Housing Supplementary Guidance.

It is considered that the development complies with the Development Plan as a whole and is appropriate subject to conditions, and a Section 106/Section

278 Agreement being entered into and complied with.

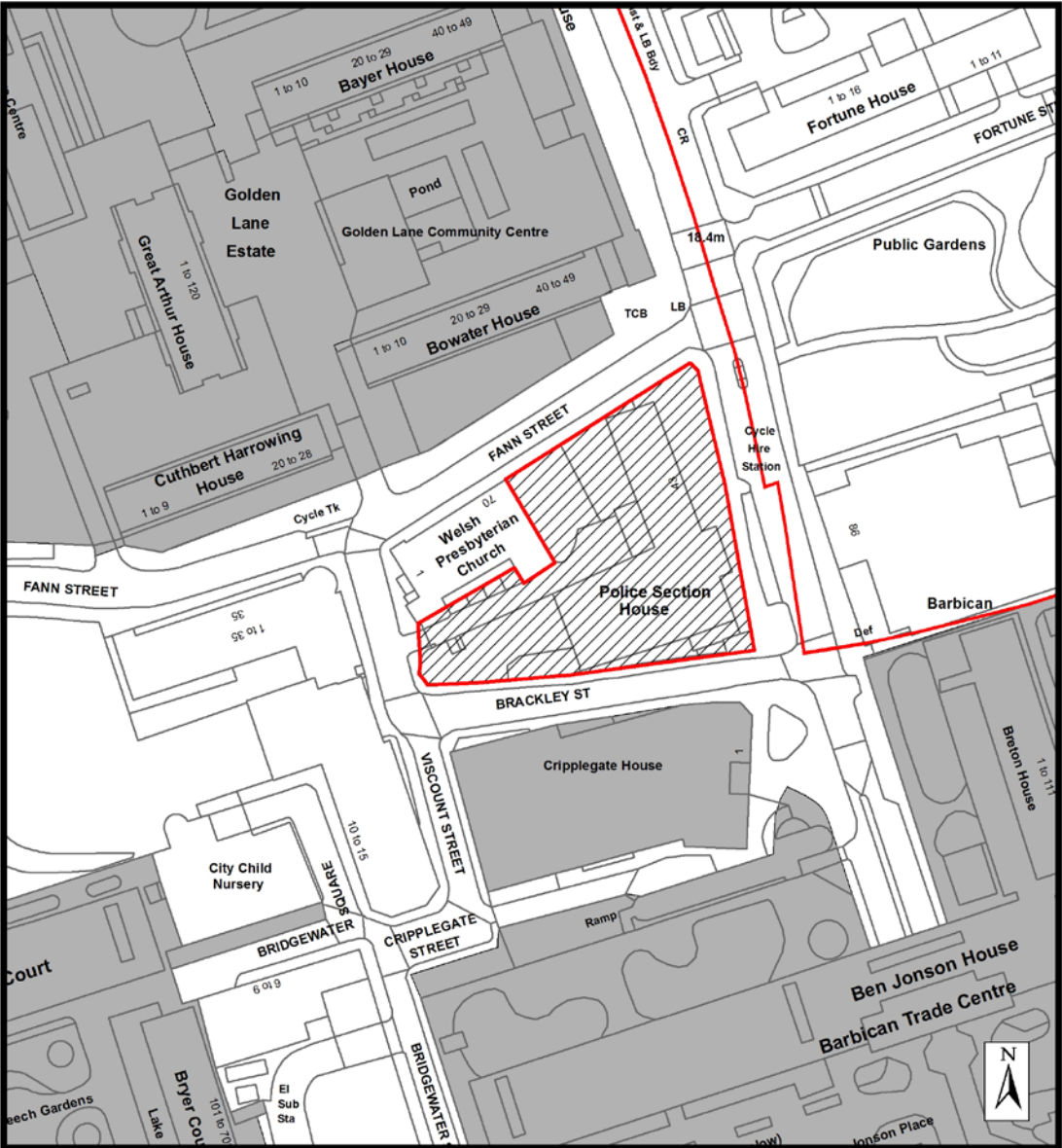
Recommendation

(1) That planning permission be granted for the above proposal in accordance with the details set out in the attached schedule subject to: planning obligations and other agreements being entered into in respect of those matters set out in the report, the decision notice not to be issued until such obligations have been executed

(2) That your Officers be delegated authority to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106

(3) That you agree in principle that the land affected by the building which is 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 (subject to consideration of consultation responses) making of a Stopping-up Order for the area shown marked on the Stopping-up Plan annexed to this report under the delegation arrangements approved by the Court of Common Council.




Site Location Plan



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ADDRESS:
Bernard Morgan House

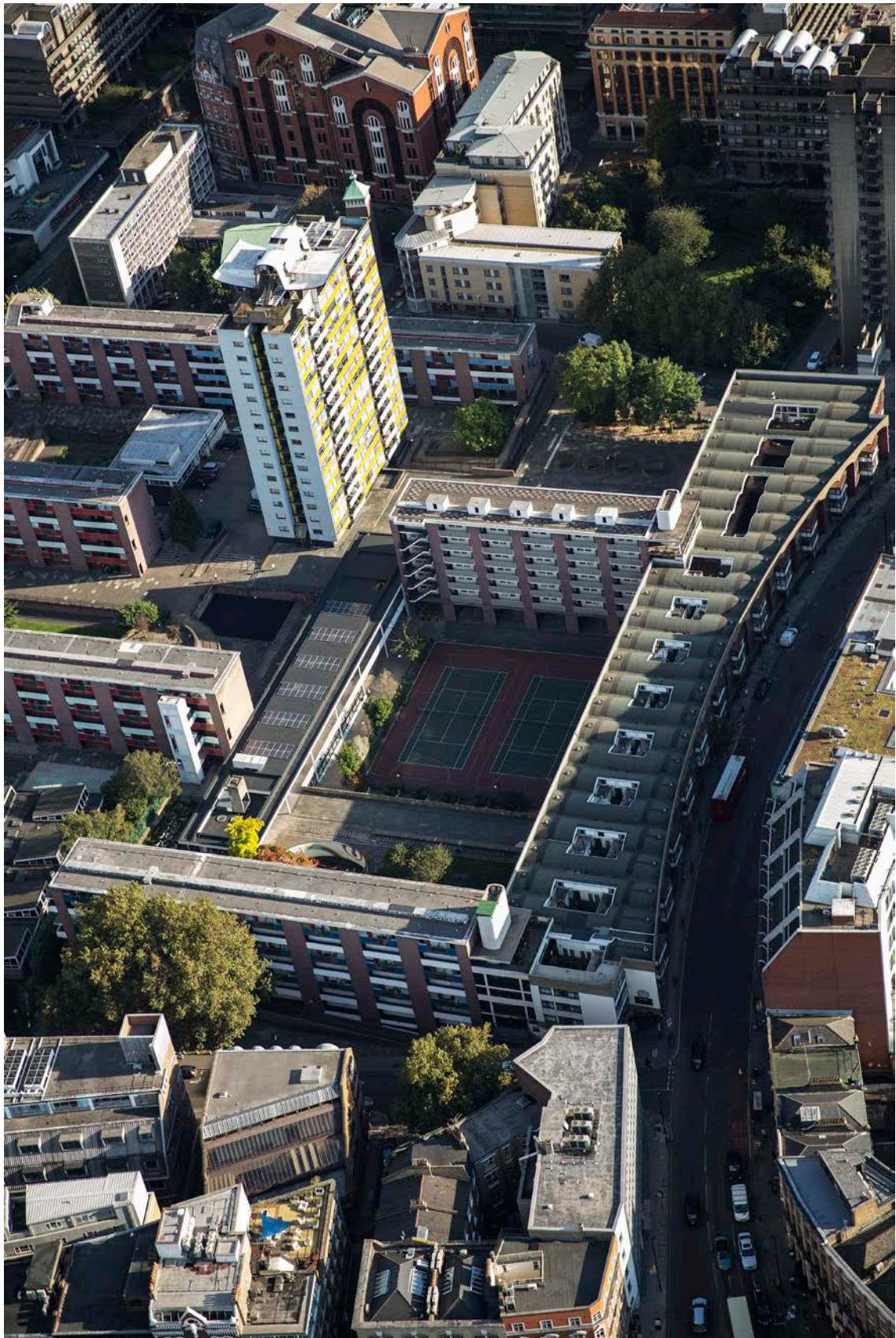
CASE No.
16/00590/FULL

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



DEPARTMENT OF THE BUILT ENVIRONMENT





Main Report

Site Location and Current Buildings

1. The site is approximately 0.2125 hectares in size and is positioned between Golden Lane to the east, Viscount Street to the west, Brackley Street to the south and Fann Street to the north.
2. The surrounding area is mixed in terms of character and uses, with the residential properties of the Golden Lane Estate to the north, the Barbican Estate to the south, the Jewin Welsh Presbyterian Church, and the residential properties of the Cobalt Building and Tudor Rose Court to the west, Prior Weston Primary School to the east and Cripplegate House, which is in commercial use to the south.
3. The site contains an existing six storey building with a two storey basement, known as Bernard Morgan House ("BMH"). The building was constructed and used as a Police Section House (sui generis use) and has been vacant since 31st March 2015. The site is not within a Conservation Area. There are a number of listed buildings in close proximity including Bowater House and Cuthbert Harrowing House (part of the Golden Lane Estate), Cripplegate House and Breton House (part of the Barbican Estate), which are Grade II listed. The Barbican is also listed Grade II* in the Register of Historic Parks and Gardens.
4. The site has a Public Transport Accessibility Level (PTAL) rating of 6a (Excellent).

Proposal

5. Planning permission is sought for the redevelopment of the site for:
Demolition of existing building, retention of existing basement and construction of new residential building to provide 99 dwellings, together with ancillary car parking, hard and soft landscaping and associated works (Total Floorspace 11,113 sq.m. GIA).
6. The height of the proposed building would range from ten storeys opposite Cripplegate House to six/eight storeys opposite Bowater House, and would reduce in height along Brackley Street from ten storeys to four storeys in the southwest corner.
7. Of the 99 flats proposed ten would be studio flats, 41 would be one-bedroom flats (including two duplex flats), 39 would be two-bedroom flats (including ten duplex flats) and nine would be three-bedroom flats (including two duplex flats).
8. The hard and soft landscaping proposals for the site create a publicly accessible 'pocket park' at the south-eastern corner of the site bordering

Brackley Street and Viscount Street. Communal private open space for the use of the residents to the rear of the building bordering Fann Street as well as private terraces and balconies on Golden Lane and at the rear of the building are proposed.

9. The main pedestrian access to the building would be from the south-eastern corner of the site at the junction of Golden Lane and Brackley Street, which would be managed by a concierge. There would also be a access point from Fann Street. Servicing and deliveries would be via an internal service yard, which would be accessed from Brackley Street.
10. The development would provide one disabled parking space within the servicing bay and a minimum of 153 cycle parking spaces at lower ground floor level.

Consultations

11. The views of other City of London departments have been taken into account in considering the amended scheme and detailed matters will be covered under conditions and the Section 106 agreement.
12. The Twentieth Century Society object to the application expressing concern that the demolition of Bernard Morgan House would result in the loss of a non-designated heritage asset, and would constitute harm to the character of an area that is defined by its high calibre listed and non-listed post-war architecture. The design of the new development takes little heed of this context due to its increased footprint, height and plan form, which in combination would result in the new building wrapping and dominating the church. (Letter attached).
13. TfL has raised concern about the continuing operation of the adjacent cycle hire docking station on Golden Lane during construction. TfL have requested an informative to notify the developer that approval would be required prior to any temporary closure of the docking station and that it would not approve a temporary closure of more than two calendar weeks due to high demand.
14. The Assistant Parks Manager at the London Borough of Islington has raised concern about loss of sunlight to Fortune Street Park and increased wear and tear due to additional usage from an increased local population. The London Borough of Islington do not currently have funding to make large scale improvements to the park.

15. Following pre-application discussions with residents there have been three rounds of formal consultation as follows:

Original application;

- Amended application to overcome the concerns raised by Officers regarding the poor levels of daylight and sunlight experienced in the proposed flats. This resulted in changes to the internal layout of the building (including an additional entrance to the building on Fann Street) and increasing the size of windows;
- Amended application to address comments received from City Transportation. The corner of the building on Golden Lane/Brackley Street which accommodates the entrance lobby including an overhang. As this corner of the site is public highway, this overhang would have required a projection licence, which would not have been forthcoming as the overhang was less than 5.7m above the highway. To overcome this, the ground floor of the building was extended to remove the overhang. This area of public highway would be stopped up.

16. A total of 182 representations have been received across the three rounds of consultations objecting to the application. The objections and the responses to these issues are summarised in the table below:

Representations received	Consultation			Response
	1 st	2 nd	3 rd	
It is not necessary or appropriate for the entire annual requirement for housing to be provided on this single site.	1	0	0	Addressed in paragraph 30-31.
No affordable housing	16	12	1	Addressed in paragraphs 36-42 and CIL.
Viability Assessment is not available online.	0	1	0	Taylor Wimpey's Financial Viability Assessment remains commercially confidential, as does Gerald Eve's advice to the Corporation as it contains confidential information within the Taylor Wimpey Assessment.
Damage to the community.	3	2	0	Addressed in paragraph 43.
The proposed building is too large.	74	19	1	Addresses in paragraphs 40-43.

The proposal should be no larger than the existing building.	7	1	0	Addressed in 42-45 and 92-103.
The proposed building is out of character.	42	15	1	Addressed in 46-50, 92-103, 107-110, 116-119 and 125-127.
Object to the demolition of the building as it is a non-designated heritage asset. The existing building should/could be refurbished and converted	18	10	3	Addressed in paragraphs 63-77
The proposal has a detrimental impact on listed buildings. The Listed Building Guidelines for Golden Lane have been ignored.	42	13	0	Addressed in paragraphs 78-99
The decorative tiles on the existing building should be incorporated into the new development.	3	3	0	Addressed in paragraphs 74
Proposed materials are not in character with the surroundings.	5	1	0	The quality of materials, texture, colour, finish and depth of modelling would be important to delivering a successful scheme. A high quality material finish would be confirmed via conditions requiring details and samples of facing materials, junctions, reveals and balconies.
The Local Authority have not taken into consideration the special architectural interest of Bernard Morgan House	2	0	0	Addressed in paragraphs 61-75.
The proposal is much larger than the building proposed in the sales brochure for the site	10	0	0	The proposal cannot be assessed against any indications made at the time the site was sold. The application must be assessed on its own merits.
The building should not extend beyond the	3	1	0	Addressed in paragraphs 44-47

current footprint along Brackley Street.				and 53-61.
The Jewin Welsh Chapel should be an undesignated heritage asset.	2	2	0	Addressed in paragraphs 112-120.
Should be a Conservation Area.	0	3	0	This is addressed in a separate report to this Committee.
Brackley Street - The upper floors should recede evenly to mirror the Fann Street Elevation or the height should be reduced by one-two floors.	1	0	0	Addressed in paragraphs 48-52.
Tudor Rose Court was carefully controlled	1	0	0	All applications must be determined on their own merits.
Loss of light to and overshadowing of neighbouring buildings, Fortune Street Park and Prior Weston School.	86	27	8	Addressed in paragraphs 125-142 and 146-151.
Daylight/sunlight assessment must include the impact on the Jewin Welsh Chapel.	0	0	1	Addressed in paragraph 137.
The proposed flats would be overshadowed.	1	0	0	Addressed in paragraphs 143-151.
The Bowater House flats will lose heat as there will be less absorption from sun	1	0	0	There will be a reduction in sunlight but this is within the BRE guidelines. The loss of heat will not be significant.
Light pollution.	3	0	0	It is unlikely that the light emitting from the proposed development will be noticed in the context of the surrounding area.
Overlooking.	31	7	0	Addressed in paragraphs 152-154.
The windows have been increased in size which worsens overlooking.	0	2	0	Addressed in paragraphs 152-154.
Dominance and enclosure.	23	3	0	Addressed in paragraphs 152-154.

Loss of outlook and loss of views.	14	6	0	Addressed in paragraphs 152-154.
Impact on Prior Weston School play area in terms of loss of light, overlooking and noise and disturbance during demolition/construction.	1	1	0	Addressed in paragraphs 136-140 (loss of light), 152-154 (overlooking), and 155 (noise and disturbance) and conditions 4-6 and 12-14.
The Hatching Dragons Nursery should be relocated. The impact on the Nursery is not fully understood	1	0	1	The developer and the Hatching Dragons Nursery School are discussing the relocation of the nursery, which could be secured through the S106 agreement.
An entrance on Fann Street is proposed. Residents were promised by the developers that there would not be an entrance on Fann Street.	0	10	0	This is a secondary entrance and is not considered to have a significant detrimental impact on neighbours.
Impact of building works (noise/dust/traffic).	15	4	2	Addressed in paragraph 155 and conditions 4, 5, and 7.
Noise from proposed flats and servicing.	12	0	0	Addressed in paragraphs 156.
Noise from the proposed 'pocket park'.	4	0	0	Addressed in paragraph 157 and the S106 agreement.
Most of the flats will be single aspect.	1	1	0	Addressed in paragraph 166.
The hours of opening of pocket park should be controlled to prevent anti-social behaviour.	1	0	0	Addressed in paragraph 157 and the S106 agreement.
Security problems and anti-social behaviour from the proposed 'pocket park'. The 'pocket park' should be private	7	3	0	Addressed in paragraph 157 and the S106 agreement.
When the flats are unoccupied there will be no way of maintaining private gardens on Golden Lane. They will become unsightly.	1	0	0	This would be a matter for the building management to address.

The 'pocket park' will be dark and will become a dumping ground.	1	0	0	This would be addressed through the management plan secured through the S106 agreement.
Congestion and lack of parking spaces.	21	7	0	Addressed in paragraphs 169-171.
Increased pressure on pay and display and disabled parking spaces, and the TFL bikes on Golden Lane	2	0	0	Addressed in paragraph 171. One disabled parking space would be provided within the service area. This is considered to be an appropriate level of provision for a residential development in this location and meets the requirements of the London Plan and the Local Plan. A minimum of 153 cycle parking spaces would be provided for which exceeds the London Plan and is acceptable
Lack of service area.	1	1	0	All servicing would take place within the designated off-street servicing area within the building, accessed from Brackley Street.
Ideally the site access should be from Golden Lane.	1	0	0	This is to be agreed through conditions 4, 6, 12 and 14.
The servicing bay would be situated opposite the servery of Cripplegate House and lorry use during office hours could be a nuisance.	1	0	0	As the building would be in residential use it is anticipated that the servicing requirements would be low and the impact on Cripplegate House would be minor.
Loss of trees.	3	1	0	Addressed in paragraphs 176-178 and by condition 2.
Additional trees should be planted	1	0	0	Addressed in paragraphs 176-178 and condition 22.
Impact on biodiversity and the wildlife garden and loss of open space.	8	4	1	Addressed in paragraphs 179-182 and conditions 18 and 23.
Amenity value of Fortune Street Park would be reduced and there would be increased wear and	12	4	1	The London Borough of Islington could request CIL money for improvements to the park but not for maintenance.

tear on the park.				
Air pollution	3	1	1	Addressed in paragraphs 190-192.
Impact on Infrastructure and public services especially the local GP surgery.	26	5	0	The developers will be making a payment towards the City CIL and the infrastructure facilities including public health care facilities could be funded by City CIL if felt appropriate.
The occupants of the new flats may insist on the imposition of controls on Cripplegate House such as controlling lighting or screen use as the building operates outside normal working hours.	1	0	0	The Department of Markets and Consumer Protection have received several complaints from Golden Lane residents about the Cripplegate House lights but have not established a statutory nuisance. If a nuisance is established the Department of Markets and Consumer Protection could insist on controls being put in place to abate the nuisance.
The Church Hall will be unusable in the construction/demolition phase and it is an important source of income.	1	0	0	The impact on the Church has been considered and conditions have been recommended to mitigate the impact (conditions 4-6 and 12-14). Loss of income is not a planning matter.
The consultation period took place in the summer when a lot of neighbouring residents were away and could not comment.	7	1	0	Local Planning Authorities cannot control when applications are received and must determine all applications in accordance with the timeframe laid out by the Government.
The public exhibitions held by the developer were misleading and the comments made have been ignored.	15	5	0	Developers are not obliged to hold public exhibitions but it is recommended. The Local Planning Authority has no control over how or when they are held.
Conflict of interest due to sale.	3	1	0	The City of London Corporation has retained the freehold of the site and sold a 154 year lease to the applicant. The ownership is not a material planning application. the statutory

				arrangements provide for a Local Planning Authority to determine applications relating to buildings or sites owned by it. The Local Planning Authority must determine all applications in accordance with national and local planning policy. See also under "Legal Issues" at end of report.
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17. A petition has been received from Cobalt Building residents objecting to the application. The petition contains 51 signatures. The issues raised are:

- The public consultation carried out by the developer has been deficient in due process;
- The redeveloped Bernard Morgan House will extend towards the Cobalt Building, which gives rise to major concerns about daylight and sunlight obstruction, change of view, lack of privacy, increased noise levels, potential risk of vagrants and anti-social behaviour;
- Negative impact on the neighbourhood and the Cobalt Building, including construction noise, traffic and pollution; and in the longer term there would be a loss of light, increased traffic noise and pollution, congestion from servicing, increased demand on local services, noise, anti-social behaviour and security problems;
- Bernard Morgan House should be rebuilt within its current footprint;
- The new building should not affect the light and views of the Cobalt Building flats and of the surrounding buildings;
- The quietness, tidiness and security of the neighbourhood should be respected and maintained during the redevelopment and in the longer term.

18. 16 representations have been received in support of the application. The following issues have been raised:

- The site is a security risk now.
- The proposals would bring more people to the area, which means more trade for the local area.
- The site is currently an eyesore and would benefit from redevelopment.

Policy Context

19. The development plan consists of the London Plan 2016 and the City of London Local Plan 2015. The London Plan sets out the Mayor's vision for London up to 2036, and includes policies aimed at delivering housing.
20. The London Plan requires that new development should not adversely affect the safety of the transport network and should take account of cumulative impacts of development on transport requirements. New development is required to be of the highest architectural quality and not to cause harm to the amenity of surrounding land and buildings, in respect of overshadowing, wind and micro climate.
21. 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.
22. There is relevant City of London supplementary planning guidance in respect of: Planning Obligations, the City of London Community Infrastructure Levy Charging Schedule. There is relevant Mayoral supplementary planning guidance in respect of Sustainable Design and Construction, Control of Dust and Emissions during Construction and Demolition, and Use of Planning Obligations in the funding of Crossrail and the Mayoral CIL.
23. Government Guidance is contained in the National Planning Policy Framework (NPPF) and the NPPF Practice Guide. Chapter 12 of the NPPF sets out key policy considerations for applications relating to designated and non-designated heritage assets. Other relevant guidance is provided by English Heritage including the documents Conservation Principles, and The Setting of Heritage Assets. Building in Context (EH/CABE) and the PPS5 Practice Guide in respect of the setting of heritage assets.
24. The NPPF sets out a presumption in favour of sustainable development, requiring that development which accords with an up-to-date local plan should be approved without delay. The NPPF identifies a number of key issues for the delivery of sustainable development, those most relevant to this case are: housing delivery, requiring good design, ensuring buildings function well and add to the overall quality of an area; meeting the challenge of climate change and addressing the potential for flooding; conserving and enhancing the natural environment; conserving and enhancing the historic environment, attaching great weight to the conservation of heritage assets of the highest significance.

Considerations

25. The City 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, any local finance considerations so far as material to the application, and other material considerations. (Section 70(2) Town & Country Planning Act 1990); and
 - 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).
26. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990); in this case the duty is to have special regard to the desirability of preserving the settings of listed buildings.
27. The effect of the duties imposed by section 66(1) of the Planning (Listed buildings and Conservation Areas) Act 1990 is, respectively, to require decision-makers to give considerable weight and importance to the desirability of preserving the setting of listed buildings.
28. 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...'. The NPPF also provides guidance on the conservation and enhancement of the historic environment at paragraphs 126 to 141.

Principal Issues

29. The principal issues in considering this application are:
- The principle of residential development;
 - The contribution towards the provision of affordable housing;
 - Design: Height, Bulk, Massing, Form, Architectural Expression, Urban Grain, Streetscene and Landscaping;
 - Impact on Heritage Assets:
 - Principle of the Demolition of Bernard Morgan House;

- Impact on the Setting of the Golden Lane Estate;
- Impact on the Setting of Cripplegate House;
- Impact on the Setting of the Barbican; and
- Impact on the Setting of the Jewin Chapel;
- Servicing, Transport and impact on public highways;
- The impact of the proposal on neighbouring residential and commercial buildings and spaces, including loss of daylight and sunlight, wind microclimate, air pollution, overlooking, dominance and enclosure, loss of outlook/views, noise, and security;
- Energy and sustainability; and
- The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan.

Principle of the provision of residential development

30. Policy CS21 of the Local Plan explains that the City Corporation aims to exceed the London Plan's minimum annual requirement by guiding new housing development to and near identified residential areas...and refusing new housing where it would prejudice the primary business function of the City or be contrary to Policy DM1.1 (protection of office accommodation).
31. Policy DM21.1 of the Local Plan states that *new housing should be located on suitable sites in or near identified residential areas*. The site is adjacent to the Golden Lane and Barbican residential areas, and the Cobalt Building and Tudor Rose Court, and is an appropriate location for residential development. The proposal would provide a substantial contribution to the City's housing quota.
32. Policy DM21.1 of the Local Plan further states that *new housing will only be permitted where development would not: prejudice the primary business function of the City; be contrary to policy DM1.1 (protection of office accommodation); inhibit the development potential or business activity in neighbouring commercial buildings and sites; and result in poor residential amenity within existing and proposed development, including excessive noise or disturbance*. The proposed development would not prejudice the primary business function of the City, it does not involve the loss of office accommodation, and would not impact on the development potential of neighbouring commercial buildings (Cripplegate House). The impact the proposal on residential amenity will be addressed in the relevant sections of this report.

Density

33. London Plan policy 3.3 recognises the need to provide additional housing in London and sets a minimum annual target for the City of London of 141 additional dwellings during the plan period (2015-2025). Policy DM21.5 of the Local Plan states that all new housing must be designed to a standard that facilitates the health and wellbeing of occupants and takes account of the London Plan's space standards and complies with the London Plan's Density Matrix standards.
34. The site is within a 'central setting', which is defined as 'an area with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800m walking distance of an International, Metropolitan or Major town centre. The site has a Public Transport Access Level (PTAL) of 6a (excellent), which recommends that the site is developed at a density of 650-1100 habitable rooms/hectare or 215-405 units/hectare considering the size of the dwellings proposed. The proposed development is at a density of 489 units/hectare (1252 habitable rooms/hectare) which is higher than recommended. However, paragraph 3.28 of the London Plan explains that the density matrix should not be applied mechanistically '*enabling account to be taken of other factors relevant to optimising potential – local context, design and transport capacity are particularly important, as well as social infrastructure, open space and play*'. The London Plan Housing Supplementary Planning Guidance further explains that *in appropriate circumstances it may be acceptable for a particular scheme to exceed the ranges in the density matrix, providing important qualitative concerns are suitably addressed*'. To be supported, schemes which exceed the ranges in the matrix must be tested against the following considerations: design, local context and character, public transport connectivity, the quality of the proposed accommodation and its compliance with the housing quality standards (found in the London Plan Housing Supplementary Planning Guidance), and the management of refuse storage and cycle parking facilities. When these considerations are satisfactorily addressed the London Plan provides sufficient flexibility for such higher density schemes to be supported. It is common for new development in central London to exceed the ranges in the density matrix and as it is considered that the proposal satisfactorily addresses the detailed issues outlined in the London Plan Housing Supplementary Guidance, the proposed density is acceptable in this instance.
35. The units proposed would range in size from 43.75sqm. to 126.14sqm. (GIA), which complies with Core Strategic Policy CS21 and the London Plan's minimum space standards for new residential development.

Contribution towards the provision of affordable housing

36. Local Plan Core Strategic Policy CS21 requires new housing development to provide 30% affordable housing on-site or, exceptionally, 60% affordable housing off-site or equivalent cash-in-lieu where a

viability study demonstrates to the City Corporation's satisfaction that on site provision is not viable. These targets are applied flexibly, having regard to individual site circumstances and viability. The Planning Obligations Supplementary Planning Document indicates that, where provision is made in the form of a cash-in-lieu payment, the payment will be calculated on the basis of £165,000 per unit of affordable housing required. London Plan Policy 3.12 similarly seeks the maximum reasonable amount of affordable housing on private residential schemes taking account of individual circumstances including development viability.

37. The application, as originally submitted in June 2016 proposed 104 private residential flats, with a proposed cash-in-lieu contribution towards affordable housing of £1.5m. The Local Plan policy compliant requirement for a scheme of this size would be £9,735,000. The offered cash-in-lieu contribution was equivalent to an affordable housing contribution of 9 units, or 8.7% of the total number of residential units proposed.
38. The affordable housing offer was supported by a financial viability assessment undertaken on the basis of a residual valuation approach and in accordance with RICS 2012 guidance 'Financial Viability in Planning'. The assessment compared the Gross Development Value of the scheme (residential sales values and other income) against the Gross Development Costs (land value, build costs, fees, marketing, finance and legal costs, s106 and CIL contributions) and assessed the outcome against a benchmark level of profit. The assessment concluded that the scheme would be unable to make a contribution to affordable housing on current day values, but taking account of potential future value growth a contribution of £1.5m would be viable.
39. The assessment included an affordable housing delivery statement which considered the merits of providing affordable housing on-site in line with the requirements of Local Plan policy CS21, or making a cash in-lieu contribution to support affordable housing provision elsewhere. The delivery statement indicated that a maximum of 2 units of on-site affordable housing could be provided, whereas an equivalent cash in-lieu payment would permit the provision of 9 units elsewhere on City Corporation owned-sites.. Therefore a cash-in-lieu contribution was proposed.
40. As the contribution was subject to viability the City Corporation appointed an independent consultant to review the applicant's viability appraisal and provide advice on the maximum feasible and viable contribution that could be made towards affordable housing.
41. The City Corporation's consultant concluded that the applicant had underestimated the potential sales value of the flats and overstated potential build costs. All other inputs to the model were considered to be reasonable, including the proposed benchmark profit and land value.

The land value in particular was assessed and considered to be reasonable given current market conditions and the requirement on the City Corporation (as previous land owner) to achieve best value. A sensitivity analysis was also undertaken to look at the potential for value growth over the projected build period of the scheme. The City Corporation's consultant concluded that the scheme could support an off-site cash-in-lieu contribution of £4.5m.

42. In November 2016, the applicant submitted a revised scheme with a reduced number of units (99) and an updated build cost schedule. This revised information was considered by the City Corporation's consultant who concluded that changes to the sales value and build costs of the scheme did not materially affect the scheme's viability and that a contribution of £4.5m remained viable. This level of provision would be equivalent to an affordable housing contribution of 27%. Although the level of contribution is below the target set in the Local Plan, it is the maximum feasible and viable contribution that could be made and is therefore compliant with Local Plan policy CS21 and the provisions of the London Plan. The contribution would assist the City Corporation in meeting its corporate target to deliver up to 700 additional affordable homes on City Corporation housing estates by 2026. The applicant has agreed to pay this contribution.

Impact on the community

43. Concern has been raised by objectors that the proposed flats would be purchased by investors who would not contribute to or be part of the community, which is strong in this part of the City. Occupation of the proposed flats as full time homes cannot be insisted on. However, Section 25 of the Greater London Council (General Powers) Act 1973 stipulates that use of a permanent residential property for the purposes of short-term lets (less than 90 consecutive nights) is a material change of use requiring planning permission. Therefore, if someone wishes to use their property in this way planning permission is required.

Design: Height, Bulk, Massing, Form, Architectural Expression, Urban Grain, Streetscene and Landscaping.

Height, Bulk, Massing and Form

44. Local Plan Policy DM 10.1, New Development, states that *proposals should be of a bulk and massing appropriate to their surroundings, having regard to general scale, height, building lines, character, historic interest and urban grain*. The site context is the Golden Lane Estate (GLE), Cripplegate House and the Barbican Estate, which are grade II listed buildings as well as the other buildings and open spaces, which adjoin the site.
45. The height, bulk and massing arrangement seek to form a transitional bridge between the height of Cripplegate House and the Barbican

podium level, with their strong urban scale, to the more human/domestic scale of the GLE. The height would reduce in height from ten storeys, opposite Cripplegate House, to six/eight storeys opposite Bowater House (6 storeys).

46. The height would reduce sharply along Brackley Street from ten storeys at the junction with Golden Lane, to four storeys in the south west corner, approximately to the height of the Jewin Chapel. The four storeys opposite the proposed 'pocket park' at the junction with Viscount Street, would better define the scale of these secondary streets.
47. The stepping in height is accompanied by a pulling back of the building line on Golden Lane from where it abuts the footway at the junction with Brackley Street to the eastern building line of Bowater House. The effect is that the main bulk and mass of the proposed building bridges the scale of the Golden Lane and Barbican Estates. Whilst this stepping is less articulated on the rear elevation, this is considered secondary and less important.

Detailed Design

48. The architectural expression would pay deference to its neighbours and would follow a common architectural language which unifies the whole. The style is often termed "New London Vernacular", which borrows architectural features and materials embedded in London's architectural history, using them in a stripped contemporary manner. The facade treatment would comprise brick-cladding with 'punched' fenestration, the latter accentuated by expressed pre-cast concrete implying 'architraves' forming a regular pattern. It would be topped by metal clad roofs; with over sailing soffits and jambs with the massing recessed and broken by mottled metal 'baguette' cladding.
49. In a contemporary manner the proposal seeks to "cloak" the main bulk and massing which forms the design narrative, the diminishing massing, to form a skin, of vernacular brick, which is a unifying material in this context, with punched fenestration appearing stretched around that mass. This stretching effect would be articulated in the returning of the corners in pre-cast concrete reveals, splayed and brought proud of the elevation, creating strong edges and returns.
50. The building would have an implied base or plinth, in common with the existing building, delineated by a more rustic 'chequerboard' pattern, reflecting a fenestration pattern used on an ad-hoc basis in the elevations. Further animation would be generated, in particular on the Golden Lane frontage, via balconies which provide depth and a three-dimensional playfulness to the principle facade.
51. The roof storeys would set back so as to appear more recessive in the immediate and wider townscape.

52. The quality of materials, texture, colour, finish and depth of modelling would be important in delivering a successful scheme. A high quality material finish would be confirmed via conditions requiring details and samples of facing materials, junctions, reveals and balconies.

Urban Grain, Streetscene and Landscaping

53. The proposal would result in a significantly higher density, and site cover than currently exists.
54. The scheme would return, in part, the front sunken garden, setting the building line back from Golden Lane, echoing the garden in front of Bowater House and giving the building a softer interface with the junction at Fann Street. Similarly, albeit significantly smaller, the sunken amenity space to the rear and the proposed 'pocket park' would make a contribution to the network of private/public spaces which defines the urban grain of the adjacent Golden Lane Estate.
55. Policy DM 10.1 states that all development should have attractive and visually interesting street elevations, provide active frontage, servicing entrances which assimilate with the architecture and appropriate hard/soft landscaping and boundary treatments.
56. The current Bernard Morgan House and Golden Lane share a common 'grain' or urban layout: of low-slung horizontal blocks, set back from the plot boundary and rising above a generous landscape. The proposed scheme would, whilst continuing to provide some open space, bring built development to the site boundaries in a denser reinterpretation of the Victorian urban grain prior to the Blitz. This will result in a more direct interface with the street.
57. Viscount and Brackley Street are historic streets which prior to the Blitz comprised smaller streets off which ran alleys and courts in a tight urban grain built to form continuous building lines. It is important that the character of this street does not become a dark service street, and continues to have interest at street level. It is considered that the quality of the brickwork, fenestrative pattern and detailed entrance panel, which could accommodate retained decorative tiles from the current BMH, or an alternative artistic treatment, would sufficiently animate the street frontage
58. The character of Brackley Street and, to a lesser extent, Viscount Street, would change in terms of scale, light and openness, as the proposal would create somewhat of a 'canyon' effect, placing more emphasis on delivering an active and attractive street frontage. A condition has been recommended requiring details to be submitted for an artistic treatment of the service entrance, UKPN room, bin store and residential entrance to ensure a treatment which sufficiently animates the public realm and does not merely read "back of house" and creates a sufficient 'sense of arrival' delineating the entrance door.

Pocket Park

59. A stepped entrance and a separate ramped entrance, compromise the usability of the space whilst discouraging inclusive access, especially for less ambulant people and cyclists. When clearing the site the access should remain step-free, as at present, unless it can be demonstrated that this is not feasible. It is also noted that the applicant is proposing two sets of gates, one into the pocket park, and another to control access to the private amenity space. In order to fully realise the public benefit of the pocket park it is considered that this should be accessible and welcoming. The treatment of the railings has been reserved for condition, but this should provide an attractive boundary treatment and highlight the entrance. The segregation of ambulant and disabled persons on the opposite side of the proposed pocket park, is unacceptable. A single entrance defining the junction between Viscount/Brackley Street should be explored. This would resolve the awkward proximity of the current proposed ramp with the adjacent ground floor flat.
60. The proposal would result in the loss of a number of trees within the site boundary, including two semi-mature trees in the south west part of the site which are of some stature and contribute to the amenity of Viscount and Brackley Street. It is proposed that these are replaced by trees which could reach a similar stature, the details of which are reserved for condition. Similarly, a lighting scheme should accompany a detailed Landscaping Strategy and should seek to make the pocket park welcoming, attractive and adverse to potential anti-social behaviour whilst taking opportunities to enhance the significance of the Jewin Chapel.
61. Details of the proposed site levels, landscaping (including tree planting) and boundary treatments are reserved by condition.

Impact on Heritage Assets

Context

62. The site is opposite the Golden Lane Estate ("GLE") which is grade II listed, with the exception of Crescent House, which is grade II* listed. Opposite, to the south is Cripplegate House, listed grade II. Nearby to the south and east are Breton House and Ben Jonson House which form part of the Barbican Estate, listed grade II, with associated landscaping which is a grade II* registered landscape. A map showing the designation context is attached.

Demolition of the existing building

63. The National Planning Policy Framework states that a building could have a degree of heritage significance meriting consideration in planning

decisions if it is of sufficient heritage interest. It states that heritage interest may be architectural, artistic, historic and/or archaeological. This significance can derive from the physical asset itself and from its relationship with its setting. Such a building/landscape is termed a “non-designated heritage asset”. The Historic England guidance document, “Conservation Principles, Policies and Practice”, make reference to the potential for a building or a landscape to be of ‘communal’ (or community) significance to a local community.

64. Paragraph 135 of the NPPF requires account to be had to the effect of an application on the significance of a non-designated heritage asset, and a balanced judgement made having regard for the scale of any harm or loss and the significance of the asset.
65. Objections, including those from the Twentieth Century Society, have been raised to the demolition of the current Bernard Morgan House. These state that the building should be considered a non-designated heritage asset that it is a good quality piece of architecture which complements its setting, and its loss is unjustified.
66. It should be noted that there is normally no additional legislative control over the demolition of a building deemed to be a non-designated heritage asset, as demolition usually benefits from permitted development rights. However, prior approval of the method of demolition is required to demolish a building if a planning permission for redevelopment has not been granted. An application for prior approval was submitted and withdrawn. The assessment process for an application for prior approval does not include a consideration of the heritage significance of the building in determining the application.
67. Historic England (HE) assessed the current Bernard Morgan House for inclusion on the national List of Buildings of Special Architectural or Historic Interest in 2015. In its report dated 26 June 2015 HE determined that the building was not of sufficient interest for inclusion on the national List.
68. In summary, the report concluded that the building lacked the architectural distinction and intactness of a building of its type for inclusion on the national list. It noted that BMH is a “noteworthy example of Modern Movement thinking (applied) to this particular building type”. It noted positively that the seriousness of its exposed structural frame is tempered by a broad palette of materials and the extensive landscaping of its sunken gardens. In support of the listing proposed the Twentieth Century Society remarked on the use of traditional materials such as knapped flint, pebbles and slate, and the distinctive glazed tile scheme and the carefully-considered interiors. Public comments received to the application state that the building is of ‘communal’ or community heritage significance, which it has accrued over time.

69. Bernard Morgan House is a former Police Section House, designed by J. Innes Elliot, architect to the Metropolitan Police, and built in 1959-60 contemporaneous with the adjacent GLE. The exposed modular geometric grid of reinforced fair-faced concrete expresses the internal cellular plan and is a bold statement relieved by equally hardy yet reassuringly traditional materials; including Staffordshire engineering brick spandrel panels, knapped flint 'base', quarry-finished stone, slate and decorative ceramic tiles. Its Modern Movement expression, with a long rectilinear horizontality, architectural form as a low-slung slab block rising above a generous landscape, and mix of robust traditional and modern materials, share a communality with the adjacent Golden Lane Estate and Jewin Chapel.
70. Bernard Morgan House is not by the same architect as the Golden Lane or Barbican Estates. There is no evidence known of direct discussions between Innes and Chamberlain Powell and Bon (architects of the Barbican) regarding the development of Bernard Morgan House. Bernard Morgan House, whilst in a 'Modern Movement' style, does not share an explicit architectural relationship with the architecture of Chamberlain, Powell and Bon. The synergy in materials is more superficial than explicit.
71. It is known that "town planning requirements" at the time stipulated that the height of Bernard Morgan House had to respect the height of the (then emerging) GLE. They share some common characteristics: principally both were raised above generously landscaped sunken gardens, built into the basements of the former Victorian warehouses, maximising light and views through.
72. There is no clear relationship between the architecture and urban design of the Barbican and BMH. The Barbican follows later 'High Brutalism' modernist principles incorporating raised pedestrian podiums above street level and vehicular traffic in an all-encompassing concrete finish. It is a clear departure from the scale and urban design of BMH and the GLE.
73. The importance of the building to the local community has been raised in the consultation process. It has been stated that the former police cadet occupiers engaged with other local residents and, occasionally, opened up the site to the public. It is said that this included the recent use of the sunken garden at the front as a community wildflower garden which returned specimens to the Natural History Museum. Whilst acknowledging that it may form part of a familiar local scene, many buildings facilitate local relationships and associated memories. The site as an operational police section house was not regularly open to public use and the garden was closed in the main to public access.
74. In terms of artistic significance, it is not considered that BMH is of sufficient interest to warrant consideration. However, on the north and south elevations there are decorative tile scheme displaying abstract

regular patterns and some striking use of colour which are interesting, if not exceptional, pieces of post-war art. It is considered that these can be re-used and this will be ensured by condition.

75. In summary, the architectural expression, style, materiality and good quality detailing of Bernard Morgan House make it a high quality building of its time, with a contemporaneous relationship with the listed Golden Lane Estate.
76. Bernard Morgan House is considered to be of a degree of heritage significance, because of its architectural and historic interest, stemming from its architecture and relationship with the adjacent GLE and Jewin Chapel. The proposal is to demolish and redevelop the site which would result in the total loss of that significance.
77. Under paragraph 135 of the NPPF the total loss of significance would still need balancing against the wider public benefits the scheme would deliver, when considered against this material consideration.

Impact on the Setting of the Golden Lane Estate

Significance and Setting

78. The Golden Lane Listed Building Management Guidelines Supplementary Planning Document (the Guidelines) (September 2013) identify the nature and extent of the special architectural and historic interest of the Estate, in order to inform decision-making on planning applications. The Guidelines are a material consideration in assessing the current planning application.
79. The GLE is an exemplar of post-war comprehensive redevelopment following the Blitz, executed on a pioneering and cohesive scale under the auspices of a single ambitious landowner, the City of London Corporation. The Guidelines acknowledge that much of the character and special interest derives from the architects' pursuit of a modern exemplar of high-density urban living. This expresses itself on a macro-level through the meticulously planned townscape and generous open landscape and on micro-level through the detailing and layout of individual flats. It should, as acknowledged in the Guidelines, be viewed in its entirety as an ensemble: a piece of architecture, urban design and townscape. The qualities of light, space, transparency, function and communality run through the Estate, from the (unique) large curtain wall landscape window of the community centre raised above the ornamental sunken garden to the finely detailed 'picture frame' curtain wall principle aspects of the flats providing views over generous landscaping.
80. The height and disposition of the blocks was meticulously considered to create varied public/private space, delivering a comfortable sense of enclosure while also feeling open and permeable. The pioneering use of glass curtain walls, in striking primary colours, add light and energy,

while the overarching use of a pleasant pink brick ties the architectural whole together.

81. The blocks are disposed to maximise daylight, sunlight, privacy and a sense of spaciousness and transparency. These spatial qualities continue inside where all flats are defined, where possible, by a principal south-aspect, dual aspect, floor-to-ceiling glazing overlooking well-landscaped courts and private balconies on flats which are orientated to avoid direct overlooking from directly facing principle aspects, revolutionary at its time. This openness and the extensive glazing creates a seamless transparency between inside and out, creating internal spaces defined by the relationship with the landscape outside.

Contribution of Setting to Significance

82. The NPPF states that elements of the setting of a heritage asset can make a positive, neutral or negative contribution to its heritage significance and a viewer's ability to appreciate that significance.
83. There is no specific section in the Guidelines dedicated to the Estates' setting, or which seeks to identify particular elements of setting which are deemed to make a positive, negative or neutral contribution to it. However, in Part 2 (section 1.2.1), "Key conclusions and recommendations", under Holistic Significance, it states:

The views from – as well as into – the estate have become important. Part of the special architectural interest of the estate lies in its relationship with adjacent buildings, their height, scale, mass, form, materials and detailing could, for example, have an impact on that special interest.

84. Part 1.2.1.2 of the Guidelines continues:

The estate should be appreciated in its entirety: not only its various components – residential, community, recreational, commercial and the external spaces between buildings – but also its setting within the surrounding urban fabric. The views from and into the estate have become important, and part of its special architectural interest lies in its relationship to adjacent buildings. Any developments on the immediate boundaries of the listed area should take into account the significance of the estate's setting.

85. The Guidelines acknowledge that the Estate was planned with a strong sense of enclosure and, in the words of the architect, was "inward looking", given the bleak wasteland setting following WWII. However, this should not be interpreted as reducing the importance of its current setting.
86. It should be acknowledged that the setting of the Estate has changed significantly since the 1950s, and will continue to change. The Peabody

Towers, Braithwaite Tower, Cripplegate House (as extended), Blake Tower and 121-167 Roscoe Street are all visible above the perimeter blocks from views within the Estate, placing it in an evolving and dynamic urban context. To the south it can be viewed with the backdrop of the Barbican tower and podium composition; reflecting continuity in architect and the development of Modernism, which is inherent in the view identified in the Guidelines from Goswell Road incorporating Crescent House with the Barbican towers.

87. In this regard, the only specific setting reference in the Guidelines to an important aspect of setting is reference to the view along Goswell Road of Crescent House with the backdrop of the Barbican Towers, identified as being of (fortuitous, if not intended) interest, given the continuity in architect and an appreciation of the development of Modernism. The Barbican towers and podium dominate the skyline to the south, providing an important visual reference and transition, contributing to the significance of GLE.
88. It is considered that the following elements of the setting of the GLE contribute to its significance :
 - The visual relationship with the Barbican to the south; in particular in the north-south axis view from the Bastion through the central piazza towards the tower of the Jewin Chapel and on alignment with the Shakespeare Tower;
 - The strong sense of enclosure and unity felt in the sunken gardens, on a whole unfettered by looming development in the immediate vicinity;
 - The retention of open diagonal views across the whole site with limited bulky development in the immediate setting to break up the unity and inter-visibility of the enclosing residential blocks;
 - An ability to appreciate the Estate from outside views in, the dominance of Great Arthur House, in contrast to the more humble scale of the perimeter blocks;
 - An ability to appreciate the interrelationship between the interior of the maisonette flats and the external spaces.
89. Whilst not identified in the Guidelines, it is considered that the current Bernard Morgan House, due to its architectural expression, form and contribution to the urban grain, contributes positively to the setting of the GLE.

Impact on Significance

90. It is considered that the proposed scheme would preserve those positive elements of the setting so as not to adversely impact on the setting or

heritage significance of the GLE. It is considered that the boldness, distinctiveness and unity of the GLE as an architectural whole is robust enough to accommodate change in its setting without significant harm to its essential significance.

91. From the majority of views in the Estate, the proposed scheme would not be visible. It would not be visible from Basterfield Lawn, from the Bastion, from the sunken ornamental garden or the community centre overlooking it, or from the tennis courts. From these spaces an unfettered sense of enclosure allows an appreciation and understanding of the Estate as an architectural whole.
92. Where it would become visible, in fleeting transient views, mainly from circulation routes, it would not rise significantly above the main ridge of Bowater or Cuthbert Harrowing House. Where it would, and where it has the potential of affecting the significance of the GLE, is from the 'piazza' west of Great Arthur House, and from the high level walkway adjacent to the leisure centre. Here the bulk of the proposed scheme would appear, in some views, above the roof ridges. It would be appreciated in the same context as current buildings, in particular Cripplegate House. The juxtaposition with the Barbican tower composition would remain pre-eminent.
93. Where the proposed scheme would be visible in more open, distant oblique views above the ridge of Bowater House, the breach of ridge would be minimal and the bulk would step away from the GLE, such that these views would remain open, and the layout of the estate would still be readily appreciated.
94. In the important north-south axis view, between the bastion and the Jewin Chapel and Shakespeare Tower, the proposal, by stepping down to the 'pocket park' in the south west corner of the site, would remain out of view, not harming it.
95. The principal architectural 'narrative' of the proposed scheme is the stepping of the height and staggering the building line in order to respect the setting of the Estate in views from Golden Lane, Fann Street and Fortune Street Park.
96. The applicant has submitted a Townscape, Visual Impact and Heritage Assessment (and addendum) which undertakes an assessment of surrounding views. Views 2, 8 and 4 assess the dynamic view on approach to the Estate, with the Barbican in the backdrop, travelling south along Golden Lane. The proposed scheme would be significantly bulkier than BMH. This additional bulk and mass would be viewed in contrast to the more pedestrian scale of Bowater House. However, the clear stepping of the height with the aim of transitioning the height from the Estate to that of Cripplegate House and the Barbican podium level, in addition to the staggering of the building line so that the north block respects the orthogonal building line of Bowater House, mitigate the

impact on Bowater House and the setting of the GLE. Indeed these features would preserve an appreciation of the sunken garden on Golden Lane, and assist in assimilating the proposed scheme with the urban design of the GLE.

97. The transient view from Fann Street, between the junction with Aldersgate Street and the site, is represented in Views 1 and 5. The main narrative is of a tripartite stepping in height and massing from the northern block, the main eaves of which would be approximately the same height as Bowater House, to the southern block, representing the scale of the extended Cripplegate House. The rear facade and roof levels would contain a degree of modelling and depth to reduce the impact of the increase in bulk when viewed in contrast to Cuthbert Harrowing and Bowater House.
98. The Golden Lane Estate can also be viewed from Fortune Street Park in the context of the proposed scheme, together forming the western backdrop to the Park. The Views 9 (wireframe) and 3 (rendered) broadly represent views of GLE from the park, with the proposed scheme in place. Once again, there would be a significant increase in height and bulk. However, given the apparent separation distance between Bowater House and the proposed scheme, and the continued prevalence of Bowater House and Cuthbert Harrowing House in the context of Great Arthur House, it is not considered that the proposed scheme would not cause harm.

The approach to the GLE from Beech Street would significantly change, but it is not considered that harm would be caused to the setting or significance of the GLE. At present, the height of BMH provides a degree of continuity with the perimeter blocks of the GLE, whilst Great Arthur House is visible on the skyline. The proposed scheme, in stepping back the building line, would preserve a glimpse of Bowater House whilst the height of the southern block would respond to that of Cripplegate House.

99. Overall, it is considered that the proposed development would result in less than substantial harm to the special architectural or historic interest and heritage significance of the Golden Lane Estate, by reason of the increased bulk and mass apparent in views of GLE when approached from the north along Golden Lane. Whilst we have had special regard for the desirability of preserving the setting of the listed building, in accordance with section 66 of the Town Planning (Listed Buildings and Conservation Areas) Act 1990, it is not considered that the harm would outweigh the wider benefits of the proposal.

Impact on the Setting of Cripplegate House

Significance and Setting

100. Built in 1893-96, and by architects Sidney R.J. Smith, it was built as a grand late-Victorian civic philanthropic venture for the betterment of the working poor of the Cripplegate Ward. It is an isolated remainder of Victorian Cripplegate that was altered following conversion to offices in 1987-92.
101. Though much altered, extended and stretched behind a part retained facade, it displays a handsome front facade of red brick with Portland stone dressings in an eclectic free-Jacobean manner with some good detail. The rear red brick 1980s part is of no architectural or historic interest.
102. Cripplegate House no longer derives significance from its setting. It's historic setting, as part of a cohesive Victorian townscape of warehouses, workshops, terraces, alleys and courts has been lost. In terms of height, architectural form, style and materials it has little relationship or dialogue with its neighbours. However, its prominent townscape position on Golden Lane assists in allowing an appreciation and understanding of its architectural and historic interest.

Impact on Significance

103. Cripplegate House can, at present, be viewed along much of Golden Lane when approached from the north. The view is mainly of the modern side return and 1980s extension. The front facade, which is of significance, splays away from these distant views, so as only revealing itself in its immediate setting. As a consequence, the proposed obscuring of Cripplegate House, on approach from the north, would not harm an appreciation of its significance.
104. When viewing the front elevation from Golden Lane and the junction with Beech Street, the height of the proposed southern block is no higher than the crowning pediment of Cripplegate House, so that it doesn't challenge or overwhelm the front elevation. The height of the roof level is no higher than the main ridge of the mansard roof of Cripplegate House and, in a similar manner, would rake back and be massed in a recessive manner.
105. The use of a complementary brick and a 'punched masonry' elevational treatment complements the traditional architecture of Cripplegate House and echoes the former Victorian warehouses which once comprised its setting.
106. It is considered that the height, bulk and design would not dominate Cripplegate House, or detract from an appreciation of its significance,

which with its bold detail and stone dressings, would retain a pre-eminence on Golden Lane. Its setting would be preserved.

Impact on the Setting of the Barbican and its Registered Landscape

Significance and Setting

107. The principal significance of the Barbican, including the associated landscape, is as a leading example of a Modernist project in the high Brutalist style, and is perhaps the seminal example nationally of a comprehensively planned Post-War, mixed-use, Modernist estate.
108. It comprises a series of long slab blocks at a raised podium level, separating pedestrians from vehicular traffic, and a composition of towers which encloses private and public landscaped open spaces centred on a canal which incorporates formal planting and ancient monuments in a Le Corbusian manner.
109. It is necessary to consider the contribution of setting to the significance of the Barbican. The Estate was designed to be like a modern 'fortress', defining its own setting, and whilst there had originally been planned relationships with its surroundings, these were never implemented.
110. Evidence has been submitted about the relationship between the current Bernard Morgan House site and the Barbican. Indeed the North Barbican redevelopment proposals came to the immediate boundaries of the BMH site, which is acknowledged on some of the original submission drawings. It shows slab blocks coming to the opposite site of Brackley Street (assuming the demolition of Cripplegate House); including a series of interconnected open spaces, including a swimming pool on the current site of Tudor Rose Court and the Colbalt Building. However, whilst there is clearly an acknowledged relationship between the Barbican development and the (nearing completion) Bernard Morgan House, there is no explicit architectural or townscape relationship cited or evident. Even so, as implemented, the Barbican, and the immediate setting to the north, morphed into something different with the connection between the Golden Lane and Barbican terminates at Beech Street and an elevated podium level, with little visual or physical connectivity.
111. The Barbican has 'hard edges' with the surrounding townscape and, other than the Blake Tower, it does not form a strong architectural relationship with surrounding buildings or landscapes. However, as discussed, the clear juxtaposition between the Golden Lane Estate and BMH when viewed in the context of the Barbican tower and podium composition is an important relationship which contributes to the significance of the 20th Century landscapes. An appreciation of the Barbican, on approach from the north from Golden Lane and Goswell Road, is important.

Impact on Significance

112. In general terms, there is a limited architectural relationship in terms of continuity and development of Modernist aesthetic and thought. However, in terms of height, style and urban design, there is not a strong and meaningful connection. The loss of the current Bernard Morgan House, in itself, is not considered to cause harm to the setting of the Barbican (either listed building or registered landscape).
113. The approach from the north, along Golden Lane, would be affected. Only as the observer approaches the site, would the height obscure a small part of the Shakespeare Tower. This 'nibbling' at the tower, and a minimal obscuring of the podium, would allow the Barbican composition to retain its pre-eminence. The stepping narrative of the proposed scheme would allow the site to bridge the GLE and the Barbican.
114. The height, bulk, mass and design of the proposal would not harm the significance of and would preserve the setting of the Barbican.

Impact on the Setting of the Jewin Welsh Chapel

Significance and Setting

115. The Jewin Welsh Chapel is not listed but is considered a non-designated heritage asset as a result of its strong architectural and historic interest.
116. Built in 1956-61, contemporaneous with the adjacent GLE, by noted ecclesiastical architects Caroe and Partners, it replaced a former Gothic Revival church of 1879 bombed in the Blitz. It is an interesting example of Scandinavian-influenced Modernism termed "New Humanism", popularised during the Festival of Britain (1951). Of pink/brown brick (with matching neat flush pointing) with Portland stone dressings and a copper-clad roof.
117. The brick (colour and finish) is a clear reference the opposing Golden Lane brick, suggesting communality, whilst the imposing west tower forms the southern termination to the principal north-south axis view from the bastion garden through the central 'piazza', which was conceived as the social focus of the Estate: a townscape ploy which would seem deliberate, rather than fortuitous. It is known that Gordon Cullen, who was developing his concept of 'townscape' at the time, had advised on the Golden Lane. However, he could not of foreseen the fortuitous offsetting of the Shakespeare Tower with the church tower, adding a dramatic verticality and juxtaposition, and a visual bridge between the Modernism of the Golden Lane Estate and that of the Barbican. The tower is a relative local landmark and particularly unique; with a belfry stage gallery of deeply splayed slit windows crowned by a socketed copper roof with stylised urn finial, terminating one of the only 'closed' vistas in the GLE.

118. The Jewin Church is considered to be of local architectural, historic and communal heritage interest, inherently as a building and in its positive contribution to the setting of Golden Lane, especially in terminating the principal north-south axis view.

Impact on Significance

119. The scheme shares the same island site as the Jewin Chapel: forming an 'L' shape that wraps around it. The stepping down of the scheme to four stories on Brackley Street means that, in views from the Golden Lane Estate, in particular that terminating on the tower, the proposal would not be visible. In the dynamic views on approach from Fann Street, represented in the Townscape and Visual Impact Assessment, the stepped height of the Golden Lane frontage would be recessed to it, whilst in close range views, especially that at the junction of Fann and Viscount Street when the nave and tower reveal themselves, the Chapel would stand pre-dominant and screen the main bulk of the proposed scheme.
120. The pronounced and explicit stepping of the building, and incorporation of a small 'pocket park', in the south west corner of the site, would preserve the setting of the Chapel on approach from Viscount Street, allowing an openness which preserves the pre-eminence of the Chapel.
121. The use of brick and the dressing of the fenestration draw on the architectural character of the Chapel.
122. The proposal would not harm the significance or setting of the Jewin Chapel as a non-designated heritage asset.

Summary of Impact on Heritage Assets

123. The Golden Lane Estate, Bernard Morgan House, Jewin Welsh Chapel, Fortune Park and the Barbican Estate were all executed over approximately a 30 year period following war damage. Bernard Morgan House has some architectural and historic heritage interest. which would be lost as a result of its demolition. However, this is considered to be outweighed by the wider public benefits of a scheme of equal merit, which brings a new use to the site.
124. The cascading height, bulk and mass of the proposal responds to its context, transitions the height between Cripplegate House/the Barbican podium and the Golden Lane Estate. Its appearance would complement those buildings, without seeking to mimic or detract from them. There would be no harm to the significance of any designated or non-designated heritage assets, and the settings of all surrounding listed buildings would be preserved, other than in respect of the effect of the increased height and bulk of the proposal on the setting and significance of GLE when viewed on approach from the north on Golden Lane,

although the benefits arising from the re-use of the site and provision of new housing would outweigh this limited less than substantial harm.

Daylight and Sunlight

Policy Background

125. Local Plan Policy DM10.7 Daylight and Sunlight resists development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's (BRE) guidelines. The policy requires new development to provide acceptable levels of daylight and sunlight for occupiers. Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations. Unusual existing circumstances, such as the presence of balconies or other external features which limit the daylight and sunlight that a building can receive, will be taken into account. Policy DM21.3 of the Local Plan requires development proposals to be designed to avoid overlooking and seek to protect the privacy, daylighting and sunlighting levels to adjacent residential accommodation.
126. BRE guidelines consider a number of factors in determining the impact of development on daylight and sunlight on existing dwellings:
- Daylight to windows: Vertical Sky Component (VSC): a measure of the amount of sky visible from a centre point of a window. The VSC test is the main test used to assess the impact of a development on neighbouring properties. A window that achieves 27% or more is considered to provide good levels of light, but if with the proposed development in place the figure is both less than 27% and reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable.
 - Daylight Distribution: No Sky Line (NSL): The distribution of daylight within a room is measured by the no sky line, which separates the areas of the room (usually measured in sq. ft) at a working height (usually 0.85m) that do and do not have a direct view of the sky. The BRE guidelines states that if with the proposed development in place the level of daylight distribution in a room is reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important.
 - Sunlight: sunlight levels are calculated for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are considered less important although care should be taken not to block too much sun. The BRE

explains that sunlight availability may be adversely affected if the centre of the window receives less than 25% of annual probable sunlight hours (APSH), or less than 5% APSH between 21 September and 21 March; and receives less than 0.8 times its former sunlight hours as result of a proposed development; and has a reduction in sunlight hours received over the whole year greater than 4% of annual probable sunlight hours.

127. Developers may also consider Average Daylight Factors (ADF). ADF is the ratio of internal light level to external light level. BRE advise that ADF is not generally recommended to assess the loss of light to existing buildings, but is appropriate to consider daylight and sunlight to new dwellings. Guidance on the levels of daylight to be provided are set out in the British Standard on daylight, which recommends minimum values for ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens. The British Standard recommends that where a living room includes a kitchen, the higher minimum average daylight factor of 2% should apply.

Daylight and sunlight assessment

128. The application is supported by a daylight and sunlight assessment which considers its impact on neighbouring residential properties in Bowater House, Tudor Rose Court, the Cobalt Building, Ben Jonson House, Breton House, the Jewin Welsh Chapel, and Prior Weston School and five open spaces – Fortune Street Park, Prior Weston School playground, the amenity area in front of Breton House, the area in front of Bowater House and the courtyard area behind Bowater House. The assessment also looks at daylight and sunlight provision within the proposed development.
129. An initial daylight and sunlight assessment was submitted in June 2016. This identified a number of cases where residential properties in the vicinity of the development would suffer a reduction in daylight and/or sunlight, as well as raising concerns about the levels of daylight and sunlight within the development. The City Corporation commissioned BRE to independently review this assessment and provide advice on compliance with BRE guidelines. This review indicated significant problems with daylight and sunlight levels in the proposed development and the applicant was asked to amend the scheme to improve the situation. Revised proposals and a revised daylight and sunlight assessment were submitted in November 2016 which were then further reviewed by BRE on behalf of the City Corporation. The detailed comments below relate to these latest proposals and not earlier iterations of the proposed development.

Daylight and Sunlight to Existing Neighbouring Buildings

a) Bowater House

130. Bowater House, to the north, faces the proposed development across Fann Street. The affected elevation contains duplex flats with living rooms on the ground, second and fourth floors and bedrooms on the first, third and fifth floors. Nearly all affected windows have overhangs above them, either projections or full balconies, which limit the light received from the sky. In such circumstances, BRE guidelines recommend an additional assessment assuming the balconies are not present.
131. An assessment was undertaken of the impact of the development on 114 windows in the affected facade. For 34 windows, the VSC would be below the BRE guideline figure of 27% and below 0.8 times the existing value. For many of the windows, visible sky reduction is only marginally below the 0.8 value – the worst affected living room having a VSC of 0.77 times its former value. When the assessment is undertaken assuming that the balconies are not present, the ratios of VSC and the area receiving direct sky light would be 0.8 or better, indicating that the presence of the balconies and projections is a major factor in limiting light to windows. Overall, BRE assess the loss of daylight to Bowater House as a minor adverse impact.
132. The applicant has also assessed the loss of sunlight to Bowater House. With the scheme in place the sunlight to all living rooms would be within the guidelines.

b) Tudor Rose Court

133. The applicant has considered the impact of the development on the 54 windows in Tudor Rose Court which face the development across Viscount Street. Reduction of VSC to all windows except for two would be within the BRE guidelines. These 2 windows light a kitchen and have an overhang immediately above them and would meet BRE guidelines without this overhang. Four other rooms are predicted to have an impact on their daylight distribution outside of BRE guidelines, but only marginally in 2 cases. BRE assess the loss of daylight to Tudor Rose Court as a minor adverse impact. Sunlight to these windows is not an issue as they face north of due east.

c) The Cobalt Building

134. The Cobalt Building abuts Tudor Rose Court and has windows facing the development across Viscount Street. Ninety nine windows in the Cobalt Building were assessed. These windows are currently heavily obstructed by Cripplegate House directly across Viscount Street. Loss of daylight to all but 5 out of 99 windows would be within the BRE guidelines. For these 5 windows, loss of light is only marginally outside the guidelines, the worst affected room has a VSC of 0.77 times its former value. One of the rooms lit by these windows and 6 other rooms are predicted to have an impact on their daylight distribution outside of the BRE guidelines, but the impact is marginal in 4 (out of 6) cases. Overall, BRE assess the loss

of daylight to the Cobalt Building as a minor adverse impact. Loss of sunlight to these windows is not an issue as they face north of due east.

d) Ben Jonson House

135. This block lies within the Barbican Estate, some distance from the proposed development. Loss of daylight to all windows would be within BRE guidelines and is assessed as negligible. Loss of sunlight would not be an issue as the windows face north.

e) Breton House

136. This block lies within the Barbican Estate and would have an oblique view of the proposed development looking north west across Golden Lane. Loss of daylight to all windows would be within BRE guidelines and is assessed as negligible. Loss of sunlight would be within BRE guidelines, with a negligible impact.

f) Jewin Welsh Chapel

137. Policy DM10.7 of the Local Plan only applies to permanent residential buildings and not ancillary residential accommodation or non-residential buildings and it would not be reasonable to withhold planning permission due to the impact on this accommodation. The Chapel lies to the north west of the proposed development. It contains living accommodation and the applicant has assessed loss of daylight and sunlight to the affected windows in this accommodation. The loss of daylight and sunlight would be outside of the BRE guidelines for 2 windows. The worst affected window has a VSC of 0.69 of its former value and a reduction in sunlight of 51.9%. BRE assess the impact as a moderate adverse impact. The applicant has not considered loss of daylight and sunlight to the church itself, but it is likely that the windows on the south side of the church would lose a significant amount of light as a result of the proposed development.

g) Prior Weston School

138. The school faces the proposed development directly across Golden Lane. The impact of the development on 4 principal classrooms and 17 windows has been assessed. Fifteen of these windows satisfy BRE VSC guidelines. Loss of daylight and sunlight to 2 small windows at ground floor level would be outside BRE guidelines. It appears that these windows are secondary windows and the affected room has larger windows facing north across Fortune Street Park and would be largely unaffected by the development. Overall, BRE assess the effect on the school as minor adverse.

Sunlight to Gardens and Open Spaces

139. The applicant has considered the impact of the development on five open spaces. BRE guidelines recommend that at least half a garden or amenity area should receive at least 2 hours sunlight on March 21. For an existing open space, if the area receiving at least 2 hours sun is less than this and less than 0.8 times the former area, then the loss of sunlight is significant.
140. The applicant's analysis shows that all of the assessed open spaces would meet BRE guidelines.
141. Shadow plots have been provided showing the shadow cast by the proposed development at different times. These are particularly relevant to Fortune Street Park and Prior Weston School playground. On 21 March the shadow plots show that the Park would not be shadowed by the proposed development until after 1pm, with the extent of overshadowing increasing through the afternoon, although other areas of the park would remain in sunshine. After 5pm, there would be little extra shading compared to the existing building. On 21 September, the shadow of the new development would start to encroach between 2pm and 3pm (later due to British Summer Time). At lunchtime there would be no additional shading from the development. Overall, BRE assess the impact of shadowing on the park as minor adverse. There would be little or no extra shadowing in winter and midsummer and in the spring and autumn it would be possible to enjoy sunshine by moving out of the shadow area.
142. Shadowing of the school playground would be confined to the afternoon, with the shadow starting to encroach after 2pm on March 21 and after 3pm on September 21, generally outside of normal primary school break times. In summer months shadowing would occur later in the day and in winter the playground is shadowed for most of the day by existing buildings. Overall, BRE assess the impact on the playground as minor adverse.

Daylight and Sunlight Provision in the Proposed Building

143. Daylight and sunlight provision to flats in the proposed building have been assessed using ADF and British Standard recommendations and reviewed by BRE on behalf of the City Corporation. This review indicated that a significant proportion of the bedrooms and living rooms would not meet the British Standard minimum recommendations and that, overall, the development would result in a poor level of daylight provision.
144. The applicant was advised by officers that the levels of daylight and sunlight offered within the new development would be contrary to the requirements of Policy DM10.7. Discussions between the applicant's architects, daylight and sunlight consultants, City Corporation officers and BRE subsequently took place in order to arrive at design changes

which delivered an acceptable level of internal daylight and sunlight without impacting on the daylight and sunlight of neighbouring properties and open space.

145. A total of 258 rooms in the proposed development, comprising 158 bedrooms and 100 living rooms have been assessed using ADF and the British Standard level of daylight. In total, 33 of these rooms do not meet the minimum British Standard (12 bedrooms and 21 living rooms). However, 13 of the failing living rooms would have an ADF between 1.5% and 2%, leaving 8 with an ADF below 1.5%, all of which are on lower floors. This situation represents a considerable improvement over the earlier submitted proposals, where 69 rooms failed to meet the British Standard.

Daylight and Sunlight Conclusions

146. Whilst there will be some impacts on daylight and sunlight to neighbouring properties, these impacts are generally minor in nature and acceptable given the densely developed urban nature of this site. Similarly, although sunlight to existing open spaces and shadowing of these spaces would worsen as a result of this scheme, these impacts are overall minor. The daylight and sunlight implications for neighbouring properties and open spaces is therefore considered to be in accordance with the requirements of Local Plan Policy DM10.7 and DM21.3.
147. Refinements to the scheme have reduced the scale of any breach of standards to the proposed flats and the scheme is now considered to be acceptable in terms of daylight and sunlight in a densely developed urban area, in line with the requirements of Local Plan policy DM10.7.
148. Overall, the advice from BRE is that daylight provision within the proposed development is average for a heavily obstructed urban area.
149. In terms of sunlight analysis, 18 of the living rooms would meet the recommended number of hours of annual and winter sunlight. A further 21 would meet the annual requirement, but not the winter one. The remaining living rooms would not meet either requirement, although some would be only marginally below the guideline, with the applicant suggesting that 30 rooms would have annual probable sunlight hours above 15% and would therefore receive some sun.
150. Whilst many rooms within the proposed development fall below the BRE and British Standard sunlight assessment, BRE has advised that it would be difficult to improve the sunlight position on this site given its location and obstructions to sunlight from surrounding buildings, including Cripplegate House and the Barbican.
151. Sunlight to the open space within the proposed development has been considered by the applicant, showing that it would be poorly sunlit

between March and June, principally because of large obstructions to the south.

Overlooking and dominance and enclosure and loss of outlook

152. Policy DM21.3 of the Local Plan states that all development proposals should be designed to avoid overlooking. The existing building has high level windows on the Fann Street elevation and there has therefore been no or limited direct overlooking experienced by the residents of Bowater House. The proposed building includes full height windows on the Fann Street elevation, and this relationship would therefore alter. At its closest point the proposed building would stand 19m from Bowater House, which is not an unusual separation distance across a street in an urban area. Whilst residents have expressed concern in this regard it is considered to be acceptable in planning terms.
153. The Fann Street elevation of the proposed building would be 19.4m in depth, 11m deeper than the existing building. The proposed building would stand in line with the site boundary, bringing the proposed building closer to the street and increasing its dominance in the outlook from the flats in Bowater House. Considering the separation distance between the two buildings this is considered to be an acceptable relationship.
154. The main part of the existing building stands 59.64m from the Cobalt Building and Tudor Rose Court, with the single storey element at the rear bringing the building 38m from the Cobalt Building and Tudor Rose Court. The single storey element has high level windows so whilst direct overlooking was experienced from the existing building these windows are a significant distance away (59.64m) and would not have impacted on the occupiers of these neighbouring buildings. At its closest point the proposed building would stand 25m from these neighbouring buildings and includes balconies and terraces, making it different to the current situation. However, the separation distance between the proposed building and the neighbouring buildings remains significant and this is considered to be an acceptable relationship.

Noise

During the demolition and construction periods

155. In redevelopment schemes most noise and vibration issues occur during demolition and early construction phases. Noise and vibration during demolition and construction would be controlled through conditions. These would require the submission of a Construction Logistics Plan (CLP) to manage all freight vehicle movements to and from the site and, a Construction Management Plan (CMP) that includes a scheme for protecting nearby residents, the church and commercial occupiers from noise, dust and other environmental effects attributable to the development. It is recommended that the Hatching Dragons Nursery School, which occupies part of the Jewin Chapel, is temporarily

relocated during construction at the cost of the developer through the S106 agreement.

From the proposed flats and pocket park

156. Local Plan policy DM15.7 states that ‘developers will be required to consider the impact of their developments on the noise environment. 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’. Concern has been raised about noise from the proposed flats and the pocket park, however, it is considered that whilst the proposed increase in the number of residents could lead to an increase in noise it is not considered that this would result in a significant detrimental impact on the occupiers of neighbouring properties. It would not be reasonable to restrict the use of private balconies or private terraces, which will to some degree be managed by the occupiers themselves. Environmental Health have raised no concerns.
157. Public access to the proposed pocket park would be secured through the S106 agreement, which would include the requirement for a management plan for the pocket park. Opening hours would be controlled as part of the management plan. Considering the limited size of the pocket park and its proximity to the proposed building it is unlikely that it would be heavily used or used by a large number of people at any one time. It is, therefore, considered that the public use of this open space would not have a significant detrimental impact on the occupiers of the Cobalt Building or Tudor Rose Court.

Quality of the proposed residential accommodation

158. Paragraphs 2.1.17-2.1.18 of the London Plan Housing Supplementary Planning Guidance explains that *‘the standards set out the minimum level of quality and design that new homes should meet. The extent to which proposed developments depart from the standards should be taken into account in planning decisions. Application of standards through the planning system (as they are through this SPG) provides some flexibility. Consideration should be given to these standards alongside achievement of other policies of the London Plan. In particular, regard should be had on the one hand to overall viability and the need to ensure an appropriate level of housing supply in changing economic circumstances. On the other hand, consideration should be given to the fact that the homes and living environments we build today will frame the lives of those who live in new homes or use the neighbourhoods now and into the future. Failure to meet one standard would not necessarily lead to an issue of compliance with the London Plan, but a combination of failures would cause concern’.*

Space standards

159. The DCLG Technical Housing Standards sets out the requirements for the Gross Internal Area (GIA) of new dwellings at a defined level of occupancy. All of the proposed dwellings meet these technical space standards for internal space.
160. Standard 26 of the London Plan Housing Supplementary Planning Guidance states that a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant. In exceptional circumstances, where site constraints make it impossible to provide private open space for all dwellings, a proportion of dwellings may instead be provided with additional internal living space equivalent to the area of the private open space requirement. Enclosing balconies as glazed, ventilated winter gardens can be considered an acceptable alternative to open balconies. 16 of the proposed flats do not have private amenity space. Eight of these flats include an additional 5sqm of internal floorspace, but eight do not. An additional S106 contribution would be required in lieu of this.

Communal open space and the pocket park

161. Standard 4 of the London Plan Housing Supplementary Planning Guidance states that where communal open space is provided, development proposals should demonstrate that the space is overlooked by surrounding development; is accessible to disabled people including people who require level access and wheelchair users; is designed to take advantage of direct sunlight; and has suitable management arrangements in place. The communal open space and the pocket park would be overlooked by the flats within the development and neighbouring flats in Bowater House and the Cobalt Building.

Entrances and Active Frontages

162. Standard 8 of the London Plan Housing Supplementary Planning Guidance states that all main entrances should be visible, clearly identifiable and directly accessible from the public realm. Standard 10 of the London Plan Housing Supplementary Planning Guidance states that active frontages should be maximised and inactive frontages minimised on the ground floor or buildings. The main entrances to the building are accessed from the street, and details of these entrances are required by condition to ensure that they are clearly identifiable. The frontages on Fann Street and Golden Lane would be activated by the residential windows on these elevations. The Brackley Street frontage would be less active as, with the exception of one flat at the south-western end, this frontage is more 'back of house' with the servicing bay, UKPN substation and refuse store. Details of the doors to the servicing bay, substation and refuse store are required by condition to ensure that this frontage is adequately animated.

Circulation Space

163. Standards 12-16 relate to the quality of the shared circulation space. The proposal meets these requirements as each core is accessible to no more than eight dwellings on each floor; a 24 hour concierge would be provided; the internal corridors would be naturally lit; all dwellings at the seventh floor and above would be served by at least two lifts; and every wheelchair user dwelling would be served by more than one lift.

Privacy and Outlook

164. Standard 28 of the London Plan Housing Supplementary Planning Guidance states that proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring properties, the street and other public spaces. At lower ground floor and ground floor each flat would have defensible space, in the form of a terrace which would provide privacy to these dwellings. The proposed flat at ground floor level on Brackley Street would be accessed from the flat's terrace, at the rear of the building. The pocket park would be 400mm lower than the building, which would provide some visual separation between the flat and the communal open space. A landscaped border would provide additional screening.
165. Standard 29 of the London Plan Housing Supplementary Planning Guidance states that development should minimise the number of single aspect dwellings. North facing single aspect dwellings and single aspect dwellings containing three or more bedrooms should be avoided. The design of single aspect ground floor dwellings will require particular consideration to maintain privacy and adequate levels of daylight.
166. 58 of the 99 proposed flats are single aspect, and six of these flats are on the ground floor. None of the single aspect flats are north facing or contain three or more bedrooms. The single aspect flats on the ground floor face onto Golden Lane and the closest windows to the Golden Lane pavement is 2.26m away. The levels of daylight experienced in these flats is considered to be satisfactory but further consideration needs to be given to the treatment of the windows to ensure adequate privacy. Details of this are required by condition.

Transport, Servicing, Parking and Impact on Public Highways

Highway Amendments and works

167. The boundary of the public highway encroaches into the south-eastern corner of the site. The built form is proposed within this area, and would regularise the highway line. City Transportation have raised no objection to this. The applicant will be pursuing a stopping-up application for this piece of land (5.15sqm) (plan attached).

168. There would be no projections over the highway below second floor level, taking the proposed projections above the City's minimum height clearance of 5.7m. The applicant will require a projection licence, which must be applied for after the granting of planning permission but prior to construction.

Servicing and Parking

169. All servicing would take place within the designated off-street servicing area within the building accessed from Brackley Street. The servicing area has been designed to accommodate small to medium sized vehicles, which would comprise the majority of residential servicing and delivery movements, including supermarket home delivery vehicles.
170. It is considered that the average duration of stay would be less than 10 minutes. The servicing area would be subject to a maximum duration of stay of 15 minutes, which would be enforced through signage in the service area and by monitoring by the concierge via CCTV. Vehicles that are required to attend the site for periods longer than 15 minutes (e.g. for maintenance work) would be advised to use local pay and display parking. These measures would prevent the servicing area from becoming congested and prevent queuing on the highway and illegal parking.
171. One disabled parking space would be provided within the service area. This is considered to be an appropriate level of provision for a residential development in this location and meets the requirements of the London Plan and the Local Plan. The demand for and supply of on-street disabled parking spaces is monitored by City Transportation and supply can be increased if deemed necessary. Pay and Display parking spaces have a four hour stay limit and it is likely that they would be used by visitors and not residents themselves. This is likely to be in the evenings and on weekends when demand is lower.

Cycle parking and facilities

172. Policy DM 16.3 of the Local Plan requires cycle parking provision for residential development to meet London Plan standards. Policy DM 16.3 states that the City Corporation encourages these standards to be exceeded and encourage on-street cycle parking in suitable locations.
173. A minimum of 153 cycle parking spaces would be provided for residents within a dedicated area at lower ground floor level. This exceeds the London Plan and is acceptable. A Residential Travel Plan would be required through the S106 agreement.

Public Transport and Pedestrian Movements

174. The Public Transport Accessibility Level (PTAL) rating of the centre of the site is 6a, which means that the site achieves an 'Excellent' score in

terms of public transport accessibility. The site is well served by public transport and is close to Barbican, Farringdon, Moorgate and Old Street stations.

Waste Management

175. The proposed development includes a centralised waste store located internally adjacent to the vehicular access on Brackley Street. Waste would be collected on-street. The Waste and Amenity Planning Manager is satisfied with the proposals and they comply with policy CS17 of the Local Plan.

Loss of trees

176. An Arboricultural Impact Assessment has been submitted as part of the application. The survey identified ten trees within and adjacent to the site, which could potentially be impacted by the proposed development.
177. To facilitate the development, five trees within the site boundary have been identified as requiring removal. These include five category B trees (trees whose retention is considered to be desirable and are of moderate quality and value): two silver birch trees, one tree of heaven, one common beech and one hawthorn. The landscaping proposals show tree planting across the site to include one common hornbeam and six silver birch trees. The proposed development would result in a net gain in tree numbers. A condition is proposed to ensure that if these trees do not survive they are replaced.
178. It is recommended that all retained trees are protected throughout the demolition and construction phase and the method of protection will be controlled by condition.

Biodiversity

179. A Preliminary Ecological Appraisal was submitted as part of the application, which provides details of a desk top study and site walkover. No impact upon designated sites of nature conservation importance are predicted as a result of the proposals.
180. There is confirmed presence of nesting birds within several of the mature trees on the site. No evidence of nesting birds was observed on the building. This is a seasonal constraint with breeding season running from March to September. Any clearance or pruning of shrubs, trees or dense vegetation should be undertaken outside of the breeding season or following confirmation of absence by a suitably qualified ecologist. This can be secured by condition.
181. Along the north-eastern frontage of the site (Fann Street) a small Wildlife Garden has been created, which although currently unmanaged continues to provide wildlife benefits. The Wildlife Garden includes a

diverse floral community which has the potential to be of value to birds, foraging bats and invertebrates. There are also records of black redstart foraging in the Wildlife Garden. This species is rare in the UK and appears on the Red List of Birds of Conservation Concern, is a City of London BAP priority species and is afforded legislative protection under Schedule 1 of the Wildlife and Countryside Act. Any proposal on this site would need to ensure the protection of this species and should provide targeted ecological enhancements to help retain and enhance suitable habitat, meeting local conservation targets.

182. The proposed ecological enhancements include the provision of a green roof to compensate for the loss of the Wildlife Garden and other existing green space, which would be specifically designed to target locally important species including black redstart and provide suitable bat foraging and invertebrate habitats. Other recommended ecological enhancements include bird nest boxes, bird perches, bat boxes and invertebrate features. Suitable green roofs and ecological enhancements are secured by conditions.

Energy and Sustainability

183. London Plan Policy 5.2 (A) requires that development proposals should make the “fullest contribution” to minimising carbon dioxide emissions in accordance with the following hierarchy: 1) Be lean: use less energy 2) Be clean: supply energy efficiently 3) Be green: use renewable energy.
184. Targets are set in the London Plan and Mayor’s Sustainable Design & Construction SPD for residential buildings to achieve a 35% improvement over the 2013 Building Regulations requirements up to 1st Oct 2016 and zero carbon from Oct 2016. Since this application was validated before 1st Oct 2016 the 35% London Plan target applies, however every effort should be made to achieve zero carbon residential development at this site.
185. Local Plan policy CS15.2 requires development to “minimise” carbon emissions and contribute to a City wide reduction in emissions. Local Plan policy DM15.2 encourages the achievement of zero carbon ahead of national target dates.
186. The Energy Strategy demonstrates that this development has been designed to achieve a 55% improvement in carbon emissions compared with the 2013 Building Regulations requirements. This is achieved through a combination of energy efficiency measures and connection to the Citigen CHP network. Renewable technologies are not proposed. The Energy Statement concludes that the proposed connection to the local heat network would deliver emission savings greater than that required by London Plan policy.. As a consequence there is no requirement to install additional renewable technology.

187. The achievement of a 55% improvement over Building Regulations is welcomed, however the applicant is expected to demonstrate that carbon emissions will be minimised not purely that the target will be met. In demonstrating the “fullest contribution” to “minimising” carbon emissions, evidence should be presented to demonstrate whether photovoltaics or any other renewable technology could minimise carbon emissions further at this site. Further details are required by condition.

Flooding and drainage

188. A Flood Risk Assessment has been submitted as part of the application. The site is within Flood Zone 1 and has a low risk of flooding from groundwater, pluvial or sewers and has a low to negligible risk of flooding from all other sources. The report concludes that the development proposals should not increase flood risk on or off site.
189. The Flood Risk Assessment includes a Sustainable Urban Drainage (SuDS) Assessment, which sets out appropriate measures for the site. As the site is underlain by clay soils and has a basement it is not possible to infiltrate on site. Any permeable paving would need to be tanked. Permeable paving, soft landscaping and green roofs would reduce run-off rates, run-off volumes and would reduce the volume of water entering the sewers during low rainfall periods. However, these measures would not provide any benefit during high intensity storms and below ground storage is therefore necessary. Details of landscaping, SuDs components and measures to prevent flooding are required by condition.

Air Quality

190. The EIA includes an assessment of the likely changes in air quality as a result of the construction and operational phases of the development and has been considered having regard to Policies 7.14 of the London Plan and CS15 of the Local Plan. Section 7.14 of the London Plan requires that major developments are at least air quality neutral in terms of their overall impact on air quality. An Air Quality Neutral Assessment has been undertaken in accordance with the GLA's Sustainable Design and Construction SPG.
191. During construction dust emissions would increase and would require control through the implementation of good practice mitigation measures in the Construction Method Statements to be approved under conditions attached to the planning permission.
192. Due to limited traffic generation the impact of new vehicle emissions from the proposed development is considered to be negligible.

Archaeology

193. The site lies to the north of the Roman and medieval city of London, on a fertile gravel terrace close to nearby rivers. Evidence shows that a Roman road may have followed the alignment of Golden Lane, and it is most likely the area was used for agricultural and quarrying activities during the Roman period. There is evidence of settlement activity during the medieval period and by the mid-17th century historic maps show the site as fully occupied by buildings. An 18th century burial ground lay immediately to the north of the site, with human burials being archaeologically recorded during the excavation of a cable trench on Fann Street.
194. The current building comprises a lower ground floor and a basement surrounded by an open area at lower ground floor level. During the late 19th and early 20th century a building with a double basement occupied part of the site, and as a result there is expected to be a low likelihood of archaeological survival where deeper basements exist. Across the remainder of the site there is the potential for Roman, later medieval and post medieval evidence including burials to have survived.
195. The proposed development would lower the existing lower ground floor level and retain the existing basement level, replacing the floor slab and making the floor level consistent. It is anticipated that foundations would be piled; however, no detailed foundation design has been submitted. A Historic Environment Assessment has been submitted as part of the application. Planning conditions are recommended to cover a programme of archaeological work and foundation design.

Planning Obligations and Community Infrastructure Levy

196. The development would require planning obligations in a Section 106 agreement to mitigate the impact of the proposal and make it acceptable in planning terms and to contribute to the improvement of the City's environment and facilities. It would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.
197. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
198. The planning obligations and CIL contributions are set out below.

Mayoral CIL and planning obligations

Liability in accordance with the Mayor of London's policies	Contribution	Forwarded to the Mayor	City's charge for administration and monitoring
Mayoral Community Infrastructure Levy	£354,100	£339,936	£14,164

payable			
Mayoral planning obligation net liability*	N/A	N/A	N/A
Total liability in accordance with the Mayor of London's policies	£354,100	£339,936	£14,164

Net liability on the basis of the CIL charge remaining unchanged and subject to variation.

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution	Available for allocation	Retained for administration and monitoring
City CIL	£672,790	£639,151	£33,640
City Planning Obligation Affordable Housing	£4,500,000	£4,455,000	£45,000
City Planning Obligation Local, Training, Skills and Job Brokerage	£21,246	£21,034	£212
City Planning Obligation Monitoring Charge	£2,250	-	£2,250
Total liability in accordance with the City of London's policies	£5,196,286	£5,115,185	£81,102

City's Planning Obligations

199. The obligations set out below are required in accordance with the City's SPD. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

- Highway Reparation and other Highways obligations
- Travel Plan
- Local Training, Skills and Job Brokerage Strategy
- Local Procurement
- Carbon Offsetting

- Television interference survey
 - Utility Connections
 - Open Spaces
 - Any Site Specific Mitigation (if necessary)
200. The developer and the Hatching Dragons Nursery School are discussing the relocation of the nursery, which will be secured through the S106 agreement.
201. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations as necessary.

Monitoring and Administrative Costs

202. A 10 year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.
203. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

Site Specific Mitigation

204. The City will use CIL to mitigate the impact of development and provide necessary infrastructure but in some circumstances it may be necessary additionally to seek site specific mitigation to ensure that a development is acceptable in planning terms. Other matters requiring mitigation are still yet to be fully scoped.

Legal Issues

205. Concern has been expressed, in some representations received, regarding the City's role as freeholder of the application site. Ownership details, whether pertaining to the City's ownership or another party's, are not normally referred to in reports on planning applications. This is because ownership information is not normally material since the Local Planning Authority ("LPA") must make its decision having regard to planning policy and material planning considerations (not to any non-planning considerations such as relating to ownership) (see Section 38(6) Planning and Compulsory Purchase Act 2006).
206. The statutory framework provides for planning applications on an authority's own land to be determined by the LPA. However, this is subject to the safeguard that any applications must NOT be determined by a committee or officer responsible for the management of the land at issue (see Regulation 10 Town and Country Planning Regulations

1992). The Planning and Transportation Committee has no remit in respect of the management of Bernard Morgan House, and may therefore determine this application.

207. The Planning Protocol advises as follows:

- Where a member of Planning and Transportation Committee is also a member of a City of London Corporation committee responsible for the site or building that is the subject of an application, this does not, by that fact, mean that the member has an interest that is disclosable under the Code of Conduct. Nor does the fact that they may have participated in the consideration of non-planning matters in relation to the site or building mean they would be regarded as biased or as having pre-determined consideration of planning matters in relation to the same site. However, if the Member's participation in a meeting of the other committee means his consideration of planning issues is not impartial (for example because he has already reached a decision about the planning merits of a planning application under consideration) then he must not participate in the decision of the Planning and Transportation Committee.
- Particular care must be taken in determining planning applications for the development of land or buildings owned by the City of London Corporation so as to ensure that such an application is not subject to preferential treatment but is subject to the same rigorous evaluation as other applications.

208. All other legal issues are dealt with in the body of the report.

Conclusions

209. The Bernard Morgan House site is appropriate in principle for residential development as it is adjacent to existing residential areas, the Golden Lane Estate, the Barbican Estate, the Cobalt Building and Tudor Rose Court. The density of the proposed development is higher than the density recommended in the London Plan's Density Matrix but this density is considered to be acceptable in this instance.

210. It is proposed that a cash-in-lieu payment towards affordable housing of £4.5m is paid by the developer. This level of contribution is below the target set by the Local Plan but is accepted as the maximum feasible and viable contribution that could be made and therefore is acceptable under Local Plan policy CS21 and the London Plan.

211. The height, bulk and mass of the proposed building, which varies across the site, responds to its context, transitioning the height between Cripplegate House and the Barbican podium, and the Golden Lane Estate. The appearance of the building would complement those buildings, without seeking to mimic or detract from them. The proposal

would preserve the setting of the Barbican (listed building and registered landscape), Cripplegate House and the Jewin Chapel, and cause limited less than substantial harm to the setting of the Golden Lane Estate, which would be outweighed by the public benefits.

212. Whilst there will be some impacts on daylight and sunlight to neighbouring properties, these impacts are generally minor in nature and acceptable given the densely developed urban nature of this site. Similarly, although sunlight to existing open spaces and shadowing of these spaces would worsen as a result of this scheme, these impacts are overall minor. Whilst many rooms within the proposed development fall below the BRE guidance, BRE has advised that it would be difficult to improve the sunlight position on this site given its location and the obstruction to sunlight resulting from surrounding buildings. The proposed open space would be poorly sunlit in March and June principally because of large buildings to the south.
213. The building has been designed to take account of its impact on neighbouring residential properties in relation to overlooking, dominance and enclosure and loss of outlook is considered to be acceptable in an urban context.
214. The proposal broadly complies with the standard for new residential accommodation outlined in the London Plan Housing Supplementary Guidance.
215. It is considered that the development complies with the Development Plan as a whole and is appropriate subject to conditions, a Section 106 Agreement and Section 278 Highway and other highway matters being entered into and complied with.

Background Papers

Internal

Email	02.08.2016	City of London Police
Email	16.08.2016	Head of Estates
Memo Protection	30.08.2016	Department of Markets and Consumer
Memo	21.09.2016	Lead Local Flood Authority
Memo	30.03.2017	City Transportation

External

Letter	11.08.2016	Twentieth Century Society
Letter	06.09.2016	London Borough of Islington
Letter	14.09.2016	London Borough of Islington – Assistant Parks Manager
Review of daylight, sunlight and overshadowing, 3 rd October 2016, BRE		
Review of revised daylight, sunlight and overshadowing assessment, 9 th December 2016, BRE		

Residents and interested parties

Petition	19.06.2016	Cobalt Building Residents
Email	24.07.2016	Harish Pankhania
Online	05.08.2016	Andrew Harrison
Letter	08.08.2016	Cennydd John - Hatching Dragons Nursery
Online	08.08.2016	Peter Heavyside
Online	08.08.2016	Simon Towns
Online	08.08.2016	Norma Wee
Online	08.08.2016	Sonal Gadhvi
Online	08.08.2016	Ovijit Paul
Online	08.08.2016	Mai Le Verschoyle
Online	09.08.2016	Mai Le Verschoyle
Online	09.08.2016	Mitra Karvandi-Smith
Online	09.08.2016	Stephen Tromans
Online	09.08.2016	Thomas Hodson
Online	09.08.2016	Priya Shah
Online	09.08.2016	Mai Le Verschoyle
Letter	09.08.2016	Doreen Greenfield

Email	10.08.2016	Ian Dowsett
Online	10.08.2016	Gareth Quantrill
Online	10.08.2016	Julie Hudson
Email	11.08.2016	Heather Page
Online	11.08.2016	Elizabeth Jobey
Online	12.08.2016	Diana Souhami
Letter	12.08.2016	M Praag
Letter	12.08.2016	Brian Albert
Letter	13.08.2016	Christopher Petit
Letter	14.08.2016	Audrey and Clive Kirsch
Online	15.08.2016	Helena Twist
Online	15.08.2016	M Loosemore
Letter	15.08.2016	David Emerson
Letter	15.08.2016	Anthony Winter
Online	16.08.2016	Claire Fielding
Email	16.08.2016	Daniel Monk
Online	16.08.2016	Jane Norrie
Email	17.08.2016	Daniel Gerring
Letter	17.08.2016	Claudia Marciante
Letter	17.08.2016	Julian Vickery
Online	18.08.2016	Suresh Nair
Online	18.08.2016	Naren Joshi
Online	18.08.2016	Deborah Phillips
Online	18.08.2016	Naren Joshi
Online	18.08.2016	Richard McKeown
Online	18.08.2016	Tommy Johansson
Letter	18.08.2016	Richard Douglas - Colliers International
Letter	18.08.2016	David Gregory
Email	19.08.2016	Hazel Brothers
Online	19.08.2016	David Gregory
Online	19.08.2016	David Vickers
Online	19.08.2016	Eva Stenram
Online	19.08.2016	Eva Stenram
Letter	19.08.2016	John Whitehead
Letter	19.08.2016	Friends of Fortune Street Park

Email	19.08.2016	Clare Carolin
Online	20.08.2016	Jacqueline Swanson
Online	21.08.2016	Jacqueline Shearman
Online	21.08.2016	Harriette Ashcroft
Online	21.08.2016	Camille Brooks
Online	21.08.2016	Mark Lemanski
Online	21.08.2016	David Henderson
Email	21.08.2016	Nirman Shah
Email	21.08.2016	J Shearman
Email	21.08.2016	Gill Kimber
Email	21.08.2016	Howard Sullivan
Email	21.08.2016	James Warriner
Email	21.08.2016	Mark Lemanski
Online	22.08.2016	Sophie Nielson
Online	22.08.2016	Helen Hulson
Online	22.08.2016	Sarah Marks
Email	23.08.2016	Fred Scott
Email	23.08.2016	Liz Davis
Email	23.08.2016	Simon Holt
Email	23.08.2016	Matilda Holt
Email	23.08.2016	Samantha Logan
Online	23.08.2016	Sarah Griffiths
Online	23.08.2016	William and Christine Clifford
Form	24.08.2016	Linda Stubbles
Form	24.08.2016	S Bensch
Form	24.08.2016	A Paveison
Form	24.08.2016	Guy Hayward
Form	24.08.2016	R Staldi and Venwzia Bacalo
Form	24.08.2016	Colin Toner
Form	24.08.2016	Mr Padda
Form	24.08.2016	Britesh Patel
Form	24.08.2016	Robert Pegg
Form	24.08.2016	Ida L'Erario
Email	24.08.2016	Tudor Rose Court Residents Association
Email	24.08.2016	Liz Paterson

Letter	25.08.2016	Iago Griffith
Letter	25.08.2016	Ruth Gee and Andrew Boyes – Prior
Weston School		
Letter	25.08.2016	Jacques Parry
Email	26.08.2016	Deborah Phillips
Online	26.08.2016	Dominic Bampton
Letter	26.08.2016	Golden Lane Residents Association
Online	27.08.2016	Marie Morley
Online	28.08.2016	Selina Robertson
Letter	29.08.2016	Golden Lane Residents Association
Online	29.08.2016	Christopher Makin
Online	29.08.2016	Martin Coomer
Online	29.08.2016	Andrea Kantor
Letter	30.08.2016	Emma Matthews
Letter	30.08.2016	Mark Campbell
Email	30.08.2016	Ben Jonson House Group
Form	30.08.2016	Victor A Giles
Online	30.08.2016	Susan Cox
Online	30.08.2016	Rita Makanjee
Letter	30.08.2016	Fred and Joanna Rodgers
Letter	30.08.2016	Joseph Ruffles
Email	30.08.2016	Saskia Lewis
Email	31.08.2016	Stephen Morgan
Email	31.08.2016	Anna Curry
Online	31.08.2016	Bridget Andrews
Email	01.09.2016	J.P Masclet
Form	02.09.2016	Patricia Liu
Form	02.09.2016	P Cody
Form	02.09.2016	Robert Gittens
Form	02.09.2016	Michael Rawlins
Form	02.09.2016	Lorenzo Castricini
Form	02.09.2016	A Brown
Letter	04.09.2016	Anna Parkinson
Letter	06.09.2016	Mr and Mrs Bulman
Letter	06.09.2016	Barbican Association

Online	09.09.2016	Sue Pearson
Email	19.09.2016	Saskia Lewis
Online	20.09.2016	Gareth Randell
Online	20.09.2016	Isobel Goodrich
Online	20.09.2016	Angela Pistilli
Online	20.09.2016	David Archer
Online	21.09.2016	Russell Bell
Email	23.09.2016	Sarah Batty- Smith
Online	23.09.2016	Lewis Jackson
Letter	03.10.2016	Rosalie Bolt
Online	13.10.2016	Aya Sekine
Letter	21.11.2016	Deborah Cherry
Online	07.12.2016	Tom Fowler
Letter	08.12.2016	Ruth Gee and Andrew Boyes – Prior
Weston School		
Online	08.12.2016	Kirill Arakcheev
Online	11.12.2016	Ovijit Paul
Online	11.12.2016	Sonal Gadhvi
Online	13.12.2016	F Jackson
Online	13.12.2016	Eva Stenram
Online	13.12.2016	Vibeche Dart
Online	13.12.2016	Martha Cossey
Online	13.12.2016	P J Haben
Online	13.12.2016	Mark Waller
Online	13.12.2016	Hugo Groves
Online	13.12.2016	Edward Marchand
Email	14.12.2016	Mark Lemanski
Online	15.12.2016	Chamoun Issa
Online	15.12.2016	Roland Jeffery
Online	15.12.2016	Fred and Joanna Rodgers
Online	16.12.2016	Steven Malies
Online	16.12.2016	Mary Loosemore
Online	16.12.2016	Bruce Nockles
Online	16.12.2016	M King
Online	18.12.2016	Jacques Parry

Letter	19.12.2016	Mai Le Verschoyle
Online	19.12.2016	Nick Lee
Online	20.12.2016	Gareth Quantrill
Letter	20.12.2016	Claudia Marciante
Letter	20.12.2016	Dan Davis
Letter	21.12.2016	Marie Morley
Email	21.12.2016	John Whitehead
Email	21.12.2016	Deborah Phillips
Email	21.12.2016	Ben Jonson House Group
Letter	21.12.2016	Anna Parkinson
Letter	21.12.2016	Emma Matthews
Letter	22.12.2016	Mai Le Verschoyle
Online	22.12.2016	Greg Turner
Letter	22.12.2016	Bill and Christine Clifford
Email	26.12.2016	Saskia Lewis
Letter	28.12.2016	Mark Campbell
Email	05.01.2017	David Whitehead
Online	25.01.2016	D Browning
Email	06.02.2017	John Whitehead
Email	06.02.2017	John Whitehead
Email	06.02.2017	Cennydd John - Hatching Dragons Nursery
Email	06.02.2017	Fred Rogers
Email	06.02.2017	Emma Matthews
Email	08.02.2017	Hazel Brothers
Email	08.02.2017	Claudia Marciente
Online	10.02.2017	Cennydd John - Hatching Dragons Nursery
Email	11.02.2017	Mark Lemanski
Email	13.02.2017	Deborah Phillips
Email	15.02.2017	Fred Rogers
Online	16.02.2017	Dominic Brampton
Online	16.02.2017	Clare Carolin
Online	17.02.2017	Eva Stenram
Email	17.02.2017	Deborah Lambkin
Email	19.02.2017	Mai Le Verschoyle
Email	20.02.2017	Fred Rogers

Email	22.02.2017	Tim Chapple and Robert Mingrino
Online	28.02.2017	Rita Mankanjee
Email	21.03.2017	Barbican Association Sustainability Committee

Application Documents

Planning Statement, May 2016, DP9

Tree Survey and Arboricultural Impact Assessment, May 2016

Preliminary Ecological Appraisal and Living Roof Design Specification, May 2016, Greengage Environmental Ltd

Sustainability Assessment, May 2016, Dalen Group

Energy Statement, May 2016, BBS Environmental

Statement of Community Involvement, May 2016, Westbourne Engagement

Noise Impact Assessment, May 2016, the Equus Partnership

Daylight, Sunlight and Overshadowing Report, June 2016, Point 2 Surveyors

Design and Access Statement, June 2016, Allford Hall Monaghan Morris

Transport Assessment, June 2016, Caneparo Associates

Air Quality Assessment, June 2016, Hawkins Environmental

Flood Risk Assessment, June 2016, Walsh

Daylight, Sunlight and Overshadowing Addendum, November 2016, Point 2 Surveyors

Design and Access Statement, November 2016, Allford Hall Monaghan Morris

Appendix A

London Plan Policies

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

Policy 2.18 Protect, promote, expand and manage the extent and quality of and access to London's network of green infrastructure.

Policy 3.1 Protect and enhance facilities and services that meet the needs of particular groups and communities.

Policy 3.2 New developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities.

Policy 3.3 Ensure the housing need identified in the London Plan is met, particularly through provision consistent with at least an annual average of 32,210 net additional homes across London which would enhance the environment, improve housing choice and affordability and provide better quality accommodation for Londoners.

Policy 3.11 Maximise affordable housing provision and seek an average of at least 13,200 more affordable homes per year in London over the term of the London Plan.

Policy 3.16 Protection and enhancement of social infrastructure - additional and enhanced social infrastructure provision to meet the needs of a growing and diverse population.

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

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

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

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

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

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

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

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

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

Policy 5.18 Encourage development waste management facilities and removal by water or rail transport.

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

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

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

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

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

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

provide parking for disabled people in line with Table 6.2

meet the minimum cycle parking standards set out in Table 6.3

provide for the needs of businesses for delivery and servicing.

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

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

Policy 7.4 Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character,

development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

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

Policy 7.6 Buildings and structures should:

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

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

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

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

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

Policy 7.18 Resist the loss of local protected open spaces unless equivalent or better quality provision is made within the local catchment area.

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

Policy 7.21 Trees should be protected, maintained, and enhanced. Existing trees of value should be retained and any loss as the result of development should be replaced.

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.

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.

DM10.2 Design of green roofs and walls

- 1) To encourage the installation of green roofs on all appropriate developments. On each building the maximum practicable coverage of green roof should be achieved. Extensive green roofs are preferred and their design should aim to maximise the roof's environmental benefits, including biodiversity, run-off attenuation and building insulation.
- 2) To encourage the installation of green walls in appropriate locations, and to ensure that they are satisfactorily maintained.

DM10.4 Environmental enhancement

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces. Enhancement schemes should be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

- a) the predominant use of the space, surrounding buildings and adjacent spaces;
- b) connections between spaces and the provision of pleasant walking routes;
- c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
- d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
- e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
- f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
- g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
- h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
- i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
- j) the use of high quality street furniture to enhance and delineate the public realm;
- k) lighting which should be sensitively co-ordinated with the design of the scheme.

DM10.7 Daylight and sunlight

- 1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to

unacceptable levels, taking account of the Building Research Establishment's guidelines.

- 2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

DM12.4 Archaeology

1. To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.
2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.
3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

CS15 Creation of sustainable development

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

DM15.1 Sustainability requirements

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.
2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:
 - a) BREEAM or Code for Sustainable Homes pre-assessment;
 - b) an energy statement in line with London Plan requirements;
 - c) demonstration of climate change resilience measures.
3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.
4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.

5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.5 Climate change resilience

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.
2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

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.

DM15.8 Contaminated land

Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.

DM16.1 Transport impacts of development

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:
 - a) road dangers;
 - b) pedestrian environment and movement;
 - c) cycling infrastructure provision;
 - d) public transport;
 - e) the street network.
2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

DM16.2 Pedestrian movement

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.
2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:
 - a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
 - b) the shortest practicable routes between relevant points.
3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.
4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.
5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.
6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

DM16.3 Cycle parking

1. On-site cycle parking must be provided in accordance with the local standards set out in Table 16.2 or, for other land uses, with the standards of the London Plan. Applicants will be encouraged to exceed the standards set out in Table 16.2.
2. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.

DM16.5 Parking and servicing standards

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.

2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.
3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.
4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.
5. Coach parking facilities for hotels (use class C1) will not be permitted.
6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.
7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

DM17.1 Provision for waste

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.
2. On-site waste management, through techniques such as recycle sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

CS18 Minimise flood risk

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

DM18.1 Development in Flood Risk Area

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:
 - a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;
 - b) the benefits of the development outweigh the flood risk to future occupants;
 - c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.
2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:
 - a) all sites within the City Flood Risk Area as shown on the Policies Map; and
 - b) all major development elsewhere in the City.
3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.
4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.
5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.
6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

DM18.2 Sustainable drainage systems

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.
2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and

other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.

3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

DM18.3 Flood protection and climate

1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.
2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm, where feasible.

CS19 Improve open space and biodiversity

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

DM19.2 Biodiversity and urban greening

Developments should promote biodiversity and contribute to urban greening by incorporating:

- a) green roofs and walls, soft landscaping and trees;
- b) features for wildlife, such as nesting boxes and beehives;
- c) a planting mix which encourages biodiversity;
- d) planting which will be resilient to a range of climate conditions;
- e) maintenance of habitats within Sites of Importance for Nature Conservation.

CS21 Protect and provide housing

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

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.

DM21.5 Housing quality standards

All new housing must be designed to a standard that facilitates the health and well-being of occupants, and:

- a) takes account of the London Plan's space standards and complies with the London Plan's Density Matrix standards;
- b) provides acceptable daylight to dwellings commensurate with a city centre location;
- c) meets standards for Secured by Design certification;

d) maximises opportunities for providing open and leisure space for residents.

SCHEDULE

APPLICATION: 16/00590/FULL

Bernard Morgan House 43 Golden Lane London

Demolition of existing building, retention of existing basement and construction of new residential building to provide 99 dwellings, together with ancillary car parking, hard and soft landscaping and associated works (Total Floorspace 11,113 sq.m. GIA).

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 Prior to the commencement of any works on site, details shall be submitted to and approved in writing by the Local Planning Authority showing the means of protection of the trees which are to be retained including their root system and the approved details shall be implemented prior to and during the course of the building works as appropriate.
REASON: To ensure the protection of the adjacent trees in accordance with the following policies of the Local Plan: DM10.4, DM19.2. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated before the design is too advanced to make changes.
- 3 Prior to demolition, a method statement for the salvage and details of the reuse of the decorative tiles on the north elevation and south elevation of the existing building shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details.
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: DM10.1.
- 4 Details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the demolition of the building(s) hereby approved shall be submitted to and approved by the Local Planning Authority in writing prior to the commencement of work. The details shall include relevant measures from Section 4 of the Mayor of London's Construction Logistics Plan Guidance for Developers issued in April 2013, and specifically address the safety of vulnerable road users through compliance with the Construction

Logistics and Cyclist Safety (CLOCS) Standard for Construction Logistics, Managing Work Related Road Risk. No demolition or construction shall be carried out other than in accordance with the approved details and methods.

REASON: To ensure that demolition and construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition and construction work commencing in order that the impact on the transport network is minimised from the time that demolition and construction starts.

- 5 A scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during demolition shall be submitted to and approved in writing by the Local Planning Authority prior to any demolition taking place on the site. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme.

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

- 6 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall include relevant measures from Section 3 of the Mayor of London's Construction Logistics Plan Guidance for Developers issued in April 2013, and specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Cyclist Safety (CLOCS) Standard for Construction Logistics, Managing Work Related Road Risk. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that demolition works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition work

commencing in order that the impact on the transport network is minimised from the time that demolition starts.

- 7 Before any works including demolition are begun a site survey and survey of highway and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority indicating the proposed finished floor levels at basement and ground floor levels in relation to the existing Ordnance Datum levels of the adjoining streets and open spaces. The development shall be carried out in accordance with the approved survey unless otherwise agreed in writing by the local planning authority.

REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 8 Archaeological evaluation shall be carried out in order to compile archaeological records in accordance with a timetable and scheme of such archaeological work submitted to and approved in writing by the Local Planning Authority before any commencement of archaeological evaluation work.

REASON: To ensure that an opportunity is provided for the archaeology of the site to be considered and recorded in accordance with the following policy of the Local Plan: DM12.4.

- 9 No work except demolition to basement slab level shall take place until:

a) An investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

b) Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

c) Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 9 No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 10 No works except demolition to basement slab level shall take place until the developer has secured the implementation of a programme of archaeological work to be carried out in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.

REASON: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are understood to exist in accordance with the following policy of the Local Plan: DM12.4.

- 11 No works except demolition to basement slab level shall take place before details of the foundation design and piling configuration, to include a detailed method statement, have been submitted to and approved in writing by the Local Planning Authority.
REASON: In order to allow an opportunity for investigations to be made in an area where remains or archaeological interest are understood to exist in accordance with the following policy of the Local Plan: DM12.4.

- 12 Details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the construction of the building(s) hereby approved shall be submitted to and approved by the Local Planning Authority in writing prior to the commencement of work. The details shall include relevant measures from Section 4 of the Mayor of London's Construction Logistics Plan Guidance for Developers issued in April 2013, and specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Cyclist Safety (CLOCS) Standard for Construction Logistics, Managing Work Related Road Risk. No demolition or construction shall be carried out other than in accordance with the approved details and methods.
REASON: To ensure that demolition and construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition and construction work commencing in order that the impact on the transport network is minimised from the time that demolition and construction starts.

- 13 A scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction shall be submitted to and approved in writing by the Local Planning Authority prior to any construction work taking place on the site. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction 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: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to

construction in order that the impact on amenities is minimised from the time that the construction starts.

- 14 Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall include relevant measures from Section 3 of the Mayor of London's Construction Logistics Plan Guidance for Developers issued in April 2013, and specifically address [driver training for] the safety of vulnerable road users through compliance with the Construction Logistics and Cyclist Safety (CLOCS) Standard for Construction Logistics, Managing Work Related Road Risk. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to construction work commencing in order that the impact on the transport network is minimised from the time that construction starts.

- 15 Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

(a) Fully detailed design and layout drawings for the proposed SuDS components (as described by the Flood Risk Assessment Revision 5 29/06/2016 and Design Note - Surface Water Strategy 13/09/2016) including but not limited to: attenuation systems, pumps, green roofs, design for system exceedance, construction plan, cost etc. The surface water discharge rate should not exceed 5 l/s and the actual attenuation volume capacity should be no less than 50m³; unless otherwise agreed with the Lead Local Flood Authority;

(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.

(c) Evidence that Thames Water have been consulted and consider the proposed discharged rate to be satisfactory.

REASON: To improve sustainability, reduce flood risk and reduce water run off rates in accordance with the following policy of the Local Plan: DM15.5, DM18.1, DM18.2 and DM18.3.

- 16 Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

(a) A Lifetime Maintenance Plan for the SuDS system to include:

- A full description of how the system would work, it's aims and objectives and the flow control arrangements;
- A Maintenance Inspection Checklist/Log;
- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.

REASON: To improve sustainability, reduce flood risk and reduce water run off rates in accordance with the following policy of the Local Plan: DM15.5, DM18.1, DM18.2 and DM18.3.

- 17 Before any piling or construction of basements is commenced a scheme for the provision of sewer vents at roof level within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.
REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 18 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) particulars and samples of the materials to be used on all external faces of the building including external ground and upper level surfaces;
 - (b) details of a typical bay of the development;
 - (c) details of ground floor elevations;
 - (d) details of the flank wall(s) of the proposed new building;
 - (e) details of soffits, hand rails and balustrades;
 - (f) details of plant, flues, fire escapes and other excrescences at roof level;
 - (g) details of the entrances on Golden Lane, Fann Street and Brackley Street;
 - (h) details of the doors to the service area, substation and refuse store;
 - (i) details of the windows, including the reveals;
 - (j) details of the treatment of glazing of the ground floor windows to ensure privacy;
 - (k) details of balconies;
 - (l) details of juliet balconies;
 - (m) details of biodiversity enhancements (for birds).
- 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: DM10.1.

- 19 Before starting any brick work, a sample panel of approximately 1m high by 1m wide of the facing materials to be used shall be erected on site to establish the detail of bonding, coursing and colour and type of jointing and shall be agreed in writing with the local planning authority. The sample panel shall include a reveal. The quality of finish and materials incorporated in any approved sample panel(s) shall be maintained throughout the development.
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: DM10.1.
- 20 Before any works thereby affected are begun a scheme for the avoidance of expansion joints in the elevation shall be submitted to and approved in writing by the local planning authority. The development shall be implemented in accordance with the approved details.
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: DM10.1.
- 21 Unless otherwise approved in writing by the Local Planning Authority, before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details.
REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DM10.1.
- 22 All unbuilt surfaces shall be treated in accordance with a landscaping scheme to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. The landscaping scheme shall include details of lighting, materials, plant species, retaining perimeter walls, boundary treatment and gates. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within 5 years of completion of the development shall be replaced with trees and shrubs of similar size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.

REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.

- 23 Details of the position and size of the green roof(s), the type of planting and the contribution of the green roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
- 24 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.
- 25 Unless otherwise approved in writing by the Local Planning Authority, no fewer than 10% of the total number of residential units within the development shall be designed and constructed in accordance with the Building Regulations 2010, Part M4(3): Category 3 - Wheelchair user dwellings and the remainder of the residential units shall be designed and constructed in accordance with the Building Regulations 2010, Part M4(2): Category 2 - Accessible and Adaptable dwellings.
REASON: In the interest of inclusive design and to ensure that adaptable housing is provided in accordance with the following policy of the Local Plan: CS21/4.
- 26 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.

- 27 No boilers that have a dry NO_x 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.
- 28 Any generator on the site shall be used solely on intermittent and exceptional occasions when required in response to a life threatening emergency or an exceptional event requiring business continuity and for the testing necessary to meet that purpose and shall not be used at any other time. At all times the generator shall be operated to minimise noise impacts and emissions of air pollutants and a log of its use shall be maintained and be available for inspection by the Local Planning Authority.
REASON: To minimise adverse air quality in accordance with policies DM15.6 and DM 21.3 of the Local Plan and policies 7.14 B a and c of the London Plan.
- 29 Unless otherwise agreed in writing by the local planning authority all combustion flues must terminate at least 1m above the highest roof in the development in order to ensure maximum dispersion of pollutants.
REASON: In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and in accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM₁₀, in accordance with the City of London Air Quality Strategy 2015 and the Local Plan DM15.6.
- 30 The refuse collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers.
REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.
- 31 No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.
REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3.
- 32 Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 153 pedal cycles. The cycle parking provided on the site must remain ancillary to the use of the building and

must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.

REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3.

- 33 No development shall be carried out in advance of the building lines as shown on the deposited plans.
REASON: To ensure compliance with the proposed building lines and site boundaries in accordance with the following policies of the Local Plan: DM16.1, DM16.2.
- 34 The threshold of all vehicular access points shall be at the same level as the rear of the adjoining footway.
REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.
- 35 Prior to the occupation of any part of the building, the land between the existing building lines and the face of the proposed new building shall be brought up to street level, paved and drained in accordance with details to be submitted to and approved in writing by the Local Planning Authority and shall not be fenced or otherwise enclosed or obstructed.
REASON: To ensure compliance with building lines and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.1, DM10.8, DM16.2.
- 36 No doors, gates or windows at ground floor level shall open over the public highway.
REASON: In the interests of public safety
- 37 Unless otherwise approved by the LPA no plant or telecommunications equipment shall be installed on the exterior of the building, including any plant or telecommunications equipment permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
- 38 Notwithstanding the drawings hereby approved, there must be no building, roof structures or plant above the top storey, including any building, structures or plant permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.
REASON: To ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1 DM12.1.

- 39 Provision shall be made for disabled people to obtain access to the building via the principal entrance without the need to negotiate steps and shall be maintained for the life of the building.
REASON: To ensure that disabled people are able to use the building in accordance with the following policy of the Local Plan: DM10.8.
- 40 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 121/03, 122/03, 123/04, 124/04, 125/03, 126/04, 127/04, 128/04, 129/03, 130/04, 131/04, 132/03, 133/03, 210/05, 211/05, 212/03, 231/03, 214/03, 310/03, 311/03, 312/02, 313/01, 314/02, 315/02, 400/03, 401/02, 402/03 and 403/02.
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 Many species are protected under legislation such as the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2010. A contravention of those statutory provisions may constitute a criminal offence. The grant of this consent/planning permission does not override any statutory requirement to notify Natural England and/or obtain a licence prior to carrying out activities which may harm or disturb protected species such as bats.
- 3 Where tree pits are to be dug for the new tree(s), there should be an archaeological 'watching brief' to monitor groundworks and record any archaeological evidence revealed before replanting and the tree pit(s) should be lined to indicate the excavated area.

- 4 If a new tree is to be planted in a different location to an existing tree, the tree should be felled to ground level only and the stump poisoned with an approved substance or solution in order not to cause damage to any archaeological remains.
- 5 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 Section106 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.

- 6 This permission must in no way be deemed to prejudice any rights of light which may be enjoyed by the adjoining owners or occupiers under Common Law.
- 7 This permission is granted having regard to planning considerations only and is without prejudice to the position of the City of London Corporation as ground landlords; and the work must not be instituted until the consent of the City of London Corporation as freeholders has been obtained.
- 8 Improvement or other works to the public highway shown on the submitted drawings require separate approval from the local highway authority and the planning permission hereby granted does not authorise these works.

- 9 Prospective occupiers are advised that various activities are undertaken in the City throughout the night which include refuse collection, servicing, maintenance, street cleaning and highway works. In addition, on some sites there may be need for occasional night-time construction work.

10 Air Quality

Compliance with the Clean Air Act 1993

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

Terraces and Open Space

The location of outside space is an important consideration with regard to the exposure of air pollutants. The applicant is therefore minded to consider the location of existing and planned combustion plant termination points relative to any terrace, general access areas or openable windows etc. In addition to any building control or planning requirements, the third edition of the Chimney Height Memorandum (1981) requires that that certain types of combustion plant terminate at least 3m above any area to which there is general access.

Combustion Plant

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

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

Advice on a range of measures to achieve the best environmental option on the control of pollution from standby generators can be obtained from the Department of Markets and Consumer Protection.

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

- 11 TfL has concerns relating to the continual operation of an adjacent cycle hire docking station Golden Lane, Barbican during construction. TfL reminds the developer that approval would be required prior to any temporary closure or suspension of the docking station. TfL would like to highlight from the outset that it would not approve a temporary closure of more than two calendar weeks due to high demand for the docking station generally. If a closure is agreed TfL would expect all lost revenue to be paid to TfL within 28 Working Days of TfL providing to the developer a statement detailing lost revenue as a result of the closure.

Stopping Up Order

**CONFIDENTIAL
FORMAL PETITION**

TO: The Director of TAYLOR WIMPEY
C/O Mr James Wickett-Whyte
Director of WESTBOURNE COMMUNICATIONS
17 Carlton House Terrace
London
SW1Y 5AH

FROM: COBALT BUILDING, 10-15 BRIDGEWATER SQUARE, LONDON EC2Y 8AH

CC: Mrs Annie Hampson
Chief Planning Officer and Development Director
CITY OF LONDON
Guildhall
PO Box 270
London
EC2P 2EJ

SUBJECT: THE REDEVELOPMENT OF BERNARD MORGAN HOUSE, 43 BRACKLEY STREET, BARBICAN

DATE: 19 JUNE 2016

We, the undersigned, are Leaseholders of the Cobalt Building.

We formally object to the plans being put forward by you as the Property Developer of Bernard Morgan House ("BMH"). As you may be aware half of our building has flats facing onto Viscount Street but we believe that our entire building will be impacted by the above. We set out our reasons below. The plans exhibited to local residents in May 2016, show an extension of the current footprint of BMH into a higher, wider and deeper building which will have a direct impact on the pleasant residential amenities we currently enjoy in our homes both during the BMH redevelopment phase and afterwards.

Our concerns and objections to the current BMH redevelopment plans are as follows:

1. The "Public Consultation" has been deficient in due process. This is because it did not involve Cobalt Building Leaseholders until recently. Further, it is to be noted that the BMH redevelopment proposals came to our attention in March (over two months after the first "Public Consultation" done by yourselves) and only due to our own diligence. As soon as we became aware of the redevelopment proposal, comments were provided to Westbourne Communications by email and on their dedicated website. However:
 - 1.1. The feedback from Cobalt Building Leaseholders was not reflected in the plan exhibited by Westbourne Communications in May 2016 – a plan that has a markedly more deleterious impact on the Cobalt Building than the one first shown in January (according to the early schematics we have now seen).
 - 1.2. Our understanding is that you have submitted to City of London Planners on the 10th of June 2016 the application, which was exhibited in May 2016. If so, we are concerned that it may not have taken into account our views as in this petition.

- 1.3. We are also aware that other neighbourhood estates have been more actively consulted on the basis that you had built them, albeit some years ago.
 - 1.4. We can, therefore, only conclude that Taylor Wimpey do not regard us - Cobalt Building Leaseholders - as a relevant constituency for engagement on this major redevelopment work in our neighbourhood and for the purposes of the "public consultation" although our Cobalt Building and our presence exist in the community since 1997.
2. **Redeveloped BMH will be extended far towards the Cobalt Building and away from Bowater House. This gives rise to major concerns:**
 - 2.1. **Daylight and Sunlight Obstruction** - The proposed redevelopment is of a scale that is not in keeping with the existing daylight and sunlight aspects that we receive. It is considerably higher than the existing BMH building and two storeys higher than the top of the roof of neighbouring Cripplegate building. This will reduce the light (daylight and sunlight) of the Cobalt Building flats facing onto Viscount Street.
 - 2.2. **Change of view** – Furthermore the views from these flats will change considerably from open sky to building façade.
 - 2.3. **Lack of privacy** – The proposed development extends well beyond the current footprint of BMH, with a major expansion of the side of the building that faces Brackley Street – reaching as high as four storeys and onto a significant part of Brackley Street and coming very close to Viscount Street. We believe the new building extension is too close to the Cobalt Building. BMH flats will encroach and overlook our windows and will also reduce, if not intrude on, our privacy. As a solution, we would suggest that the height on the Viscount Street side should be no more than two floors high and should not extend down Brackley Street towards Viscount Street beyond the current main BMH building footprint.
 - 2.4. **Increased noise levels** - The current proposal for inset balconies on the BMH flats facing Brackley Street – with terraces on the top floors – will result in increased noise levels when these are kept open and /or in use. Moreover, as the walls of the existing surrounding building walls will be so close to the proposed BMH house and both Viscount Street and Brackley Street are very narrow roads, there will be tunnel effects created and persistent echoes.
 - 2.5. **Potential risk of vagrants and anti-social behaviour** - The proposal to transform the existing green space at the side of the BMH site bordering onto Viscount Street into a "public pocket park" fills us with horror. Who will manage this space? Will there be a 24 hour security guard? Will the police respond to calls if there is trouble? We note that there was previously a motorbike parking area on Viscount Street which attracted gangs of thieves and a great deal of anti-social behaviour before it was closed in 2002. We fear the same will happen with the pocket park. We would suggest that the 'green' space in the same form and footprint as current is retained and it is not turned into a 'public' space.
 - 2.6. The Cobalt Building flats which face Viscount Street are likely to suffer the most from the reduced light, lack of privacy, increased noise and disruption caused by the pocket garden.
 3. **Negative Impact on the neighbourhood and Cobalt Building. The impact on Cobalt Building and local residents would be detrimental in many ways.**
 - 3.1. We understand that the existing BMH will be demolished. Whilst this occurs and as construction gets underway, there will be increased noise, traffic and pollution. The Cobalt Building is already enduring many months of refurbishment work going on in Blake Tower which, despite being clad and only having refurbishment works done, has caused and is causing significant noise and environmental pollution, impacting the peace and well-being

of residents. This is our practical first experience and we do not wish to see a repeat of this from the BMH redevelopment.


3.2. In the longer-term, there will be:

- A significant reduction in light to Cobalt Building flats facing Viscount Streets and Brackley Street especially during the winter months when the sun is low in the sky.
- Increased traffic, pollution, noise which will disrupt the quiet and pleasant environment and residence and adversely impact the health of the local residents.
- The traffic and servicing requirements will transform Viscount Street, Brackley Street and Fann Street from quiet side roads into a busy through roads which they are not simply designed to accommodate and will increase the risk of unfortunate accidents besides congestion.
- Increased demand on the local services
- Potential issues with noise, anti-social behaviour and security of the neighbourhood.

We understand that you have had a number of meetings with the City of London Corporation Planners since your purchase of BMH from the Corporation last year. Therefore we request that you and the City of London Corporation Planners consider and actively address all our concerns above so as to ensure that:

- a) BMH will be rebuilt within its current footprint;
- b) The height of BMH will not affect the light and views of the Cobalt Building flats and of the surrounding buildings;
- c) The quietness, tidiness and security of the neighborhood environment and space will be respected and maintained during BMH redevelopment and in the long-term.

Below are signatures from the Cobalt Building Leaseholders for the BMH – Cobalt Petition.

Cobalt Leaseholders	Flat	Signature
Mai Le Verschoyle	1	
Marie Morley	2	
Peter Heavyside	12A	
Meera Shah	27	
Priya Shah	28	
Jane Norrie	15	
Andy Harrison	23	
MinHui Wong	31	
Rajan Vatish	38	
Mukesh Raja	36	
Nirmani Shah	56	
c/o AGENT - Francesca Sapiano	32	
Sue Weeks	18	
Norma Wee	40	
Norma Wee	35	
Derrick & Kelly Wee	42	
Sonal Gadhvi / Ovijit Paul	48	
25 Draycott Place Limited	Freeholder / Landlord	
Stephen Tromans	50	

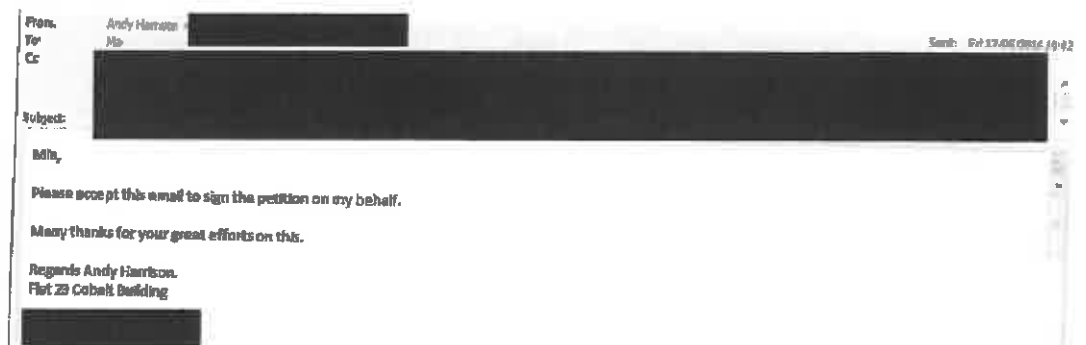
Below are signatures from the Cobalt Building Leaseholders for the BMH - Cobalt petition.

Cobalt Leaseholders	Flat	Signature
25 Graycott Place Ltd	Freeholder	
David Sapirst	54	
Nick Prior	21	
SYLVIA SMIT	45	
Tommy Johanson	4	
David x Julia Vickers	7	
Stephen Zerner	49	
Paul x Lynette Foll	30	
Shreshth Dair	19	
Raola Perotti	22	
Steven Joshi	8	
Dean Wybron	4	
ELIADETH PATTERSON	27	
Ravindranath Raghunath	3	
Anil Vashist	11	
Anil Vashist	33	
Saura Feldman	17	

Cobalt Leaseholders	Flat	Signature
Suresh Nair	19	PP Signed (attached Email of approval from Leaseholder)
David Lapish	54	Attached scanned of signed version
Nick Prior	21	Attached scanned of signed version
Sylvia Smit	45	Signed
Tommy Johansson / Dean Wybrow	4	Signed
David & Julia Vickers	7	Attached scanned of signed version
Stephen Lerner	49	PP Signed (attached Email of approval from Leaseholder)
Paul & Lynette Foll	30	PP Signed (attached Email of approval from Leaseholder)
Paola Perrotti	22	Signed
Naren Joshi	8	Attached scanned of signed version
Elizabeth Patterson	37	Signed
Simon Towns	47	Attached scanned of signed version
Ravindranath Raghunath	3	PP Signed (attached Email of approval from Leaseholder)
c/o AGENT - Francesca Sapiano	34	Awaiting scanned of signed version
Mr Zampetti c/o Chelsea Property Management	39	Awaiting scanned of signed version

Below is the list of flats with approvals from Leaseholders for signing the petition on their behalf

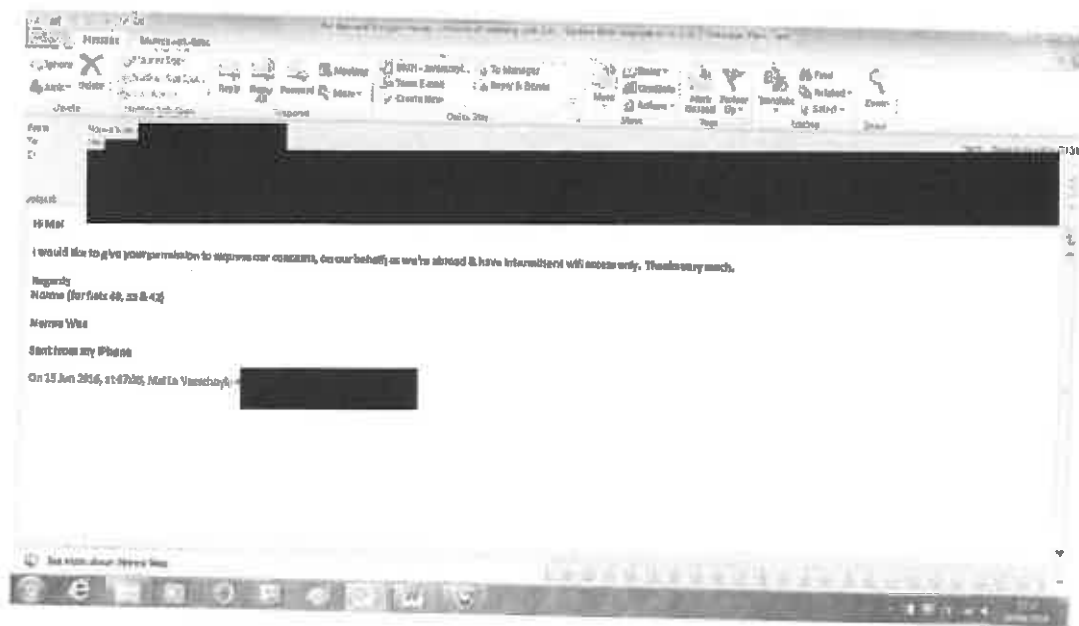
1. Andy Harrison - Flat 23



2. Sue Weeks - Flat 18



3. Norma Wee - Flats 35 / 40 / 42



4. Stephen Tromans QC - Flat 50

From: Stephen Tromans QC [REDACTED]
To: Marie Verschuur
Cc:
Subject: RE: Bernard Morgan House development - Cobalt Building Formal Petition

Sent: Thu 18/06/2016 09:22

Dear Mai

I am happy for you to sign the petition pp me.

Best wishes

Stephen
(Flat 50)

Stephen Tromans QC

20 Essex Chambers

[REDACTED]
email: [REDACTED]

5. Suresh Nair - Flat 19

From: Suresh Nair [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: Bernard Morgan House development - Cobalt Building Formal Petition Update

Sent: Fri 17/06/2016 10:10

Dear Mai

I am happy for you to sign the petition on my behalf

Warm regards,

Suresh Nair
Flat 19
The Cobalt Building

6. Paul & Lynett Foll - Flat 30

From: Lynette Foll [REDACTED]
To: [REDACTED]
Cc:
Subject: Re: Bernard Morgan House development - Cobalt Building Formal Petition - Update

Sent: Fri 17/06/2016 10:06

Please accept this email as approval to sign the petition on our behalf as we do not reside in our flat. We really appreciate your hard work on this.

Paul & Lyn Foll
Flat 30 Cobalt Building

Sent from my iPad

7. Stephen Lerner - Flat 49

From: Stephen Lerner
To: [Redacted]
Cc: [Redacted]
Subject: [Redacted]

Hi [Redacted]

Please accept this email to sign the petition on my behalf.

Kind regards

Stephen Lerner
Flat 48
Cobalt Building

8. c/o Agent – Francesca Sapieno - Flat 32

From: Francesca Sapieno
To: Ms Le Verchev
Cc: [Redacted]
Subject: Re: Bernard Morgan House - latest news - Cobalt Petition

Sent: Fri 17/06/2016 09:2

Dear Mai

Hope you're well.

My landlord has emailed me to say that he does not have any scanning facilities so is unable to sign the form.

He has stated the following in his email: "Thanks, but we do not have any scanning facility, best you advise them that you have our go ahead to sign for us, or just leave it".

Please let me know your thoughts.

Thank you.

Francesca Sapieno
Property Manager

[Redacted]

Harpoons International

9. Ravindranath Raghunath – Flat 3

From: [Redacted]
To: [Redacted]
Cc: [Redacted]
Subject: [Redacted]

Sent: Fri 17/06/2016 10:4

Dear Mai

You can add us to the list of petitioners. We own no 3. My daughter Anjana is there and will sign on my behalf if required. Or you can put this email as confirmation of my agreement.

Best regards
Raghu
No 3 The Cobalt

[Redacted]

10. Mukesh Raja – Flat 36

To: [Redacted]
Cc: [Redacted]
Subject: Re: Bernard Morgan House - update of meeting with Cllr - Update BMH approval in Cllr

Sent: Sun 19/06/2016 11:45

Hi Mai

Thank you for your email. Please consider this email authorising you to sign on my behalf the petition against the development.

Thank you for the splendid work you are doing.

Regards

Mukesh Raja
Flat 36

Send from my iPhone

11. Anil Vashisht - Flat 11 / Flat 33

PL 96-564 / American Homechildcare - Child Care & Family Support Options

Dear Mel,

[illegible]

Track 9

Ant. Vauchoer

12. Laura Feldman – Flat 17

TO: [REDACTED]
FROM: [REDACTED]
SUBJECT: RE: NEWBORN MORGAN HARRIS (DOB: 1/24/2004) - 12000 BUCKINGHAM PARK DRIVE

இந்தியா தனது ௭௭ வது பிறந்தநாள்

Learn To Fold

Confidential Communication

1992-1993, 1994-1995, 1996-1997, 1998-1999, 2000-2001, 2002-2003, 2004-2005, 2006-2007, 2008-2009, 2010-2011, 2012-2013, 2014-2015, 2016-2017, 2018-2019, 2020-2021, 2022-2023, 2024-2025, 2026-2027, 2028-2029, 2030-2031, 2032-2033, 2034-2035, 2036-2037, 2038-2039, 2040-2041, 2042-2043, 2044-2045, 2046-2047, 2048-2049, 2050-2051, 2052-2053, 2054-2055, 2056-2057, 2058-2059, 2060-2061, 2062-2063, 2064-2065, 2066-2067, 2068-2069, 2070-2071, 2072-2073, 2074-2075, 2076-2077, 2078-2079, 2080-2081, 2082-2083, 2084-2085, 2086-2087, 2088-2089, 2090-2091, 2092-2093, 2094-2095, 2096-2097, 2098-2099, 2100-2101, 2102-2103, 2104-2105, 2106-2107, 2108-2109, 2110-2111, 2112-2113, 2114-2115, 2116-2117, 2118-2119, 2120-2121, 2122-2123, 2124-2125, 2126-2127, 2128-2129, 2130-2131, 2132-2133, 2134-2135, 2136-2137, 2138-2139, 2140-2141, 2142-2143, 2144-2145, 2146-2147, 2148-2149, 2150-2151, 2152-2153, 2154-2155, 2156-2157, 2158-2159, 2160-2161, 2162-2163, 2164-2165, 2166-2167, 2168-2169, 2170-2171, 2172-2173, 2174-2175, 2176-2177, 2178-2179, 2180-2181, 2182-2183, 2184-2185, 2186-2187, 2188-2189, 2190-2191, 2192-2193, 2194-2195, 2196-2197, 2198-2199, 2200-2201, 2202-2203, 2204-2205, 2206-2207, 2208-2209, 2210-2211, 2212-2213, 2214-2215, 2216-2217, 2218-2219, 2220-2221, 2222-2223, 2224-2225, 2226-2227, 2228-2229, 2230-2231, 2232-2233, 2234-2235, 2236-2237, 2238-2239, 2240-2241, 2242-2243, 2244-2245, 2246-2247, 2248-2249, 2250-2251, 2252-2253, 2254-2255, 2256-2257, 2258-2259, 2260-2261, 2262-2263, 2264-2265, 2266-2267, 2268-2269, 2270-2271, 2272-2273, 2274-2275, 2276-2277, 2278-2279, 2280-2281, 2282-2283, 2284-2285, 2286-2287, 2288-2289, 2290-2291, 2292-2293, 2294-2295, 2296-2297, 2298-2299, 2300-2301, 2302-2303, 2304-2305, 2306-2307, 2308-2309, 2310-2311, 2312-2313, 2314-2315, 2316-2317, 2318-2319, 2320-2321, 2322-2323, 2324-2325, 2326-2327, 2328-2329, 2330-2331, 2332-2333, 2334-2335, 2336-2337, 2338-2339, 2340-2341, 2342-2343, 2344-2345, 2346-2347, 2348-2349, 2350-2351, 2352-2353, 2354-2355, 2356-2357, 2358-2359, 2360-2361, 2362-2363, 2364-2365, 2366-2367, 2368-2369, 2370-2371, 2372-2373, 2374-2375, 2376-2377, 2378-2379, 2380-2381, 2382-2383, 2384-2385, 2386-2387, 2388-2389, 2390-2391, 2392-2393, 2394-2395, 2396-2397, 2398-2399, 2400-2401, 2402-2403, 2404-2405, 2406-2407, 2408-2409, 2410-2411, 2412-2413, 2414-2415, 2416-2417, 2418-2419, 2420-2421, 2422-2423, 2424-2425, 2426-2427, 2428-2429, 2430-2431, 2432-2433, 2434-2435, 2436-2437, 2438-2439, 2440-2441, 2442-2443, 2444-2445, 2446-2447, 2448-2449, 2450-2451, 2452-2453, 2454-2455, 2456-2457, 2458-2459, 2460-2461, 2462-2463, 2464-2465, 2466-2467, 2468-2469, 2470-2471, 2472-2473, 2474-2475, 2476-2477, 2478-2479, 2480-2481, 2482-2483, 2484-2485, 2486-2487, 2488-2489, 2490-2491, 2492-2493, 2494-2495, 2496-2497, 2498-2499, 2500-2501, 2502-2503, 2504-2505, 2506-2507, 2508-2509, 2510-2511, 2512-2513, 2514-2515, 2516-2517, 2518-2519, 2520-2521, 2522-2523, 2524-2525, 2526-2527, 2528-2529, 2530-2531, 2532-2533, 2534-2535, 2536-2537, 2538-2539, 2540-2541, 2542-2543, 2544-2545, 2546-2547, 2548-2549, 2550-2551, 2552-2553, 2554-2555, 2556-2557, 2558-2559, 2560-2561, 2562-2563, 2564-2565, 2566-2567, 2568-2569, 2570-2571, 2572-2573, 2574-2575, 2576-2577, 2578-2579, 2580-2581, 2582-2583, 2584-2585, 2586-2587, 2588-2589, 2590-2591, 2592-2593, 2594-2595, 2596-2597, 2598-2599, 2600-2601, 2602-2603, 2604-2605, 2606-2607, 2608-2609, 2610-2611, 2612-2613, 2614-2615, 2616-2617, 2618-2619, 2620-2621, 2622-2623, 2624-2625, 2626-2627, 2628-2629, 2630-2631, 2632-2633, 2634-2635, 2636-2637, 2638-2639, 2640-2641, 2642-2643, 2644-2645, 2646-2647, 2648-2649, 2650-2651, 2652-2653, 2654-2655, 2656-2657, 2658-2659, 2660-2661, 2662-2663, 2664-2665, 2666-2667, 2668-2669, 2670-2671, 2672-2673, 2674-2675, 2676-2677, 2678-2679, 2680-2681, 2682-2683, 2684-2685, 2686-2687, 2688-2689, 2690-2691, 2692-2693, 2694-2695, 2696-2697, 2698-2699, 2700-2701, 2702-2703, 2704-2705, 2706-2707, 2708-2709, 2710-2711, 2712-2713, 2714-2715, 2716-2717, 2718-2719, 2720-2721, 2722-2723, 2724-2725, 2726-2727, 2728-2729, 2730-2731, 2732-2733, 2734-2735, 27

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Thank you for your response.

13. Marie Morley – Flat 2

የጽሁፍ ፊርማ: _____
 የጽሁፍ ቀን: _____
 የጽሁፍ ቦታ: _____
 የጽሁፍ ስም: _____

Thank you, too!

well done. Very happy for you or Dean to sign for me as I don't have access to a server.

Keywords:

Maze

Send Us Your Phone

We, the undersigned, are Leaseholders of the Cobalt Building- with flats facing onto Viscount Street. We formally object to the plan put forward by Taylor Wimpey, the Property Developer of Bernard Morgan House (BMH). The plans exhibited to local residents in May 2016, show an extension of the current footprint of BMH into a higher, wider and deeper building – with a direct impact on the residential amenity we currently enjoy in our homes.

Our concerns and objections to the BMH plan are as follows:

1. The "Public Consultation" has been deficient in due process since it did not involve Cobalt owners until recently.
 - 1.1. The feedback from Cobalt Building residents was not reflected in the plan exhibited by Westbourne Communications in May 2016 – a plan that has a markedly more deleterious impact on the Cobalt Building than the one first shown in January (according to the early schematics we have now seen).
 - 1.2. Our feedback is also ignored and is not taken into account in the recent application plan that Taylor Wimpey submitted to City Planners on the 10th of June 2016.
2. BMH site has been extended towards the Cobalt Building, away from Bowater House.
 - 1.1. The proposed redevelopment is of a scale that is not in keeping with the area. It is considerably higher than the existing BMH building and two storeys higher than the top of the roof of neighbouring Cripplegate building. It will reduce the light – and obscure the views of Bowater House and the Cobalt Building (with flats facing onto Viscount Street).
 - 1.2. The proposed development extends well beyond the current footprint of BMH, with a major expansion of the side of the building that faces Brackley Street – reaching four storeys on Viscount Street. We believe the new building extension is too close to the Cobalt. BMH flats will overlook our windows and will also reduce / intrude our privacy. Also it should be no more than two floors high – and should not extend down Brackley Street towards Viscount Street.
 - 1.1. The current proposal for inset balconies on the BMH flats facing Brackley Street – with terraces on the top floors – will result in increased noise.
 - 1.2. The proposal to transform the existing green space at the side of the BMH site bordering onto Viscount Street into a "public pocket park" fills us with horror. Who will manage this space? Will there be a security guard? Will the police respond to calls if there is trouble? A motorbike car parking area on Viscount Street attracted gang of thieves and a great deal of anti-social behaviour – before being closed in 2002. We fear the same will happen with the pocket park. Please retain the 'green' space – but do not turn it into a 'public' space.
 - 1.3. Flats 1, 2 and 3 of the Cobalt Building are on the ground floor (facing Viscount Street) and likely to suffer the most from the reduced light, increased noise and disruption caused by the pocket garden.
3. Negative impact on Brackley and Viscount Street.

The impact on Cobalt & local residents would be detrimental in many ways.


 - 3.1. While construction is underway, there will be increased noise, traffic and pollution.
 - 3.2. In the longer-term, there will be:
 - A significant reduction in light to Cobalt flats facing Viscount and Brackley Street especially during the winter months when the sun is low in the sky.
 - An increased traffic, pollution, noise which will disrupt the quiet environment and residence.
 - The traffic and servicing requirements will transform Brackley Street from a quiet side road into a busy through road which it is not designed to accommodate.
 - A potential issue with noise, anti-social behaviour and security.

We request that City Planners to consider and to address our concerns above to ensure that:

- a) BMH will be built within its current footprint;
- b) The height of BMH will not affect the light and view of the Cobalt Flats and of the surrounding buildings;
- c) The quietness, tidiness and security of the neighborhood environment and space will be maintained during BMH construction and also in the long-term.

Below are signatures from the Cobalt Leaseholders with flats facing Viscount Street and Brackley Street.

Cobalt Leaseholders	Flat	Signature
Mai Le Verschoyle	1	
Marie Morley	2	
Anjana Raghunath	3	
Dean Wybrow / Tommy Johansson	4	
David Vickers	7	
Naren Joshi	8	
Ryan Ramsay	9	
Tom Gadsden	10	
Jane Norrie	15	
Edmund Carroll	16	
Ms Feldman	17	
Sue Weeks	18	
Andy Harrison	23	
Richard McKeown	24	
MA Res. Finanziaria SRL	25	
Richard Shaw	26	
MinHui Wong	31	
AGENT - Francesca Saplano	32	
Anil Vashisht	33	
AGENT - Francesca Saplano	34	
Mr Zampetti	39	
Norma Wee	40	
Linda Lek	41	
Derrick & Kelly Wee	42	
Simon Towns	47	
SonalGadhvi/ OviJit Paul	48	
Stephen Lerner	49	
Stephen Tromans	50	
Edmund Carroll	55	
Nirmani Shah	56	

Peter Heavyside	12A		peter.heavyside@globalorient.com

**CONFIDENTIAL
FORMAL PETITION**

TO: The Director of TAYLOR WIMPEY
C/O Mr James Wickett-Whyte
Director of WESTBOURNE COMMUNICATIONS
17 Carlton House Terrace
London
SW1Y 5AH

FROM: COBALT BUILDING, 10-15 BRIDGEWATER SQUARE, LONDON EC2Y 8AH

CC: Mrs Annie Hampson
Chief Planning Officer and Development Director
CITY OF LONDON
Guildhall
PO Box 270
London
EC2P 2EJ

SUBJECT: THE REDEVELOPMENT OF BERNARD MORGAN HOUSE, 43 BRACKLEY STREET, BARRICAN

DATE: JUNE 2016

We, the undersigned, are Leaseholders of the Cobalt Building.

We formally object to the plans being put forward by you as the Property Developer of Bernard Morgan House ("BMH"). As you may be aware half of our building has flats facing onto Viscount Street but we believe that our entire building will be impacted by the above. We set out our reasons below. The plans exhibited to local residents in May 2016, show an extension of the current footprint of BMH into a higher, wider and deeper building which will have a direct impact on the pleasant residential amenities we currently enjoy in our homes both during the BMH redevelopment phase and afterwards.

Our concerns and objections to the current BMH redevelopment plans are as follows:

1. The "Public Consultation" has been deficient in due process. This is because it did not involve Cobalt Building Leaseholders until recently. Further, it is to be noted that the BMH redevelopment proposals came to our attention in March (over two months after the first "Public Consultation" done by yourselves) and only due to our own diligence. As soon as we became aware of the redevelopment proposal, comments were provided to Westbourne Communications by email and on their dedicated website. However:
 - 1.1. The feedback from Cobalt Building Leaseholders was not reflected in the plan exhibited by Westbourne Communications in May 2016 – a plan that has a markedly more deleterious impact on the Cobalt Building than the one first shown in January (according to the early schematics we have now seen).
 - 1.2. Our understanding is that you have submitted to City of London Planners on the 10th of June 2016 the application, which was exhibited in May 2016. If so, we are concerned that it may not have taken into account our views as in this petition.

Page 1 of 6

- 1.3. We are also aware that other neighbourhood estates have been more actively consulted on the basis that you had built them, albeit some years ago.
 - 1.4. We can, therefore, only conclude that Taylor Wimpey do not regard us - Cobalt Building Leaseholders - as a relevant constituency for engagement on this major redevelopment work in our neighbourhood and for the purposes of the "public consultation" although our Cobalt Building and our presence exist in the community since 1997.
2. **Redeveloped BMH will be extended far towards the Cobalt Building and away from Bowater House. This gives rise to major concerns:**
 - 2.1. **Daylight and Sunlight Obstruction** - The proposed redevelopment is of a scale that is not in keeping with the existing daylight and sunlight aspects that we receive. It is considerably higher than the existing BMH building and two storeys higher than the top of the roof of neighbouring Cripplegate building. This will reduce the light (daylight and sunlight) of the Cobalt Building flats facing onto Viscount Street.
 - 2.2. **Change of view** - Furthermore the views from these flats will change considerably from open sky to building façade.
 - 2.3. **Lack of privacy** - The proposed development extends well beyond the current footprint of BMH, with a major expansion of the side of the building that faces Brackley Street - reaching as high as four storeys and onto a significant part of Brackley Street and coming very close to Viscount Street. We believe the new building extension is too close to the Cobalt Building. BMH flats will encroach and overlook our windows and will also reduce, if not intrude on, our privacy. As a solution, we would suggest that the height on the Viscount Street side should be no more than two floors high and should not extend down Brackley Street towards Viscount Street beyond the current main BMH building footprint.
 - 2.4. **Increased noise levels** - The current proposal for inset balconies on the BMH flats facing Brackley Street - with terraces on the top floors - will result in increased noise levels when these are kept open and /or in use. Moreover, as the walls of the existing surrounding building walls will be so close to the proposed BMH house and both Viscount Street and Brackley Street are very narrow roads, there will be tunnel effects created and persistent echoes.
 - 2.5. **Potential risk of vagrants and anti-social behaviour** - The proposal to transform the existing green space at the side of the BMH site bordering onto Viscount Street into a "public pocket park" fills us with horror. Who will manage this space? Will there be a 24 hour security guard? Will the police respond to calls if there is trouble? We note that there was previously a motorbike parking area on Viscount Street which attracted gangs of thieves and a great deal of anti-social behaviour before it was closed in 2002. We fear the same will happen with the pocket park. We would suggest that the 'green' space in the same form and footprint as current is retained and it is not turned into a 'public' space.
 - 2.6. The Cobalt Building flats which face Viscount Street are likely to suffer the most from the reduced light, lack of privacy, increased noise and disruption caused by the pocket garden.
 3. **Negative impact on the neighbourhood and Cobalt Building. The impact on Cobalt Building and local residents would be detrimental in many ways.**
 - 3.1. We understand that the existing BMH will be demolished. Whilst this occurs and as construction gets underway, there will be increased noise, traffic and pollution. The Cobalt Building is already enduring many months of refurbishment work going on in Blake Tower which, despite being clad and only having refurbishment works done, has caused and is causing significant noise and environmental pollution, impacting the peace and well-being

of residents. This is our practical first experience and we do not wish to see a repeat of this from the BMH redevelopment.

3.2. In the longer-term, there will be:

- A significant reduction in light to Cobalt Building flats facing Viscount Streets and Brackley Street especially during the winter months when the sun is low in the sky.
- Increased traffic, pollution, noise which will disrupt the quiet and pleasant environment and residence and adversely impact the health of the local residents.
- The traffic and servicing requirements will transform Viscount Street, Brackley Street and Fann Street from quiet side roads into a busy through roads which they are not simply designed to accommodate and will increase the risk of unfortunate accidents besides congestion.
- Increased demand on the local services
- Potential issues with noise, anti-social behaviour and security of the neighbourhood.

We understand that you have had a number of meetings with the City of London Corporation Planners since your purchase of BMH from the Corporation last year. Therefore we request that you and the City of London Corporation Planners consider and actively address all our concerns above so as to ensure that:

- a) BMH will be rebuilt within its current footprint;
- b) The height of BMH will not affect the light and views of the Cobalt Building flats and of the surrounding buildings;
- c) The quietness, tidiness and security of the neighborhood environment and space will be respected and maintained during BMH redevelopment and in the long-term.



EDMUND CARROLL

FLAT 16 COBALT BUILDING

FLAT 55 COBALT BUILDING

We, the undersigned, are Leaseholders of the Cobalt Building- with flats facing onto Viscount Street. We formally object to the plan put forward by Taylor Wimpey, the Property Developer of Bernard Morgan House (BMH). The plans exhibited to local residents in May 2016, show an extension of the current footprint of BMH into a higher, wider and deeper building – with a direct impact on the residential amenity we currently enjoy in our homes.

Our concerns and objections to the BMH plan are as follows:

1. The "Public Consultation" has been deficient in due process since it did not involve Cobalt owners until recently.
 - 1.1. The feedback from Cobalt Building residents was not reflected in the plan exhibited by Westbourne Communications in May 2016 – a plan that has a markedly more deleterious impact on the Cobalt Building than the one first shown in January (according to the early schematics we have now seen).
 - 1.2. Our feedback is also ignored and is not taken into account in the recent application plan that Taylor Wimpey submitted to City Planners on the 10th of June 2016.
2. BMH site has been extended towards the Cobalt Building, away from Bowater House.
 - 1.1. The proposed redevelopment is of a scale that is not in keeping with the area. It is considerably higher than the existing BMH building and two storeys higher than the top of the roof of neighbouring Cripplegate building. It will reduce the light – and obscure the views of Bowater House and the Cobalt Building (with flats facing onto Viscount Street).
 - 1.2. The proposed development extends well beyond the current footprint of BMH, with a major expansion of the side of the building that faces Brackley Street – reaching four storeys on Viscount Street. We believe the new building extension is too close to the Cobalt. BMH flats will overlook our windows and will also reduce / intrude our privacy. Also it should be no more than two floors high – and should not extend down Brackley Street towards Viscount Street.
 - 1.1. The current proposal for inset balconies on the BMH flats facing Brackley Street – with terraces on the top floors – will result in increased noise.
 - 1.2. The proposal to transform the existing green space at the side of the BMH site bordering onto Viscount Street into a "public pocket park" fills us with horror. Who will manage this space? Will there be a security guard? Will the police respond to calls if there is trouble? A motorbike car parking area on Viscount Street attracted gang of thieves and a great deal of anti-social behaviour – before being closed in 2002. We fear the same will happen with the pocket park. Please retain the 'green' space – but do not turn it into a 'public' space.
 - 1.3. Flats 1, 2 and 3 of the Cobalt Building are on the ground floor (facing Viscount Street) and likely to suffer the most from the reduced light, increased noise and disruption caused by the pocket garden.
3. Negative Impact on Brackley and Viscount Street.

The impact on Cobalt & local residents would be detrimental in many ways.

 - 3.1. While construction is underway, there will be increased noise, traffic and pollution.
 - 3.2. In the longer-term, there will be:
 - A significant reduction in light to Cobalt flats facing Viscount and Brackley Street especially during the winter months when the sun is low in the sky.
 - An increased traffic, pollution, noise which will disrupt the quiet environment and residence.
 - The traffic and servicing requirements will transform Brackley Street from a quiet side road into a busy through road which it is not designed to accommodate.
 - A potential issue with noise, anti-social behaviour and security.

We request that City Planners to consider and to address our concerns above to ensure that:

- a) BMH will be built within its current footprint;
- b) The height of BMH will not affect the light and view of the Cobalt Flats and of the surrounding buildings;
- c) The quietness, tidiness and security of the neighborhood environment and space will be maintained during BMH construction and also in the long-term.

Below are signatures from the Cobalt Leaseholders with flats facing Viscount Street and Brackley Street.

Cobalt Leaseholders	Flat	Signature
Mai Le Verschoyle	1	
Marie Morley	2	
Anjana Raghunath	3	
Dean Wybrow / Tommy Johannson	4	
David Vickers	7	
Naren Joshi	8	
Ryan Ramsay	9	
Tom Gadsden	10	
Jane Norrie	15	
Edmund Carroll	16	
Ms Feldman	17	
Sue Weeks	18	
Andy Harrison	23	
Richard McKeowns	24	
MA Res. Finanziaria SRL	25	
Richard Shaw	26	
MinHui Wong	31	
AGENT - Francesca Sapiano	32	
Anil Vashisht	33	
AGENT - Francesca Sapiano	34	
Mr Zampetti	39	
Norma Wee	40	
Linda Lek	41	
Derrick & Kelly Wee	42	
Simon Towns	47	
SonalGadhvi/ Ovijit Paul	48	
Stephen Lerner	49	
Stephen Tromans	50	
Edmund Carroll	55	
Nirmani Shah	56	

Peter Heavyside	12A	Signed (signature attached)	

.....

of residents. This is our practical first experience and we do not wish to see a repeat of this from the BMH redevelopment.

3.2. In the longer-term, there will be:

- A significant reduction in light to Cobalt Building flats facing Viscount Streets and Brackley Street especially during the winter months when the sun is low in the sky.
- Increased traffic, pollution, noise which will disrupt the quiet and pleasant environment and residence and adversely impact the health of the local residents.
- The traffic and servicing requirements will transform Viscount Street, Brackley Street and Fann Street from quiet side roads into a busy through roads which they are not simply designed to accommodate and will increase the risk of unfortunate accidents besides congestion.
- Increased demand on the local services
- Potential issues with noise, anti-social behaviour and security of the neighbourhood.

We understand that you have had a number of meetings with the City of London Corporation Planners since your purchase of BMH from the Corporation last year. Therefore we request that you and the City of London Corporation Planners consider and actively address all our concerns above so as to ensure that:

- a) BMH will be rebuilt within its current footprint;
- b) The height of BMH will not affect the light and views of the Cobalt Building flats and of the surrounding buildings;
- c) The quietness, tidiness and security of the neighborhood environment and space will be respected and maintained during BMH redevelopment and in the long-term.



DA LAPISH

18/6/16

Floor 54

Cobalt Building



We request that City Planners to consider and to address our concerns above to ensure that:

- a) BMH will be built within its current footprint;
- b) The height of BMH will not affect the light and view of the Cobalt Flats and of the surrounding buildings;
- c) The quietness, tidiness and security of the neighborhood environment and space will be maintained during BMH construction and also in the long-term.


Below are signatures from the Cobalt Leaseholders with flats facing Viscount Street and Brackley Street.--> I can amend to include any flats that wish or wish not to be included in the petition

Cobalt Leaseholders	Flat	Signature	Email
Mai Le Verschoyle	1		
Marie Morley	2		
Anjana Raghunath	3		
Dean Wybrow / Tommy Johansson	4		
David Vickers	7		
Naren Joshi	8		
Ryan Ramsay	9		
Tom Gadsden	10		
Jane Norrie	15		
Edmund Carroll	16		
Ms Feldman	17		
Sue Weeks	18		
Andy Harrison	23		
Richard McKeowns	24		
MA Res. Finanziaria SRL	25		
Richard Shaw	26		
MinHui Wong	31		
AGENT - Francesca Sapiano	32		
Anil Vashisht	33		
AGENT - Francesca Sapiano	34		
Mr Zampetti	39		
Norma Wee	40		
Linda Lak	41		
Derrick & Kelly Wee	42		
Simon Towns	47		
SonalGadhvi/ Oviijt Paul	48		
Stephen Lerner	49		
Stephen Tromans	50		
Edmund Carroll	55		
Nirmani Shah	56		

Below are signatures from the Cobalt Building Leaseholders.

Cobalt Leaseholders	Flat	Signature
Mai Le Verschoyle	1	
Marie Morley	2	
Peter Heavyside	12A	
Meera Shah	27	
Priya Shah	28	
Jane Norrie	15	
Andy Harrison	23	
MinHui Wong	31	
Rajan Vatish	38	
Mukesh Raja	36	
Nirman Shah	56	
Andy Harrison	23	
c/o AGENT - Francesca Sapiano	34	
Mr Zampetti c/o Chelsea Property Management	39	
Norma Wee	40	
Norma Wee	35	
Derrick & Kelly Wee	42	
Simon Towns	47	
Mr. Ovijs Paul Dr. Sonal Gadhvi	48	
c/o AGENT - Francesca Sapiano	32	
25 DRAUGHT PLACE LTD (LONDON)	L/L	

Below are signatures from the Cobalt Building Leaseholders.

Cobalt Leaseholders	Flat	Signature
Mai Le Verschoye	1	
Marie Morley	2	
Peter Heavyside	12A	
Meera Shah	27	
Priya Shah	28	
Jane Norrie	15	
Andy Harrison	23	
MinHui Wong	31	
Rajan Vatish	38	
Mukesh Raja	36	
Nirman Shah	56	
<i>Sue Weeks</i> Andy Harrison	18 29	
c/o AGENT - Francesca Sapiano	34	
Mr Zampetti c/o Chelsea Property Management	39	
Norma Wee	40	
Norma Wee	35	
Derrick & Kelly Wee	42	
Simon Towns	47	
Mr Oviat Paul Dr Sonal Gadhvi	48	
c/o AGENT - Francesca Sapiano	32	
Stephen Tromans	50	

Please find below documents enclosed with the Cobalt Residents petition:

- I. Cover Letter
- II. Cobalt Residents Petition
- III. List of Leaseholders with signatures /scanned signatures/ PP Signatures with enclosed attachments as follows:
 - Signed
 1. Flat 1 – Mai Le Verschoyle
 2. Flat 27 – Meera Shah
 3. Flat 28 – Priya Shah
 4. Flat 38 – Rajan Vatish
 5. Flat 56 – Nirmani Shah
 6. Flat 48 – Ovijit Paul and Sonal Gadhvi
 7. Flat 45 – Sylvia Smit
 8. Flat 4 – Dean Wybrow and Tommy Johansson
 9. Flat 37 – Elizabeth Patterson
 10. Flat 22 – Paola Perotti
 11. Flat 31 – Minhui Wong
 - Scanned of signed versions:
 12. Freeholder / Landlord – 25 Draycott Place Limited
 13. Flat 12A – Peter HeavySide
 14. Flat 15 – Jane Norrie
 15. Flat 47 – Simon Towns
 16. Flat 21 – Nick Prior
 17. Flat 7 – David and Julia Vickers
 18. Flat 8 – Naren Joshi
 19. Flat 54 – David Lapish
 20. Flat 23 – Andy Harrison
 - Emails of approvals for PP signatures:
 21. Flat 2 – Marie Morley
 22. Flat 18 – Sue Weeks
 23. Flat 35 – Norma Wee
 24. Flat 40 – Norma Wee
 25. Flat 42 – Norma Wee
 26. Flat 50 – Stephen Tromans
 27. Flat 19 – Suresh Nair
 28. Flat 30 – Paul & Lynette Foil
 29. Flat 49 – Stephen Lerner
 30. Flat 32 – C/o Agent Francesca Sapiano
 31. Flat 3 – Ravindranath Raghunath
 32. Flat 36 – Mukesh Raja
 33. Flat 11 – Anil Vashisht
 34. Flat 33 – Anil Vashisht
 35. Flat 17 – Laura Feldman

Below are signatures from The Cobalt Building Leaseholders.

Cobalt Leaseholders	Flat
<u>Mai Le Verschylle</u>	1
<u>Marie Morley</u>	2
<u>Peter Hazzard</u>	32A
<u>Meera Shah</u>	27
<u>Priya Shah</u>	28
<u>Jane Norrie</u>	15
<u>Andy Harrison</u>	23
<u>Manhui Wong</u>	37
<u>Karen Vainio</u>	38
<u>Mukesh Raja</u>	36
<u>Gurpreet Shah</u>	56
<u>Andy Harrison</u>	23
<u>On AGENT - Francesca Sapiano</u>	34
<u>Mr Zampetti</u>	
<u>c/o Chubca Property Management</u>	39
<u>Norma Wee</u>	40
<u>Norma Wee</u>	35
<u>Deirdre & Kelly Wee</u>	42
<u>Simon Toms</u>	47
<u>Mr David Paul</u>	
<u>of Coral Garden</u>	43
<u>c/o AGENT - Francesca Sapiano</u>	32
<u>PHILIP - [unclear]</u>	7

Signature from Nick Prior – Leaseholder of Flat 21

From: Prior, Nick (UK - London) [REDACTED]
Sent: 16 June 2016 21:56
To: 'inverscayle@gmail.com'
Cc: Pugh, Elizabeth (UK - London)
Subject: RE: Bernard Morgan House development - Cobalt Building Formal Petition

Hi Ma! ~ absolutely!
Liz ~ can you please forward my electronic signature to Ma?
Many thanks
Nick



File name: Nick Prior Electronic Signature.docx

Size: 26 KB

Author: epugh

Last changed: 17 June 2016

Message: Nick Prior Electronic Signature.docx (26 KB)



Below are signatures from the Cobalt Building Leaseholders.

Cobalt Leaseholders	Flat	Signature
Mai Le Verschoyle	1	
Marie Morley	2	
Peter Heavyside	12A	
Meera Shah	27	
Priya Shah	28	
Jane Norrie	15	
Andy Harrison	23	
MinHui Wong	31	
Rajan Vathish	38	
Mukesh Raja	36	
Nirman Shah	56	
Andy Harrison	23	
c/o AGENT - Francesca Sapiano	34	
Mr Zampetti c/o Chelsea Property Management	39	
Norma Wee	40	
Norma Wee	35	
Derrick & Kelly Wee	42	
Simon Towns	47	
Mr OVijit Paul Dr Sonal Gadhvi	48	
c/o AGENT - Francesca Sapiano	32	
NAREN JETHI	8	

Below are signatures from the Cobalt Building Leaseholders.

Cobalt Leaseholders	Flat	Signature
Mai Le Verschoyle	1	
Marie Morley	2	
Peter Heavyside	12A	
Meera Shah	27	
Priya Shah	28	
Jane Norrie	15	
Andy Harrison	23	
MinHui Wong	31	
Rajan Vatish	38	
Mukesh Raja	36	
Nirmani Shah	56	
Andy Harrison	23	
c/o AGENT - Francesca Sapiano	34	
Mr Zampetti c/o Chelsea Property Management	39	
Norma Wee	40	
Norma Wee	35	
Derrick & Kelly Wee	42	
Simon Towns	47	
Mr OVJit Paul Dr Sonal Gadhvi	48	
c/o AGENT - Francesca Sapiano	32	
NAREN JOHI	8	

Below are signatures from the Cobalt Building Leaseholders.

Cobalt Leaseholders	Flat	Signature
Mai Le Verschoren	1	
Maria Morley	2	
Peter Heavyside	12A	
Meera Shah	27	
Priya Shah	28	
Jane Norton	15	
Andy Harrison	23	
MintHui Wong	31	
Rajan Vaurish	35	
Mukesh Kaje	36	
Neeraj Shah	56	
Andy Harrison	23	
c/o AGENT - Francesca Sapiano	34	
Mr Zampetti c/o Chelsea Property Management	39	
Norma Wee	45	
Norma Wee	35	
Derrick & Kelly Wee	42	
Simon Towns	47	
Mr Divjit Paul Or Sonal Gadhani	48	
c/o AGENT - Francesca Sapiano	32	



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

Sent by email: PLNComments@cityoflondon.gov.uk

11th August 2016

Our ref: 15 05 22

Dear Catherine Linford,

16/00590/FULL Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works at Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Thank you for consulting the Twentieth Century Society on the above planning application. The Society wishes to strongly **object** to the application, as we consider it will result in the loss of one important non-designated heritage asset, and harmfully impact the setting of another. The letter below sets out our views in further detail.

Significance

Bernard Morgan House as a Police Section House designed in 1957-9 and built in 1960 to the designs of J. Innes Elliott, the chief architect and surveyor for the Metropolitan Police. It sits in an angled plot next to and aligned with the Golden Lane estate, and clearly draws its architectural cues from its Grade II listed neighbour Bowater House of 1956.

The building comprises of a long slab and a single storey service wing, and is remarkable in its detailing and use of traditional materials such as napped flint, pebble stone and slate on the facades. It has distinctive glazed tile work of high quality, and external terraces and the sunken garden are of York paving. Interiors were carefully considered, with floors finished in African Missandra hard wood in entrance and visitor areas, terrazzo tiling in wash rooms, quarry tiles for kitchens and stores, and marble for landings and stairs. The upper floors have 24 bedrooms each, originally with in-built furniture.

J. Innes Elliott was an architect of considerable standing, responsible for 16 different post-war Met buildings that were published in the architectural press. We consider this to be one of his most sophisticated designs, and of importance for being the first modernist post-war Police Section House. Due to its considerable architectural and historic value, the Society strongly supported a listing application made to Historic England in May 2015, and despite the fact it was ultimately not recommended for national listing, it should be recognised as a non-designated heritage asset of local significance.

Immediately to the east of Bernard Morgan House on the same plot lies the Jewin Welsh Church by Caroe & Partners of 1956-61 which replaced an older chapel of 1879. Together with Bowater House, these buildings form a group of special interest and make an important contribution to the particular post-war character of this part of the City.

Policy

Paragraph 131 of the NPPF states that in determining planning applications, local authorities should take account of both 'the desirability of sustaining and enhancing the significance of heritage assets'.

Paragraph 135 states that 'the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application... a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.'

The City of London Local Plan 2015 Policy DM12.1, which supports the Core Strategic Policy CS12 covering the historic environment, states that in managing change affecting all heritage assets and spaces, the City should wherever possible seek to 'sustain and enhance heritage assets, their settings, and significance'. It goes on to state that 'development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.'

Comment

The Twentieth Century Society considers that the demolition of the Bernard Morgan House would result in the total loss of a non-designated heritage asset, and would constitute harm to the character of an area that is defined by its high calibre listed and non-listed post-war architecture.

We consider that the design of the new development takes little heed of this context due to its increased footprint, height and plan form, which in combination will result in the new building wrapping and dominating the church.

We urge that in line with national and local policy, the City of London deny permission for demolition, and we strongly encourage the applicant to consider alternative and sustainable schemes for Bernard Morgan House that will sensitively refurbish the current building, which is structurally sound and in a good state of repair.

I trust that these comments are of use to you. Please do not hesitate to contact me at this office 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.

Adjei, William

From: Linford, Catherine
Sent: 27 July 2016 10:51
To: Adjei, William
Subject: FW: OBJECTION to Bernard Morgan House Development

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

From: Harry [REDACTED]
Sent: 24 July 2016 23:24
To: [REDACTED]
Ann: [REDACTED]
Cc: [REDACTED]
Pank: [REDACTED]
Subject: OBJECTION to Bernard Morgan House Development

Hello All

We live in Bowater House and we would like to OBJECT to the above development. We would like development only to the extent as current dimensions ie NO higher than current building and NO development than the existing building space. This means no higher building than the current one and no occupation of space more than the current building.

Further we object cutting of mature trees more than 30 years old.

We have been here for 30 years and we do not want our sunlight to be blocked in any way and have any trees to be removed.

We hope that you recognise and note our objections.

Best Regards

Harish Pankhania

24 Bowater House

EC14 0RT

ACKNOWLEDGED

\$

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mr Andrew Harrison

Address: Flat 23 Cobalt Building 10-15 Bridgewater Square London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: I am raising an objection to the development at Bernard Morgan House (App' ref 16/00590/FULL)

As a resident of an apartment in the Cobalt building, which will face the development, I have a major concern that the development is significantly larger and more dominating than the current structure. This seems disproportional to the site and the area.

I have major concerns that a development of this size will severely impact on the Cobalt building and in particular my apartment, which faces the building and is on a relatively low floor.

I am supportive of a more modest development on a scale similar to the existing building and leaving some more open space.

My chief concerns are of the noise impact of so many apartment so closely abutting neighboring buildings and the light a structure of the proposed size will eliminate, both from the apartments facing the development and the surrounding area. In addition I have concerns about the privacy of my apartment with new apartments looking directly into the Cobalt building.

The area is already densely populated and the development should consider that we do not want to increase the density and reduce the quality of the area for existing and new residents. There is an opportunity here to build a high quality smaller block which will be a win win for both the

developer and the existing residents of the area. What we do not need is a developer to simply maximize the number of units they can build in the area then walk away leaving us with the ramifications for the next 50 years.

Please ensure this development is scaled back to a building of similar proportions to the existing structure and all the residents both new and old will have a better quality of life for decades to come.

As long time, long term residents we are reliant on the Planning Officer to protect our environment and ensure we have reasonable high quality living space for us and future generations.



Hatching Dragons

Helping your Baby Fly through Life



Catherine Linford
Assistant Director (Development Management)
Department of the Built Environment
City of London Corporation
Guildhall Buildings,
London
EC2P 2EJ

Monday, August 8, 2016

RE: Taylor Wimpey Development of Bernard Morgan House
REF: PT_CL/16/00590/FULL

Dear Catherine

I received a copy of your letter regarding the above development from John Whitehead. As the owner of hatching Dragons, the nursery located in Jewin Chapel and therefore located only a matter of metres from the proposed development, clearly the proposed plans are of huge concern to us, given what we do and the potential impact it can and will have on our day to day operations.

Both the Chapel and myself have made representations to Taylor Wimpey (please see attached submission to the pre-consultation plans submitted in February 2016) but have not had any response from the developer.

Clearly, we have a responsibility to provide the children and the families that we serve with an optimal learning environment but have seen no environmental impact assessments from Taylor Wimpey to better understand what impact the demolition and development will have on our nursery and the children that frequent the setting. During our meeting with the developer in March, their representative said that no such requirement was necessary for the size and scale of this development, which I can't understand, given the obvious risk that it poses to children by way of construction dust and other issues.

I have been in email contact with Peter Shadbolt, Rob Chipperfield, met with Neal Hounsell and Will Wright to try and establish a solution that would allow us to temporarily relocate during the works but nothing has materialized as of yet. There was some talk about the Golden Lane Community Hall amongst other options but things have stalled.

I am forwarding you our original positioning paper submitted to Taylor Wimpey in the hope that you can more formally register our concerns with them and our hope to secure some support to relocate for the duration of the works and to provide me, if possible, with some information as to how best register our concerns. Both myself and the local families we serve want our voices to be heard

Best
Cennydd John

ADDRESS

PHONE

WEB

ACKNOWLEDGED



Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mr Peter Heavyside

Address: Flat 12a, The Cobalt Building 10-15 Bridgewater Square London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: The proximity of the proposed BMH development to The Cobalt Building will introduce considerable noise pollution to us over the period of the construction. The current proposal for inset balconies on the BMH flats facing Brackley Street - with terraces on the top floors - will result in increased noise levels when these are kept open and /or in use. Moreover, as the walls of the existing surrounding building walls will be so close to the proposed BMH house and both Viscount Street and Brackley Street are very narrow roads, there will be tunnel effects created and persistent echoes.

The proposed redevelopment is of a scale that is not in keeping with the existing daylight and sunlight aspects that we receive. It is considerably higher than the existing BMH building and two storeys higher than the top of the roof of neighbouring Cripplegate building. This will reduce the light (daylight and sunlight) of The Cobalt Building flats facing onto Viscount Street. The proposed development extends well beyond the current footprint of BMH, with a major expansion of the side of the building that faces Brackley Street - reaching as high as four storeys and onto a significant part of Brackley Street and coming very close to Viscount Street. We believe the new building extension is too close to The Cobalt Building. BMH flats will encroach and overlook our windows and will also reduce, if not intrude on, our privacy. As a solution, we would suggest that the height on the Viscount Street side should be no more than two floors high and should not extend down Brackley Street towards Viscount Street beyond the current main BMH building footprint.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mr Simon Towns

Address: Flat 47, The Cobalt Building 10-15 Bridgewater Square London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: I would like to object to the height and density of the proposed development.

The proposed building will mean that my flat will be looked over by the new apartments which means a loss of privacy, light and sight lines across the city.

The proposed building is out of scale with the rest of the development in the area particularly the church.

The public park will lose afternoon sunshine in the summer.

The area is already congested and there simply isn't space for extra parking in the area.

Whilst the building work is being carried out the flat will be subject to all the noise of the building site.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mrs NORMA WEE

Address: Flat 40 Cobalt Building 10-15 Bridgewater Square London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment:Currently Flat 40 gets minimal lighting as it's not South west facing. With the height of this new building, it would shut off the limited lighting to our flat; which is unacceptable.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Dr Sonal Gadhvi

Address: Flat 48, The Cobalt Building, London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment:1)Noise- From the proposed public park. There is already one nearby, noisy public park opposite Bernard Morgan House (Fortune Street). There is no additional benefit of a second public park - it will lead to loss of privacy for neighboring flats, especially those on the ground floor/overlooking proposed park.

2) Residential amenity - the proposed building has a significantly higher height and bulk (extending onto Vicount Street/Brackley Street) which will cause over shadowing and significantly change the outlook from the flats on The Cobalt Building facing directly onto the new building.

Please note - after initial consultation (when The Cobalt was not informed of) the height was reduced on the side facing Fann Street and subsequently added to the Brackley Street half of the building - thus impacting on flats the other side).

The extension towards Viscount Street/proposed balconies will lead to loss of privacy).

The height of the building will cause over-showing and lead to loss of light to the neighboring Cobalt Building.

Proposed public garden poses risk to safety and encouragement of crime (which has been a problem in the area in the past). This will lead to loss of privacy for people at The Cobalt and nearby buildings).

3)Traffic/Highways - There is likely to be increased congestion in an already narrow roaded area.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mr Ovijit Paul

Address: Flat 48, The Cobalt Building Bridgewater Sq London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: The four main points for objection are:

- The height of the building is too high compared to the neighbouring buildings, and significantly impacts the light (overshadowing), privacy (overlooking) and outlook from the Cobalt building.
- The plans are encroaching too far west down Brackley St, further impacting the light, privacy and outlook from the Cobalt building.
- Brackley st is a narrow road. The increased number of vehicles using this road to access the new building would significantly increase the traffic in the area.
- The proposed open area will add additional noise.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Ms Mai Le Verschoye

Address: Flat 1 The Cobalt Building 10-15 Bridgewater Square London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: I object the plan submitted for the redevelopment of Bernard Morgan House (BMH) (16/00590/FULL) because:

- The proposed plan is of a massive scale in height and extends beyond the current footprint of BMH.
- There is a major extension coming toward Viscount Street and is too close to the Cobalt Building and to my flat. The proposal of inset balconies with many terraces facing Brackley Street and Viscount Street will increase the noise levels when they are open or in use. They will also overlook my windows and intrude my privacy.
- The outlook from my windows will be changed from open sky to building façade. There will be a significant reduction /loss of sunlight and daylight to my flat and to Cobalt Building flats facing Viscount Street - Brackley Street especially in the winter months when the sun is low.
- The proposal of a "public pocket park" at the side of BMH site bordering onto Viscount Street and situated opposite my windows fills me with anxiety and distress. There will be potential issues with security, increased noise, disruption and anti-social behaviour, which will have a negative impact on the neighbourhood and the Cobalt Building. This brought back bad memories I encountered with the motorbike parking area at Viscount Street before its closure in 2002.
- The traffic and servicing requirements for BMH will transform Viscount Street, Brackley Street and Fann Street from quiet and narrow side roads into a busy through roads which, they are not designed to accommodate. There will be tunnels effects created and persistent echoes as the walls of existing surrounding building walls will be so close to the proposed BMH house.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Ms Mai Le Verschoye

Address: Flat 1 The Cobalt Building 10-15 Bridgewater Square London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: I object the plan submitted for the redevelopment of Bernard Morgan House (BMH) (16/00590/FULL) because:

- The proposed plan is of a massive scale in height and extends beyond the current footprint of BMH.
- There is a major extension coming toward Viscount Street and is too close to the Cobalt Building and to my flat. The proposal of inset balconies with many terraces facing Brackley Street and Viscount Street will increase the noise levels when they are open or in use. They will also overlook my windows and intrude my privacy.
- The outlook from my windows will be changed from open sky to building façade. There will be a significant reduction /loss of sunlight and daylight to my flat and to Cobalt Building flats facing Viscount Street - Brackley Street especially in the winter months when the sun is low.
- The proposal of a "public pocket park" at the side of BMH site bordering onto Viscount Street and situated opposite my windows fills me with anxiety and distress. There will be potential issues with security, increased noise, disruption and anti-social behaviour, which will have a negative impact on the neighbourhood and the Cobalt Building. This brought back bad memories I encountered with the motorbike parking area at Viscount Street before its closure in 2002.
- The traffic and servicing requirements for BMH will transform Viscount Street, Brackley Street and Fann Street from quiet and narrow side roads into a busy through roads which, they are not designed to accommodate. There will be tunnels effects created and persistent echoes as the walls of existing surrounding building walls will be so close to the proposed BMH house.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mrs Mitra Karvandi-Smith

Address: 544 Ben Jonson House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: I object to the scheme for the following reasons:

1 Scale, massing and height. the proposed development is 50% bigger than that conceived by the city when the site was put up for sale. The new development will block winter sun on the park and playground in the afternoons.

2. The proposed plans ignore The City of London Listed Building Management Guidelines for the Golden Lane Estate; "The views from-as well as into-the estate have become important. Part of the special architectural interest of the estate lies in its relationship with adjacent buildings; their height, scale, mass, form, materials and detailing could, for example, have an impact on that special interest...The relevant local authority should, therefore, take into account the significance of the estate's setting to its special architectural interest when considering any developments on the immediate boundaries of the listed area."

3. The design of the building completely ignores the design and scale of Bowater House and the Jewin Church which will be dwarfed by the new building.

4. The material of the scheme ignores the use of material on Bernard Morgan House. For example, the walls feature knapped flint that is local to the site and the mosaic tiles are a particular feature.

5. Existing services and infrastructure will not be able to cope with so many new residents. For example GP services and schooling for the local population are already under resourced.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mr Stephen Tromans

Address: Flat 50, The Cobalt Building 10-15 Bridgewater Square London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I am concerned that the scale and mass of this proposed building will be out of keeping with the local area, and in particular as to the overshadowing and loss of daylight on neighbouring buildings and outside public spaces. This important impact does not appear to have been properly assessed or consulted on.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mr Thomas Hodson

Address: 52 The Cobalt Building Bridgewater Square London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The proposed building is too high and will affect the light of surrounding residential houses.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Miss Priya Shah

Address: 28 Cobalt Building Bridgewater Square London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: The proposed development is far too large and intrusive and thus must be retained within the existing BMH footprint. This will contain the above issues in terms of noise, residential amenity and traffic both during and after the build.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Ms Mai Le Verschoyle

Address: Flat 1 The Cobalt Building 10-15 Bridgewater Square London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: I object the plan submitted for the redevelopment of Bernard Morgan House (BMH) (16/00590/FULL) because:

- The proposed plan is of a massive scale in height and extends beyond the current footprint of BMH.
- There is a major extension coming toward Viscount Street and is too close to the Cobalt Building and to my flat. The proposal of inset balconies with many terraces facing Brackley Street and Viscount Street will increase the noise levels when they are open or in use. They will also overlook my windows and intrude my privacy.
- The outlook from my windows will be changed from open sky to building façade. There will be a significant reduction /loss of sunlight and daylight to my flat and to Cobalt Building flats facing Viscount Street - Brackley Street especially in the winter months when the sun is low.
- The proposal of a "public pocket park" at the side of BMH site bordering onto Viscount Street and situated opposite my windows fills me with anxiety and distress. There will be potential issues with security, increased noise, disruption and anti-social behaviour, which will have a negative impact on the neighbourhood and the Cobalt Building. This brought back bad memories I encountered with the motorbike parking area at Viscount Street before its closure in 2002.
- The traffic and servicing requirements for BMH will transform Viscount Street, Brackley Street and Fann Street from quiet and narrow side roads into a busy through roads which, they are not designed to accommodate. There will be tunnels effects created and persistent echoes as the walls of existing surrounding building walls will be so close to the proposed BMH house.

- The increased traffic, pollution, noise will disrupt the quiet environment and residence and adversely impact the health of local residents.

I therefore request the Planning Committee to ensure BMH will be rebuilt within its current footprint and height and that the 'green' space is not turned into a 'public' space.

PLANNING & TRANSPORTATION		
PSDT	CPD	PPD
TFD	18 AUG 2016	LTP
OWI		SSE
	127383	PP
		DD

41 Bowater house

Golden Lane Estate

London EC1Y0RJ

9th August 2016

Planning reference number:16/00590/FULL00

Dear Catherine Linford,

I am writing in response to your letter dated 1st August 2016 as regards the development proposed by Taylor Wimpey London Central. I have looked at the planning documents. I am dismayed to see that Taylor Wimpey have disregarded and ignored any comments made by me or my fellow residents in Bowater house.

Firstly, the scale, massing and height of the proposed development are vastly over-sized for the actual site. The new building will block winter sun on the park in the afternoons when school finishes and our children and grandchildren desperately need to boost their Vitamin D levels.

Secondly, the oversized building will also block valuable light and sunlight into all our flats in Bowater House. It is especially valuable to me as I am confined to my flat due to Parkinson's disease and the morning sunlight warms my flat and my balcony. My balcony is my only chance to enjoy an outdoor space and sunshine.

Thirdly, I am surprised to see that the developers have disregarded the City of London Listed Building Management Guidelines for Golden Lane Estate. The proposed building (due to its oversized scale, mass and height) impacts negatively on the views from Bowater house as well as into Bowater House. It seems that the developers and the architects have transplanted and squeezed a building (of inappropriate size and design) from somewhere else. Surely, the city planners must take the guidelines into account as this development is to be built onto the immediate boundary of Golden Lane Estate which is a listed area and is of special architectural interest. I would have hoped that the elevation of the building onto Fann Street would be designed to be in line (in height) with Bowater House thus creating a link between the buildings. Bernard Morgan House was designed to create this link with Golden Lane Estate. The proposed plans indicate the opposite. The elevation will loom over Bowater and the presenting façade clearly looks like a prison wall!

Lastly, I would like to point out that it is increasingly difficult to get appointments at my local GP surgery. The NHS Neaman Practice is over subscribed and is currently considering closing its books. The developers have not taken into account the local infrastructure and its ability to serve a greater demand.

Many thanks,

Yours sincerely,



Doreen Greenfield.

Wells, Janet (Built Environment)

From: DBE - PLN Support
Subject: FW: Objection to the proposed demolition of Bernard Morgan House in Fann street, and the construction of a multi story residential block in its place.

From: Dowsett, Ian
Sent: 10 August 2016 09:17
To: Linford, Catherine
Subject: Objection to the proposed demolition of Bernard Morgan House in Fann street, and the construction of a multi story residential block in its place.

Dear Catherine Linford, FYI I have today submitted the objection below to WWW.planning2.cityoflondon.gov.uk (planning reference – 16/00590/FULL

I would like to strongly object to the proposed demolition of Bernard Morgan House in Fann Street, and the construction of a multi - floored residential block of flats in its place. having worked and lived on Golden lane estate for several years, I feel that the reduction in light brought about by the new structure alone would seriously affect the quality of life for residents of Bowater House and users of Fortune park, and also the adjacent nursery in Golden Lane. I would also like to point out that the Bowater House flats currently have a good absorption rate of the sun's heat, and this is particularly important in the winter months, and I feel strongly that we will lose this additional natural heat with the new construction. I am also concerned about the level of noise and dirt that will be generated by the demolition of the existing building. Finally, in my capacity as a housing officer on Golden lane estate, I have conducted several tours of this iconic grade 2 listed estate with architecture groups from as far a field as Norway and the USA and cannot understand why this proposed "out of scale" building would be permitted, as this will alter the character of the neighbourhood permanently, as well as placing a huge strain on local services.

Mt Address supplied (45 Bowater House, Fann Street, EC1Y 0RJ)

Regards,

Ian Dowsett
Estate Officer
Golden lane Estate Office
Gt Arthur House
Fann Street
London
EC1Y 0RD

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mr Gareth Quantrill

Address: 91 Breton House London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: I have two comments to make having reviewed the proposed plans.

The first is that the "stacking" of the upper floors towards Brackley St will have the effect of blocking all direct evening sunshine to Breton House. This impact could be reduced if the upper floors recede evenly to mirror the Fann St elevation. Or indeed the height of the building being reduced by 1-2 floors.

The second relates to the increased demands on transport; there seems to be no provision for an increase to the TFL bike stand on Golden Lane. Frequently there are no bikes available at this stand and this situation will only be exacerbated by the increase in residents that this development will create.

It should be a condition of the application that bike provision is increased, say by 50%.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Ms Julie Hudson

Address: 20, Breton House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: In my view the proposed building is too high. It will have adverse impacts on many of the residents living around the site. I would suggest submitting a new proposal in tune with the height profile of the existing building.

Adjei, William

From: Linford, Catherine
Sent: 11 August 2016 11:28
To: Adjei, William
Subject: FW: Planning application for bernard Morgan House

From: H PAGE [mailto:]
Sent: 11 August 2016 11:06
To: Linford, Catherine
Subject: Planning application for bernard Morgan House

To whom it may concern

I am deeply distressed by the proposed building on the site of Bernard Morgan House.

As a resident of Bowater House (No 2 on the ground floor) I enjoy the light and sunshine in my living room and on my balcony whenever I'm at home. Although I am currently still working, as a senior citizen, I expect to spend more time at home in the near future but feel very angry that the light and sun I receive at the moment will be denied to me.

Furthermore, I am appalled that the planners are choosing to ignore the City of London Listed Building Management Guidelines for the Golden Lane Estate, in particular, ***"The relevant local authority should, therefore, take into account the significance of the estate's setting to its special architectural interest when considering any developments on the immediate boundaries of the listed area."***

I will be severely affected by this development, which is deeply incompatible in every way (height, scale, mass, etc.) with the existing and adjacent buildings and our community will literally be overshadowed if this development goes ahead.

I would, therefore, ask you to consider the quality of life we, on the Golden Lane Estate currently enjoy, and implore you not to proceed with this building project.

Yours

Heather Page
2 Bowater House

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Miss Elizabeth Jobey

Address: 29 Basterfield House Golden Lane Estate London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: I am objecting to the proposed plan to replace Bernard Morgan House with a giant luxury housing block that will dominate and destroy the balance of our residential neighbourhood. The building is 50 per cent larger than that proposed by the City when they sold the site. It will overlook and remove light from the neighbouring residential blocks. It will dominate the small park, overlook and overcrowd the schools, overburden the traffic systems, and destroy the already overstretched local healthcare provision. It also completely disregards the residential and architectural balance of the area, of which, until this point, the Corporation has been so proud. The public consultation has been sketchy and objections by residents have been ignored. I would like to ask the planning committee to look carefully at the adverse effects of this plan and reject it. It will damage one of the most mixed and well balanced neighbourhoods in central London.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Ms Diana Souhami

Address: Barbican 133 John Trundle Court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: This is a cynical development and should not be approved. I live in the Barbican. From my windows I view the destruction of the city as an affordable place to live and its transformation into a money making dystopia of office blocks and property portfolios. The sale of the Barbican YMCA tower which provided a place to stay for young people, affordable meals, tuition courses, social occasions, and its reincarnation as Blake Tower with even studios at a price of £670K and penthouses at £2million is a metaphor for all that is wrong in the City's decision making.

Affordable housing is the mantra. Let's see some evidence of it. Taylor Wimpey's project is all about making money. No other consideration

10 Bowater House
Golden Lane Estate
London EC1Y0RJ

12/08/16

OBJECT to development

Planning ref: 16/00590/FULL

Dear Madam,

I am responding to your letter which informs us that Taylor Wimpy have submitted their plans for the above site.

I am very worried that the 3D illustrations and plans reveal the structure to be incredibly bulky, awkward looking and high. I have lived in a ground floor flat in Bowater House for many years and feel that this large building will block light from Bowater House and its residents which will affect our quality of life, health and well being. I am also very concerned that the building will affect the amount of sunlight to Fortune Park and the Prior Weston Primary School.

I am concerned that the design of the building does not fit well with Bowater House and Golden Lane Estate which are Grade II listed. My view and my neighbours' views will change irrevocably and that is a great shame.

Thank you,

Yours Faithfully



M. PRAG

Flat 5 Bowater House,

Golden Lane Estate,

London EC1Y0RJ,

Friday 12th August 2016.

To Catherine Linford

Planning Reference: 16/00590/FULL

Dear Ms Linford

Thank you for your letter dated 1st August 2016.

PLANNING & TRANSPORTATION		
PSDD	CPO	PPD
TPD	22 AUG 2016	LTP
OM		SSE
NO FILE	127382	PP DD

I would like to convey to you my real concerns over the development proposed by Taylor Wimpy and their architects AHMM.

I believe that the building proposed is far too large in height and size considering it is on such a small site. The height is excessive and I live on the ground floor of Bowater House which means that I and my ground floor neighbours will lose considerable amounts of much valuable sunlight and daylight to my garden and into my home. The very tall building will result in my home being in its shadow for most of the day especially in winter. The beauty of Bernard Morgan House is that it was built to complement the buildings that it is adjacent to i.e. Bowater House. In winter when the sun is low I still would enjoy warming sunlight into my home. This huge, unsightly building will incur drastic loss of light to my home and garden and will severely impact on not only my quality of living but also for the rest of my fellow residents in Bowater House.

I would ask you also to try and protect the trees that are in the site which have stood for the communities benefit for over thirty years.

Many thanks,

Yours sincerely



Brian Albert

Bernard Morgan House

I object to the intended demolition of Bernard Morgan House, 'an important non-designated heritage asset' (Twentieth Century Society), and the plans submitted for its replacement, an inappropriate development which will acquire no historical significance however long it stands, and on paper is already to the detriment of its listed surroundings and local park.

The proposal is unthinking, overbearing, bullying, oversubscribed and ugly; it adds nothing. The procedure of its presentation to the public remains inconsistent and questionable at best.

It takes no account of, offers no aesthetic response to, or complements the listed neighbouring Barbican and Golden Lane Estate, as it must according to City Planning Guidelines. Nor does it take proper account of the needs/opinions of the considerable resident community, which has been treated to a vapid, patronising consultation process (meaningless question surveys). (Note the hollow slogan of PR company Westbourne Communications: 'Change Opinion'. If opinion has been sought it is only so it can be steamrollered.) Some residents directly affected by the development were not even informed of the first public meeting (subsequently revised as a pre-consultation because of the inadequacy of the presentation).

If this proposal is the developers' considered response to consultation, and important points raised, then it is a failure to the heritage of the area, the resident community and those in City planning who believed they weren't going to get bullied into something aggressive and unacceptable, but then it has long been suspected that the Corporation is embarrassed by any social obligations it has to its residents. The architects, based on what they offer, must have long since abandoned principles of community or design to become mere slaves to electrical conduit and their master's voice, with no evidence of independent thought. Their plans manage the extraordinary feat of being simultaneously slavish, dull, timid *and* offensive.

The developers have proved expert at disingenuousness and prevarication, especially in terms of the project's intended mass and scale, far bigger than intimated by the City of London. They have also consistently failed to provide samples of the Fann Street elevation, which will have major repercussions for residents of Bowater House on the Golden Lane Estate, and the Welsh church. (The Belfast Divis flats [demolished 1993] used to be known as

stack-a-prole; the Bernard Morgan House development might as well be known as [REDACTED]

I object to the loss of light and the effect it will have on the Golden Lane Estate, the Barbican, Fortune Park, the flats in Viscount Street and the Prior Weston Campus in terms of reduced quality of life. Note that this light (and the relationship between interior and exterior space) is integral to the design of the Golden Lane Estate, which is not often the case.

I object on the grounds that the design is loathed by the community, which is by no means entrenched in its thinking, but has been alienated by a process of lies, evasion and untrustworthiness. If you can find one person that approves of the development in any way, then that person should be produced and paraded to convince the rest of its virtues.

A building of this scale and size, quite apart from other considerations, will strain an already overstretched infrastructure.

I also wish to object to the way the plans have been submitted at a time when many of the parties that would object are away, especially the Prior Weston school campus; more disingenuousness.

This is a travesty of a development in the context of its site. The real objection is that something resembling it will eventually go up and it will be a horrible building without any redeeming features (doubly so in the context of its listed surroundings).

Both the Barbican and Golden Lane Estate have a spatial awareness which complement each other, despite differences in style. Bernard Morgan House is a well-mannered building of historical importance, as noted, and in structure and design was conscious of its position as a community building in terms of vernacular, footprint, context and historical presentation. The proposed excrescence has none of these qualities when it should. Both the Barbican and the Golden Lane Estate developed out of history; the plan to redevelop Bernard Morgan House has no awareness of anything other than its own steroidal bulk (while at the same time being dull, timid, etcetera).

It is, to switch metaphors, the building/design equivalent to a large h [REDACTED] that has been dropped from the sky. It stinks. Its addition would be a disgrace to the City, its skyline, its planners, the location and the architects involved.

If something closely resembling this deeply unexciting proposal is waved through with minor points addressed it will serve only to underline the meaninglessness of consultation because none of the real issues raised will have been addressed: e.g. loss of light; who cares;

look at the size of my wallet and [REDACTED] Forgive my bluntness but the whole thing is a nasty business, however it is dressed up. So please surprise us and reject this monstrous proposal for something we can be proud of instead of having to live with, and resent it as an(other) example of laxity, greed and unthinking and careless development at its worst.

Chris Petit
20 Bowater House
Golden Lane
EC1Y 0RJ

13 August 2016

PLANNING & TRANSPORTATION		
PSDD	CPO	PPD
TPD	18 AUG 2016	LTP
OM		SSE
	117384	PP
		DD

Audrey and Clive Kirsch

48 Bowater House,

Golden lane Estate,

London EC1Y0RJ,

14th August 2016.

To Catherine Linford

Planning reference: 16/00590/FULL

Dear Madam,

I am writing to you to say that this is a very inopportune time to have a consultation about Bernard Morgan House bearing in mind that most of the people affected by this development are away on holiday. A truly cynical move on the part of the developers and architects to delay submitting all documents for validation until this time. I do hope that you as the city planners have the integrity to extend the deadline so that all the concerned parties i.e. Bowater house, Cobalt House, Breton House, Fortune Street Park and the Prior Weston School can make their views known.

The height and overinflated size of the building is too big for the site. When Bernard Morgan House was built in 1958/1959 most of Golden Lane Estate was occupied and as I remember the Finsbury council had asked that Bernard Morgan House should match Bowater House in height and alignment. Bernard Morgan House fits in with Golden Lane Estate. The building that Taylor Wimpy want to build does not work with Bowater House. The building will overpower and block a great deal of our day light and sun light. This will reduce day light and sunlight into my home and will be very bad for myself and my disabled son who is confined to the front room and the balcony. He does not get out often and is unable to leave the flat unattended. Bowater House will be overlooked and the long windows that I will have to stare at make the building look like a prison. How can the architects think that this building they have designed and want to build has anything to do with this area? The views from Bowater House will be lost and changed for good. I will not be able to see the Barbican or Cripplegate. How can this be allowed by you when Golden Lane Estate is Grade II listed building and should be protected by you, from developers who think they can build whatever they like, wherever they like and treat us, the community, however they like, which is very poorly! (all for making a large amount of money for Taylor Wimpy and great investments for overseas investors).

I would like to add that the excessive height of the building will not only block considerable light from Bowater House but also to the Fortune Street park and Prior Weston playground especially in winter time when the sun is low. Our children need to be able to make Vitamin D in winter as well as summer.

I'd like to add that the Neaman Practice, the only GP in the City is already under terrible pressure providing service to city workers and the local community and are considering closing their practice list.

Thank you for your consideration.



Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Ms Helena Twist

Address: 501 Ben Jonson House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: I am the owner of a property in Breton House.

I endorse objections made by other neighbours about the scale, footprint and height of the development and the disregard of the residential and architectural balance of the area. The proposed building should be limited to the same height as the building it replaces.

The proposed plans appear to ignore the City of London Listed Building Management Guidelines for the Golden Lane Estate.

The current design will have the effect of blocking direct evening sunlight to Breton House.

A significant increase in residents raises concerns about the impact on GP and other services.

No provision has been made for affordable housing. The City needs affordable residential accommodation for a variety of workers. A balanced and safe community occurs when there is a social mix of residents.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Ms M Loosemore

Address: 507 Ben Jonson House Barbican

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: At 10 storeys high, even with the frontage being limited to 7 storeys, this proposed building is too high. It would tower over its lower rise neighbours, in particular the Jewin Welsh Church and Golden Lane Estate, and Fortune Park and its school.

The bland exterior pays no heed to the neighbourhood's architectural and historic designs, listed buildings and world famous modernist context. Bernard Morgan House contains some beautiful echoes of its built environment - from the Barbican, to Golden Lane to the school - and in the materials used in its construction. The proposed design looks like so many other Taylor Wimpey developments.

The proposed redevelopment of Bernard Morgan House equates to the loss of affordable housing for those key workers who work in the City - as defined by the boundaries of the Square Mile.

Comprising over 104 residential units, the proposal will have an impact on local amenities and public services - doctors, and schools to name but two. As a resident of Ben Jonson House I am concerned about the noise that will come from the balconies, and the increase in traffic (and accompanying noise) using the narrow streets around Bernard Morgan House, and trying to park there.

A redevelopment reflecting Bernard Morgan House's scale, design and purpose would be far

preferable to that which is currently proposed.

PLANNING & LANDSCAPE ACTION		
PROJ	OPD	PPD
T2	22 AUG 2016	LTP
O		SSE
N	127384	PP
FI		DD

David Emerson
 No 4 Bowater House
 Golden Lane Estate
 London EC1Y0RJ
 15th August 2016

To Catherine Linford

Planning reference: 16/00590/FULL

Dear Madam,

Thank you for your letter concerning Bernard Morgan Section House. I went to look at the plans and found that the building that Taylor Wimpy want to build will block my sunshine and light considerably. I live on the ground floor of Bowater House and I will lose a great deal of light (Into my home) because the building is far too high and far too big for the size of the site. I have taken great pride in my garden for many years and it thrives because the Bernard Morgan House was of a height which did not prevent my plants from getting necessary sunlight to grow.

Bernard Morgan is just the right height to work well with our block, Bowater House. I understand that Golden Lane Estate is Grade II listed and therefore as the planning officer in charge I would ask you to take into account that The City of London must manage and direct any development to be designed and work with the surrounding adjacent buildings which are all listed. The architects and developers have not designed the building with this in mind.

Please direct the developers to lower the height and reduce the size and mass of the building.

Your Faithfully



PLANNING DEPARTMENT		
PPS	CDU	PPD
PA	22 AUG 2016	LTP
PS		SSE
PC		PP
PD	17385	DD

25 Bowater House
Golden Lane Estate
London EC1Y0RU
15th August 2016

Catherine Linford

Planning Reference: 16/00590/FULL

Dear Madam,

I am writing to you to express my deepest concerns with regard to the proposed development where Bernard Morgan House (BMH) stands at present.

My first concern is that Taylor Wimpy Central (TWCL) have not taken into consideration the views expressed by residents in Bowater House at the public consultations with regard to size, height and mass. The building is grossly oversized and will loom over the adjacent buildings i.e. The Jewin Church, Bowater House, Fortune Street Park and Prior Weston School and nursery. Thus, contra-indicating The City of London Listed building Management guidelines for Golden Lane Estate. I and many other residents asked on several occasions for TWCL and AHMM architects to provide views to show the development block in relation to Bowater House. The City of London's listed building guidelines clearly states, "The views from – as well as into – the estate have become important. Part of the special architectural interest of the estate lies in its relationship with adjacent buildings; their height, scale, mass, form, materials and detailing could, for example, have an impact on that special interest.... The relevant local authority should, therefore, take into account the significance of the estate's setting to its special architectural interest when considering any developments on the immediate boundaries of the listed area,". Clearly, TWCL and AHMM are reluctant to provide these views as this would show their blatant disregard towards Bowater House, its residents and Golden Lane Estate as an architecturally significant Grade II listed building.

Sadly and crucially, the overwhelming size of the proposed development will also negatively impact on the sunlight and the daylight that bathes Bowater House. Even in winter BMH is sympathetically placed and designed in its site so that Bowater House (including the ground floor flats) benefits from the morning light. My quality of living and well being will be reduced because of the loss of sunlight, daylight and natural warmth which has suffused into my flat for the past thirty years.

ACKNOWLEDGED

Daily , throughout those thirty years, I have looked out from my window and from my balcony over to BMH and its trees. It is a very pleasant view which I fear is to change drastically because of the development. I am seriously concerned and worried that these beautiful, mature trees which have for so long given me, my neighbours and the general public so much pleasure will be destroyed; cut down to make way for luxury dwellings!. I would ask that these trees including the valuable Hawthorne at the rear of BMH be retained and preserved for everyone.

Finally, I would like to point out that there seems to be a lack of original design process in this application. AHMM appear to have lifted one of their stock designs from another site and placed it onto the BMH site. They have ignored the importance of designing a building which complements and interacts with two outstanding Grade II listed estates. They have ignored the importance of this design sensitive area and in doing so disregarded The City of London Listed Building Management Guidelines for Golden Lane Estate.

Yours Faithfully,

A black rectangular box redacting the signature of Reverend Anthony Winter.

Reverend Anthony Winter

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Ms Clare Fielding

Address: 282 Lauderdale Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I strongly support the proposed redevelopment of this site. The existing building contributes very little to its surroundings and is clearly of lesser architectural quality than the listed Barbican and Golden Lane estates nearby. The replacement AHMM building will be far more attractive and improve the street scene considerably. The new pocket park on the south western corner of the site will add a welcome bit of breathing space to the dense and untidy area below and behind the Barbican podium. Along with the other recently delivered schemes in and around the Barbican, this will help to improve the area generally.

Adjei, William

From: Linford, Catherine
Sent: 16 August 2016 12:08
To: Adjei, William
Subject: FW: Reference: 16/00590/FULL Bernard Morgan House 43 Golden Lane London EC1Y 0RS

From: Daniel Monk [mailto:]
Sent: 16 August 2016 12:06
To: Linford, Catherine
Subject: Reference: 16/00590/FULL Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Further to our telephone conversation today . . please see below my comments. Could you please acknowledge receipt and confirm that they will be accepted in this format?

I do very much hope that the City will listen and take on board some of our concerns. Holding the 21 day request for info doing the middle of August - when people - especially those with children who lose the park and school - are away has upset many people and there is a very real loss of goodwill towards the City about the way in which the proposal seems to have favoured the luxury flat private developers interests over everybody else. Now is a real opportunity for the City to demonstrate that it really does listen.

Dear Catherine

Reference: 16/00590/FULL

Bernard Morgan House 43 Golden Lane London EC1Y 0RS

I am writing to object to the proposed new building on the site of Bernard Morgan House. My objections are as follows:

1. The proposal ignores the City of London Listed Building Management Guidelines for the Golden Lane Estate. These state that:

‘ . . . part of the special architectural interest of the estate lies in its relationship with adjacent buildings; their height, scale, mass, form, materials and detailing could, for example have an impact on that special interest’.

It is hard to see how this has been in any way taken into account as the proposed building – in terms of ‘height, scale, mass, form, materials and detailing’ are totally out of keeping with the Golden Lane Estate neighbouring buildings in ALL of these respects.

In this respect it is curious that the proposed building mirrors in scale the least interesting and non-listed neighbouring building – the extension to the Cripplegate Library. The lack of inspiration in the proposed building – in particular its lack of reference to any of the listed buildings in the neighbourhood – is a real pity.

2. One of the very attractive qualities of the existing Bernard Morgan building on are the mosaic tiles at both ends of the building. These tiles are in keeping with the architectural period of both the Golden Lane Estate and the Jewin Church. It is a terrible pity that the proposed building makes no use of them. They are enjoyed by the public and have become in effect much loved 'public art'. At the very least could they be incorporated into the external structure of the proposed building in the existing spaces? Or could the City commit to installing them in the open spaces proposed – clearly visible to the public? This very small gesture would at least demonstrate a recognition of the particular historical mid-century moment that this corner of the City currently reflects.
3. Light. The scale of the new building will have a detrimental effect on the light in the park in Fortune Street in the afternoons – especially during winter. This park is a much loved community resource for everyone in the area. The scale of the building will negatively impact on light into flats in Bowater House.

I very much hope that the City will take into account the concerns of the people who live in the area and most of all limit the bulkiness and scale of the proposed building.

Yours sincerely

Daniel Monk

46 Bowater House, Golden Lane Estate, London EC1Y 0RJ

16 August 2016

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mrs Jane Norrie

Address: Las Limas, Casa 490, Calle 23, Guadalmina Alta Marbella Spain

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I am the owner of flat 15 in the Cobalt Building.

My flat is going to be overlooked and will suffer a loss of sunlight and daylight as a result of this proposal.

The facade of the proposed building should be stepped back to allow more light to the flats on the lower floors of the Cobalt Building.

Adjei, William

From: Linford, Catherine
Sent: 18 August 2016 12:34
To: Adjei, William
Subject: FW: Bernard Morgan House

From: Daniel Gerring [mailto:]
Sent: 17 August 2016 23:50
To: Linford, Catherine
Subject: Bernard Morgan House

Dear Ms Linford

As a resident of Ben Jonson House, Barbican, I would like to make the following comments regarding the proposed redevelopment of Bernard Morgan House:

- I broadly share the views expressed by the 20th Century Society and, for the same reasons they suggest, I believe that renovation of the existing building would be far preferable to the proposed redevelopment.

In the alternative, if the City is minded to approve the redevelopment, I would request that:

- A condition to such approval is enhanced amenity planting of trees and shrubs, to be visible from the street. This would be consistent with the ambitions set out in the Barbican & Golden Lane Area Strategy 2015 and provide a potential upside to local residents and businesses who will suffer significant inconvenience during the demolition and construction phases.
- Strict conditions be applied to both demolition and construction (time and days of work, site access etc.), bearing in mind, in particular, the close proximity of both residential and business neighbours and the near adjacent school and nursery.
- Further consideration is given to the height of the building - might it not be slightly less high, in light of the relative height of nearby buildings and the potential over-shadowing effect on the Jewin Welsh Church?

Kind regards

Daniel Gerring

ACKNOWLEDGED
18/08/2016



Daniel Gerring

561 Ben Jonson House

Barbican

London

EC2Y 8NH

1 Bowater House
Golden Lane Estate
London EC1Y 0RJ

Catherine Linford & Annie Hampson
Department of the Built Environment
City of London
London
EC2P 2EJ

20 December 2016

Dear Ms Linford and Ms Hampson,

RE: Objection to Revised Planning Application 16/00590/FULL (Revised Drawings) 43 Golden Lane, EC1Y 0RS

I'm writing to OBJECT to the above revised planning application and to recommend it is REFUSED.

Please note that I would like to ensure that the entirety of my previous objection letter dated 17 August 2016 still stands. Taylor Wimpey have not revised their drawings in any way to take note of the objections made previously by myself or any others. This is hugely disappointing.

The new drawings in fact now show the addition of a significant entrance to the new building on the Fann Street side, within metres of Bowater House. During meetings with Taylor Wimpey, the architects and residents from Bowater we were assured that this would not be the case. Lewis Kent from TW and Nigel Hetherington from AHMM agreed that it would be too noisy for residents to have an entrance on Fann street due to increased noise from people, taxis, cars etc - in particular at all hours of the night - when our bedrooms are so close. They said time and time again that there wouldn't be a main entrance on Fann Street as it would be inappropriate.

Having re-looked at the drawings again this second time it is still shocking to see the building looming over the school, blocking sunlight to the playground and Fortune Park. This building is not being built to serve the community, it is not being built to solve a housing crisis. It is seriously detrimental to our community and entirely inappropriate.

I still feel strongly that the City Planners should be using the original footprint of Bernard Morgan as their guide, following the lead of the original Finsbury Council Planners who had the vision to create a building that was the correct proportions for the site. If the new building is built even a metre higher on the Fann Street side then it will block Bowater's Winter Sun, and with the current proposals the loss of Fortune Park's Winter sun is devastating.

Please note that these revised plans are still in contravention of the City of London's Golden Lane Estate Listed Buildings Management Guidelines with regard to height, scale and massing, as well as many areas of the Local Plan, which I understand the City must adhere to. In particular section CS5, CS10, CS15, CS19, CS21&22 and Policy DM 10.1 - these sections have been disregarded.

"The relevant local authority should, therefore, take into account the significance of the estate's setting to its special architectural interest when considering any developments on the immediate boundaries of the listed area."

Yours faithfully

Claudia Marciante

341 Ben Jonson House, Barbican, London EC2Y 8NQ

Catherine Linford
Corporation of London
Planning Department
Guildhall,
London EC2
Catherine.Linford@cityoflondon.gov.uk

Dear Catherine,

Bernard Morgan House (BMH) application 16/00590/FULL

I am writing to you regarding this planning application. I am writing to object to the design as I think it is overdevelopment of the site.

BMH sits on a prominent site between the two most important pieces of British residential architecture and town planning in the 20th century: moving from the more Corbusier influenced Golden Lane estate to the Brutalism of the Barbican itself - so this site is important.

Yet the massing is overdone instead of siting 'quietly' between the two sites it is over massed it sits on top of the Presbyterian Church and Tudor Rose Court. Whilst to the east it is taller than Breton House. It appears as if the architect sees his building as the most important in the area and is trying to hide the Barbican when looking south or the Church to the west

I can see no justification for this as I think the architecture is somewhat 'vanilla' in appearance but also too bulky

Another point I would add is that the crossing to the Fortune street Park is used a lot by children going to the park but it has a small pavement and I would have thought that the design could benefit the area by splaying at the corner to give more space for waiting pedestrians

I hope these comments can be brought to the attention of the planning committee I should add that we live in the Barbican Estate

Regards

Julian

Julian Vickery

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mr Suresh Nair

Address: Flat 19, The Cobalt Building 10 - 15 Bridgewater Square London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: My objections are based on the following:

1. Outlook of the building.
2. Traffic and congestion in surrounding roads (cars/bins/cycles).
3. Blocking of daylight to the Cobalt building.
4. Lots of noise and disruption.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mr Naren Joshi

Address: Flat 8, The Cobalt Building 10-15 Bridgewater Square London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: I am the owner of flat 8 in the Cobalt Building.

I strongly object to the proposal building

My flat is going to be overlooked and will suffer a loss of sunlight and daylight as a result of this proposal.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Ms Deborah Phillips

Address: 42 Bowater House Golden Lane Estate London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I am writing to object to the Taylor Wimpy London Central (TWLC) application to demolish Bernard Morgan Police Section House which is in good repair and an architecturally sound and significant post Second World War.II building . I object to the proposed planned building because it is excessively large in scale ,massing and height. I object to TWLC and AHMM architects for clearly ignoring The City of London Listed Building Managent Guidelines for Golden Lane Estate(GLE).The applicant has disregarded these guidelines;submitting plans for a building which overwhelms,overshadows and overlooks Bowater House.The proposed building (A stock design designed to fit off the shelf and squeezed into this small site) negatively impacts with regard to its design ,excessive height.mass,form,materials and details.Such a building will block valuable sunlight and daylight to the dwellings within Bowater House. Such a building, if granted planning permission ,will detrimentally change the views irrevocably from Bowater House and into Bowater House forever . I urge the City of London planners to act on the The City of London s Listed Building Management Guidelines for Golden Lane Estate , take note of the residential communities objections and REFUSE this application.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mr Naren Joshi

Address: Flat 8, The Cobalt Building 10-15 Bridgewater Square London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: I am the owner of flat 8 in the Cobalt Building.

I strongly object to the proposal building

My flat is going to be overlooked and will suffer a loss of sunlight and daylight as a result of this proposal.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mr Richard McKeown

Address: 24 Cobalt Building London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment:- Cobalt Building residents were not informed of or invited to participate in the initial consultation, despite being an adjacent building

- Proposal is of a massive scale in height and extends beyond the current footprint
- Proposal is significantly larger and more dominating than the current structure, and is disproportionate to and inconsistent with the site and the local area
- Proposal will place unreasonable strain on the surrounding roads and other infrastructure, both during construction and after completion, with potential wider implications on feeder roads
- Proposal is far too close to the Cobalt Building
- Proposed inset balconies and multiple terraces facing Brackley Street and Viscount Street will increase the noise levels when they are open or in use, and will overlook and intrude Cobalt Building privacy
- Proposal will result in a significant reduction/loss of sunlight and daylight to adjacent properties facing the new building, particularly in the winter months when the sun is low. Significant light and noise pollution issues
- Proposed "public pocket park" will likely lead to loss of local security, increased noise, disruption and anti-social behaviour, with a negative impact on the neighbourhood
- The traffic and servicing requirements for BMH will transform surrounding streets from quiet and narrow side roads into congested through roads - beyond their design and capability
- The size and height of the proposed new building will result in wind tunneling through the surrounding narrow roads and will be a danger to pedestrians and increase noise pollution

- The increased traffic, pollution and noise will disrupt the quiet environment and use of surrounding residences and adversely impact the health of local residents
 - Proposal places an unbearable strain on existing local services and infrastructure, such as healthcare services and schooling, which will be unable to cope with so many new residents
- Please scale back significantly

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mr Tommy Johansson

Address: 4 The Cobalt Building 10-15 Bridgewater Square London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: Living next door to the proposed development, I want to register my objections to the scale of the proposed development. The size and scale feels completely out of proportion and will add considerably to traffic and noise in what is now a quiet residential neighbourhood. I am also very concerned about the proposed 'pocket garden', which I feel has the potential to act as a gathering point for anti-social elements and behaviour, should this not be locked at night along the same lines as the nearby Fortune Park.

Our Ref: RDMM/180816

35 King Street
London EC2V 8EH
www.colliers.com/uk

DDI +44 207 487 1881
MAIN +44 207 835 4488
EMAIL Richard.Douglas@colliers.com
Mobile [REDACTED]



18th August 2016

Department of Built Environment
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2ET

Dear Mr. Chipperfield

**BERNARD MORGAN HOUSE DEVELOPMENT, 43 GOLDEN LANE, LONDON
(REF 16/00590/FULL)**

We are writing on behalf of the owners of the freehold of the former Cripplegate Library building, now known as 1 Golden Lane, and leased as offices to UBS.

Our Client has reviewed details of the proposed scheme submitted for the redevelopment of the former Police House buildings (Bernard Morgan House) that are subject to the current planning submission and have discussed this with representatives of UBS.

We have also attended one of the earlier public exhibitions held on site by the developer, Wimpey Homes.

As a result of this, we wish to register our Client's concerns with the proposals as follows:

1. Public "Pocket" Park – whilst new open green space is welcome in an urban environment, we would like to see public access to this area controlled out of normal hours to prevent it from being used for anti-social purposes that could present a security issue to our Client's office building /UBS.
2. Servicing – the location of the flats new service yard lies directly opposite the serverly facility in the ground floor of our Client's building and lorry use during office hours could be a nuisance, especially if Brackley Street is used for temporary parking or deliveries etc.
3. Overlooking issues – we would be concerned if the occupants of the new flats have the ability to enforce controls on the offices as their windows / balconies will be directly opposite the office windows. Such potential issues would include the offices having to control lighting or screen use especially as this office building is in use beyond old fashioned "working hours" and lights etc need to be on.
4. The height of this new building does result in a degree of dominance and the current unobstructed views from the office windows will be blocked, despite the stepped terrace arrangement allowed for in the design, but we note earlier concessions have been made in the redesign of the building so it is unlikely that further redesign will be required.



The replacement of the current dated building is something we generally welcome though, and its redevelopment would be preferred to it remaining a vacant eyesore.

We assume that the developer will be subject to normal restrictions / conditions in demolition and construction work. Ideally we would like to see the site access for construction traffic being from the main / Golden Lane frontage to reduce noise disruption to the offices as these are a key business operation for UBS.

I trust that these matters above will be taken into proper consideration in judging the planning submission.

Yours sincerely


RICHARD DOUGLAS
Associate Director

c.c I.Phua – HH

L.Goh - HH

B.Brookman – Colliers

H.Dorrell - Colliers

**2 Cuthbert Harrowing House
Golden Lane Estate
Fann St
LONDON EC1**

City of London Planning Dept,
Catherine Linford,
PO Box 270,
Guildhall,
LONDON EC2P 2EJ

Date; 18th August 2019

Dear Sir,

**Ref; 16 / 00590 / FULL
Bernard Morgan House redevelopment**

I write to set out my objections to the planning application above, submitted by Taylor Wimpey.

1. The massing of the build, both its height and width along Fann St and Brackley St will dwarf the adjacent Welsh Jewin Church which it encircles, and Bowater House on the Golden Lane Estate on the opposite side of the road.
2. The new façade along Fann St will reduce statutory daylight and sunlight levels to the lower level flats in Bowater House, which already suffer reduced light levels as a result of the building's vertical 'fins' that enclose the balconies, and because the living rooms are set back behind cantilevered bedrooms.
In addition, the proposed west facing flats appear to be almost entirely overshadowed by the Church, and the proposed flats along Brackley St are overshadowed by both the Church and Cobalt House.

Massing.

The scheme's massing will dominate Fann St and the Jewin Church.

When the site was advertised, I understand it was recommended that a building of approximately 80,000 sq ft could be achieved. This advice would have been obtained from the City's planning dept, which would have used its guidelines for residential development, and the precedent it established when giving consent to the Tudor Rose building.

The Tudor Rose building aligns horizontally with the Jewin Church along Fann St, stepping up for a narrow tower section immediately beside the Church, allowing the rear sections of the building to tier up to match the Cobalt building at the back. When viewed from an aerial perspective such as google map, it is clear that the building was designed to take advantage of the Cobalt building's height, while also relating carefully to the Jewin Church, Cuthbert Harrowing House on the Golden Lane Estate, and the park and Barbican to the south and west. In theory, the building could have been higher facing the park, and it must have been on the planners' insistence that this did not happen.

The Bernard Morgan proposal is hugely overbearing both vertically and horizontally, crowding out and dominating the Church, and stepping up sharply from Bowater House.

I note that the Twentieth Century Society believes that Bowater House and the Jewin Church are both very good examples of mid twentieth century architecture, with Bowater House which they consider listable, designed to complement the Church giving it space and a well-considered setting.

A new building should maintain the planning principles that have been implemented both for the original construction of the Church and Bowater House, and subsequently the Tudor Rose building.

Daylight

I understand that the electronic daylight and sunlight model has been requested in order to understand the extent to which daylight and sunlight levels fall below statutory levels, as the new development facing Fann St is both higher, wider and closer to Bowater House than the current building, and the new flats facing onto the Jewin Church at lower levels appear to be entirely devoid of access to sufficient daylight and sunlight, particularly in rooms that are shaded by balconies. It is disappointing that access to the daylight and sunlight model has not been given.

It is noted that the Design and Access statement asks that the Planners to interpret statutory regulations 'flexibly' to allow the new development to proceed. As stated above, this would aggravate an already unsatisfactory situation at Bowater House and I suspect, provide an even poorer environment to many of the proposed flats.

The Tudor Rose scheme sets out the City's planning view as to how a new building should relate to the listed environment around it.

These principles seem to have been abandoned with the redevelopment proposal for Bowater House, and there is suspicion in some quarters that the City, which sold the site, may benefit from overage payments if a certain square footage of development is exceeded. There is therefore concern over the possibility of a conflict of interest, whereby justification is sought for a scheme that stretches what is allowable beyond the City's and statutory guidelines for residential property - guidelines that are there to protect the City's environment, listed buildings, and existing and future residents, as well as facilitate new development.

Yours sincerely,

A large black rectangular redaction box covering the signature area.

DAVID GREGORY

Adjei, William

From: [REDACTED]
Sent: 19 August 2016 09:35
To: PLN - Comments
Subject: Bernard Morgan House

Dear Ms Linford

Your ref: 16/00590/FULL

I object to the planned redevelopment of the site of Bernard Morgan House because of the huge bulk of the proposed building, in particular the extension along Brackley Street.

I will lose almost all the sky and sunlight enjoyed from my flat. In the afternoons and evenings, depending on the time of year, my flat is flooded with sunlight. This would all be lost, to be replaced at night with artificial light from banks of windows facing Brackley Street. I have not previously needed curtains, but would have to be put to the expense of buying blackout-quality curtains to block out the sight of these lights from my bed.

Such a building would significantly affect my way of life, transforming a pleasant sunny flat into one where the view needs to be blocked out.

Please acknowledge receipt of my observations.

Yours sincerely
Hazel Brothers
86 Breton House
Barbican
London EC2Y 8PQ



This email has been checked for viruses by Avast antivirus software.
www.avast.com

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mr David Gregory

Address: 2 Cuthbert Harrowing Hs Golden Lane Estate London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: Massing. The scheme's massing will dominate Fann St and the Jewin Church.

When the site was advertised, a building of approx 80,000 sq ft was recommended. This would have been obtained from the City's planning dept, based on its guidelines for residential development and the precedent of the Tudor Rose building.

The Tudor Rose building aligns horizontally with the Jewin Church along Fann St, stepping up to align horizontally with Cobalt building. The building could have been higher facing the park, and it was at the planners' insistence that this did not happen.

The new application crowds out the Church, stepping up sharply from Bowater House. The massing & planning principles that have been implemented both for the original the Church and Bowater House, and subsequently the Tudor Rose building should be maintained.

Daylight & Sunlight levels to low level flats will fall below statutory levels, as the new development is both higher, wider and closer to Bowater House than the current building, and the new flats facing the Church at lower levels will be in shadow, particularly in rooms that are shaded by balconies.

The D&A statement asks that statutory regulations are applied flexibly. This would aggravate an already unsatisfactory situation at Bowater House and provide an even poorer environment the proposed low level flats.

Residential guidelines. The Tudor Rose scheme sets out the City's view as to how a new building should relate to the environment around it. These principles have been abandoned with the proposal for Bowater House, raising concern over a conflict of interest if overage is obtainable for the City if a certain value - relating to the size of the development, is obtained. Justification could be sought for a scheme that stretches what is allowable beyond the City's and statutory guidelines for residential property - guidelines that protect the City's environment, listed buildings, existing and future residents, as well as facilitate new development.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mr David Vickers

Address: Foxgloves Clock Barn Lane Godalming

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I am the landlord of Flat 7 on the first floor of The Cobalt Building which looks out on to Viscount Street and down Brackley Street. The footprint of the proposed building encroaches further down Brackley Street than Bernard Morgan House covering existing open space and overshadowing residential apartments in the Cobalt Building. Despite being slightly stepped back, the daylight and sky view will be greatly reduced in the Cobalt flats by this vastly overbearing building on Brackley Street. This development must be reduced.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Ms Eva Stenram

Address: Flat 7, Bayer House Golden Lane Estate London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment:- I am very concerned about the loss of light to Prior Weston School and Fortune Park. The building will be too high and will overlook and remove light to the school and the park. It also overlooks and removes light from the neighbouring blocks.

- The proposed building ignores The City of London Listed Building Management Guidelines for Golden Lane Estate(GLE): "The views from-as well as into-the estate have become important. Part of the special architectural interest of the estate lies in its relationship with adjacent buildings;their height, scale , mass, form, materials and detailing could, for example, have an impact on that special interest...The relevant local authority should, therefore, take into account the significance of the estate's setting to its special architectural interest when considering any developments on the immediate boundaries of the listed area."
- The overall footprint of the building is far too large. It is a lot bigger than the existing building and is not in proportion with the area architecturally. It is architecturally disrespectful to the surrounding post-war modernist architecture and is much larger than that proposed when the site was sold.
- The impact of noise and dust - particularly in regard to Prior Weston School and how this will negatively impact on school children.
- The proposed building will result in a great increase of people to the area - putting a great

on NHS practices, schools, roads and other public amenities.

- I am very concerned about the increase in traffic that 104 residential units will cause. The surrounding roads were not built to accommodate such large numbers.

- The proposed building does not include any affordable housing.

- I would wholeheartedly support the refurbishment of the existing Bernard Morgan House, which should be recognised as a heritage asset of local significance.

- So far, objections by residents have been ignored. This development urgently needs to be scaled back.

111 Breton House . Barbican . LONDON . EC2Y 8PQ . [REDACTED]

Department of the Built Environment
Guildhall
City of London
LONDON
EC2P 2EJ

19th August 2016

Dear Sirs

Planning Application 16/00590/FULL, 43 Golden Lane, EC1Y 0RS.

I wish to object to the above planning application on the following grounds and recommend that this application be refused.

1. The proposed development has negative and unacceptable impacts on adjacent listed heritage assets, including the Golden Lane Estate and Cripplegate House, and the application also fails to address the Golden Lane Listed Building Management Guidelines which were adopted by the Planning and Transportation Committee as recently as November 2013.
2. The height, bulk and scale of the proposed development is inappropriate to the site, and is also far greater than was envisaged by the City of London itself in the sales prospectus for the site, published by DTZ on behalf of the City in February 2015.

Impact on adjacent, listed, heritage assets

The northern part of Cripplegate Ward is quite unlike the rest of the City. Here we find tree lined streets and the residential areas of Fann Street, Golden Lane and, to the north-east, the post-war Peabody Estate in Islington, all typified by four- and six-storey blocks of maisonettes, interspersed with occasional residential tower blocks. This is what this applicant has not only chosen to studiously ignore, but to deny.

It is very misleading for the applicant to state that the "... townscape itself is fragmented ..." (TVIHA 3.16) and that the site "...does not belong to any wider townscape areas ..." (TVIHA 3.58).

The site and its current building specifically relate to the setting of the Grade II listed Golden Lane Estate, and also acts as a link between that heritage asset and the listed Barbican Estate – both by Chamberlain, Powell and Bon. A little background may be helpful.

When the current building at 43 Golden Lane was built, most of that site and all of the Golden Lane Estate (GLE) were in the former London Borough of Finsbury.

The Second World War saw the devastation of Finsbury's housing stock, but austerity limited what the Borough of Finsbury alone could do in respect of reconstruction ⁽¹⁾.

In the south of Finsbury this led to the collaboration with the City of London which compulsorily purchased the land on which the City was to build the GLE. The large, first phase of the GLE opened in 1957, to provide homes for City and some Finsbury residents.

When, on Wednesday 30th July 1958 Finsbury Council granted planning permission for the police section house at 43 Golden Lane ⁽²⁾, we now know that the council had already recognised the importance of the site to the setting of the newly built Golden Lane Estate.

Once the new Finsbury Police Section House (later Bernard Morgan House) was completed it was considered to be of sufficient importance to merit an article, in July 1962, in the journal 'Official Architecture and Planning'.

From this article we learn that Finsbury Council had specified that the new section house should reflect both the height and the street alignment of the three parallel, six-story blocks of maisonettes on the Golden Lane Estate, of which the closest block is Bowater House ⁽³⁾.

That this was the case is clear from this photograph, and this also explains why the current building sits back from the line of the pavement. We can say with confidence that this visual harmony with the Golden Lane Estate was planned.

Figure 1



Subsequent changes to both the interior and exterior of the section house meant that the building as it stands today does not meet the exacting standards set by Historic England to justify listing. However, the visual coherence of the Golden Lane street view, as planned in the 1950's, remains apparent to the present day.

In 1997 the whole of the Golden Lane Estate was listed. In June 2007 the Golden Lane Listed Building Management Guidelines were produced. These were reviewed and amended in

2012/2013. As members of the Committee will recall, these guidelines were adopted by the City's Planning and Transportation Committee as recently as 5th November 2013.

This 259-page document bears witness to how seriously the City commits itself to preserving and protecting its heritage assets - in this case the Golden Lane Estate - which is a commitment that I am sure the city still stands by today.

Let me simply quote this, from the key conclusions and recommendations of those Listed Building Planning Guidelines :

"The estate should be appreciated in its entirety: not only its various components – residential, community, recreational, commercial and the external spaces between buildings – but also its setting within the surrounding urban fabric. The views from and into the estate have become important, and part of its special architectural interest lies in its relationship to adjacent buildings. Any developments on the immediate boundaries of the listed area should take into account the significance of the estate's setting." (4).

As demonstrated above, the former Bernard Morgan House clearly does take into account the setting of the Golden Lane Estate. The proposed new development overpowers the GLE.

"...The views from and into the estate ..." (above) include sightlines between the Golden Lane Estate and the Barbican Estate. These visual links between the City's two listed Chamberlain Powell and Bon estates are crucial to the townscape of this local area and can be seen in Fig 1, which was taken from a balcony in the Barbican's Breton House. This sightline will be lost with the much more massive, proposed development.

The only building, which in the terms of the applicant, could be considered to 'fragment' the townscape (TVIHA 3.16.op. cit.) is the listed Cripplegate House to south of the proposed development.

Sitting on a lost, pre-war street alignment, this brick-built, late-nineteenth century building with later extensions, sits proud on Golden Lane and bears witness to and is a reminder of the lost former street view. On the south side of the Barbican, St. Giles Cripplegate Church could be considered to play a similar role in recalling a past, lost townscape.

The ambition of the developer is to match the height of the adjacent Cripplegate House. Taking the roof of Cripplegate House as a target height for the new development disrespects its listed neighbour. This new building would vulgarly compete with and detract from the setting of the older, more illustrious premises.

The height, bulk and scale of the proposed development

In respect of my objections concerning the general height, bulk and scale of the proposed development I refer, by way of evidence, to the City's own Independent assessment of the potential of the site.

In February 2015 commercial property consultants, DTZ, issued a prospectus to promote the sale of a 150 year leasehold interest in 43 Golden Lane as an investment and development opportunity (5).

This prospectus highlighted an independent feasibility study that had been commissioned by the City from Alison Brooks Architects and which identified that the site could support redevelopment of the order of 80,000 square feet (compared with the 44,000 square feet of the former police section house).

However, the City's own sales prospectus pointed out that local views were important *"...to the setting of the listed Golden Lane and Barbican Estates ..."* and that *"... the impact of daylight, sunlight and amenity to adjoining residents, the neighbouring church, adjacent primary school and park are key considerations ..."*.

The applicants are proposing a redevelopment with a gross internal area in excess of 120,000 square feet – half as much again as that suggested by the City's own Independent consultants. Even allowing for the stated possibility that careful design might take the scale of this redevelopment above 80,000 square feet, over 120,000 square feet seems unimaginably ambitious.

It is because of this massive scale that this development will damage the setting of GLE and other heritage assets, and impact negatively on the sunlight and visual amenity of adjoining residents, the neighbouring church, adjacent primary school and park. The scheme constitutes a gross, intrusive overdevelopment of the site and is totally inappropriate.

I refer you to paragraphs 131 and 132 of the National Planning Policy Framework concerning the conservation of the historic environment, and Policy DM 12.1 of the City of London Local Plan 2015 - managing change affecting heritage assets. I object to this application.

Subject to my availability I wish to reserve the right to address the Planning and Transportation Committee in respect of my objections.

Yours faithfully,

John W Whitehead

⁽¹⁾ "Building the Post-war World: Modern Architecture and Reconstruction in Britain", Nicholas Bullock, pp. 201 - 203.

⁽²⁾ Minutes and Proceedings of Finsbury Council, Islington Local History Centre.

⁽³⁾ "Finsbury section house for the Metropolitan Police, London; Architect: J. Innes Elliott" Official Architecture & Planning, 1962 July, pp. 369-373.

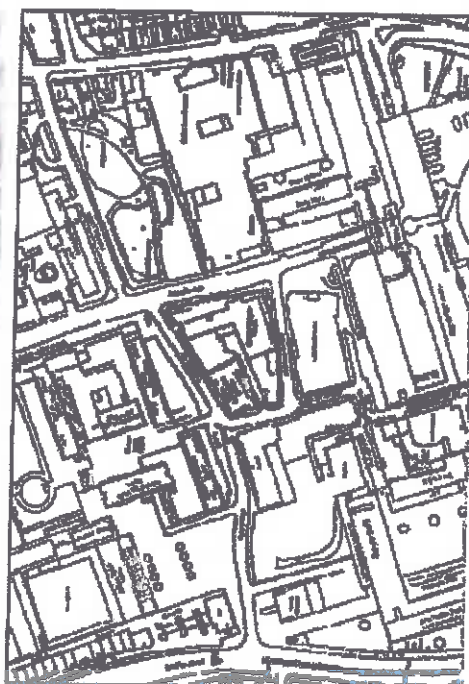
⁽⁴⁾ "Golden Lane Listed Building Management Guidelines", City of London, September 2013, para. 1.2.1.2.

⁽⁵⁾ "Bernard Morgan House: a high value development opportunity positioned within the City of London", DTZ, February 2015 (extract attached).

Development potential



EXCLUSIVE
 "We're not in a hurry to produce the new album," says the 37-year-old singer. "I don't want to be like the other guys who are rushing to get a new record out. I want to make sure it's the best I can do."



Planning

The 1980s are a predominantly national period in the history of the world's nations of Western Europe and America in the City of London.

Partnership includes giving the representatives of the club are provided by the London Party 200th and the City of London Local Plan 200th.

The idea is not allowed for any particular age
 100, although the idea belongs to such a
 of the City is claimed as a fact, and
 at the last page of the book.

As a result, the company's sales are expected to grow by 10% to 15% in 2000, and by 15% to 20% in 2001. The company's earnings are expected to grow by 10% to 15% in 2000, and by 15% to 20% in 2001.

Index

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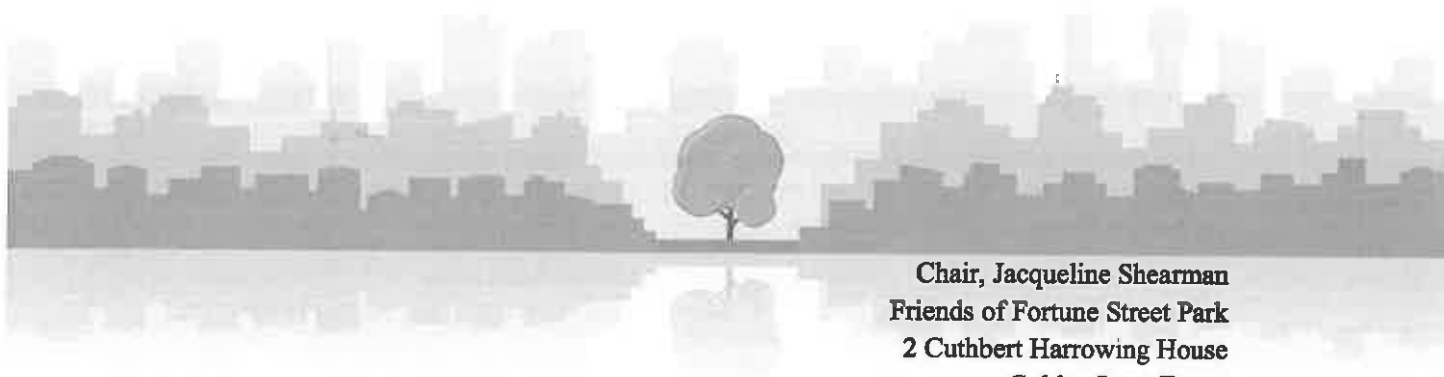
Emergency

2017-2018

17

2014-15 Budgetary Control Statement

671



Chair, Jacqueline Shearman
Friends of Fortune Street Park
2 Cuthbert Harrowing House
Golden Lane Estate
EC1Y 0RB
19th August 2016

Department of the Built Environment
Guildhall
City of
London
LONDON
EC2P 2EJ

Dear Sirs,

Planning application 16/00590/FULL, 43 Golden Lane

I am the Chair of the Friends of Fortune Street Park, a volunteer support group for Fortune Park, which has been recognised by the London Borough of Islington since 2003. This was following a major refurbishment of the park, which was substantially funded by the City of London. We are a group of volunteer local residents working towards making Fortune Street Park the best it can be for the community, and every summer we organised a community Family Fun Day in the park.



The park is very popular with the public and it is the only public green space in this area. During lunchtimes many City workers relax on the lawn and later in the afternoon pupils from the Golden Lane Campus make heavy use of the park facilities after school. Through out the day the elderly residents rest and meet to socialise.



The Friends Group is especially concerned about:

- The loss of amenity due to reduced sunlight to the park in the afternoon when pupils are leaving the school and making use of the park;
- Increased wear and tear due to additional usage of the park from an increased local population;
- Over shadowing causing an additional negative impact on the park and planting.

Will there be considerable funding made available for Fortune Street Park to mitigate these pressures on what is an already heavily used park, to turn this into an exceptional public open space for such an urban environment?

At present the park enjoys afternoon sunshine from March until September. This picture shows Fortune Street Park at 16:40 on 4th March, when the sun was just setting behind Bernard Morgan House.

The application to redevelop the site purports to include 'before' and 'after' views from Fortune Park, but it does no such thing. The application repeats the 'before' image, thereby giving us no informed idea of the impact of the new building on the setting of the Fortune Street Park.

However, we understand that the new building will be much taller than the current structure, starting nearly 50% higher on the right of this image and rising to around twice the current height on the left.

As far as we can see this will cut off most of the afternoon sun from the park. We consider this an overbearing and unacceptable loss of amenity for park users and in particular for pupils of the Golden Lane Campus as they leave school and play in the park.

The Friends of Fortune Park object strongly to this planned development on the grounds that the proposed structure is overbearing, out of scale with the area and threatens a serious loss of sunlight and amenity to users of this popular public park that we are committed to champion.

Yours faithfully,

Friends of Fortune Street Park Group

Jacqueline Shearman, Chair,

Simon Holt, Secretary (Vice Chair)

Patrick Hegarty, Treasurer

Linford, Catherine

From: [REDACTED]
Sent: 19 August 2016 16:30
To: Linford, Catherine
Subject: 16/00590 FULL Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping, and all associated works at Bernard Morgan House 43 Golden Lane E...

Dear Catherine Linford

16/00590 FULL Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping, and all associated works at Bernard Morgan House 43 Golden Lane Estate, London EC1Y 0RS

I am writing to strongly object to the proposed plan. Moreover I want to register that I am appalled and shocked by the cynical timing of the plan's submission in mid-August when the school is closed and many local residents are away on vacation and therefore unaware of what is happening and unable to object. Despite the so called 'consultation' process conducted by the developer local resident have not been considered, in fact they have been treated with contempt throughout the process. I list the specific detail of my concerns below:

Destruction of an area of architectural and historical significance: Bernard Morgan House is a building of considerable architectural merit and a fine, indeed paradigmatic example of modern design from an internationally recognised and celebrated era of British civic architecture and urban planning. Like the adjacent Golden Lane Estate and Welsh Church, the design of Bernard Morgan House preserves the topography of the former bombsite on which it is constructed by maintaining the sunken foundations of older buildings destroyed in Luftwaffe raids over London in 1940. The proposed development would completely wreck all of this.

Destruction of quality of life to local residents and those who frequent the area:

The scale and massing of the proposed building takes no account of the existing architecture. It will rob light from surrounding residential and civic buildings, notably Bowater House where I live, but also the adjacent Cobalt Building and Tudor Rose Court. It will throw areas of well-used Fortune Street Park into permanent shadow and critically have a negative impact on winter sun in out of school hours. It will obliterate sun from classrooms and rooftop recreation areas of Golden Lane Campus, which accommodates three separate institutions for local children: Richard Cloudeley School (for children with special needs), Golden Lane Children's Centre and Prior Weston Primary School, as well as community resources for pregnant women.

Social Cleansing: In the midst of a national housing crisis the destruction of key worker housing and its replacement with a purely commercial speculative development is indefensible. The former YMCA building at the opposite end of Fann Street is currently being developed into residential units with price tags far beyond the reach of ordinary working people. Old Street Roundabout, sites along City Road and Central Street and around the Barbican, including the Moorgate Exchange are currently being developed in a similar way. These 'ghost' developments, which exclude and disturb the local community are marketed to overseas investors. Previous occupancy trends demonstrate that the vast majority of them will simply remain empty.

In the strongest possible terms I urge you to consider alternatives to the commercial redevelopment of this site with the offensively over scaled and alienating development and to appeal against the listings application of Bernard Morgan House rejected by the Secretary of State. At the very least the proposed plan must be modified.

Yours,

Clare Carolin

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Ms Jacqueline Swanson

Address: 13 Basterfield House Golden Lane Estate London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The development is over scaled for the immediate surroundings and has a very unsympathetic relationship with its neighbouring buildings, the park and the Golden Lane Estate. It will completely dwarf the neighbourhood. It is very clear that it is not an original design which one would expect in such an architecturally significant neighbourhood.

I am particularly concerned that it will winter sun to the park and playgrounds in the afternoons. The park is well used after school by local children and enjoyed by much of the community. It would also block sunlight to many of the flats of my neighbours on the Golden Lane Estate.

It would appear to me that the proposed plans ignore The City of London Listed Building Management Guidelines for the Golden lane Estate:

"The views from - as well as into - the estate have become more important. Part of the special architectural interest of the estate lies in its relationship with adjacent buildings; their height, scale, mass, form, materials and detailing could, for example, have an impact on that special interest... The relevant local authority should, therefore, take into account the significance of the estate's setting to its special architectural interest when considering any developments on the immediate boundaries of the listed area."

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Ms JACQUELINE SHEARMAN

Address: 2 CUTHBERT HARROWING HOUSE GOLDEN LANE ESTATE LONDON

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: I am writing to object to the destruction of Bernard Morgan Station House. An excellent well designed building, that was designed specifically to compliment the architecture around it, most renowned is The Golden Lane Estate and is of special interest to 20th century. The proposed design ignores scale and material, the impact on the local park our only green space, robbing light and sunshine due to its scale overshadowing it, as well as overshadow the children's playground in Prior Weston, Richard Cloudesley Special school and the children centre.

The design, scale and stacked massing of the building proposed by Taylor Wimpey will have huge negative impact on the local surroundings and the community.

There is concern that the local infrastructure is at its full capacity the local surgery Neeman Practice is overstretched as is the park and the negative impact of traffic and parking spaces. there will be an increase in noise and local traffic.

The last public consultation I attended had not incorporated any of the comments and objections that were raised by the local community, they have been completely ignored. I can only hope that this official process for objection is heard and we can make a difference to stop this

I have sent a separate email to catherine.linford@cityoflondon.gov.uk with my list of objections.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mrs Harriette ashcroft

Address: 11s Peabody building Chequer street Islington

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: I am objecting to the Wimpey Taylor new building to replace Bernard morgan .

I went to the consultation originally and feel my comments and concerns have been ignored.

I am deeply concerned with the impact of the height and mass of the building impacting on children's play and the loss of light to the park . I am also worried about the height it will overwhelm the local residents homes and the lack of privacy for the school. The demand on local services will also be a drain on an already over subscribed doctors surgery. I am very disappointed in the scale and mass of this building wish to make my objections heard.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mr Camille Brooks

Address: 83 Great Arthur House Golden Lane Estate London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: This development will be a disaster for my neighbours in Golden Lane Estate, which was carefully designed to give residents a feeling of space in the middle of the city. The estate is still around 50% social housing, and tenants feel once again that they are seen as nothing but a vague inconvenience in the square mile, to be walled up and deprived of light without a whimper.

We need more affordable housing. Bernard Morgan House is perfectly suited to this already, it is an elegant structure that sits perfectly between Golden Lane and the Barbican, both architecturally and in scale. There is a one-off opportunity here for reusing an existing building to help ease the London housing crisis, and it is about to be lost forever.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mr Mark Lemanski

Address: 528 Ben Jonson House London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Bernard Morgan House is a beautiful piece of architecture that effortlessly knits the Golden Lane Estate to the former Cripplegate Library in both massing and architectural articulation, and to the Barbican further south. Siting, massing and facade treatment are all carefully balanced and complement the adjoining masterpieces. In stark contrast, the drawings of the proposed plans show a much bulkier mass that distract from and compromise the refined language of the Barbican and Golden Lane estate.

Of even greater concern is the harm that would be inflicted upon Fortune Park through the obstruction of sunlight. This is a park that is heavily used, especially during the late afternoon by school children, in an area of underprovision of green spaces. The increased height and increased footprint of the proposed building mean that precisely at the time of the highest use, direct sunlight to the park would be substantially reduced. This means that the amenity value of the park would be greatly reduced, and health benefits such as the 'happiness factor' of sunlight reduced. The City of London recognizes the value of Fortune Park in its play and open spaces policies, as both a means to alleviate the shortage of open space provision within its boundaries, and as a way to create meaningful partnerships with adjacent communities, which has been corroborated by the City's financial contribution to its enhancement and upkeep. To allow the proposed development to go forward would appear to be in direct contradiction to these commendable past efforts and many of your own planning policies.

I would also note that the public consultation carried out by the applicant was misleading in terms of amenity and sunlight issues, and appears to have failed to take on concerns expressed by local residents.

I trust that you will consider conscientiously the detrimental effect the proposed development would have on the quality of life in the area, and especially its youngest residents.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mr David Henderson

Address: 13 Basterfield House Golden Lane Estate London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: These proposals appear over scaled in the context of the street and surrounding buildings. They will have a negative impact on the setting and amenity of the listed Golden Lane Estate in particular.

The design seems generic and not of the standard of either the existing building or the surrounding listed buildings.

Wells, Janet (Built Environment)

From: Pln - CC - Development Dc
Subject: FW: PLN FW: Objection COL:00183062

From: Nirmani Shah []
Sent: 21 August 2016 01:08
To: PlanningQueue
Cc: Graves, David; Barker OBE Deputy, John; Starling CC, Angela; Bradshaw CC, David; Chipperfield, Rob; Linford, Catherine
Subject: Objection

Ms. Annie Hampson
Chief Planning Officer and Development Director,
City of London,
P.O.Box 270,
Guildhall,
C2P 2EJ

Dear Ms. Hampson,

Your Reference : Planning Application 16 / 00590 / Full
Proposed Redevelopment of Bernard Morgan House, 43 Golden Lane, London EC1Y 0RS

I am writing to formally register my objections to the proposed redevelopment of Bernard Morgan House as contained in the above referenced Application.

My objections are on several grounds :

- The height, mass and bulk of the proposed redevelopment is out of character with both the existing building and buildings which immediately surround it. This results in a significant intensification of the Plot Ratio for the site. Simply counting the number of storeys is not sufficient as each storey has a significant floor to ceiling height and, as a result, the total height exceeds by at least 2 storeys the neighbouring Cripplegate building, itself the highest building that surrounds the Square on which Bernard Morgan House sits.
- The Developer has paid scant regard to comments made in the Public Consultation, notwithstanding its claim to the contrary in the Planning Application. Not only did the Public Consultation in January 2016 exclude owners and residents of Cobalt Building, but the Developer has merely transferred the mass and bulk of the proposed redevelopment to the elevation along Brackley Street. Furthermore, objections registered by owners and residents of Cobalt Building to this transfer of mass and bulk towards Cobalt Building, when they were invited for the first time to review the proposed redevelopment at the May consultation, have been completely ignored in the Application ;
- This reorientation of the proposed redevelopment, and its scale, has a dramatic and deleterious impact on residents of Cobalt Building on their quiet enjoyment of amenity which they currently possess. Not only is the proposed South West elevation of 4 storeys equivalent to some 6 storeys in Cobalt Building, and almost the same in relation to Cripplegate Building, but the redevelopment now extends close to Cobalt Building, with an attendant impairment of light and visual amenities.
- Furthermore, residents will no longer be able to enjoy the quiet amenity of Brackley St which would be transformed into a busy thoroughfare for vehicular traffic for the proposed 104 flats in terms of set- down,

pick-up of residents and guests along with increased service vehicle requirements. This will dramatically increase noise for Cobalt residents who currently enjoy a quiet and peaceful Brackley St.

As I have set out in earlier correspondence, I would ask that the development is not allowed to extend beyond the current footprint along Brackley Street (unlike the currentl proposal which extends well beyond), and that it is lowered at the South West elevation to no more than 2 storeys. These changes would go some way to mitigating the highly detrimental impact on owners / residents of Cobalt Building on the amenities they currently enjoy if the proposed redevelopment is approved in the form presented in the Application.

Additionally, the Application suggests that you and your colleagues in Planning have already approved the height, bulk and massing for the redevelopment as proposed. I trust this is a misleading statement on the part of the Developer, otherwise seeking our comments / objections to the Application would be an exercise in futility !

Yours Sincerely,

N. D. Shah
56, The Cobalt Building,
10-15 Bridgewater Square,
London EC2 8AH

Adjei, William

From: Linford, Catherine
Sent: 22 August 2016 11:30
To: Adjei, William
Subject: FW: objections to Bernard Morgan planning application
Importance: High

From: shearmedia [REDACTED]
Sent: 21 August 2016 18:26
To: Linford, Catherine
Subject: objections to Bernard Morgan planning application
Importance: High

Please find enclosed below a summary my objections to the Bernard Morgan House redevelopment proposal.

1. The size and mass of the building
2. no thought of the design and listed buildings surrounding the area
- 3, the loss of light towards the park and the footprint
- 4 lack of infrastructure pressure is already felt on local surgery.
5. the noise and increase of traffic on fann street and golden lane.
6. the over bearing size of the building swamping the jewel church
7. i will have loss of site of the barbican and loss of light from where i live.
8. completely ignored all the concerns and issues raised by the little consultation there was.
9. 20th century objections need to be heard and valued
10. materials mentioned ignore the original build which was built specifically to compliment surrounding estate and height.
- 11.local authority have not taken into account the special architectural interest of the BM building

I did enter this o the website but it did not come up so I have emailed it too.

your sincerely
Mrs J shearman

shearmedia
2 cuthbert harrowing house
golden lane estate
London
EC1Y 0RB

mobile: [REDACTED]
[REDACTED]

Adjei, William

From: Linford, Catherine
Sent: 22 August 2016 11:15
To: Adjei, William
Subject: FW: Planning Application 16/00590/FULL Bernard Morgan House

From: [REDACTED]
Sent: 21 August 2016 10:58
To: Linford, Catherine
Subject: Planning Application 16/00590/FULL Bernard Morgan House

Dear Ms Linford

I am writing to you to object to the Bernard Morgan House Planning Application. As a long leaseholder of a flat in Breton House, I have an interest in protecting the surrounding area. I wish to object on the following grounds.

1. It is totally unreasonable of the applicant to have disregarded objections made at the second consultation by people whose lives will be adversely affected, and to have gone ahead and submitted the same plans. This seems to me to be a total disregard for other people's lives.
2. The proposed height and mass of the frontage would dominate the surrounding area, overlooking and overshadowing existing buildings.
3. Studio flats on the west-facing side of Breton House have no other aspect than that west side. Apart from significantly dimming the level of light during the day, the new development would block out completely the evening sunlight which those west-facing flats currently enjoy.

For the above reasons I ask that the Planning and Transportation Committee refuse to grant planning permission for the proposal.

Yours sincerely,

Gill Kimber (Mrs)

Long leaseholder of 67 Breton House, Barbican
Address for correspondence: 18 Pinehill Road, Crowthorne, Berkshire RG45 7JD

Adjai, William

From:

Sent:

To:

Subject:

21 August 2010 21:02

PLN - Comments

Ref: 16/00590/FULL Bernard Morgan House Case Officer: Catherine Winford

For the attention of Catherine Winford

Ref. 16/00590/FULL

Location: Bernard Morgan House, 43 Golden Lane, London, EC1Y 0RS

Dear Catherine,

I am a resident of the Golden Lane Estate and have lived here for the past 10 years. I am just 40 and studied architecture at the Royal College of Art, London. I am all for progressive architecture.

However, having visited the Bernard Morgan open day a couple months ago, I wasn't just shocked, but horrified by the proposal. Architecturally, the scheme not only obliterates the classic simplicity and volume of the current building (which I was hoping would be retained and renovated) but completely obliterates it, stacking up horrendously overbearing and over-scaled architecture in its place.

This area is unbelievably unique- one of the first cases of progressive social housing in the City of London. Both the Golden Lane Estate and The Barbican are hailed as significant exemplars of communal social living which are not only respected nationally but acclaimed worldwide.

This building (above), significantly, sits at the junction of these two impressive estates. However, rather than bridging and complementing them, the scale completely belittles and besmirches its neighbours.

I will be horrified if this proposal goes through. It is greedy, grossly bursting out of its plot and screams of developer greed. It will, without doubt, reduce the scale of the Golden Lane Estate to dolls' house proportions and if it is allowed to go through planning, this will be irreversible.

Please let me know any way in which I can help to make sure this development does not happen.

Please accept this email as my formal rejection of the scheme and if you could advise me of the next steps that would be great.

Yours in shock,

Howard Sullivan

Howard Sullivan MA RCA

Co-founder & Creative Director. YourStudio. London



YourStudio Ltd,
54 Rivington St,
London. EC2A 3QN

weareyourstudio.com
[Journal](#) : [Twitter](#) : [LinkedIn](#)

Adjei, William

From: Linford, Catherine
Sent: 22 August 2016 11:10
To: Adjei, William
Subject: FW: Objections to redevelopment of Bernard Morgan House - 16/00590/FULL

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

From: James Warriner [mailto:]
Sent: 21 August 2016 10:54
To: Linford, Catherine
Subject: Objections to redevelopment of Bernard Morgan House - 16/00590/FULL

Dear Catherine,

As the owner of a flat in Breton House (95), I wish to object to the proposed redevelopment of Bernard Morgan House.

The height and scale of the development is wholly inappropriate for the following reasons:

1. A dramatic change to the immediate environment around listed buildings
2. Significant reduction in light
3. Negative impact for residents and visitors in terms of views from Breton House and surrounding area.
4. The sheer scale and bulk of the design overwhelming the area dramatically increasing the hemmed in and cramped feeling to the bottom of Golden Lane.

Please can you confirm receipt of this email and confirm if my objection has been registered and if I should forward this objection to anyone else.

Yours Sincerely,

James Warriner.

Sent from my iPad

Adjei, William

From: Linford, Catherine
Sent: 22 August 2016 12:21
To: Adjei, William
Subject: FW: Bernard Morgan House ref 16/00590/FULL

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

From: Mark Lemanski [mailto:]
Sent: 21 August 2016 19:04
To: Linford, Catherine
Subject: Bernard Morgan House ref 16/00590/FULL

Dear Catherine Linford,

I am writing with regards to proposals to replace Bernard Morgan House with a much bigger building.

Bernard Morgan House is a beautiful piece of architecture that effortlessly knits the Golden Lane Estate to the former Cripplegate Library in both massing and architectural articulation, and to the Barbican further south. Siting, massing and facade treatment are all carefully balanced and complement the adjoining masterpieces, as indicated in the attached pdf. In stark contrast, the drawings of the proposed plans show a much bulkier mass that distract from and compromise the refined language of the Barbican and Golden Lane estate.

Of even greater concern is the harm that would be inflicted upon Fortune Park through the obstruction of sunlight. This is a park that is heavily used, especially during the late afternoon by school children, in an area of underprovision of green spaces. The increased height and increased footprint of the proposed building mean that precisely at the time of the highest use, direct sunlight to the park would be substantially reduced, as is evident in the attached document. This means that the amenity value of the park would be greatly reduced, through the reduction of health benefits such as the 'happiness factor' of sunlight. The City of London recognizes the value of Fortune Park in its play and open spaces policies, as both a means to alleviate the shortage of open space provision within its boundaries, and as a way to create meaningful partnerships with adjacent communities, which has been corroborated by the City's financial contribution to its enhancement and upkeep. To allow the proposed development to go forward would appear to be in direct contradiction to these commendable past efforts and many of your own planning policies.

I would also note that the public consultation carried out by the applicant was misleading in terms of amenity and sunlight issues, and appears to have failed to take on concerns expressed by local residents.

I trust that you will consider conscientiously the detrimental effect the proposed development would have on the quality of life in the area, and especially its youngest residents.

With best wishes,

Mark Lemanski
528 Ben Jonson House
London EC2Y 8NH
[REDACTED]

URBAN GRAIN

Bernard Morgan House
as part of the Golden Lane
and Barbican ensemble



view from Ben Jonson
House House

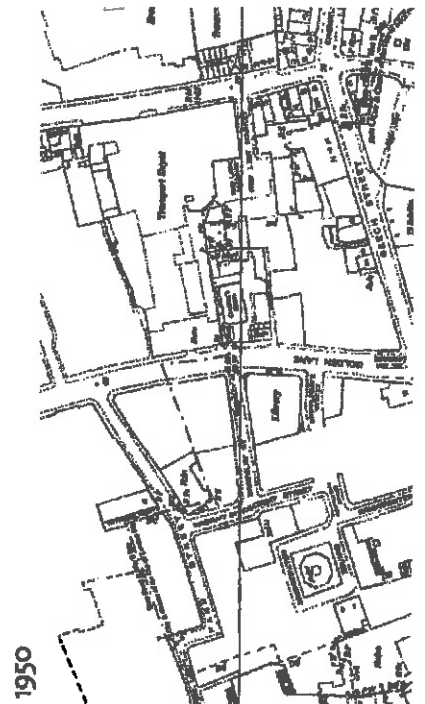
aerial view demonstrates
close relationship in
alignment, massing,
height and facade treat-
ment



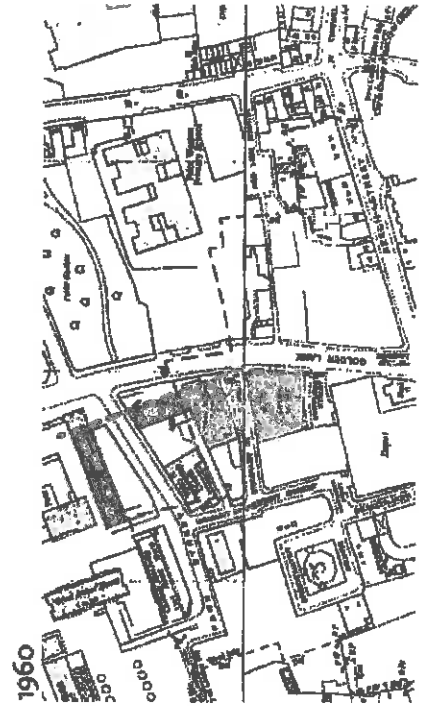
1890



1910



1950



1960

LOSS OF AMENITY

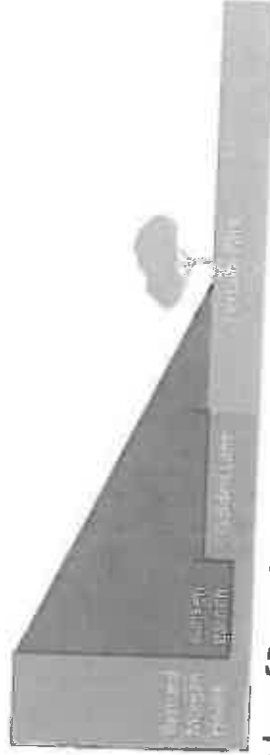
Diminishing quality of Fortune Park
through loss of direct lighting



shadow of Bernard Morgan House on 30th of September 2015 at 3:35pm



shadow of proposed replacement at the same time



shadow of Bernard Morgan House on 30th of September 2015 at 3:35pm



Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Miss Sophie Nielsen

Address: 106 Great Arthur House Golden Lane Estate London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: I would like to start off this letter of objection to the proposed new Development on The Bernhard Morgan house site (at the corner of Golden Lane and Fann Street) by pointing out:

1.

How rather evil (and clever, I guess) the planners have been to only give a two week window of opportunity to oppose to the scheme - in the middle of the school summer holidays !!! while most people are away (myself included - hence the late reaction) and will have no opportunity to voice their opposition!

This brings me straight to the next point:

2.

Most of the above mentioned people away, have children in Prior Weston school, Golden Lane Childrens centre or Richard Cloudsly school , all of whom will be massively affected by the proposed development.

The sunlight to the outdoor play areas will be blocked by the proposed development !!!
We do not have many sunny days in the first place, it must surely be a crime to deprive the children of those few we do have !!!!

3.

The children's school days are long... They finish at 3:30 at which point most play outside the school in the sun of Fortune park.

This of course will be a thing of the past if the proposed development is implemented, as those few hours of sun and daylight left for the children to enjoy, will never reach the park!!!

4.

I wonder too what the lack of sun will do to the flora of the park?

5.

The unique architecture of Bernhard Morgan House has always been a beautiful link between the iconic Golden Lane Estate and Barbican Estate. The proposed development completely dwarfs these surrounding buildings!

It is absolutely appalling that a development like the proposed is even being considered!!!

I assume it is solely profit driven!!

But I am sure more fitting (environmentally, socially and aesthetically) developments could be considered for this site!!!!

With kind regards

Sophie Nielsen

Flat 106 Great Arthur House

Golden Lane Estate

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mrs Helen Hulson

Address: 523 Ben Jonson House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment:

1. I am very concerned about the loss of light and sunshine to Fortune Park and to the listed Barbican gardens at the base of Breton House. The substantial increase in height of the proposed building, compared with the present building, means that it will overshadow the areas to the East of it. This will be particularly damaging during the winter months when the sun is low. Fortune Park is an area where primary aged children at the adjacent Golden Lane Campus, leaving school at 3.30pm, are accustomed to play on the grassy section nearest to Golden Lane. There will also be loss of light and sunshine to the western part of the Golden Lane raised playground. Insufficient sunshine is indicated in cases of Vitamin D deficiency.

Under the City of London Core Strategy Open Spaces and Recreation Policy CS19 I understand that existing open spaces should be protected by improving the quality and ensuring developments contribute towards them. It is clear that this development will have an adverse effect on Fortune Park as a direct result of the excessive height of the proposed building.

2. Taylor Wimpey are taking the UBS building to the immediate South of the proposed development, as the reference/precedent for the substantial increase in height. This is not appropriate because the site is in fact on one of the streets and in a position that directly borders on Fortune Park. It is in this context that its height should be considered. It will be too dominant and overbearing in relation to the built form of the street in this location.

3. I understand that it is intended in the proposed development to increase the current square footage of approximately 44,000 to approximately 80,000 and to use the space to provide 104

dwellings. Under the Core Strategy Housing Policy CS21 the plan is to exceed the minimum annual requirement of 110 additional residential units in the City up to 2026. It cannot be necessary or appropriate for nearly all of the annual requirement to be provided on this single site.

4. The design of the proposed building is greatly inferior to the one it replaces. Bernard Morgan House, as it stands, was carefully designed in its quality and proportions to complement the Golden Lane Estate. It displays an interesting use of materials and many original features both inside and out. By contrast, the proposed building appears to be a barely altered, mediocre design from developments completed by Taylor Wimpey in Ladbroke Grove and Wandsworth, which are both quite different in character from this location. There is no attempt to refer either to the current building, or to the listed buildings on the Golden Lane and Barbican Estates.

These points are the principal basis on which I object to the proposals set out in this Planning Application.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Ms Sarah Marks

Address: 41 Peabody Tower Golden Lane London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: I am writing to object to the proposed development of Bernard Morgan House (BMH).

The biggest objection I have is the loss of light to the surrounding area, in particular Prior Weston Primary School and Fortune Park. The new development will almost certainly overlook the school causing loss of privacy.

The proposed new building will be much bigger than BMH and as such be a very imposing structure.

The local area does not have the infrastructure to support the big influx of people the new building will almost certainly generate.

The proposed new building does not incorporate affordable housing and so will not offer the much needed accommodation that local people require.

I agree that BMH needs redevelopment but not with the current plans.

Adjei, William

From: Linford, Catherine
Sent: 23 August 2016 16:08
To: Adjei, William
Subject: FW: BMH

Sent: Tuesday, August 23, 2016 at 9:32 AM

From: "Fred Scott"

Subject: BMH

The current relationship of Bernard Morgan House to the neighbouring Golden Lane Estate is a monument to the achievements of British Modern architecture, planning law and town-scaping in the mid 20th. Century. The careful attention the more recent building pays to its then unlisted neighbour to the north is a striking outcome of the co-operation between the planners and the architects of the Police section house. The airiness and light at the corner of Fann St and Golden Lane is the legacy of this earlier wisdom, a continuing daily benefaction due to the earlier foresight of others. The proposed development of the sight would obliterate these virtues, this is apparent from comparing the Golden Lane elevations of the two adjoining sites, the existing and the proposed. Now that the architectural quality of Golden Lane Estate has been nationally recognised by its listing in 1988, one would think there would be more pressing reasons why the re-development of any adjoining site should be at least as considered as the original development of Bernard Morgan House.

The choice of style for the new building is also puzzling, in as much as it is a discernible style. The massing clearly mirrors the Cripplegate Library to the south, not in its original condition, but with the lumpen Post Modern additions on the sides and to the rear. The Library has the mighty Barbican as its neighbour to the south, so the size is not an issue, but this is not the case on the north side. I have sympathy with the architects in trying to fit the developers' requirements onto the Bernard Morgan site, but I think the choice of a sort of Post Modernism, islanded windows set in a brick carcass and consequently fragmented facade, emphasises the importing of the scale of the over bearing neighbour on to the site. Not to choose a Modernist approach, for which the practice is well known, compounds the intrusion. To eschew any attempt at contextualism with its attractive neighbour to the north seems also to be a mistake.

To prioritise development over aesthetics makes the City prone to charges of Philistinism, which as an aspiring world city claiming a deeply engrained culture, one would think it cannot easily afford.

Adjei, William

From: Linford, Catherine
Sent: 23 August 2016 11:54
To: Adjei, William
Subject: FW: Bernard Morgan House Planning Objection

From: Liz Davis [mailto:]
Sent: 23 August 2016 11:12
To: Linford, Catherine
Subject: Bernard Morgan House Planning Objection

I am not sure my comment went through on the website
Liz Davis 4 Bayer Hse Golden Lane Est EC1Y 0RN

The mass of the proposed development will overpower a perfectly composed street. It is too large ,too dest and has none of the delicacy of Golden Lane Est or the building it will replace Bernard Morgan House.It will take the light away from the park and Bowater House We all pass this corner daily to go to the shops ,into the park ,commuting et.The wildlife garden which I study is set within the site(floral specimens of which go into the archives of the Natural History Museum) Bird nest roost and feed there, insects flourish.It is a valuable and rare wildlife habitat within the city.We need this space , children and adults alike We are squashed in the city but survive due to brilliant architecture.

Adjei, William

From: [REDACTED]
Sent: 23 August 2016 11:37
To: Linford, Catherine
Cc: PLN - Comments
Subject: Planning application 16/00590/FULL. Objection.

Dear Catherine Linford

Planning application 16/00590/FULL

My family have lived and run a business in Whitecross Street in Islington since 1864. I am now lucky enough to live in a modern house that overlooks Fortune Park which has views towards Bernard Morgan House and the Golden Lane Estate.

When we redeveloped our site in 2007, Islington's planners instructed us to reduce the planned bulk and height of our relatively modest four storey home. They advised that the bulk and mass of the building was overbearing and inappropriate on Fortune Park.

I have studied the BMH planning application in vain looking for a clear idea of the impact of the proposed new development on the setting of Fortune Park but can find nothing helpful. The developers seem rather shy of sharing exactly what their new building will look like from different viewpoints.

However, from what I can tell, this new development appears unexpectedly massive. It will overshadow the park in the evenings and dominate the Golden Lane Estate.

I therefore object to this application of the grounds of the bulk and massing of the proposed new building; its overbearing impact on the surrounding area, including Fortune Park, and also its negative effect on the setting of the listed Golden Lane Estate.

Please acknowledge receipt of this email.

Yours sincerely

Simon Holt
A. Holt & Sons Ltd.
115 Whitecross Street
London
EC1Y 8JQ

T: + [REDACTED]
[REDACTED]

Adjei, William

Subject:

FW: Planning application 16/00590/FULL Objection

From: M Holt [mailto: [REDACTED]]
Sent: 23 August 2016 12:07
To: Linford, Catherine
Cc: PLN - Comments
Subject: Planning application 16/00590/FULL Objection

Dear Catherine Linford

Planning application 16/00590/FULL

I have lived in my home in Islington all of my life. It overlooks Fortune Park which has views towards Bernard Morgan House and the Golden Lane Estate.

This new development appears unexpectedly massive. It will overshadow the park in the early evenings and dominate the Golden Lane Estate.

Loss of light and amenity are my concern.

I object to this application of the grounds of the bulk and massing of the proposed new building; its overbearing impact on the surrounding area, including Fortune Park, and also its negative effect on the setting of the listed Golden Lane Estate.

Please acknowledge receipt of this email.

Yours sincerely

Matilda Holt
13 Shrewsbury Court
London
EC1Y 8JE

M: [REDACTED]

ACKNOWLEDGED

Adjei, William

From: Linford, Catherine
Sent: 23 August 2016 11:56
To: Adjei, William
Subject: FW: Planning Application 16/00590/FULL

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

From: Samantha Logan [mailto:]
Sent: 23 August 2016 11:34
To: Linford, Catherine
Subject: Planning Application 16/00590/FULL

Dear Catherine,

Re: Planning Application 16/00590/FULL

I write to you as a resident of 63 Breton House, Barbican, to strongly object to this planning application.

My reasons for this are that if permission is granted, the mass of the proposed new building, particularly around the junction of Golden Lane and Blackley St will significantly reduce, if not eliminate altogether, the evening sunlight currently enjoyed by flats on the western side of Breton House. It will also reduce daylight generally and lead to being overlooked, especially from overhanging balconies on the Golden Lane frontage.

In addition I also object to the massing, height, scale and bulk of the proposed development, the horrendous aesthetic impact of the development on the setting of the surrounding listed buildings, the overall loss of sunlight on surrounding listed buildings, the design and appearance of the proposed development and the loss of visual amenity and the impact on visitors to Fortune Park which sits directly opposite the proposed site.

Best wishes,

Samantha Logan

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Ms Sarah Griffiths

Address: 235 Ben Jonson House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: Scale, Massing Height

The new development will block winter sun in the park, as well as affect the flats within Golden Lane - Bowater House.

It is higher than Cripplegate Library - and would affect any future development of this site.

Its possible the existing Infrastructure will not be able to cope with the significant number of new residents.

It is shame we are losing Bernard Morgan house which in itself is an iconic building.

It has no respect for the either the Grade II Listed buildings of the Barbican or Golden Lane.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mr William and Christine Clifford

Address: 26 Bowater House Golden Lane Estate London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: We are objecting on two grounds. 1. The loss of light- this will seriously affect residents in Bowater, the School, users of the park, residents in parts of the Barbican estate and residents in Cobalt House and lastly those in Cripplegate Library building.

2. The disregard of the Corporation's own planning policy and the Golden Lane Estate listing guidelines. BMH was built to the same height of Bowater House for a reason. Its design complements the GLE and acts as a successful bridge with the sister estate Barbican. It would seem to be willful vandalism of the two architectural gems in the City's residential portfolio. A disregard also of the affordable housing requirement that has not been agreed by committee. Why have any policy if the City itself opts to pick and choose when it should be applied.

I fear this development has been agreed before any consultation just as the West Smithfield debacle. I hope the City decides against this appalling design and rethinks BMH. Surely it could be converted to residential uses without demolition.

Catherine Linford
The Department of the Built Environment
City of London
PO Box 270
Gulldhall
London EC2P 2EJ

PLANNING & TRANSPORTATION		
PSDD	CPO	PPD
TPD	24 AUG 2016	LTP
OM		SSE
NO	127 395	PP
FILE		DD

Redevelopment of Bernard Morgan House, Golden Lane (Ref: 16/00590/FULL)

☐

I am writing to state my support for the planning application to redevelop Bernard Morgan House.

Please add any other comments below:

I think that the architects for the developers have made an effort to make the building (proposed) as pleasant as they can, trying to avoid cutting out light and sun from the opposing buildings.
The matter of whether there should be more affordable flats within the building is a matter for the City of London or Islington. Personally, I think there is a urgent need for such properties with hospitals, police forces, firemen and teachers all needing homes in the area.

☒ I am a local resident

☐ I am a local business owner

☐ I work at a local business

Name:

Ms Linda Stables

Address:

534 Bernard Morgan House,
Barnet
London EC2Y 8NH.

Tel:

Email address:

Signature:

Catherine Linford
The Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ

Redevelopment of Bernard Morgan House, Golden Lane (Ref: 16/00590/FULL)



I am writing to state my support for the planning application to
redevelop Bernard Morgan House.

Please add any other comments below:

MUST BE GOOD FOR THE LOCAL ECONOMY

24 AUG 2016

☐ I am a local resident ☒ I am a local business owner ☐ I work at a local business

Name:

S. BENSONER

Address:

6-10 GOSWELL ROAD
LONDON EC1M 7AA

Tel:

Email address:

Signature:

Catherine Linford
The Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ

Redevelopment of Bernard Morgan House, Golden Lane (Ref: 16/00590/FULL)



I am writing to state my support for the planning application to
redevelop Bernard Morgan House.

24 AUG 2016

Please add any other comments below:

☐ I am a local resident ☐ I am a local business owner ☒ I work at a local business

Name:

Amaris ~~at~~ Paveion Pavision A.

Address:

36 Carmichael Road

London
SE1 7AA

Tel:

Email address:

Signature:

Catherine Linford
The Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ

Redevelopment of Bernard Morgan House, Golden Lane (Ref: 16/00590/FULL)



I am writing to state my support for the planning application to
redevelop Bernard Morgan House.

Please add any other comments below:

WORKING & CONCERNED ABOUT SECURITY.
NEW RESIDENTS ALWAYS WELCOME.

24 AUG 2016

☐ I am a local resident ☒ I am a local business owner ☐ I work at a local business

Name: GUY HAYWARD

Address: 12c ALDERSGATE STREET
E1A 4JQ

Tel:

Email address:

Signature:



Catherine Linford
The Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ

Redevelopment of Bernard Morgan House, Golden Lane (Ref: 16/00590/FULL)



I am writing to state my support for the planning application to redevelop Bernard Morgan House.

Please add any other comments below:

IT WOULD BE GOOD TO BRING MORE PEOPLE
AND BUSINESS IN THE AREA

24 AUG 2016

☐ I am a local resident



I am a local business owner

☐ I work at a local business

Name:

28/10/16

Address:

VENTURA SAKALO

3-5 GOSWELL ROAD

LONDON

EC1R 7AH

Tel:

Email address:

Signature:



Catherine Linford
The Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ

PLANNING & TRANSPORTATION		
PSDD	CPO	PPD
TPD	24 AUG 2016	LTP
OM		SSE
No	127346	PP
FILE		DD

Redevelopment of Bernard Morgan House, Golden Lane (Ref: 16/00590/FULL)



I am writing to state my support for the planning application to redevelop Bernard Morgan House.

Please add any other comments below:

Bring new people into the area and
help local businesses grow.

☐ I am a local resident

☐ I am a local business owner

☒ I work at a local business

Name:

Colin Turner

Address:

2 Goswell Road

Tel:

Email address:

Signature:



Catherine Linford
The Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ

Redevelopment of Bernard Morgan House, Golden Lane (Ref: 16/00590/FULL)



I am writing to state my support for the planning application to
redevelop Bernard Morgan House.

Please add any other comments below:

24 AUG 2016

Local business would welcome more
trade.

☐ I am a local resident

☒ I am a local business owner

☐ I work at a local business

Name:

Mr PADDA (WINE SHOP)

Address:

32 Grosvenor Road
London
EC1M 7AA

Tel:

Email address:

Signature:



Catherine Linford
The Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ

Redevelopment of Bernard Morgan House, Golden Lane (Ref: 16/00590/FULL)



I am writing to state my support for the planning application to redevelop Bernard Morgan House.

24 AUG 2016

Please add any other comments below:

I THINK IT IS A SECURITY
RISK NOW.
I WOULD LIKE TO SEE IT TURNED
INTO FLATS FOR NEW FAMILIES

☐ I am a local resident

☒ I am a local business owner

☐ I work at a local business

Name:

RAJESH PATIL

Address:

127 ALPHAGATE ST

GC1A 4SQ - BARNET

Tel:

Email address:

Signature:



Catherine Linford
The Department of the Built Environment
City of London
PO Box 270
Gulldhall
London EC2P 2EJ

Redevelopment of Bernard Morgan House, Golden Lane (Ref: 16/00590/FULL)



I am writing to state my support for the planning application to
redevelop Bernard Morgan House.

24 AUG 2016

Please add any other comments below:

I would like to see the building redeveloped as
flats.



I am a local resident



I am a local business owner



I work at a local business

Name:

ROBERT PECK

Address:

FLAT 10, 6-9, BRIDGEWATER SQ
EC2Y 8AG

Tel:

Email address:

Signature:



Catherine Linford
The Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ

Redevelopment of Bernard Morgan House, Golden Lane (Ref: 16/00590/FULL)



I am writing to state my support for the planning application to
redevelop Bernard Morgan House.

Please add any other comments below:

24 AUG 2016

MORE PEOPLE IN THE AREA

☐ I am a local resident ☐ I am a local business owner ☒ I work at a local business

Name:

IDA L'ERARIO

Address:

3-5 GOSWELL RD

EC1M 7AH

Tel:

0

Email address:

Signature:



Hassall, Pam

From: Jan and Peter Bennett
Sent: 24 August 2016 12:44
To: PLN - Comments
Subject: Bernard Morgan House Planning Application - your Ref 16/00590/FULL

For the attention of Catherine Linford

I am writing in my capacity as Secretary of the Tudor Rose Court Residents' Association to generally support the above planning application, subject to a number of issues as set out below. You will be aware that Tudor Rose Court is adjacent to the development site on Fann Street/Viscount Street, and comprises 35 retirement flats.

At a meeting of the Tudor Rose Court Residents' Association on 23 May 2016 the proposed development of Bernard Morgan House was discussed and it was agreed that in general the proposals for Bernard Morgan House were good for the area. The provision of a small garden area which could be used by residents of Tudor Rose Court, together with other neighbours, was welcomed. It was, however, noted that there will be a great deal of disruption during the demolition and building works which will have an adverse impact on the elderly residents of Tudor Rose Court. Clear conditions are therefore requested in the planning consent to minimise this disruption and to provide appropriate compensation, from the developers, for the residents of Tudor Rose Court.

Yours sincerely
Jan Bennett
Secretary - Tudor Rose Court Residents' Association
Flat 21 Tudor Rose Court
35 Fann Street

Adjei, William

From: Linford, Catherine
Sent: 24 August 2016 15:15
To: Adjei, William
Subject: FW: OBJECTION TO THE PROPOSED REDEVELOPMENT OF BERNARD MORGAN HOUSE, 43 GOLDEN LANE, LONDON EC1Y 0RS: PLANNING APPLICATION: 16/00590

From: Patterson, Liz [mailto:]
Sent: 24 August 2016 14:27
To: PlanningQueue
Cc: Graves, David; Barker OBE Deputy, John; Starling CC, Angela; Bradshaw CC, David; Chipperfield, Rob; Linford, Catherine; ELIZABETH PATTERSON
Subject: OBJECTION TO THE PROPOSED REDEVELOPMENT OF BERNARD MORGAN HOUSE, 43 GOLDEN LANE, LONDON EC1Y 0RS: PLANNING APPLICATION: 16/00590

FOR THE ATTENTION OF MS. ANNIE HAMPSON, CHIEF PLANNING OFFICER AND DEVELOPMENT OFFICER, CITY OF LONDON

Dear Ms. Hampson,

I am a leaseholder in Flat 37, Cobalt Building, 10-15 Bridgewater Square, London EC2Y 8AH.

By this e-mail, I formally register my objection to the above redevelopment, for the reasons set out below:-

- 1 The sheer size, volume and height of the proposed redevelopment is out of character with the existing surrounding buildings.
- 2 The height of the proposed redevelopment will exceed by two storeys the height of the neighbouring Cripplegate Building, at present the highest building in the surrounding Square on which the existing Bernard Morgan House building is situated.
- 3 It is proposed to extend the redevelopment further along Brackley Street, which will have a very prejudicial and harmful effect on residents of Cobalt Building flats overlooking Brackley Street. Such residents will see their enjoyment of light and amenity very seriously diminished.
- 4 For all of us residents in the Cobalt Building, the building of 104 flats will inevitably result in increased noise, including traffic noise, and pressure on parking.
- 5 Furthermore, as a disabled person with the need to park very close to my home, I fear the additional numbers of people residing in the 104 flats, as well as visitors to such residents, will increase the pressure on the two disabled bays in Bridgewater Square and in Fann Street, as well as the limited Pay and Display bays in Brackley Street.

I am strongly of the view that residents of what is currently a very quiet oasis in this corner of the City will be seriously prejudiced by this proposed re-development. Please can all of my concerns expressed above be taken into account. At the very least, I would urge that the proposed re-development not extend beyond the current size of Bernard Morgan House.

I look forward to hearing from you in response to my Objection.

203
Yours sincerely,

Liz Patterson, Solicitor

AIG

**Financial Lines Major Loss Adjuster Europe
Financial Lines Claims/AIG Property Casualty**

The AIG Building, 58 Fenchurch Street, London EC3M 4AG

Tel: [REDACTED]

www.AIG.com

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Planning Application 16/00590/FULL - Bernard Morgan House

As trustees of Jewin Welsh Church at 70 Fann Street we are grateful for the opportunity to comment on the planning application for Bernard Morgan House. We have also welcomed the efforts Taylor Wimpey have made to engage with us through their exhibitions and subsequent meetings.

We were founded as a church in 1774, making us the oldest London Welsh congregation. Our church has been present on the current site on Fann Street since 1879. The church was rebuilt in 1960 following its destruction in the Blitz in 1940. The current building is widely appreciated for its architectural merit, the quality of its internal design and workmanship, its excellent acoustic qualities and its fine pipe organ by John Compton of London. Jewin Chapel plays a major role in the life of the wider London Welsh community, regularly hosting events attracting hundreds of people. In the view of this, and of our long history as a congregation, the church building is greatly valued and we are firmly committed to remaining on site in the current building.

We welcome in principle the redevelopment of Bernard Morgan House and hope the provision of further homes and commercial space will bring added vitality to the area. As a church we would hope to see the social benefits of such a scheme being maximised, including the provision of social housing and local employment schemes.

Having reviewed the current application, we have five principal areas of concern and wish to make the following points.

- **Disruption from demolition and construction** – Given the proximity of the church to the site, we have serious concerns about the effects of demolition and construction. Our church complex contains a caretaker's flat on its south flank (which would therefore be immediately adjoining the site on three sides). The flat is tenanted and we are extremely concerned as to the effect of the noise and dust upon its residents and would ask that mitigation measures be explored and implemented
- **Natural Light** – The church currently benefits from extensive natural light from its South facing windows, and we would wish to see this considered and respected as regards the design of the wing along Brackley Street. Our main service is at c11 m on a Sunday and we would ask that the levels of light at this time be given particular consideration. We appreciate that a daylight and sunlight assessment has been done, but would urge an independent study be undertaken, and the effect on the basement and flat be carefully considered.
- **The Hall** – The church contains a large half basement, which is regularly used for a range of functions. It is currently leased to a commercial Nursery, Hatching Dragons. The lease which is for 5 years provides the church with a critical source of income. We are extremely concerned that the impact of the demolition and construction will be such as to render the hall unusable for a nursery, or indeed any other function. We are further concerned that the impact of overshadowing and overlooking from the Southern flank of the development will further compromise the functionality of the hall – having that use is an important element of church life.

- **The Caretaker's Flat-** Whilst the bulk of our site is the Church, we would urge that all due regard is given to caretaker's flat as a dwelling in considering this application. Not solely in terms of concerns over noise ,dust and light- but that due consideration to the effect the proposed building would have on the outlook, privacy and general amenity of the flat.
- **Parking** As a church with a gathered congregation, with many elderly worshippers, parking provision on roads immediately adjacent to the Chapel (Fann St, Viscount St, Brackley and Golden Lane) is vitally important to us, and we have concerns as to the impact on street parking as a result of construction, and from the long term uplift in residential numbers. We are therefore glad to note that the current application does contain on-site parking, and hope that it will be endorsed.

We hope that these comments are useful and would welcome the opportunity for further engagement and dialogue with you as this case progresses.

Iago Griffith

70 Fann Street

EC1A 0SA

***BERNARD MORGAN HOUSE DEMOLITION and REDEVELOPMENT
PLANS***

We believe that the Bernard Morgan demolition and redevelopment will have a detrimental impact on Prior Weston Primary School and Children's Centre and, in particular, on the upper level, outdoor playground and learning areas at Prior Weston School, directly across from the proposed development. Toddlers and the under fives will also be affected at the ground floor level playground.

The playgrounds and outdoor learning space on the upper level of the building is a key resource for improving the learning, progress and achievement of children at the school. It is also a key resource for the physical, social and emotional well being of children at the school. We have current plans to make even further use of this area, with an upgraded playground and more frequent and better use of outdoor play, exercise and learning areas. We also plan to improve the Children's Centre playground facilities. These plans are outlined in the current Prior Weston School Improvement Plan (SIP).

It should also be noted that the effective use of the physical environment, in terms of integrated indoor/outdoor play and integration into the wider community (such as the mixed use of Fortune Street Park), is clearly identified as an indicator of 'Best Practice' by Ofsted (2015).

The school is seeking re-assurance that the Bernard Morgan proposals will not result in any significant loss of light to this area during the main hours of use (8am-6pm). The school objects to plans resulting in loss of light which have the potential to diminish this key resource for our children.

Prior Weston Governing Body also seeks re-assurance that the Bernard Morgan development does not create a situation where the children are inappropriately overlooked and that the safety and security of the children are not in any way compromised.

Noise and disruption during the development of the site is likely to be very intrusive and detrimental to children's learning and we wonder what measures are to be put in place to minimise that and compensate the primary school and children's centre.

The Prior Weston Governing Body resolved at its meeting on 12th July 2016 to OBJECT to the demolition and redevelopment plans for Bernard Morgan House and to ask the City of London to REJECT the planning application.

We are willing to meet with appropriate officers and individuals in the light of decisions taken by the City of London. Please use Ruth Gee as the first point of contact.

Ruth Gee
Chair of the Governing Body,
Prior Weston Primary School and Children's Centre.



And

Andrew Boyes,
Headteacher, Prior Weston.

BERNARD MORGAN HOUSE DEMOLITION and REDEVELOPMENT PLANS

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We are willing to meet with appropriate officers and individuals in the light of decisions taken by the City of London. Please use Ruth Gee as the first point of contact.

Ruth Gee

Chair of the Governing Body,

Prior Weston Primary School and Children's Centre.



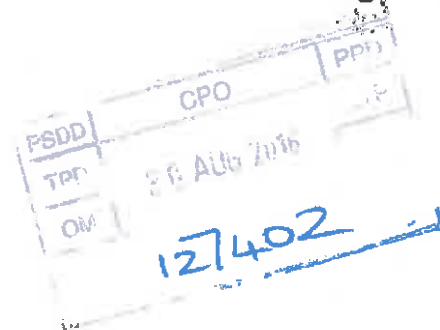
And

Andrew Boyes,
Headteacher.

110 Breton House
Barbican
London
EC2Y 8PQ

25 August 2016

Catherine Linford
Department of the Built Environment
City of London
PO Box 270
Guildhall
London
EC2P 2EJ



Application reference 16/00590/FULL

Bernard Morgan House, 43 Golden Lane, London EC1Y 0RS

Dear Ms Linford,

I object to the above application on the ground that the scale and design of the proposed development is wholly out of keeping with that of the surrounding buildings, especially Bowater House and the Welsh church. Whereas the present building was carefully planned so as to harmonize with its neighbours, the proposal ignores the distinctive character of the area altogether. Approval of the proposal would fly in the face of the Listed Building Management Guidelines for the Golden Lane estate, which require the local authority to "take into account the significance of the estate's setting to its special architectural interest when considering any developments on the immediate boundaries of the listed area" (2.2). This requirement applies to developments on any of the estate's boundaries, but, in view of the historical and architectural connections between the Golden Lane and Barbican estates, I submit that it must apply with particular force to developments in the corridor between them.

Moreover the sentence quoted above is preceded by an example: "An illustration of the importance of the current setting is the view along Goswell Road and Crescent House with the backdrop of the tower blocks of the Barbican Estate – all by Chamberlin, Powell and Bon." An equally valid example of the same point would have been the views from the open areas around Great Arthur House towards the Barbican towers, which the proposed building would obstruct.

I note the applicants' argument that the reduction in daylight and sunlight which the proposed building would inflict on the residents of Bowater House is justifiable because it would be largely attributable to the design of Bowater House itself. In support of this argument they quote the City's Local Plan as stating: "Where appropriate, the City Corporation will take into account unusual existing circumstances, such as ... the presence of balconies or other external features, which limit the daylight and sunlight that a building can receive".

However, I would emphasise the words "where appropriate". In this case the offending building, Bowater House, is one of some architectural distinction. The Guidelines point out that, like the other low-rise blocks, it was "planned specifically to achieve an impression of spaciousness and

light" (2.2.4). The architects managed to achieve this effect in spite of the features that are now said to reduce the building's own daylight. Clearly they must have made certain assumptions as to the size and proximity of the buildings that would eventually become these blocks' neighbours. If they had suspected that one of those neighbours would be anything like the building now proposed, they would have adopted different solutions. In effect the applicants' argument is that Chamberlin, Powell and Bon got it wrong, and that the consequences of that error must now be borne by the residents and not by developers. Accepting this argument would, I suggest, be a strange way for the Corporation to honour the architects' legacy.

Yours sincerely,

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

Jacques Parry

Adjei, William

From: Linford, Catherine
Sent: 31 August 2016 10:10
To: Adjei, William
Subject: FW: Request to add and amend my objection letter 16/00590/FULL 42 Bowater House

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

From: Debs [REDACTED]
Sent: 26 August 2016 20:55
To: Linford, Catherine
Subject: Request to add and amend my objection letter 16/00590/FULL 42 Bowater House

Dear Catherine Linford ,

I am writing to request and add on on further comment to my objection letter. This is as follows:

As a resident of Bowater House , I object to the potential impact to daylight and sunlight amenity on my flat at 42 Bowater House.

The enjoyment of my property will be greatly affected by the scheme .

I understand that City of London have a statutory obligation to recognise my objection.

Many thanks for your consideration .

Yours sincerely,

Deborah Phillips

Sent from my iPad

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mr Dominic Bampton

Address: 6 Brandon Mews Barbican London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I strongly object to the demolition of Bernard Morgan House and redevelopment the site. There will be a great deal of disruption for nearby residents and the relative peace of Golden Lane and fortune park will be ruined for months if not years. Having seen the CGI pictures of the proposed new building it is clear that it will be completely disproportionate to its surroundings. I suggest a renovation of the existing building and its use as affordable housing for local people. The demolition and redevelopment should not go ahead.

Yours sincerely, Dominic Bampton

Consultation response and objection to the planning application for Bernard Morgan House,
43 Golden Lane, London EC1Y 0RS, Ref. 16/00590/FULL

Tim Godsmark
Chair Golden Lane Estate Residents' Association
23 Hatfield House
Golden Lane Estate
London
EC1Y 0ST

26 August 2016

Dear Sirs,

I write on behalf of the Golden Lanes Residents' Association (GLERA) who are a statutory consultee for the above application.

While we accept that some form of development on the site, preferably reusing the existing building, is desirable this is not the right building for the context. We therefore object to this application and recommend that it be refused.

Our reasons for objecting are:

Planning Policies and Government Planning Policy

1. Community facilities or public infrastructure amenity

The community facilities in the area are already overstretched and because of the cost of land in Central London that is unlikely to change. The main areas of concern are:

Medical Services.

The area is served by one doctors' surgery, The Neaman Practice in Half Moon Court and one NHS dentist on the parade of shops on the Golden Lane Estate fronting Goswell Road. Both have to serve the populations of the Barbican, the Golden Lane Estate and the Peabody blocks around Whitecross Street as well as the local office population. St Bartholomew's Hospital was downgraded a number of years ago and it is questionable that it has sufficient capacity and range of facilities to serve an ever expanding population.

Education.

The City usually relies on private provision for nursery education which is unaffordable for many people. It is unlikely that there will be sufficient provision at the publicly funded Golden Lane Early Years Centre as this is already over subscribed and it gives priority to residents of LB Islington.

The local primary schools are heavily subscribed and, although a new primary school is to be built on the old Richard Cloudsley school site it is unclear how soon this will come on stream.

The City of London has no none fee paying secondary schools provision in its boundaries and although it has arrangements with the sponsored City Academies these mean sometimes lengthy travel by public transport for the children from the City who use them and our understanding is that uptake from City children is limited.

Public Open Space.

The only local public open Space is Fortune Street Park opposite the site. This is already over-used as a visit on a summer's lunch-time demonstrates and this has led to damage to the planting in the park. The proposals include minimal amenity space and this will

lead to an increased use of the park which it will be unable to sustain. Equally overshadowing of the park will lead to a degradation of the ecology.

Transport

Although the area is well served by buses and the underground the extra users of public transport will stretch the services already near capacity. The nearest bus route, the 153, is infrequent and only runs single deck buses and this will be under particular strain.

2. Overlooking

The Fann Street elevation of the proposals has living room and bedroom windows overlooking Bowater House. We have been told that the City of London does not have a policy for minimum distances between windows onto habitable rooms however the policy with most London Boroughs is a minimum distance of 18 metres. The distance between the blocks and windows onto habitable rooms appears to be slightly less than this and is unacceptable.

We recommend that if the application be approved that the flats facing Bowater House and the Cobalt Building have either frosted glass or 2 metre privacy screens to the windows.

3. Loss of daylight, sunlight and over-shadowing

The proposals will mean a material loss of sunlight and ambient light to the surrounding buildings and Fortune Street Park and the play areas of the Golden Lane Campus. The most affected building will be Bowater House, a residential block on the Golden Lane Estate. The Sun Light, Daylight and Over-shadowing Report states that *"Secondly, one of the key surrounding properties, Bowater House, has a large number of windows that are self-obstructed by a combination of projecting balconies, recessed windows and brick-built privacy screens which materially limit the access of light to those windows facing the site."* Having lived in an identical Golden Lane maisonette block for 14 years I can categorically state that there is not loss of daylight due to the articulation of the façade and solar gain can be a problem in the summer.

The Report says, in précis, that the reduction in light is greater than the BRE guidelines but this is acceptable because of the building's inner city location. This argument is unacceptable given that the building (and some of its occupants) have enjoyed the same level of natural light since the late 1950s and the occupants of inner city flats have as much need of natural light as anyone else.

The over-shadowing diagrams for Fortune Park show a greater level of shadow at certain times of day and year. This will have an impact on the ecological make up of the Park and reduce its usability to the local community.

Over-shadowing of the Golden Lane Campus will limit children's access to the play area at certain times of the day and year. It will also impact on public health because of reduced children's exercise and vitamin D levels. The Report shows that this overshadowing will be at its worse at school departure time at 3:30pm in winter.

4. Noise and Disturbance

While we understand that construction noise and disturbance is not a valid grounds for objecting to a planning application we would note that no Construction Management Plan has been submitted. The disturbance caused by the development will be most felt the, often frail, elderly occupants of Tudor Rose Court and this should be taken into account.

For the ongoing use of the building we note that the service entrance is to be in Brackley Street. The streets to the rear of the site are narrow and the 'canyon' effect caused by such a tall building fronting other tall buildings will cause sound to carry and nuisance to surrounding flats. This again will have particular impact on Tudor Rose Court but also on the occupants of Bowater House due to increased use of Fann Street. We would recommend that if the application is approved that hours of use of the service entrance are conditioned.

The site is in close proximity to a school and delivery trucks using Golden Lane during the works will be a hazard for children going to and from school. We would suggest that deliveries be limited by condition outside these hours should the application be approved.

5. Design, Character and Appearance

The site sits between several listed buildings and a new school designed by a respected contemporary architect. The Listed Buildings Management Guidelines for the Golden Lane Estate state that:

'The views from – as well as into – the estate have become important. Part of the special architectural interest of the estate lies in its relationship with adjacent buildings; their height, scale, mass, form, materials and detailing could, for example, have an impact on that special interest. An illustration of the importance of the current setting is the view along Goswell Road and Crescent House with the backdrop of the tower blocks of the Barbican Estate – all by Chamberlin, Powell and Bon. The relevant local authority should, therefore, take into account the significance of the estate's setting to its special architectural interest when considering any developments on the immediate boundaries of the listed area.'

There is no evidence from the documentation supplied with the application that views from the Estate have been taken into account, especially given the reluctance for the applicant to provide views looking along Golden Lane to and from the Estate.

The design of the elevations of the proposals appear to take their cue from the Peabody flats fronting Fortune Street with brick walls and raised contrasting reveals to the window openings. These are the least architecturally interesting buildings in the locality and as they were a generic response to housing design in the late 1950s/early 60s the proposed elevational treatment is a generic response today that can be found in numerous developments including several by AHMM. Given the sensitivity of the site and the close proximity of listed buildings that demonstrate a development in the architectural thinking of a single architect it would have been more appropriate to have seen the building in the context of the Golden Lane Estate and the Barbican. The existing building on the site certainly took ideas from the Golden Lane Estate while not attempting to directly mimic it and we do not understand why this could not have been done with the proposals rather than a rather lazy imposition of a house style or ideas from elsewhere.

We would comment that a majority of the flats proposed are single aspect and this is not good practice in housing design as it limits natural ventilation. This can be compared to the Golden Lane Estate where all the flats are dual aspect.

6. Sustainability

The design and access statement does not make a case for losing the embodied energy in the existing building apart from a brief line in the Design & Access Statement saying that the existing building is in a poor state of repair. In fact, for a building that has been empty for over a year, it is in a remarkably good state of repair and we can see no reason why it should not be reused.

The Sustainability Statement supplied with the application is about aims but is light on the specifics of how these are to be achieved. If the application is granted approval we would recommend that specific energy reduction targets are conditioned.

7. Density, Massing and Bulk

The existing building has a floor area of 4,047 sq m. The site was sold with a sketch scheme prepared for the City Surveyors Department suggesting that a floor area of 8,000 sq m might be possible. The current proposals are around 12,000 sq m. This is an unacceptably high increase given the context and the sensitivity of the site.

The building is extremely bulky and no thought appears to have been given to the impact on its neighbours or their residential amenity with regards to overshadowing, over looking or sense of enclosure.

8. Impact on the Historic Environment, Listed Buildings or Conservation Areas

As noted in the design section no regard has appeared to have been taken of the surrounding listed buildings.

An application has been made for the existing Bernard Morgan House to be defined as a non designated Heritage Asset.

9. Traffic implications, Parking and Means of Access

Although the proposals are effectively car free it is unlikely, given the socio-economic status of the prospective owners, that it will be possible to maintain this position as the occupants will find ways around it. Central London already regularly misses targets and regulations for air pollution and given the proximity of the proposals to a primary school on what is currently a relatively lightly trafficked street, an increase in local traffic can only have a detrimental effect on public health.

As noted above Brackley Street is completely unsuitable for servicing the building given the carriageway width.

SUMMARY

The Golden Lane Estate Residents' Association strongly objects to these proposals and recommends refusal of this application.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Miss Marie Morley

Address: Flat 2, Cobalt Building 10-15 Bridgewater Square London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: As a Cobalt Building resident, I object to the application to re-develop Bernard Morgan House (BMH). I urge the Corporation of London (CoL) refuse the application.

The Cobalt Building was neglected in the community engagement process. A petition signed by Cobalt residents was sent to Taylor Wimpey and CoL in June. As our concerns had not been addressed in the validated planning application, the petition was re-submitted in August. Taylor Wimpey's planning statement fails to mention the Cobalt Building when referring to adjacent/adjoining buildings. However, the statement does say CoL has approved the "height, bulk and massing for the redevelopment as proposed" - before the start of the consultation period.

The density, massing and bulk of the proposed development will have a negative impact on my residential amenity. The building is c. 4,000sqm more than the original plan. Not only is this an overbearing size, the building's bulk has moved towards Viscount Street with proximity to my flat. The designated "service" entrance on Brackley Street will give rise to increased traffic required to service 104 flats. This traffic will come directly down Brackley Street and exit via Viscount Street. These narrow roads face my flat and will become busy thoroughfares, creating untold noise and pollution. Please do not permit the development to extend beyond the current footprint along Brackley Street, with two storeys at the South West elevation.

A "public pocket park" will sit outside my lounge window. I am extremely concerned about anti-social behaviour. Retain the green space but keep it private.

My flat is not the brightest now, so the light received is very precious. The new development will obstruct the light I currently enjoy and reduce my quality of life. Point 2 Surveyors' Light Report says five windows in my flat "all record minor transgressions of the BRE numerical targets, with reductions ranging from 20.07% to 22.94%.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Miss SELINA ROBERTSON

Address: 323 SHAKESPEARE TOWER Barbican LONDON

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment:As a neighbour in Shakespeare Tower, I am appalled by the plans to pull down BMH and re-build a higher, intrusive building that will impact the local city planning of the area in terms of blocking any winter light to the park, the school children playing and the residents at Bowater House and Fann Street itself. What is the point of pulling down an good enough existing building to build something that no local resident wants or needs? There are so many reasons why I enjoy living on the Barbican estate and one of them is the material relationship to Golden Lane Estate, the community and the special local building design. Why is the City of London considering an planning application that is breaking the Golden Lane Listed Buildings Guidelines? Also, why do we need more private house accommodation, when are you going to provide new social housing for the local area? I really hope that you take into account of the comments from local residents, not just those living on Golden Lane Estate, as this planning application will affect the whole neighbourhood in terms of bad design, impact on the community of all ages, increased local traffic, increasingly worrying pollution levels, and stresses on local social/NHS services. Thank you.

Dear Catherine Linford

The Golden Lane Estate Residents Association Planning Sub-Committee strongly object to the demolition of Bernard Morgan House and I would like to recommend to the local planning authority that the planning application should be refused.

The current proposals for Bernard Morgan House do not meet the City of London's planning policy, are an over-development of the site, will have a negative impact on its surroundings, including neighbouring dwellings in terms of over-shadowing, over-looking and by dominating neighbouring buildings. The design is a generic response to a multi storey housing typology and selects its design cues from the least architecturally interesting buildings in the locality.

The issues with the design are summed up by the following points:

- The building is not contextual and, as it replicates design details of AHMM buildings elsewhere, is a generic response to the site.
- The details of the design pick up on the least interesting buildings in the locality rather than the architecturally significant Golden Lane Estate and Barbican.
- The proposals do not follow the listed building guidelines and the building as a whole is inappropriate in the context of two, major, listed building complexes.
- The provisions of the Local Plan have not been followed.
- The mass of the building is too great and the elevation facing Fann Street and the Golden Lane Estate is banal.
- The bedroom windows in the elevation facing Fann Street are close to the windows of habitable rooms in Bowater House on the Golden Lanes Estate.
- The proposals will overshadow Bowater House on the Golden Lane Estate, Fortune Park and the Golden Lane Campus including Prior Weston and Richard Cloudsley schools. This will impact on local childrens' health.
- The developer says that it does not intend to follow the City of London's policy for on-site affordable homes and is not providing any.
- The development is replacing key worker housing with housing that is unaffordable to the majority of the local population as well as key workers.

We were very sad to see the new designs intended to replace Bernard Morgan House. This feels like a wasted opportunity by such renowned architects to build something which could complement the extraordinary and elegant Golden Lane Estate. If they were sensitive to this specific site how can they just rehash buildings they have already built in Wandsworth and Ladbroke Grove? Completely different settings to this unique site.



Planning Application 16/00590/FULL, 43 Golden Lane, EC1Y 0RS.

The site is right next to the iconic grade 2 listed Golden Lane Estate. Bernard Morgan House connects the Golden Lane Estate with the Barbican. The architects (AHMM) have said how much they admire Chamberlin, Powell and Bon, these new designs are an insult to their memory. AHMM have taken as their influences the Welsh Church and the low rise Peabody buildings in Fortune Street and not the still outstanding and innovative designs of the Golden Lane Estate and the Barbican.



When Bernard Morgan House was built in 1960 great care was taken to compliment Bowater House and the Golden Lane Estate.



In 1960 The Architectural Journal ran an article about The Finsbury Section House (in the 1970s the building was renamed Bernard Morgan House)

GROUND FLOOR PLAN (Scale: 1 inch=32 feet)

The Finsbury Section House of the Metropolitan Police occupies part of an island site at the junction of Golden Lane and Fenn Street, immediately to the south of the City of London's Golden Lane housing scheme and on the northern edge of the Barbican area. One of the town-planning requirements was that the Golden Lane frontage and the height of the building should be complementary to a neighbouring six-storey block of malcontries. Another requirement was that

the main entrance should not be in Golden Lane itself. Bearing in mind both the position and the purpose of the Section House, the architects attempted to create a building which would harmonise with the adjoining housing schemes but would also have an added "civic" feeling in keeping with its use.

The site had been heavily bombed during the war and the level was approximately fifteen feet below the road at the

Official Architecture and Planning, July 1962 369



The architects' new building doesn't need to replicate the style of the Golden Lane Estate or the Barbican but imagination is needed to create a replacement of Bernard Morgan House that equals this unique building, with its fine detail and use of decorative tiles and knapped flint. It's a tragedy that this building is being demolished to be replaced by something so mediocre. Surely the architects can come up with something more exciting than remodelling their past designs built in completely different locations?



"Bernard Morgan House, a Section House by the Metropolitan Police Architects' Department, completed 1960. Long slab, well detailed, with infill of the concrete frame in dark brick and knapped flint." (The Buildings of England, London 1: The City of London by Simon Bradley and Nikolaus Pevsner)

Planning Application 16/00590/FULL, 43 Golden Lane, EC1Y 0RS.

Having seen what they want to replace Bernard Morgan House with it makes us feel even more upset that this building was not listed. It was built using materials that remained onsite after the old church was bombed, giving it a sense of history that goes back centuries. The architect references the old church with the use of knapped flint wall panels which gives an ecclesiastical allusion.



There is a sense of space around the building, which fits with Bowater in scale and structure without mimicry or pastiche. You can also see how well it compliments the Barbican which was built afterwards; Chamberlin, Powell and Bon must have taken this building into consideration while designing the Barbican.



The new designs do not conform to The Listed Building Guidelines.

The Listed Building Guidelines

"No new buildings, infilling, removals or extensions should be introduced which would be detrimental to the integrity of the estate as a whole.

The design of the estate is particularly significant in its achievement of a viable and sustainable community within a tightly defined space. It provides not only a high density of accommodation but also large areas of open space and diverse social facilities and amenities. All available space is used to maximum effect.

The Golden Lane Estate should be understood in its entirety: not only its various components – residential, community, recreational, commercial and the external spaces between buildings – but also its setting within the urban fabric of the City of London.

The estate was conceived to provide a self-contained, distinct and sustainable community enjoying a high standard of accommodation and amenities. Because of its unpromising setting – at that time, in the early 1950s, a bleak wasteland of bomb sites to the north of St Paul's Cathedral – it was specifically designed to have a strong sense of enclosure. There was, however, no intention or attempt to diminish its essentially urban location and character. The architects clearly articulated this: 'It has tried to be as urban as the City itself.

While the original concept was, in words of the architects, 'inward-looking' because of the inhospitable surroundings at the time, five decades on the estate should be appreciated in its current environment, which differs considerably from that of the early Golden Lane Estate Listed Building Management Guidelines 1950s.

This concept should not, however, be misinterpreted as implying that developments around the estate are unimportant. The views from – as well as into – the estate have become important. Part of the special architectural interest of the estate lies in its relationship with adjacent buildings; their height, scale, mass, form, materials and detailing could, for example, have an impact on that special interest.

An illustration of the importance of the current setting is the view along Goswell Road and Crescent House with the backdrop of the tower blocks of the Barbican Estate – all by Chamberlin, Powell and Bon. The relevant local authority should,

therefore, take into account the significance of the estate's setting to its special architectural interest when considering any developments on the immediate boundaries of the listed area.

The design of the Golden Lane Estate is particularly significant in its interpretation of a viable and sustainable community within a tightly defined urban space. In addition to the efficient use of space to provide the required density of housing (200 people per acre), it also provided amenities and facilities to support a self-contained community. While this was an aspiration of many post-war redevelopment projects, few succeeded in achieving the diversity and integration of the Golden Lane Estate. From its earliest conception, it included a community centre for residents, leisure facilities including a swimming pool and badminton court, a bowling green (subsequently tennis courts), a nursery and children's playground (which later included a paddling pool, since removed), residents' club rooms, garages, estate workshops, and, slightly later as the site was extended, shops and a public house (which originally included a restaurant), as well as open spaces or 'courts'. These are contained within a tightly planned area, where all available space is used to maximum effect.

This guideline has been completely ignored "The relationship with adjacent buildings; their height, scale, mass, form, materials and detailing could, for example, have an impact on that special interest."



The architects AHMM say this is *“An architectural design that is in keeping with the distinctive feel of the local area.”*

How AHMM make this claim when all they have done is transpose designs they did for buildings in Wandsworth and Ladbroke Grove?

The new plans may be influenced by the design of the Welsh Church and the low rise peabody buildings, both of which we like but none are listed and neither are “distinctive”.

The Golden Lane Estate, the Barbican and Bernard Morgan House are what makes this area special and interesting architecturally. It is these buildings which are in keeping with the ‘distinctive feel of the local area’. And the new building does **not** conform to The Listed Building Guidelines.



Planning Application 16/00590/FULL, 43 Golden Lane, EC1Y 0RS.

According to the architects the City's Conservation officer directed them to use the Welsh Church as their model. We find this very strange as even though the Church may not be listed, the new designs will completely dwarf it. The new building is huge. We like the Welsh Church very much and we think it should be listed but if this new building is allowed to be built the church will be lost in a mass of brown brick.



"The current building was designed by Caroe and Partners in a Swedish-inspired form of modern architecture sometimes called the New Humanism" Wikipedia

Ironic that the new building has no sense of human scale whatsoever and completely dwarfs both the church that inspired it and the iconic Golden Lane Estate. The Corbusier influence, which played a big part in the designs of Golden Lane was also clearly a major influence on the design of Bernard Morgan House.



The Pavillon Suisse or Swiss pavilion was designed by Le Corbusier between 1930-31

CITY OF LONDON LOCAL PLAN January 2015

page 125

Core Strategic Policy CS15: Sustainable Development and Climate Change

3. Avoiding demolition through the reuse of existing buildings or their main structures, and minimising the disruption to businesses and residents, using sustainably sourced materials and conserving water resources.

This building is worth preserving

Page 125 of the Local Plan makes reference to avoiding demolition through the reuse of existing buildings or their main structures and we question the need to demolish Bernard Morgan House. We refer back to page 91 CS10: Design point 1. Ensuring that the bulk, height, scale, massing, quality of materials and de-tailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. And point 3. Ensuring that development has an appropriate street level presence and roof scape and a positive relationship to neighbouring buildings and spaces.

All of this was clearly considered in 1960 when Bernard Morgan House was built: the scale and position in relation to Bowater House; the use of knapped flint and the decorative tiling. As well as the integrated open spaces and gardens.



Why couldn't something exciting be done with the building as it is now? Keep the shell, it would look amazing renovated, there are so many beautiful details. The blandness of the new plans emphasis the careful thought that went into the design of Bernard Morgan House.

Bernard Morgan House, The Welsh Church and The Golden Lane Estate were all built after the war on an area that had been destroyed in bombing raids. Each incorporated the basements of the original buildings into its design, with each building creating a sunken garden with a sense of lightness and space. Bernard Morgan House has particularly elegant green slate staircases rising up from these gardens. Even an original victorian street light remains in the grounds. It is clear that care was taken when building on these sites to respect the history of the area.

The overbearing quality of this proposal makes us appreciate how Bernard Morgan House and the adjacent Welsh Church, with its trees and space between, adhere to the notion of enclave that is a common feature of the Barbican, Golden Lane Estate, and the school, (whose western elevation quotes directly from Bernard Morgan House) and Fortune Park opposite. Buildings coexist. Some become important for their place in the community. Bernard Morgan House performed such a function.

The new designs ignore the City of London Local Plan, page 91

Core Strategic Policy C310: Design

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

1. Ensuring that the bulk, height, scale, massing, quality of materials and detailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces.
2. Encouraging design solutions that make effective use of limited land resources.
3. Ensuring that development has an appropriate street level presence and roofscape and a positive relationship to neighbouring buildings and streets.
4. Requiring the design and management of buildings, streets and spaces to provide for the access needs of all the City's communities, including the particular needs of disabled people.
5. Ensuring that new development respects and maintains the City's characteristic network of streets and alleyways.
6. Delivering improvement in the environment, amenities and enjoyment of open spaces, play areas, streets, lanes and alleys through schemes in accordance with public realm enhancement strategies.
7. Ensuring that signs and advertisements respect the residential character of the City.

These new designs not only ignore the local plan but they make Jonathan Meades' statement in support of the Listed Buildings application all the more relevant.

" Whilst there can be no doubt that cities benefit from near-anarchic heterogeneity there can equally be no doubt that the combination of an officially sanctioned Croesus inspired near-anarchy has only the most baleful consequences. At some point the City of London's shiny, ostentatious self- destruction must stop. Greed has marred it. Corporate sloth has allowed it to become a carnival of bling. Developers and architects have been subjected to only the frailest checks. The very idea of aesthetic control seems laughably quaint, a hangover from an age which valued propriety. Bernard Morgan House belongs to such an age. It is over fifty years old. Thus it has enjoyed what, by current measures, it is an exceptional longevity. But then it belongs to an era when buildings were reckoned to be something other than ephemeral - and it looks it: there is nothing in its materials which speaks of impermanence. Black bricks, knapped flint, concrete. Whilst the form may derive from Le Corbusier the materials, unusual in this conjunction, derive from the industrial vernacular of the nineteenth century and the immemorial structures of the flint-constellated chalklands of the Thames Basin.

There are also extrinsic reasons why it should be listed.

1) It is superior to whatever will replace it. One need not see what replacement is proposed to make such an assertion. One need only look at the abortions which have replaced other victims of corporate vandalism.

2) A section house is not, say, a refinery or a piece of kit - it is a civilian barracks and so easily convertible to another kind of human accommodation.

3) It forms part of a unique continuous contemporary composition which includes Golden Lane and the Barbican. "

(Jonathan Meades 2015)

The Fann Street Elevation?

The architects have failed to show a Fann Street elevation of the new building. After the exhibition in January we specifically asked for a drawing of this elevation and a drawing which showed the new build in relation to Bowater House, its nearest neighbour. They show a drawing from further up Golden Lane, because of tricks of perspective Bowater House seems to be taller than the new build. Is this deliberately misleading?



The side wall along Fann Street is covered by full height windows with juliet balconies. Why is this necessary? Everyone in Bowater House will lose their privacy after 60 years. These are north facing bedrooms and do not need full height windows. It reminds everyone of a penitentiary. It would help if it wasn't built right up to the Fann Street pavement. If it was set back slightly and parallel to Bowater House, as Bernard Morgan House is at the moment, it would give the whole building a sense of lightness and space which the new building lacks at the moment. Something much more interesting could be made out of that north facing wall.



Cripplegate House



Cripplegate House is grade 2 listed and Bernard Morgan House was designed to respect its older next door neighbour. The new building again ignores the scale and design of another of its listed neighbouring building.

The Barbican Gardens are Grade 2* and the new building will over shadow the gardens around the Barbican's Breton House.

Sunlight

Taylor Wimpey did a sunlight survey on one day of the year at the end of March. It isn't the average that counts it is the winter sun that we all need, especially our children and the elderly residents who enjoy Fortune Street Park in the afternoons.

The mass of the new building is huge. It will have a devastating affect on the residents in Bowater House, Breton House, The Cobalt Building, Tudor Rose Court, the Welsh Church and children in Prior Weston Primary School and Richard Cloudesley Special Needs School. The new building will loom over its nearest neighbours, blocking out our sunlight.

Planning Application 16/00590/FULL, 43 Golden Lane, EC1Y 0RS.

This is the view of the sun clipping the top of Bernard Morgan House on 24th February 2016 at 11:02am. If the block is any higher it will block the sun into our Bowater House apartments.



Fortune Street Park and Sunlight

But our greatest concern is the impact on our extremely popular local park, Fortune Street Park. This picture was taken at 17:08 on 27th September 2015, from just between the school entrance and the playground.



The new designs are two stories higher and the new building will block the sun by the time children come out of school. The park is full of children after school, especially if the sun is shining. Vitamin D deficiency is a real problem with children in London at the moment. The City of London is very concerned about the health of all its residents. If the building is any taller than the existing building this will have an enormous impact on the health of the children and all residents that use Fortune Park. This park might be in Islington but the City

Planning Application 16/00590/FULL, 43 Golden Lane, EC1Y 0RS.

of London can't ignore the health implications this new building will have if it is allowed to be built any higher than the present building. Many City residents use the park, it has the only public playground in the area. Many of the City's elderly residents use the park. It is a place to sit in the sun as well as somewhere to meet friends and to socialise.

It is also hugely popular with City workers at lunch times. On a sunny day you can hardly see the grass for groups of workers eating picnics. If the sun is blocked during the winter months this grass will never have a chance to dry out and will turn to mud.

This picture was taken on 4th March at 4.41pm, the sun is just disappearing behind Bernard Morgan House. If the building is any higher that sun would have been blocked by 3.30pm when children come out of school. The school entrance is actually in the park, designed so children could leave school and play before going home. These are children who live in apartments without gardens. This park is like our back garden, where we can get to know each other as our children grow up together. The park is vital for the community's mental health as well as its physical health.



Affordable Homes

There is no affordable housing included even though the City of London's Local Plan says there should be 30% affordable housing built onsite on any new developments unless a viability study shows it's not viable.

Another bidder for the site lost out to Taylor Wimpey even though their plans included affordable rented homes and studio work spaces. Their highest bid was more than Taylor Wimpey eventually paid for the site.

There is a housing crisis in London, does this area need another building like The Heron?

"About a year after the residents of The Heron in the City of London moved into their glistening new skyscraper, they decided to form a residents' association. Yet when they tried to gather support for the idea among their fellow tower dwellers, they encountered a problem: they couldn't find half of the residents."

"They hadn't even picked up the keys 12 months on," says Peter Wynne Rees. "If that isn't an indication of their motive for buying a property, I don't know what is."

Rees, who not only lives in the building but guided its planning application in his previous role as the City's chief planner, offers the vignette as a prime example of what he believes is wrong with the capital's property market: speculative foreign investors are flooding in, pushing out locals with cash purchases and exacerbating the city's housing shortage by leaving their homes empty" (Financial Times, November 14, 2014)

Planning Application 16/00590/FULL, 43 Golden Lane, EC1Y 0RS.

There is a very special sense of community here, right in the centre of London. Our children go to the local nursery and primary school and on to local secondary schools. They have grown up together and still play together in Fortune Park, Golden Lane and The Barbican Gardens.

There are enough luxury flats in the city, newly built, many bought as investments and now sitting empty.

Another semi-empty set of luxury flats would not in any way benefit this community. The suggested replacement to Bernard Morgan House has no consideration for the surrounding buildings, our local community or the history of this part of the City.

The City is not just about business and money. This area is a real home to many people. Not just an investment opportunity. Bernard Morgan House is situated right in the centre of this community, between the Barbican and Golden Lane Estate, overlooking Fortune Park and Prior Weston School. It was carefully designed to be part of this community and is as an example of postwar development at its best. Any replacement needs to recognise the uniqueness of this area and its rich history and must benefit and enhance our community.

Emma Matthews

On behalf on The Golden Lane Estate Residents Association Planning Sub-Committee

20 Bowater House

Golden Lane

EC1Y 0RJ

29th August 2016

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mr christopher Makin

Address: 21 Speed House Barbican

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: Put simply, this proposal is way too big for the site in question and out of proportion to properties in the area, leading to lack of light for its neighbours which it will overlook and the opportunity to future disruption from noise.

Further this proposal rides roughshod over the the City's Listed Building Managment Guidelines for the Golden Lane Estate that states that: "The views from-as well as into-the estate have become important. Part of the special architectural interest of the estate lies in its relationship with adjacent buildings;their height, scale, mass, form, materials and detailing could, for example, have an impact on that special interest...The relevant local authority should, therefore, take into account the significance of the estate's setting to its special architectural interest when considering any developments on the immediate boundaries of the listed area."

I am very disappointed that 3D models of the proposals have not been made widely available. The overdevelopment of the site can be seen at <http://bjhg-blog.blogspot.co.uk/2016/08/bernard-morgan-house-updated-google-view.html>

Bernard Morgan House is not listed but, like Roman House to the south of the Barbican it is suitable for refurbishment and should be recognised as a heritage asset of local significance.

This proposal should be rejected.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mr Martin Coomer

Address: 503 Ben Jonson House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The proposed building is too large and inappropriate for the site, a constricted area between two listed estates. The design of the proposed building, with its stepped-up plan, increased height and footprint, would dominate surrounding buildings and completely overshadow the adjacent church.

The Local Plan, Policy DM10.1 requires 'all developments to avoid harm to the townscape by ensuring that the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, character, historic interest of the locality.....'.

The Local Plan, Policy DM21.3, requires developments 'to be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation'.

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'.

The proposed development is contrary to the principles of the GLA's London Plan, specifically that planning policy should deliver "mixed and balanced communities". With no provision for affordable housing in this or indeed any new development in the City of London, only vague promises to build affordable homes elsewhere, the City of London is pursuing its own policy that flies in the face of the wider intention of the Mayor's Office to create mixed and balanced communities.

Policy 3.9 Mixed and balanced communities. Communities mixed and balanced by tenure and household income should be promoted across London through incremental small scale as well as larger scale developments which foster social diversity, redress social exclusion and strengthen communities' sense of responsibility for, and identity with, their neighbourhoods. They must be supported by effective and attractive design, adequate infrastructure and an enhanced environments.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Ms Andrea Kantor

Address: 61 Breton House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: I object to the proposed redevelopment on the grounds of scale, architectural merit, target market and lack of neighbourhood benefit. The proposed building is out of proportion to its listed neighbours, in a bloated, generic design that is being duplicated from somewhere like Canary Wharf rather than tailored to its surroundings. And it is frankly hideous, with cheap-looking balconies and materials. Such bad architecture seems aimed at investment buyers rather than potential neighbours, and the size of the proposed building calls into question whether the area could in fact support so many new residents if the flats were actually inhabited. There also appears to be no affordable housing included let alone a replacement for the lost amenities for the police. It seems like a cynical money-grabbing scheme designed to benefit the developers more than the City (which has already struggled to attract enough high-end buyers for its recently constructed flats).

The construction phase: How much noise for how many years will the site generate in an area of residential flats and offices that is already blighted by constant daytime noise from the Golden Lane Campus? I am aware that this is not considered to be a valid planning objection, but the combination of these factors could make lower Golden Lane uninhabitable during the day, and the scope of new building work should take this into account.

The current proposal must be rejected. It is simply the wrong building being foisted upon a neighbourhood for the wrong reasons.

Planning Application 16/00590/FULL, 43 Golden Lane, EC1Y 0RS.

Dear Catherine Linford

I want to strongly object to the demolition of Bernard Morgan House and I would like to recommend to the local planning authority that the planning application should be refused.

I am shocked by the ignorance shown by the developers and architects about the local area, its residents, the demographic and particularly the City of London Local Plan setting out strategy objectives and policies for planning the City of London.

The City of London Local Plan goes on repetitively and at length about its good intentions regarding redevelopment. None of these is reflected the proposed development. The key issues referred to below are:

- 1) appropriateness the new build in terms of mass, scale etc in the context of a noted historical and world-famous architectural site
- 2) daylight and sunlight and intrusiveness of any new build in terms of mass, scale etc
- 3) the City's biodiversity policies and loss of garden and open space in an existing green corridor

In the City of London Local Plan of January 2015, page 9, 1.3 and 1.4: the overarching strategy is its sustainable community strategy supported by key themes including supporting our communities and protecting, promoting and enhancing our environment. The current proposed plans fail on all these points.

City of London Local Plan of January 2015

Page 16

Table 2.2 projects 430 new units in the whole of the City between 2016 and 2021. The Blake Tower and Bernard Morgan House developments will count for almost half the predicted amount in Fann Street alone! None of these are affordable homes.

Page 21

Makes reference to the Barbican and Golden Lane Estate and how careful planning is essential to retain the character and amenity of individual areas. These plans fail to retain in any way the very particular character of this area.

Page 24

Makes reference to integrating sustainability and equality of opportunity, accessibility and involvement. We suggest that the current proposal does none of these in terms of offering affordable homes and key-worker accommodation.

Page 28

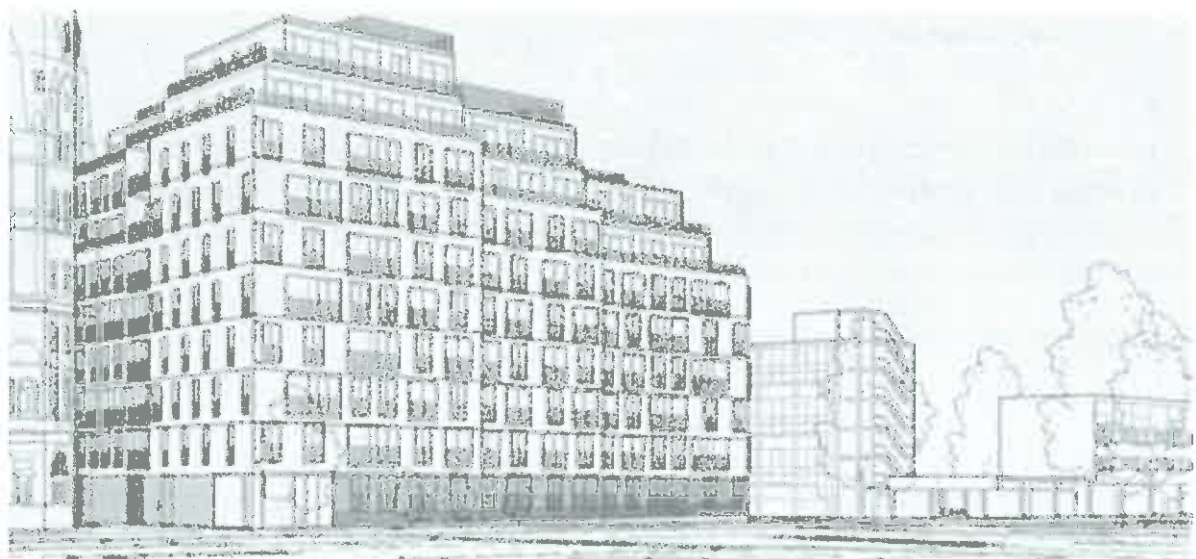
Refers to the number of open spaces that will be increased; biodiversity will also be increased. One such site will be destroyed by the redevelopment as there is an existing wildlife garden on the Bernard Morgan site.

Page 62

Point 5 refers to identifying and meeting residents' needs in the north of the city including protection of residential amenity, community facilities and open space. Point 8 requires developers to address the challenges posed by heritage assets while respecting their architectural and historic significance. The Bernard Morgan site is a key link between the listed Barbican and Golden Lane Estate. The current plans reflect none of this.

Page 90

3.10 Design, refers to human scale reflected in the relationship between buildings and their surroundings. The proposed plan dominates rather than fits in with its surroundings. Below is a view of the proposed building which the architects failed to provide even though in both public exhibitions we asked for a view of the building in relation to Bowater House. It clearly dominates grade two listed Bowater House, the scale is completely wrong.



Page 91

Talks of new buildings having regard to their surroundings ensuring that the bulk, height, scale, massing, quality of materials and detailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. The current plans fail to take any of this into account.

Page 92

Makes further reference to the bulk and massing of schemes being appropriate in relation to their surroundings and having due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality.

Page 95

Talks of environmental enhancement including the inclusion of trees and soft landscaping and the promotion of biodiversity linking up existing green spaces and routes to provide green corridors. The Bernard Morgan site is already part of a green corridor from Fortune Street Park to Charterhouse Square and its wild-life garden should be retained.

Page 98

Refers to daylight and sunlight and resisting development which would reduce noticeably daylight and sunlight available to nearby dwellings and open spaces. The proposed development would have a disastrous effect on both Bowater House in the Golden Lane Estate and Fortune Street Park. The park will lose sunlight, particularly autumn and winter afternoon sun. When school finishes at 3.30 Fortune Park is full of children. Because of the height and width of this proposed development there will be no winter sun in the park at that time. The blocking out of sunlight would also have a detrimental effect on parts of the Barbican and The Golden Lane Campus.

Page 109

Refers to how development proposals will be required to include supporting information describing the significance of any heritage assets whose fabric or setting would be affected and the contribution made by their setting to their significance and the potential impact of proposals on that significance. It also refers to how existing trees will be affected by a proposed development and how gardens and landscaping will be affected by a proposed development. All of these would be affected by this proposed development of Bernard Morgan House.

Page 111

Makes specific reference to the Barbican and Golden Lane Estates and how developers should take account of the Listed Building Management Guidelines SPDs.

(The City of London's Listed Building Management Guidelines 2013 (updated))

1.2.1.2 Holistic significance

The estate should be appreciated in its entirety: not only its various components – residential, community, recreational, commercial and the external spaces between buildings – but also its setting within the surrounding urban fabric. The views from and into the estate have become important, and part of its special architectural interest lies in its relationship to adjacent buildings. Any developments on the immediate boundaries of the listed area should take into account the significance of the estate's settings. No new

buildings, infilling, removals or extensions should be introduced which would be detrimental to the integrity of the estate as a whole.)

"The views from – as well as into – the estate have become important. Part of the special architectural interest of the estate lies in its relationship with adjacent buildings; their height, scale, mass, form, materials and detailing could, for example, have an impact on that special interest.....The relevant local authority should, therefore, take into account the significance of the estate's setting to its special architectural interest when considering any developments on the immediate boundaries of the listed area."

It is entirely obvious to anyone who lives there and cares about scale and architecture that Bernard Morgan House when it was designed was entirely mindful in terms of height, mass, scale, function and sight lines of its position in relation to Chamberlain, Powell and Bon's very different works of the Barbican and Golden Lane estate and was designed to fit accordingly.

Page 125

Makes reference to avoiding demolition through the reuse of existing buildings or their main structures and we question the need to demolish Bernard Morgan House. We refer back to page 91 CS10: Design point 1. Ensuring that the bulk, height, scale, massing, quality of materials and detailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. And point 3. Ensuring that development has an appropriate street level presence and roofscape and a positive relationship to neighbouring buildings and spaces. All of this was clearly considered in 1960 when Bernard Morgan House was built: the scale and position in relation to Bowater House; the use of knapped flint and the decorative tiling as well as the integrated open spaces and gardens. I suggest that the knapped flint facade and the tiling on Fann Street be retained and incorporated into the new designs.

Page 162

Makes reference to major commercial and residential developments providing new and enhanced open space where possible. In the case of Bernard Morgan House open space already exists and will be lost.

Page 175 following,

Deals with the issue of key-worker housing. Bernard Morgan House accommodated key-workers in the City and the proposed redevelopment will contain no key-worker housing.

Page 179

Says that 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. In the case of Bowater House this has been ignored.

I think the City should commission an independent Light Survey to verify the findings of Taylor Wimpey's. The Over Shadowing report even suggests that the design of Bowater House is at fault;

"Bowater House, has a large number of windows that are self-obstructed by a combination of projecting balconies, recessed windows and brick-built privacy screens which materially limit the access of light to those windows facing the site. The upper portions of the sky dome are self-obstructed by the external amenity provisions on the façade of the building which has the effect of blocking out light from the top part of the sky. This of course creates a significant burden on the site as any meaningful form of development beyond the profile of the existing building will inevitably have some effect upon this building"

They are criticising the design of the grade two listed Bowater House. This statement is ludicrous in every way. My flat is full of sunlight all through the year with wonderful views of the Barbican and a huge expanse of sky. With imagination it would be possible to design a building which doesn't block our sunshine for most of the day. The design of the new building means we will lose 30% of our sunshine and this is not acceptable.

With imagination it would be possible to design a building which conforms to all the above guidelines from the City of London Local plan. I am not against developing the site, I would like to keep the original building and a narrow tower could be added behind which would only block sunlight for a short period of time, both in our flats and on the park. A unique design for this area which compliments the unique design of the Golden Lane Estate and the Barbican. The Local Plan seems to value the City's heritage and its community but in reality will any of its guidelines be followed?

Yours sincerely

Emma Matthews

20 Bowater House
Golden Lane Estate

EC1Y 0RJ

29th August 2016

FROM:

Dr. Mark Campbell
8 Bowater House
Golden Lane Estate
London, EC1Y 0RJ

TO:

Catherine Linford
Environment and Planning
City of London
Guildhall
PO Box 270
London, EC2P 2EJ

RE: 16/00590/FULL Bernard Morgan House Redevelopment

Dear Catherine,

I am writing to register my strongest possible objection to the planning application 16/00590/FULL, submitted by Taylor Wimpey for the proposed demolition of Bernard Morgan House and redevelopment of the site including new buildings and landscaping. Given these objections - listed in detail below - I further request the City of London refuse this application.

My objections to this proposal comprise: 1. Excess Strain on Existing Public Infrastructure Amenity; 2. Daylight, Sunlight and Overlooking; 3. Design, Character and Appearance; 4. Failure to address the Townscape Context; and 5. Misrepresentation of the Public Consultation Process by the Applicant. These objections are detailed below.

As a statutory consultee, who is a leaseholder of 8 Bowater House, Golden Lane Estate, I request the opportunity to present my objections to this Application at any relevant meeting of the City of London Planning Committee.

In detail my objections to this proposal comprise:

1. - Excess Strain on Existing Public Infrastructure Amenity

I object to the proposed scheme on the basis that the over-scaled extent of proposed residential accommodation will place an undue strain on existing Public Infrastructure Amenity.

Furthermore, given the impending over-supply of similar residential schemes in London and the current economic instability following the UK Referendum to Leave the EU, the applicant has not adequately proven the need to develop such a large-scale residential scheme given the undue pressure it will place on the Existing Public Infrastructure Amenity.

1.1 - NHS Healthcare Provision

The local NHS healthcare provider - the Neaman Practice - is the sole provider of care to the resident populations of Golden Lane Estate, the Barbican and social housing clustered around Fortune Street Park. Many of these residents are vulnerable, including a large proportion of children and the elderly. This GP-run Practice is barely able to cope with its existing workload.

The proposed scheme would place an undue and potentially dangerous strain on local healthcare provision.

Please note, I raised this point of objection with the Applicant team during the public exhibitions and note with dismay that no response or meditation of this serious concern occurs in the applicant's submission. This omission is an example of the Applicant's failure to engage in a meaningful process of public consultation, discussed in '5. Lack of Adequate Public Consultant over the Proposal' below.

1.2 - Open Public Space

Fortune Street Park is the principal public green space for the local community. It is heavily utilised by the resident population, including the adjacent Golden Lane Campus, and under substantial strain from existing over-loading caused by local city workers, who use the park during the working week. This often results in annoyance, noise pollution and the unsanitary overspill of refuse.

As anyone who has had to ask lunchtime adult park occupants to move to allow their child to use play facilities, or has been compelled to clean up refuse in order their child enjoy these facilities, would attest, the increased use of this park brought about by the undue scale of the proposed scheme will further diminish the capacity of Fortune Street Park as a public amenity space. This strain will further be exacerbated by the Applicant's decision to not include provision for an on-site children's play area in the scheme.

1.3 - Local Traffic

The streets around the site are narrow and are frequently difficult to safely navigate for pedestrians, cyclists and motorists. The disturbance and increased loading that would result from the proposal, in particular during the construction phase and during servicing (such as rubbish collection), will exacerbate this situation to a vastly greater extent than the Applicant indicates in their submitted materials.

As residents who must have emergency access to the use of our vehicle to transport our daughter to hospital, any traffic obstruction to Fann Street is potentially life threatening. (Our daughter has a rare inherited metabolic disease that, in instance of occurrences necessitates immediate hospitalization.) Many other residents who have cars on Golden Lane Estate have health issues or need access for family reasons. Similarly as local residents are aware, Fann Street access from Golden Lane is frequently utilized by emergency services – including the Ambulance Service and Police Force – to provide emergency access to distressed or ill residents at Tudor Rose Court. Disruption to this access is a severe concern.

1.4 - Education Provision

Local non-fee paying primary schools are heavily over-subscribed and will be placed under further untenable strain by the proposed scheme. In addition, this situation would be further exacerbated at secondary level as the City of London does not have any non-fee paying secondary schools within its boundaries.

2. - Daylight, Sunlight and Overlooking

I object to the application on the basis of the negative affects of the proposed scheme on the Daylight and Sunlight Amenity on neighbouring properties and the Overlooking of neighbouring properties. I strongly object to the applicant's claim that the proposal 'is sympathetic to the daylight and sunlight amenity enjoyed by existing neighbouring properties'. This is a falsity.

Finally, I object to the request by the Applicant that their application be assessed and considered on special terms by the City of London despite its undue impact on the Daylight and Sunlight Amenity on neighbouring properties. To do so would be a dereliction of care by the City of London and a rejection of the statutory rights of the affected residents of these properties.

2.1 - Daylight, Sunlight

As the Applicant's submission concedes, the proposed scheme will negatively affect the Daylight and Sunlight amenity of the surrounding townscape, including, but not limited to: Bowater House and Bayer House, Golden Lane Estate; Breton House and the Cobalt Building, the Barbican; Golden Lane Campus and Fortune Street Park.

Given that many residents in neighbouring buildings and Fortune Street Park will have objected to the scheme on this basis, I will concentrate my objections to Bowater House, Golden Lane Estate.

As a ground floor resident of Bowater House, I specifically object to the future impact to daylight and sunlight amenity of our flat at 8 Bowater House. This impact is indicated in the Applicant's submission in terms of our loss of light. The enjoyment of our property will be greatly affected by the scheme. I further note that both my partner and I use the ground and first floor habitable rooms facing Fann Street to work throughout the day. Our ability to use these habitable rooms would be comprised by the proposed scheme.

I object the Applicant's comments regarding the proposal's affect of the light/sky amenity on Bowater House. I further object to the applicant's suggestion that the elevational treatment of Bowater House reduces light levels -- this is a self-serving and deeply cynical suggestion. I remind the City of London that Bowater House and Golden Lane Estate is an internationally recognised example of post-war housing designed by Chamberlin, Powell and Bon on the modernist architectural principles of the Swiss architect le Corbusier, which emphasised the importance of abundant natural light, open space and communality. The status and importance of this building and the estate is indisputable. Furthermore, the Grade II listing and City of London's own conversation guidelines for the estate specifically recognise the importance of the front elevations, including the abundant and, for the period, technically sophisticated, fenestration of the front elevations. Residents have enjoyed the current high level of light amenity since the building first opened.

I would like to further note the Applicant has not assessed the light levels within our accommodation. I request additional details and evidence of the information and sources used by the Applicant in their determination of the affect of the proposed scheme on our property.

As a statutory consultee, I suggest any concession afforded by the City of London in ignoring the negative affect of the proposed scheme on the existing daylight/sunlight amenity would be a dereliction of the duty of care for residents by the City of London. It would further disrespect the intention and guidance of the City of London's own Golden Lane Estates Listed Building Management Guidelines.

1.2 - Overlooking

I object to the application on the basis that accommodation within the proposed development overlooks surrounding residential properties and amenity areas, including: Bowater House and communal garden, Golden Lane; Breton House and Cobalt House, the Barbican; Fortune Street Park; and the Golden Lane School Campus, which includes Prior Weston Primary School, Golden Lane Children's Centre and Richard Cloudsley School. The distance between the proposed accommodation and existing habitable accommodation appears to fall within the minimum 18m distance required by many London Boroughs. The proposed scheme does not sufficiently mitigate this issue of overlooking and is unacceptable in this regard.

As a ground floor resident of Bowater House I object to the overlooking of my flat and the communal garden, which is occupied and played in by my young children. This overlooking will impact upon and affect their enjoyment of our property and neighbourhood. Furthermore, the overlooking of residents and occupants that the proposal acknowledgeable, including vulnerable children who are educated within the Golden Lane Campus and use Fortune Street Park, is wholly unacceptable as proposed.

I would also like to specifically note that when I discussed this issue of overlooking with the Applicant during the public exhibitions, they were unaware of any vulnerable constituencies who would be overlooked by the proposed scheme. The continued failure of the proposed scheme to address this issue of overlooking is unacceptable. This omission is another example of the Applicant's failure to engage in a meaningful process of public consultation, as discussed in '5. Lack of Adequate Public Consultation over the Proposal' below.

To approve the application on this basis would constitute a dereliction of duty of care on the part of the City of London and a negation of the stated aims of the Children's and Families Department of the City of London, which is dedicated to safeguard children and provide best possible services.

3. Design, Character and Appearance

I object to the application on the basis of the gross overdevelopment of the site and inappropriate Design, Character and Appearance of the proposed scheme. In particular the proposed scale, architectural massing and design of the scheme is inconsistent with the contextual setting of the proposed scheme. The application violates London Plan Policy 3.5, which stipulates housing developments should be of 'the highest quality internally, externally and in relation to their context and to the wider environment'. The proposed scheme is disproportionately scaled and will overwhelm the 'wider environment' – rather it will be a deleterious presence in the immediate townscape.

3.1 Massing and Scaling

The bulk, height and massing of the proposed scheme is inappropriate to the context of its immediate location. As the Applicant's 3D visual representations - contained in the light assessment report accompanying the application - attest, the proposed scheme is grossly overdeveloped and will be disproportionate in its effect on the surrounding buildings and general townscape. The unwieldy bulk, height and massing of the scheme is also evident in a series of views I intend to submit as a supplement to this objection in early-September.

Despite public consultee concerns regarding the bulk, height and massing of the scheme made during the Applicant's second public exhibition, none of these concerns or suggestions have affected the final submitted design, which is unaltered since the second public exhibition.

By aligning its height to Cripplegate House, the proposal does not manage the transitional change in height, bulk and massing between Golden Lane Estate, the site, Cripplegate House and the Barbican. Together with set-backs from the site and alignments in building massing and landscaping, these existing transitions are a deliberately designed, sensitive and crucial aspect of the existing townscape. The proposed scheme will overwhelm and have a detrimental effect on Bowater House, a component of the Grade II listed Golden Lane Estate, the Barbican Estate, Fortune Street Park and the Jewin Welsh Church, a property that is in the process of seeking recognition as a listed or non-designated historical asset, in addition to other adjacent buildings and the immediate townscape.

The set-back to Golden Lane does not align to the planning grid of Golden Lane Estate. As street-views and ground level plans indicate the existing relationship along Golden Lane is a carefully managed transition of building lines, masses, heights and vegetation that manages the transition along the streetscape from Golden Lane to the Barbican. The proposed scheme will interrupt and dominate this linear progression.

The proposed design scheme does not have a carefully considered or responsive relationship in terms of bulk, massing and height to the surrounding context and listed buildings.

3.2 - Heritage

The proposed scheme does not respond to the unique heritage setting of the site. The Design, Character and Appearance of the proposal does not address the local townscape and, as such, violates a number of planning guidelines. The NPPF requires that proposed scheme act in 'conserving and enhancing the historic environment', with local authorities required to give 'great weight' to the impact on 'the significance of a designated heritage asset', such as Bowater House, Golden Lane Estate. Furthermore Core Strategic Policy CS12 of the City of London's Local Plan seeks to conserve or enhance the significance of the City's heritage assets and their settings by safeguarding listed buildings and their settings.

These guidelines are not satisfied by the proposed scheme, which will overwhelm and subjugate the surrounding buildings and does not conserve or enhance the historic environment. Rather it will disrupt and destroy the historic environment. I remind the City of London of their obligation to follow the NPPF guidelines and the Core Strategic Policy of their own Local Plan.

In addition, the City of London's own Golden Lane Estates Listed Building Management Guidelines acknowledges the 'holistic significance' of Golden Lane Estate and its 'surrounding urban fabric', including the adjacent proposed development site, which is in especially close proximity to Bowater House. Paragraph 1.2.1.2 of the Golden Lane Estates Listed Building Management Guidelines states:

'The estate should be appreciated in its entirety: not only its various components – residential, community, recreational, commercial and the external spaces between buildings – but also its setting within the surrounding urban fabric. The views from and into the estate have become important, and part of its special architectural interest lies in its relationship to adjacent buildings. Any developments on the immediate boundaries of the listed area should take into account the significance of the estate's setting. No new buildings, infilling, removals or extensions should be introduced which would be detrimental to the integrity of the estate as a whole'.

The proposed scheme does not recognise the historic significance of Bowater House and Golden Lane Estate, rather it will have a disproportionate, overwhelming and overshadowing presence – this is evident in the street elevations and 3D views submitted by the Applicant. The proposed scheme would have a detrimental affect on Bowater House and the integrity of the estate as a whole. The over-scaled massing and disproportionate presence of the proposal means the proposal would visually dominate this listed and internally recognised work of architecture. Views from and of the estate would be compromised and the carefully considered streetscape views along Golden Lane and other surrounding streets would be disturbed – the proposed scheme would have an undue and deleterious presence.

As such, the proposal runs counter to the City of London's requirement suggested in the Golden Lane Estates Listed Building Management Guidelines that surrounding buildings – such as the proposal – take into account 'the significance of the estate's setting' and the estates recognised 'setting within the surrounding urban fabric'.

The proposed scheme violates the importance of 'views from and into the estate', which are an essential 'part of its special architectural interest lies in its relationship to adjacent buildings'. The disruption of these views in the proposed scheme is specifically addressed in '4. Failure to address the Townscape Context' below.

3.3 - Generic Design

The design of the proposed scheme is demonstrably similar to other residential schemes designed by AHMM Architects for entirely different contextual settings in Wandsworth and Ladbroke Grove, London. The stepped back massing, external elevations, materiality and balconies are inappropriate in this highly specific context. Rather the scheme is entirely generic and inappropriate for its setting. For example, the use of balconies is inappropriate in this instance as it is exceptional to the built fabric. Similarly the proposed use of material does not include such materials and knapped flint (locally derived from a previous building) and ceramic tiling that are distinctive and locally appreciated features of the existing Bernard Morgan House on the application site.

The genericism of the application scheme is inconsistent with the specific internationally recognised designs of Chamberlin, Powell and Bon's Golden Lane Estate and Barbican complex, which are highly sophisticated in their consideration and sponsorship of the built environment, integration into the contextual surroundings of these schemes and use of materiality and detailing. Rather the proposed scheme is an unexceptional and generic example of contemporary commercial residential architecture that – in its genericism and indistinguishability – will actively detract from the surrounding townscape, including these celebrated examples of postwar British modernist architecture.

3.4 - Failure to Consider the Reuse of the Existing Building

The application does not include a scheme, or critical appraisal, that addresses the potential of reusing the existing Bernard Morgan House building. The application does not acknowledge or elaborate on the potential of the existing building or declare how its reuse is untenable for the redevelopment of the application site.

The proposed demolition of the existing Bernard Morgan House will destroy a building that has specific contextual relationships to the immediate townscape and is worthy of recognition as a non-designated historic asset. As an article published in *Architecture and Planning Journal* (July 1962), the design of Bernard Morgan House was a response to:

'One of the town-planning requirements was that the Golden Lane frontage and building height should be complimentary to a neighbouring six-story block of maisonettes. Another requirement was that the main entrance should not be on Golden Lane itself. Bearing in mind the position and the purpose of the Section House, the architects attempted to create a building which would harmonise with the adjoining housing schemes but also would have an added 'civic' feeling in keep with its use'.

The proposed scheme does not harmonise with the existing townscape, nor does it offer a well-designed or civically integrated building with the local community.

As a professional architectural historian - who serves as an editor on the *Journal of Architecture* (Routledge & RIBA) and a Programme Director at the Architectural Association, the oldest architectural school in the world - in my professional opinion I see nothing that is distinctive, exceptional or of lasting historical value in the application scheme. Instead I firmly believe it is a generic, clumsy and undistinguished piece of architecture. One that would be hugely detrimental to its surrounding context.

4. Failure to address the Townscape Context

I object to the proposed scheme on the basis of its failure to recognise the historical importance of the site and the unique townscape context in which it is located. I further object in the strongest possible terms to the applicant's erroneous suggestion that the local townscape is incoherent and fragmented.

The existing townscape is an unusually coherent and engaged townscape. This is especially evident in the visual and massed relationships evident in the transition between Golden Lane Estate, Bernard Morgan House, Cripplegate Institute and the Barbican, which is purposeful, deliberately designed and carefully managed. In this designed relationship, this unique townscape composition illustrates the influence of the underlying and hugely influential theories of townscape advanced by Gordon Cullen, who specifically references Golden Lane Estate in *his Concise Townscape* (1961) - an internationally acknowledged and crucial work in post-war urban planning. The influence of Cullen's widely published and well known ideas clearly inform the work of Chamberlin, Powell and Bon and the architects of Bernard Morgan House.

As the City of London's Golden Lane Estates Listed Building Management Guidelines suggest, the retention and respect for 'views from and into the estate' are critical to the consideration of any proposed neighbouring scheme. The disproportionate massing and scale of the proposed scheme interrupts and overwhelms several views from and into Golden Lane Estate. In particular it will be unduly visible as one enters the estate from the Grade II* listed Crescent House, disrupt views in the forecourt in front of Great Arthur House, and overshadow the communal areas between Bowater House and Bayer House. In addition views of the estate and surrounding townscape will be interrupted along Golden Lane, Fann Street, and Fortune Street in particular. This is a clear violation of the stated intention of the City of London's Golden Lane Estates Listed Building Management Guidelines.

The negative affect of the disproportionate bulk, height and massing of the proposed scheme on the townscape of Golden Lane Estate will be demonstrated in a supplemental document I will append to this objection following my return from vacation in early-September.

The proposed scheme entirely ignores the importance of these views from and into the estate, violating the City of London's Golden Lane Estates Listed Building Management Guidelines. I remind the City of London of its self-stated obligation that 'The relevant local authority should, therefore, take into account the significance of the estate's setting to its special architectural interest when considering any developments on the immediate boundaries of the listed area'. This guidance must be enforced.

The approval of the proposed scheme in its current form would result in the loss of a townscape that is unique, coherent and of international significance. In this regard the City of London would be remiss in failing to follow its own regulations and the statutory obligations surrounding the historical context of the site. This includes recognising the hugely influential notion of post-war townscape in which the Golden Lane Estate, the Barbican and existing Bernard Morgan House were engendered. The proposed scheme would destroy the coherence of this urban assemblage and undermine the architectural presence of the adjacent buildings and urban realm.

This would be an unconscionable loss given the internationally recognised reputation of Golden Lane Estate and the Barbican - two hugely significant post-war works by Chamberlin, Powell and Bon.

5. Lack of Adequate Public Consultation over the Proposal

I object to the application on the basis of the misrepresentation of the Public Consultation process by the Applicant. Contrary to their submission, the Applicant did not engage in an open and responsive dialogue with the local community and affected parties. Rather the Applicant's erroneous representation of this process appears as a cynical attempt to fulfill a mandatory process of public engagement - in that sense, the Applicant's suggestion of an open dialogue is duplicitous and self-serving.

Please note, my objection to the Applicant's representation of the Public Consultation process is one shared by many other statutory consultees. Our complaints regarding this process will be reiterated and further elaborated on in a separate cosigned letter regarding the Applicant's representation of this process.

5.1 - Public Exhibitions

The public exhibition of the scheme did not include or address the comments of all of the parties who are now statutory consultees to the scheme. In particular the residents of the Cobalt Building were not adequately informed of initial discussions, nor did their - or any other parties - comments inform the proposed scheme between the second public exhibition and the submitted scheme. To suggest that consultees' views were taken into account is a falsity.

During the public exhibitions the materials presented included many instances of dissuasion, such as illustrating the proposal at the instance of least overshadowing, or representing street views of the scheme concealed behind trees with full summer growth. In addition, the Applicant's submission acknowledges that the public feedback questionnaire contained a multitude of errors and dissuasions, including questions regarding whether 'more housing is needed in Golden Lane Estate', or 'further improvements would benefit Golden Lane'. As the basis for public commentary, this process is deeply flawed, duplicitous and deliberately vague, constituting an attempt on the part of the Applicant to misrepresent public attitudes to the scheme.

Public concerns with the public exhibitions were specifically raised with the City of London following these exhibitions and discussions with the Applicant.

This lack of open information regarding the proposal is reinforced by the incompleteness of the Applicant's submission, which continues to omit materials that would enable statutory consultees to comment fully on the scheme.

Furthermore, many of the Applicant's revisions to the schemes - including set-backs to Fann St frontage, alignment to the Golden Lane Estate planning grid, which were implemented between the first and second public exhibition - appear to be pre-planned concessions on the part of the Applicant's design team. As such, it can be suggested that these revisions to an even more vastly over-scaled design presented during the first public exhibition were made in order to provide an erroneous suggestion of concessions in the application document. Following the second public exhibition, it appears that no revisions to the scheme were made prior to application submission of the scheme. In this regard, public feedback to this exhibition was ignored.

The City of London must uphold the intention and credibility of the pre-application consultation process that a developer holds with parties affected by a proposed scheme - a condition indicated in the City of London's own guidance and national guidelines. The City of London should refuse the application on the basis of the Applicant's misrepresentation of this consultation process with the public and affected parties to the proposed scheme. To accept the Applicant's representation of the public consultation process would be a dereliction of care toward the public by the City of London.

5.2 - Validation and Statutory Consultee Comments Period

I wish to object to the timing of the Applicant's submission of requested materials for the application validation by the City of London. Despite the Applicant's suggestion they would be receptive to comments and concerns by the local community, the timing of this validation meant this commentary period fell within the period when many statutory consultees were on holidays or occupied with childcare. Given the minimal extent of materials requested by the City of London the timing of the submission of these materials appears deliberately timed to give the local community the most awkward and least possible opportunity to respond to an application that contained 96 submitted documents.

This is clearly unacceptable and many consultees, including myself, have requested the City of London extend the period for comments given this situation.

In regards to this matter, I request that the City of London does not prejudice or distinguish between any consultee's comments or objections made before or after 30 August in compiling the material for the application determination.

Given the submission of comments regarding the application falls within the summer vacation period, as a public consultee I also request the right to update and amend this letter of objection following 30 August without any prejudicing of the Import of my objection. In particular, further amendments will include photographic and visual material that illustrate the impact of the applicant's proposed scheme on the immediate townscape - illustrating the overbearing massing of the scheme on the surrounding context and failure to recognise the visual impact on the surrounding townscape.

On the basis of the objections listed above I object in the strongest possible terms to the application 16/00590/FULL Bernard Morgan House Redevelopment. I also formally request the City of London refuse this application.

Finally, given these objections I formally request the opportunity as a statutory consultee to publicly present my objections to this application at any relevant meeting of the City of London Planning Committee.

Regards,



PhD (Princeton University), MA, B.Arch (Hons.)
Fulbright Scholar, Princeton Honorific Scholar

Director, MPhil in Media Practices / AA Research Cluster
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36 Bedford Square
London, WC1B 3ES

Visiting Professor
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Southeast University
2 Sipailou
Nanjing
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Editor, The Journal of Architecture (Routledge & RIBA)
Royal Institute of British Architects
66 Portland Place
London, W1B 1NT

From: Bruce Badger <[REDACTED]>
Sent: 01 September 2016 12:47
To: PLN - Comments
Subject: RE: PLN FW: Bernard Morgan House - House Group Response COL:04358497

From: Bruce Badger [REDACTED]
Sent: 30 August 2016 09:13
To: Linford, Catherine; Chipperfield, Rob; PlanningQueue
Cc: Ba Planningchair
Subject: Fwd: Bernard Morgan House - House Group Response

City Planning Officer

Department of Planning and Transportation

City of London

Guildhall

London EC2P 2EJ

For the attention of Robert Chipperfield and Catherine Linford

(BCC'd to the Ben Jonson House Group Committee)

Re: Objection to application 16/00590/FULL

Dear Sir/Madam,

I write on behalf of the Ben Jonson House Group, a Recognised Tenants' Association representing residents of the Ben Jonson House on the Barbican Estate.

Ben Jonson House is very close to and overlooks the current Bernard Morgan House. Residents of Ben Jonson House will be directly affected by the proposed buildings.

The massing of the proposed building is out of proportion with the surroundings (it's huge!), and this appears to fly in the face of the City's own planning guidelines. The Local Plan was put together with the help of residents, and we were led to believe that the plan would act as a guide for future developments in our neighbourhood. The phrase "Design solutions must respect the sensitive nature of listed buildings" in the Local Plan seems to have been ignored in this application for an excessively bulky building. The proposed building will have a significant negative effect upon the adjacent listed buildings.

The proposal includes projecting balconies and patio areas which would overlook and give elevated views down into Ben Jonson House flats, reducing the privacy and residential amenity enjoyed by current residents.

The visual amenity of the area will be reduced. The current Bernard Morgan house is specifically lined up with Golden Lane Estate buildings (which was explicitly required in past planning conditions) and sits well in that context with complementary materials used in its construction. The proposed building blurs the lines and makes the southern end of Golden Lane more of a canyon. The proposed building materials seem to have come straight from the Taylor Wimpey parts bin rather than from any creative thinking. The proposal is really boring and unimaginative, putting it even further out of step with it's high quality listed neighbours.

In addition the visual amenity of Fortune Park would be reduced by the looming bulk of the proposed building. The park is in Islington, but is enjoyed by people from the City and from the adjoining school, so the impact of the proposed building on the park would be felt by many. Also the significant loss of the small garden area currently between Bernard Morgan House and Golden Lane should not be ignored. When locals were allowed to maintain this, it was a lovely green area creating a separation between the road and Bernard Morgan House, very popular with birds and making a very welcome contribution to the visual amenity of the area.

The current Bernard Morgan House has an off street service area accessible from Brackley St. which helps to reduce the traffic and services impact on the surrounding area. The proposed building has no such on-site service area, instead pushing all service access onto public pavements and streets. The lack of a service area, and the significant increase in demands for services with such a large building, will increase traffic (and noise) in the area, and will also have an impact on road safety which is already pretty dodgy with large waste trucks servicing the UBS building. Blockages in Brackley St. already cause traffic to back up on Golden Lane which in turn leads to jams, scary cycle weaving, and problems with vehicles servicing the Golden Lane school (in particular accessible vehicles for disabled pupils).

It should be noted that the developer has been unhelpful and has obscured and misrepresented their intentions. Images produced by the developer even tried to hide the proposed building behind foliage! The developers simply ignored pointers given to them which would have helped them to come up with a much higher quality proposal.

Another example of the unhelpfulness of the developer: In January we asked the developer for a simple 3D model (a .kmz file) which would allow everyone to get a sense of how the proposed building would look in context. Residents have produced a .kmz file on the basis of the submitted plans. I attach a copy of the .kmz file (viewable in Google Earth) plus before and after screenshots taken from Google Earth. The images reveal the huge difference in bulk between the existing a proposed buildings. It would have been quite easy for a competent CAD user to produce a .kmz file for us. I think we can see why they didn't want to.

In light of the above we ask officers and members to reject this application and call for a more enlightened proposal in it's place.

Regards

Bruce Badger

Chair, Ben Jonson House Group

Catherine Linford
The Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ

Redevelopment of Bernard Morgan House, Golden Lane (Ref: 16/00590/FULL)



I am writing to state my support for the planning application to
redevelop Bernard Morgan House.

Please add any other comments below:



I am a local resident



I am a local business owner



I work at a local business

Name:

VICTOR A GILES

Address:

302 SHAKESPEARE TOWER
BARBICAN
EC2Y 8NJ

Tel:

Email address:

Signature:

PLANNING & TRADING		PPD
1-511	TPD	LTP
OM	30 AUG 2016	SSE
No	12/398	PP
FILE		DD

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mrs Susan Cox

Address: 343 Lauderdale Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: I strongly object to this application (16/00590) on the grounds of the proposed development's appearance in the context of the Grade II listed Barbican and Golden Lane Estates and the loss of residential amenity. I would also voice my concern at the cynical timing of the submission of this application given that many people who may be impacted by the proposed devt will find it difficult to respond in a timely manner.

My objections are:

- The planned devt should be refused on the grounds of its excessive height and massing. At 10 storeys high and even with the frontage being reduced to 7 storeys, the overall footprint is too large and is not in proportion architecturally with the existing buildings in the vicinity. It will tower over the Jewin Church and dominate Fann St, the Golden Lane Estate, Cobalt House, Tudor Rose Court, Cripplegate House, Prior Weston School and Fortune Park and will overshadow and restrict light to many properties and areas. My understanding is that a building of 80000 sqft was recommended for the site when it was advertised for sale. This proposal is for a completely unacceptable 120000sqft.
- The proposed design totally ignores the City of London Listed Building Management Guidelines for the Golden Lane Estate.
- Residential amenity for the neighbouring buildings will be significantly compromised. The proposed balconies and roof terrace will reduce privacy and increase noise and light pollution for many neighbouring properties. The planned pocket park is also likely both to increase noise and attract unwelcome use from non-residents. No general car parking provisions have been made,

just 2 disabled places, 1 of which would be onstreet, exacerbating the existing problematic transport/delivery issues on narrow Brackley St even further. The proposed 104 flats will also put pressure on services such as the local doctors' surgery.

This application should be withdrawn or substantially re-designed, preferably using the existing BMH footprint

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mrs Rita Makanjee

Address: 31 Hatfield House Golden Lane Estate London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I object to the proposed development on grounds that it will replace a sound and finely composed building of the same era as the adjacent listed Golden Lane Estate, with an over-scaled, out of proportion scheme, with potential loss of light, overshadowing and overlooking onto surrounding buildings.

The scheme is clearly developer led, and if approved will not make 'a lasting and positive contribution to the rich architectural context of Golden Lane' - as purported to in the Design and Access Statement.

Catherine Linford
Development Division
Department of the Built Environment
City of London
Guildhall
EC2P 2EJ

30 August 2016

Dear Ms Linford

PROD	21 AUG 2016	PPD
PD		LTF
OM		SSE
Nc	127407	PP
		OD

Application number 16/00590/FULL (the Application) on behalf of Taylor Wimpey UK Ltd (TWUK) re Bernard Morgan House, 43 Golden Lane EC1Y (BMH)

This letter both sets out our grounds of objection to the Application and our request that the Application be refused.

1. Retention of the existing BMH building

We object to the demolition of the existing BMH building and request that it be retained in any event. It warrants being treated as a non-designated Heritage Asset and there are feasible methods of incorporating it into a redevelopment, as underbidders for BMH were and are able to demonstrate. We endorse Twentieth Century Society's comments in this respect.

2. Pre-Application Consultation Process

The objections of local residents included the size, height, bulk and massing of the proposed Building; their resultant loss of daylight and sunlight; their being overlooked and overshadowed; and their loss of amenity. These were all communicated to TWUK after each of the two public exhibitions.

The gap of fifteen weeks between the two public exhibitions only served to enable TWUK to move from an incompletely presented scheme it knew beforehand was unacceptable to the Application. That this was submitted less than ten working days after the second public exhibition reveals a cynical disregard for genuine and serious local concern and makes a mockery of "consultation".

It took TWUK's team thirteen months to prepare the Application but it has failed to demonstrate any actual evolution in the design and, consequently, an evolving pre-application consultation process with local residents. As per the quote from the NPPF in paragraph 3.5 of the Statement of Community - Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably - the lack of proper consultation should penalise TWUK.

Telephone: [redacted] (home) – Facsimile: [redacted]
Mobile: [redacted] and [redacted]
Email: [redacted] and [redacted]

3. Footprint, Height, Bulk, Massing and Size of the proposed Building

The 120,000 sq. ft GIA entails a substantially increased footprint, including significant encroachment onto the open space between the existing BMH building and Eglwys Jewin. It also has fifty per cent greater GIA than the then seemingly inappropriate but perhaps now more acceptable, scheme proposed by Allison Brooks Architects for CoL.

The existing BMH building is 7 storeys high above ground floor level across the whole of its frontage to Golden Lane but the proposed Building would be 10 storeys high along its Golden Lane and Brackley Street frontages. The height falls to 8 storeys in two stages northwards along Golden Lane and to 4 storeys in four stages northwards along Brackley Street but the proposed Building would actually be higher overall than the 11-storey 1 Golden Lane.

The footprint and height of the proposed Building are unacceptable in themselves. As a result, the proposed Building has an excessive and unacceptable bulk, massing and size.

4. Effect of the proposed Building on 100 Breton House (our Flat)

Our Grade II listed Flat is a one-room studio on the fourth floor of Breton House. Our only window looks out onto the mass of 1 Golden Lane, but that mass is relieved by views along Brackley Street and over BMH, including the top of Eglwys Jewin's unique tower. The proposed Building would block our only views, overshadow us and deny us a significant amount of the daylight and all the late evening sunlight we currently enjoy.

We understand CoL is carrying out an independent Daylight, Sunlight and Overshadowing Assessment. If this is not the case, although we have previously pointed out various apparent defects in TWUK's DSOA Assessment regarding Breton House, which we trust you are pursuing with TWUK, we will also require details of the assumptions used in its DSOA Assessment regarding our Flat, to enable verification by an independent surveyor.

The 2-bed and larger flats in the proposed Building would have large overhanging balconies and the 1-bed flats and studios correspondingly smaller ones overlooking Golden Lane. These balconies are ugly in appearance and would not only enable flat occupants to overlook our Flat but would be a source of noise nuisance when used. The flats fronting Brackley Street and Fann Street would have internal balconies and there is no reason why the same should not be the case for all flats along Golden Lane frontage, as well as those fronting Eglwys Jewin.

In addition to being overlooked from the flats in the proposed Building, we would also be overlooked from the roof terraces on both the Golden Lane and Brackley Street frontages. The use of the roof terraces would mean we are disturbed by noise, as we have been by a few people merely having a drink and chat on the roof terrace of The Cobalt Building.

Our Flat has no significant ventilation other than through its full-height sliding window, which means that in order to keep cool at night, we would have our sleep interrupted by the merest noise from flats in the proposed Building. Already we get disturbed by workers in 1 Golden Lane, opposite us, talking outside that building during the night.

The larger balconies, at least, would according to the Application, be used for storage, irrespective of any legal restrictions. It is inevitable that, so used, those balconies would

become even more unsightly, adding to the depressingly dull and unimaginative appearance of the proposed Building.

The gardens along Golden Lane, which would be visible from our Flat, would only be accessible through the individual flats. If any flats were unoccupied, which is highly likely, not only would the gardens be litter traps, there seems to be no provision for access for tidying up and removing litter or ensuring the trees, shrubs, plants etc are properly maintained.

The existing BMH building is the work of the former Surveyor to Metropolitan Police Force from 1947 to 1974, J Innes Elliott. Whilst AHMM may be past winners of the Stirling Prize, the proposed Building would have more chance of being nominated for the Carbuncle Cup than for the illustrious award. On the subject of carbuncles, if our open views over a much-loved and elegant friend, which CoL and TWUK have deliberately let deteriorate, are to be replaced, then we require much more than a "wannabe" copy of what can be found all over London.

BMH was described in DTZ's sales brochure as an exciting opportunity to produce a fantastic urban project that responds to the potential of the site. To suggest the proposed Building would do that is, to misquote the Arctic Monkeys, whatever TWUK says it is, that is what it is not. Each of the surrounding residential blocks have a symmetry of design with regular grids, the existing BMH building being a regular horizontal grid asymmetrically divided vertically. Any grid in the proposed Building along its extensive and most viewed frontage would be broken up by the random sticking-on of the obtrusive and ugly balconies.

With its lack of colour and aspiration, its ugly obtrusive balconies, equally obtrusive roof terraces and roof top bus shelters, it is no surprise that all the Planning Statement can offer is - the main body of the proposed Building would be clad in brick with differing arrangements of windows and balconies with common features (such as expressed pre-cast concrete reveals and metal balustrades) utilised to provide coherence across the facades. Even TWUK seem to accept the ugliness of the proposed Building by only revealing a third of it on the covers of its Application documentation.

The proposed Building would add nothing to the enjoyment of our Flat. In fact, if permitted, it would decrease the amenity of our Flat unacceptably.

5. Effect of the proposed Building on the immediate neighbourhood of BMH

Breton House and Ben Jonson House are part of the Grade II listed Barbican Estate. The Barbican Gardens are listed Grade II*. 1 Golden Lane, is also Grade II listed and Bowater House is part of the Grade II listed Golden Lane Estate.

The proposed Building, apart from overlooking and overshadowing, as well as reducing the daylight, sunlight and amenities enjoyed by the surrounding listed buildings, would negate the reasons for listing. CoL is tasked with the duty and obligation of upholding the integrity of those listings and not permitting any adverse challenge to it.

Brackley Street is a very narrow and dominated along virtually its whole southern side by 1 Golden Lane. At present there are unbuilt upon gaps between its pavement and BMH and also along BMH's frontage. The proposed Building would fill all those gaps except around the junction with Viscount Street, dominating Brackley Street on the north and rendering it a claustrophobic virtual tunnel. All servicing, including daily collections of black bag waste, food waste and recycling would jostle for space with vehicles also servicing 1 Golden Lane. The

noise generated would adversely affect not only residents of the existing buildings but also residents of the proposed Building from 7.00 am onwards every weekday and, sometimes, at weekends.

Only one of the two disabled car parking spaces would be within the curtilage of BMH. The other would be on-street. Parked vehicles on Brackley Street already force refuse wagons, for example, to drive on the pavements to get through. Permanent parking there would ensure this illegal activity occurs during virtually every day. The proposed Building's 104 flats would, of themselves generate further vehicle movements - delivery wagons and cabs amongst others. Factor in the peloton of 153 cycles and there would be traffic chaos.

The Cobalt Building and Tudor Rose Court would both be severely and depressingly affected by the proposed Building. Windows of flats in these buildings which look out onto Viscount Street, also very narrow, would, as TWUK acknowledges, suffer an unacceptable diminution in both daylight and sunlight, as well as being substantially overshadowed and overlooked by the proposed Building. In addition, the proposed "pocket park" at the junction of Viscount Street and Blackley Street would act as a magnet for anti-social behaviour.

Eglwys Jewin, which, if not to be listed, also warrants treatment as a non-designated Heritage Asset. Peter Stewart Consultancy's TVIH Appraisal, considers it to be unremarkable for its period without providing evidence of buildings in the similar "Swedish/New Humanist" style - not even with a similar tower - and ignores the fact that it is one of only two post-war churches in the City. The TVIH Appraisal alleges Eglwys Jewin has no historical or visual relationship with either BMH or the Golden Lane Estate, even though it is virtually contemporaneous with them and is built on the site of the former Eglwys Jewin which was destroyed in 1940.

The TVIH Appraisal's summary of Eglwys Jewin's history from the eighteenth century seems to draw, without acknowledgement, on Huw Edward's book, *City Mission*, despite referring to him in another context. Eglwys Jewin came to its present site after the then Elders surrendered their Jewin Crescent lease in 1874, as a result of a warehouse being built, which cast shadows across the frontage of the Church. The affect of the proposed building on Eglwys Jewin would be far worse than that warehouse.

The enjoyment of Fortune Street Park would be reduced, especially in the early evening by the loss of sunlight. The same would also be true of Golden Lane Campus and both properties would suffer seriously from being overlooked and overshadowed by the proposed Building. The lack of children's play space in the proposed Building will lead to an increased demand for the park's already limited facilities.

There are rumours the only GP surgery in the City may have to close its list in 2017 as a result of demand from the new residential building around St Bartholomew's Hospital. In addition, in June, there were 12 unsold flats in Blake Tower, so the influx of more residents there and in the proposed Building would add additional problems in the neighbourhood.

6. Housing Need

The Application refers to housing need in London without providing any evidence that the proposed Building would help fill this. No demographics for the intended market have been provided nor any evidence that target has a need, as opposed to a desire, for any of the proposed Building's 104 flats. There is a desperate housing need, indeed crisis, in London which the proposed Building would not help fill.

Whilst we are well aware of CoL's current "social" housing policy, the past use of BMH should be recreated in providing accommodation for essential workers, as well as much needed "social" housing. CoL is a member of London Councils and signed up to the Mayor's Homes for Londoners commitment to 50% of new homes in London being genuinely affordable to rent and buy. BMH would be an ideal starting point for that commitment.

7. Planning Process

According to the DTZ sales brochure:

Development potential

Alison Brooks Architects have been commissioned to undertake a high level feasibility study for the site. The CGI demonstrates potential massing on the site in the order of 80,000 sq. ft GIA (subject to planning) and with careful design, additional site coverage and potential massing could be considered. The information is provided for indicative purposes and we advise developers to undertake their own due diligence.

Planning

The site lies in a predominantly residential area between the residential estates of Golden Lane and Barbican in the City of London. Planning policies guiding the redevelopment of the site are provided by the London Plan (2011) and the City of London Local Plan (2015). The site is not allocated for any particular land use, although the area (referred to as the 'North of the City') is defined as a 'Residential Area' on the Local Plan Key Diagram. The site does not lie within a protected view, although regard should be given to the views within the London View Management Framework. In addition, local views are important especially in relation to the setting of the listed Golden Lane and Barbican Estates. The impact on daylight, sunlight and amenity to adjoining residents, the neighbouring church, adjacent primary school and park are key considerations. The City Corporation have been presented with the Alison Brooks proposals. They have commented that any additional development must be considered in the context of high quality design and the general constraints surrounding the site.

Not only does the proposed Building fail CoL's comments on all points, CoL's decision to offer BMH for sale without planning permission but subject to planning overage passed the responsibility for determining what, if anything replaces the existing BMH building on to your Department. CoL may have had to obtain as much money as possible when selling BMH but it failed to both consider the effect of an inappropriate development on its local residents and cost the value of the community benefits when selling BMH unconditionally.

Selling BMH with the benefit of detailed planning permission, as HM Court Service did with St Dunstan's Court, Fetter Lane - a previous TWUK development - would, at least, have ensured a full and proper public consultation, as well as high quality architecture. Now your Department is faced with a conflict of interest that cannot be seen to be capable of a fair resolution except by the deemed or actual refusal of planning permission enabling determination by a third party.

8. Conclusion

The footprint, height, bulk and massing of the proposed Building may be necessary to enable TWUK to make a twenty per cent plus return on its investment and secure CoL a significant

planning overage payment but nothing in the Application justifies acceptance of the proposed Building. Accordingly, we have set out our objections and request that the Application be refused, either by action or omission.

Yours sincerely,



Fred Rodgers



Joanna Rodgers

Catherine Linford
Development Division
Department of the Built Environment
City of London
Guildhall
EC2P 2EJ

30 August 2016

Dear Ms. Linford:

I write regarding Application number 16/00590/FULL (the Application) on behalf of Taylor Wimpey UK Ltd (TWUK) re Bernard Morgan House, 43 Golden Lane EC1Y (BMH).

I request that the application be refused; this letter states my reasons.

My property is 21 Bowater House, which you and your colleagues visited on June 10th.

As you know, Bowater House is part of the Golden Lane Estate, which is Grade II listed, as is the Barbican.

Between us sits BMH, which, while unfortunately not listed, was nonetheless constructed to be sensitive to the surrounding neighbourhood. The proposed new development is anything but sensitive, and it will have a severe impact on the character of the neighbourhood and the surrounding listed buildings.

As you will recall, my flat in Bowater House is designed to benefit from its southern exposure and the light that exposure affords. Like the other flats in Bowater House and in similar buildings in the Golden Lane Estate, the south-facing windows are large and innovatively designed to maximize the light in the living space, rendering it a very pleasant place to spend time during the day. As a home worker, I use the southern-facing top floor room of my flat as my study and home office – for working on the computer, participating in conference calls, reading, and sometimes just relaxing.

Moreover, as I approach and think about retirement, my plans are to use that room more and more as a library and home study, while sometimes continuing to work on projects and consulting contracts – something that the proposed building in place of BMH will affect severely.

As I read the lighting survey filed as part of the Application, it shows that my home office window will fall outside the BRE's guidelines in at least two ways:

- 1) Vertical Sky Component (VSC). My home office is already sensitive, as the VSC is below 27% in the existing condition (in this case 11.85%), and it is expected to be reduced by more than 20%. The BRE suggest that such a reduction would be noticeable. The report from TWUK's surveyors says that this can be discounted because the room is a bedroom, however that room is my study/office, where I spend most days when I am working at home. (My bedroom, located on the opposite side, is considerably darker.)
- 2) Average Daylight Factor (ADF). My home office is projected to have an ADF of 1.05%, barely meeting the ADF's standard for a bedroom, but significantly below the level for living rooms (1.5%) or rooms where work is done (such as kitchens, 2%). Barely making the standard for a bedroom is not acceptable for a room where I spend most of my day time hours, especially since a good portion of those hours are spent reading or working on similarly visual tasks.

TWUK's survey admits that this room falls outside of the guidelines, but deems it acceptable because it's a bedroom. I strongly protest this classification, and I request full details of the assumptions used in the analysis of the daylight and sunlight of my property, so that I may have the analysis verified by a third party surveyor, taking into account my actual use of the room.

Beyond the loss of light in my office, the loss of light will be felt in the rest of my flat as well. As you may recall from standing on my balcony, BMH does not extend to the full edge of the pavement as the proposed structure would. That extension would remove the light, view, and connection to the Fortune Street Park – all of which combine to make my flat (and much of the Golden Lane Estate) a pleasant place to be.

Speaking of the balcony, I notice that the daylight and sunlight report speaks of Bowater House as "imposing a burden" on the development of the proposed property – a ridiculously 'convenient' turn of phrase for describing a Grade II listed property which has been there for decades, and which seems not to have posed an undue burden on the existing BMH. The real burden is being imposed by TWUK's development on the existing residents of the neighbourhood.

While BMH may no longer be useful as a police barracks, the building itself is sensitive to its surroundings, not overly imposing, and contains many elements of architectural

interest (decorative tiles, local flint, etc). The proposed building exhibits no such pleasant architectural elements – being instead a generic mass extending to the corners of the envelope of what might be allowed – and introduces balconies from which its residents can easily peer into the flats on Golden Lane, further reducing the amenities of the residents by forcing us to keep curtains and blinds drawn – a practice that is currently unnecessary.

Finally, the neighbourhood is not in need of more luxury flats, especially ones such as the famously under-occupied Heron that are used as investment vehicles and not actual residents. The Golden Lane Estate is known for being a community – I believe that was mentioned when you and your colleagues visited – and the proposed development threatens that community and its quality of life. I request that permission for the proposal be denied – and if it is not denied immediately, then at the very least the local community needs to be engaged in a proper consultation, not the current effort that has endeavoured to meet the minimum letter of the law (and not even managed to do that) while evading proper scrutiny and engagement from the people who will have to live with the consequences long after TWUK have moved on to the next project.

Yours Sincerely,

Joseph W. Ruffles
21 Bowater House
Golden Lane Estate
EC1Y 0RJ

Adjei, William

From: Linford, Catherine
Sent: 06 April 2017 16:32
To: Adjei, William
Subject: FW: 16/00590/FULL - Bernard Morgan House - Objection to Proposal - Recommend Refusal of Planning Permission

From: Saskia Lewis [REDACTED]
Sent: 30 August 2016 14:38
To: Linford, Catherine
Cc: Emma Matthews; Claudia Marcianti; Timothy Godsmark; Frederick Rodgers; John Whitehead; [REDACTED] Mark Campbell
Subject: Re: 16/00590/FULL - Bernard Morgan House - Objection to Proposal - Recommend Refusal of Planning Permission

FROM:
Saskia Lewis
8 Bowater House
Golden Lane Estate
London, EC1Y 0RJ

TO:
Catherine Linford
Environment and Planning
City of London
Guildhall
PO Box 270
London, EC2P 2EJ

Re: 16/00590/FULL Bernard Morgan House Redevelopment - Recommendation to Reject the Planning Proposal

Dear Catherine,

I wish to object to this application in the strongest possible terms to both the demolition of the existing Bernard Morgan House and to the new proposed buildings and landscaping. I make a request that the proposal is rejected by the City of London on the following grounds –

Light – Overshadowing and Overlooking – Light, Sunlight and Views

Please refer to your own guidelines –

12.1.2 Holistic significance

The estate should be appreciated in its entirety: not only its various components – residential, community, recreational, commercial and the external spaces between buildings – but also its setting within the surrounding urban fabric. The views from and into the estate have become important, and part of its special architectural interest lies in its relationship to adjacent buildings. Any developments on the immediate boundaries of the listed area should take into account the significance of the estate's setting. No new buildings, infilling, removals or extensions should be introduced which would be detrimental to the integrity of the estate as a whole.

Golden Lane Estate Listed Building Management Guidelines: Part 2.1 Introduction & executive summary 44

This proposed block of flats will utterly compromise the light and sunlight to my property, 8 Bowater House - (where I live with my partner and two children) and those of my neighbours in Bowater House and all other neighbouring properties surrounding the site of the current Bernard Morgan House. If this proposal were to get permission and be built it would have a profoundly negative affect on the quality of life that we as a family have until now enjoyed within our home, a place where we both work and enjoy time together as a family, in the interior spaces, balcony and communal garden. Given that the proposal would compromise the quality of light and views from my apartment it should be understood that it will also have a negative effect on the value of this property as I am a leaseholder and this property is my most major financial asset.

The interior volumes of apartments in Golden Lane are modest and rely on the exceptional qualities of light penetration and views to make the apartments happily liveable. We enjoy light throughout the day in all south facing rooms in winter as well as summer and use the balcony and communal garden daily throughout the year (these facts are appreciated in the guidelines referring to the listing of the Golden Lane Estate guidelines – please see above). We find the light and views essential to the feeling of wellbeing in our home. The proposed building is so enormous that it will block light to our property for substantial periods of time during the morning in summer and destroy any quality of morning winter light that we now enjoy. It will also entirely block a substantial portion of our views to the Barbican estate that we enjoy from both our living room and bedroom. The quality of light and views of the Barbican towers are the reasons why we chose to live on the Golden Lane Estate and why we so enjoy living there now. This proposal stands to entirely compromise the quality of light and views to and from our apartment.

Bowater House is one of only two buildings that sit on the southern edge of the Golden Lane Estate and face external views rather than the majority whose volumes face the interior qualities of the Estate. In this respect the views and light of this edge of the site must be equally protected as those apartments that find themselves more firmly embedded within the Estate itself. Bowater and its neighbour represents the southern façade of the Golden Lane Estate that introduces the Estate to a wider public by revealing the pattern of buildings laid out with reference to sunken gardens – we regularly have people photographing the displays of flowers and shrubs in this garden and this relationship of the architecture. The altered light level will make growing plants more difficult due to the significant reduction in light that will access the garden should this proposal go ahead.

I can find no satisfactory evidence that the impact on our light has been carefully assessed. I dispute the inference that the design of our apartments – Bowater House – inhibit light from entering the property – it does not – we are flooded with light all year round. I request further details of the applicant's determination of light levels in our apartment and request the opportunity to have this independently verified.

The Golden Lane Estate and Barbican Estate are specifically designed in modernist style influenced by the architecture of Le Corbusier to construct blocks of apartments to replace single dwellings to free up land for communal use and to allow maximum light into each property and extensive views to neighbouring blocks. The Golden Lane Estate and Barbican Estates are both Grade II listed and in being listed appreciate that the spaces between buildings and indeed between these two neighbouring Estates are of equal importance to the buildings themselves. Architecture is about appreciating the volumes between interior and exterior in differing scales not least of which addresses the volumes between buildings; in this respect the current Bernard Morgan House was designed to entirely complement Bowater House. Bernard Morgan House faces East West so as to have no directly overlooking views to Bowater House as the northern facade of the current building is reserved for circulation not residential occupation. And the external landscape to this site mirrors the sunken garden of Bowater so the imagery of the landscape of the Golden Lane Estate extends over Fann Street. Similarly the neighbouring Jewin Welsh Church has no overlooking windows and is of a height that compliments those buildings on the Golden Lane Estate.

There is a vibrant community on the Estate who regularly use the external spaces as a natural and intended overspill from the modest interior volumes. In particular the size of the proposed building will mean that our communal garden is overlooked in an oppressive and intrusive manner. Our enjoyment of this garden will be utterly compromised.

Scale and Massing

Please refer to your own guidelines –

5.3 The character and setting of a listed building, or group of buildings, is of course also dependent upon its urban composition in addition to the architectural aspect of the buildings themselves. In the case of a carefully conceived ensemble like Golden Lane the quality and details of the spaces between and around the buildings are a key part of its special interest and require equal care and consideration.

Listed Building Management Guidelines - Updated Edition 2013 - (Originally published May 2007)

The scale of the proposed building is of great concern. The current proposal is so enormous that it dwarfs the Jewin Welsh Church and the low-rise buildings on the Golden Lane Estate, it also compromises the integrity and scale to the façade of the listed Cripplegate Institute to its south by being too close to it in scale. It makes a mockery of the surrounding architecture, appearing to constitute an over-scaled blocky mass – please recognise that these existing estates all aimed to stack living units to offer up the majority of the landscape to garden whereas this project inverts this making pokey internal spaces sitting in pokey external spaces that will enjoy no light and an overwhelming amount of accommodation.

The dwelling units are stacked in such a way to appear vertiginous and overbearing, we will have the feeling of living under a cliff face or a ziggurat in Bowater House. The units being proposed are single aspect and pokey, unlike the existing surrounding buildings that are all dual aspect and were designed with ethics and aesthetics in mind. There is literally no architectural merit in this proposal, it is banal, dark and dense in its fabric and massing and seems to replicate at least two other schemes by AHMM in other London locations that bear no similarity to this site in the City.

Claims that this proposal is an architectural response to the character and materials of the local area must be dismissed as utterly absurd and untrue. I recognise that AHMM has won awards in the past but none of that care or understanding of design is present in this scheme – they are clearly quite capable of churning out work that is the manifestation of a vision from Taylor Wimpey, who, as a developer is clearly aiming to make maximum financial return from this central London site with no desire to communicate with the architecture or community that exists here.

There are such opportunities here to create a real dialogue with the superb surrounding post war buildings, an opportunity entirely ignored at the moment with a scheme that smacks of space planning and flooding the market with poorly designed spaces that constitute more of venue to park funds rather than places to live.

Amenities

There are grave concerns as to the impact that a development of this overwhelming scale will have on already stretched resources. There is already one new development on Fann St that will provide a large number of new residential units, with this proposed scheme all local amenities will be overwhelmed. In addition it seems that the Green Corridor that exists very successfully will be lost.

NHS - The Neaman Practice already struggles with the residents of Golden Lane and the Barbican, it is difficult to get an appointment with a doctor as the demand is already so high. There appears to be flagrant disregard for the already stretched amenities in this area, the addition of over development on this scale will only compound the problem.

Fortune Park - With limited external space and no play-space for children within the scheme the occupants will spill over into Fortune Park, a park already overwhelmed with existing local inhabitants.

Green Corridor - The existing Bernard Morgan House sits in a wild garden that has been tended by local residents to maintain the qualities sought in creating continuous green corridors within the City of London. There is much commitment from the local community to mitigate against pollution and support species and education. The residents within the city represent a minority community (as opposed to business) and this community must insist and see that the values that it upholds and the wellbeing of its residents and children is honoured by the council and planners – please see the following for guidance -

The City of London - Biodiversity Action Plan refers to the following as some examples among many -

3.6 Achievements and recommendations

During the period of the previous City of London Biodiversity Action Plan 2010-2015 there have been some significant achievements:

- *The establishment of the City-based friends group, 'Friends of City Gardens' who focus on encouraging more biodiversity-friendly planting, such as native bulbs and hedges. Their work also includes monitoring wildlife across the Square Mile and supporting the monitoring and recording of target species.*

3.8 Health and Wellbeing

....Biodiversity is also an important contributing factor in mitigating air pollution with specific planting used to improve local air quality and raise awareness within the community. The City of London Corporation is also working with external organisations based in the Square Mile such as Bart's Heath NHS Trust to increase green infrastructure across their sites. Access to green space and nature is also linked to improving the mental health and wellbeing of individuals.

3.9 Education and community engagement

The work of promoting and enhancing SINC provides a valuable opportunity for individuals to share and learn new skills, knowledge and experience as well as bringing together residents, workers and visitors with a shared passion for biodiversity across the Square Mile. This form of engagement can be vital in local residents taking ownership of local parks and gardens and acting as champions to promote the quality and understanding of biodiversity in the City.

Key Worker Housing - I would like to know where the police who inhabited Bernard Morgan House for several decades are due to be housed now? In this era of increased rents, security threats and the dogged rise of the private market it is essential that Key Workers are supported to live in or near the areas that they work in. There are many key workers within this area; police, teachers, nurses etc. so no shortage of opportunity to continue to use Bernard Morgan House to fulfil this function.

Sustainability

I can find no evidence within this application of a fully sustainable proposal or reasons given for not exploring what it would be to retain the existing building and make additional works in response to that building. I did not see any evidence of sustainability being properly explored either during the ill-fated first consultation that was latterly re-titled a pre-consultation or indeed later at the final exhibition for consultation. The existing building is well built and sound – there is no clear defense as to why it would not be possible to include it in the future proposal. In this age we should be using what exists and building in response to it – we do not need to demolish sound well built, well conceived buildings only to replace them with a poorly designed over-developed proposal that will need mechanical ventilation to maintain the interior spaces.

Procurement and Planning

Procurement - I am interested to better understand the procurement of this site by Taylor Wimpey given that another party offered substantially more monies for the site with a scheme that retained the existing building with extensions. This alternative developer and scheme appeared to be more aware of the local community and appeared to want to commit to the infrastructure of the community and urban fabric on a long-term basis. I would request under freedom of information all correspondence that led Taylor Wimpey to acquiring the site. One would hope that there be no underhand reason why the those in charge would want Taylor Wimpey to take charge of the development.

Lack of Local List - I am surprised that the City of London does not have a Local List – a governmental scheme upheld by neighbouring Islington and Camden councils where a community can describe local non designated heritage assets. It appears as if the City of London has scant interest in safeguarding the qualities of its urban fabric and upholding clear policy described in its own guidelines. The authority needs to listen to local residents to understand the value of

Guardianship of Listed environments - The City of London is guardian to a wealth of post war building with the Barbican and Golden Lane Estate that continues to attract enormous amounts of visitors from around the world – these sites have been granted

listed status that include views into and out of these sites and the sites relationship to one another – this must be respected and the guidelines upheld. It seems that the survey department of the City of London saw fit to sell this site with no guidelines for development leaving the open to gross over-development – I challenge that this was a negligent move and is in part the reason why we now see such a poor proposal to grossly over-develop this site. I feel that the City sought to discredit the existing building on the site by procuring and paying for a survey to negate or play down any factors of architectural interest in Bernard Morgan House in order to smooth the route to a lucrative sale. I am astonished that English Heritage seems to have based their advice on this survey procured by the City of London rather than making their own independent enquiries into the quality of the existing building. This sequence of events is fundamentally flawed and calls into question the relationship of these public bodies and their integrity. A wealth of local residents find the Bernard Morgan House to have ample post war qualities and parts of the English Heritage report are fundamentally flawed – it is within documents from the architectural press at the time of building that accurately describe how Bernard Morgan House was explicitly designed in relation to Bowater House (evident from scale, massing, orientation etc) so any statement to the contrary is untrue and should be thoroughly investigated. I request – under freedom of information – all information relation to the surveys of the qualities of Bernard Morgan House.

Timing - I have serious concerns regarding the relationship of the planning bodies at City of London with members of the public who are considered statutory consultees on this project. Many meetings were promised that have never materialized. The timing of this validation of the proposal has come during the summer holidays – this was discussed significantly in advance of the event and residents were assured that this would not happen. Communication between residents and the planning department have been slow and non-committal with often confusing messages. Many bodies were not appropriately notified and the conservation officer who is new to the job and council has been away on holiday during this consultation period as has the senior planner attached to the proposal. All of this I would consider bad practice as a public body – or practice that is failing to be appropriately transparent and honest about the events in process. I will under freedom of information like to request all material relating to the timing of this planning application that seems attempt to get a proposal through planning during a time when one would expect all neighbours to be absent due to summer vacation – a very cynical move on the part of all bodies.

Finally, works of the scale proposed in this application - 16/00590/FULL Bernard Morgan House Redevelopment - will horribly disrupt the peace and tranquillity of my home and communal garden (as well as that of my neighbours) for a considerable time and will totally compromise our ability to happily inhabit our homes. I urge you to turn down this application. I honestly believe it would ruin our treasured oasis of peace, quality of life and privacy within the confines of this unique central London location - treasured and much visited by those seeking to explore inspirational examples of excellence within examples of post-war twentieth century housing. I formally request the City of London refuse this application.

Yours faithfully

Saskia Lewis
Director of Foundation
Architectural Association

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Adjei, William

From: Chipperfield, Rob
Sent: 31 August 2016 13:17
To: DBE - PLN Support
Cc: Linford, Catherine
Subject: FW: Objection to planning application: 16/00590/FULL

From: Stephen Morgan [REDACTED]
Sent: 31 August 2016 13:15
To: Chipperfield, Rob
Subject: Objection to planning application: 16/00590/FULL

Dear Sir,

I object to the planning application 16/00590/FULL at address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

I object to this development for reasons including its:

- Adverse visual impact on the surrounding street scape and buildings.
- Negative impact on the character of the neighbourhood.
- Over-bearing design: the massing and bulk is too large for the site and out of proportion with buildings immediately adjacent to the site.
- Unreasonable large scale: the proposed development is out-of-scale and out of character with the look of the neighbourhood, which includes many listed buildings.
- Insensitivity to the listed environments in the immediate vicinity.
- Listed building impact: the proposed development is insensitive to the grade II listed Barbican and Golden Lane estates
- Impact on loss of views from buildings in the immediate vicinity, which would adversely affect residents and workers within the immediate area.
- Adverse effect on residential amenity of neighbours in the vicinity due to loss of privacy and overshadowing.
- Impact on light/overshadowing Fortune Street Park, one of the few open spaces in the Borough of Islington.
- Unacceptable high density.
- 'Garden grabbing' - loss of garden space on the proposed development site.
- Unacceptable impact of noise and overshadowing on neighbouring schools.
- Lack of consideration to preserve the existing building, whose appearance and materials are in keeping with the neighbouring built environment.

Yours faithfully,
Stephen Morgan 143 Shakespeare Tower, Barbican, LONDON. EC2Y 8DR

Adjei, William

From: [REDACTED]
Sent: [REDACTED]
To: Linford, Catherine
Cc: PLN - Comments
Subject: FW: Planning application 16/00590/FULL. Objection.

Dear Catherine Linford

Planning application 16/00590/FULL

I have lived at 13 Shrewsbury Court for 25 years and my husband's family have lived and run a business in Whitecross Street in Islington since 1864. My family and I live in a house that overlooks Fortune Park which has views towards Bernard Morgan House and the Golden Lane Estate.

We built our family house in 2007. There was much discussion with Islington planners as they felt the plans for our house were too bulky and the height not in keeping with the buildings that surround and they decided it was overbearing and inappropriate in relation to Fortune Park. We adjusted our plans to satisfy these concerns. The original plans and our subsequent house, which ended up being no larger than the building it replaced, is tiny in relation to the development proposal for Bernard Morgan House.

The BMH planning application does not give a clear idea of the impact of the proposed new development will have on the setting of Fortune Park. The developers seem unwilling to share exactly what their new building will look like from different viewpoints. From what I can tell, this new development appears unexpectedly massive. It will overshadow the park in the evenings and dominate the Golden Lane Estate.

This small, much loved park is a sanctuary for many and any loss of light would have a detrimental effect on the lives of many of its stakeholders.

I therefore object to this application of the grounds of the bulk and massing of the proposed new building; its overbearing impact on the surrounding area, including Fortune Park, and also its negative impact on the setting of the listed Golden Lane Estate.

Please acknowledge receipt of this email.

Yours sincerely

[REDACTED]

Anna Curry
13 Shrewsbury Court
London
EC1Y 8JF

[REDACTED]

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Ms Bridget Andrews

Address: 106 Breton House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I object most strongly to this application. The proposed development will deprive me of day and evening sunlight to my flat. It is too large and overbearing and lacks all sympathy with the surrounding buildings many of which are listed. I understood that the City valued its heritage and cannot believe that the planning team would approve of this development if it were able to do so impartially and was free of other considerations.

Wells, Janet (Built Environment)

From: DBE - PLN Support
Subject: FW: Planning application 16/00590/FULL. Objection.

From: JP Masclet
Sent: 02 September 2016 10:18
To: Linford, Catherine
Subject: Re: Planning application 16/00590/FULL. Objection.

Dear Catherine,

My address:

Flat 4
103 Whitecross Street
London EC1Y 8JD

Kind regards,

JP

JP MASCLET

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From: JP Masclet
Sent: 01 September 2016 18:39
To: Linford, Catherine
Cc: PLN - Comments
Subject: Planning application 16/00590/FULL. Objection.

Dear Catherine Linford

Planning application 16/00590/FULL

I have lived in Whitecross Street in Islington for sixteen years; the rear of my property overlooks Fortune Street Park with views towards Bernard Morgan House.

I have visited the proposed site and studied the BMH planning application. What I cannot find is any information about the potential impact of the new development on the setting of Fortune Street Park and the outlook I will be faced with from the rear of my property. However, from what I can tell, this new development appears obtrusive and unreasonably massive. It will throw the *entire* park into shade in the evenings and dominate the Golden Lane Estate, changing forever and in a negative way the inner-city charm of this community. Furthermore, the new structure seems to me to be bland and lack distinction from every other new build in London.

I therefore object to this application of the grounds of the bulk and massing of the proposed new building; its overbearing impact on the surrounding area, including Fortune Street Park, and also its negative effect on the setting of the listed Golden Lane Estate.

Please acknowledge receipt of this email.

Yours sincerely,

JP Masclet

JP MASCLÉT



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Catherine Linford
The Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ



Redevelopment of Bernard Morgan House, Golden Lane (Ref: 16/00590/FULL)



I am writing to state my support for the planning application to
redevelop Bernard Morgan House.

Please add any other comments below:

More people in the area - community
good for business. etc.

☒ I am a local resident ☐ I am a local business owner ☐ I work at a local business

Name:

Robert Lin

Address:

6/9 Bridge Water Square
EC2P 8AF

Tel:

Email address:

Signature:



Catherine Linford
The Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ

PLANNING PERMISSION		
PSDD	CPD	PPD
TPD	02 SEP 2016	LTP
OM		SSE
NO	123794	PO
FILE		DD

Redevelopment of Bernard Morgan House, Golden Lane (Ref: 16/00590/FULL)



I am writing to state my support for the planning application to redevelop Bernard Morgan House.

Please add any other comments below:

WE NEED MORE HOUSING.
LUXURY AND AFFORDABLE FOR
LOCALS.

☒ I am a local resident

☐ I am a local business owner

☐ I work at a local business

Name:

P. CODY

Address:

83 PEABODY TOWER
GOLDEN LANE
LONDON
EC1Y 0RX

Tel:

Email address:

Signature:

Catherine Linford
The Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ

PLANNING & TRANSPORTATION		
PSDD	CPO	PPD
TPD	02 SEP 2016	LTP
OM		SSE
No		PP
FILE		DD

Redevelopment of Bernard Morgan House, Golden Lane (Ref: 16/00590/FULL)



I am writing to state my support for the planning application to redevelop Bernard Morgan House.

Please add any other comments below:

- ☐ I am a local resident ☐ I am a local business owner ☐ I work at a local business

Name:

ROBERT SUTTON

Address:

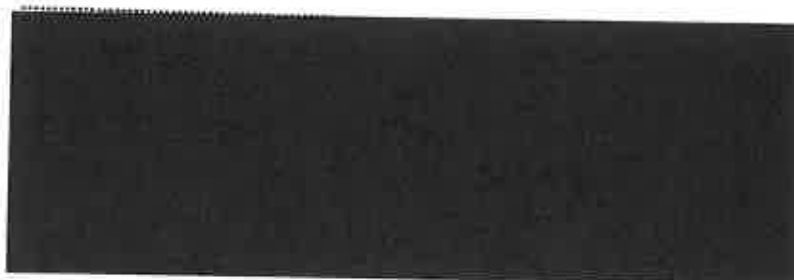
37, BARNET ST

EC1

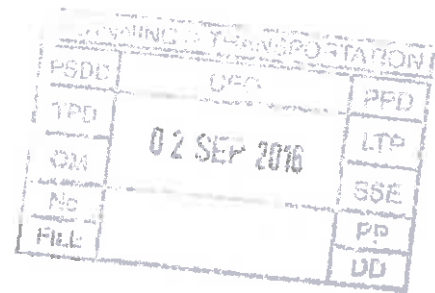
Tel:

Email address:

Signature:



Catherine Linford
The Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ



Redevelopment of Bernard Morgan House, Golden Lane (Ref: 16/00590/FULL)



I am writing to state my support for the planning application to
redevelop Bernard Morgan House.

Please add any other comments below:

☒ I am a local resident ☐ I am a local business owner ☐ I work at a local business

Name:

Michael Rawlins

Address:

16 Friar St
EC1V 7NS

Tel:

Email address:

Signature:



Catherine Linford
The Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ

PLANNING & TRANSFORMATION		
PSDD	02 SEP 2016	REF
TFD		LTF
OM		SSE
		PP
		DD

Redevelopment of Bernard Morgan House, Golden Lane (Ref: 16/00590/FULL)



I am writing to state my support for the planning application to redevelop Bernard Morgan House.

Please add any other comments below:

Will be good to have new flats and more people living in this area, specially for our business aspect.



I am a local resident



I am a local business owner



I work at a local business

Name:

Lorenzo Castiglioni

Address:

101 Goswell Road, Crescent House

Tel:

Email address:

Signature:

Catherine Linford
The Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ

PLANNING		
PREP	DATE	REF
TPD	02 SEP 2016	UTP
OIA		SSE
Nb		PP
FILE		DD

Redevelopment of Bernard Morgan House, Golden Lane (Ref: 16/00590/FULL)



I am writing to state my support for the planning application to
redevelop Bernard Morgan House.

Please add any other comments below:

☐ I am a local resident ☐ I am a local business owner ☐ I work at a local business

Name: MR A. BROWN

Address: 78 LEXINGTON APTIC
40 CITY RD

Tel:

Email address:

Signature:

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

Anna Parkinson
23 Hatfield House
Golden Lane Estate
EC1Y 0ST

4 September 2016

Dear Ms Linford,

Bernard Morgan House Planning Application ref 16/00590/FULL

OBJECTION

I write to object to the above referenced planning application with the following references to planning policy issues:

1. The proposed design disregards the City of London Listed Building Management Guidelines for the Golden Lane Estate.

There are a number of grave concerns about the proposed design approach:-

The proposals are not in keeping with listed neighbours on the Golden Lane and Barbican estates, both of which demonstrate a rigorous and subtle rhythm of elevational treatment. The existing buildings are widely recognised for their significant architectural quality and contain a considered and well-proportioned regular composition of windows, balconies and bays within a predominantly horizontal and monolithic frame. This is lost in the design for the proposed building.

The proposed design is opportunistic in order to maximise the development of the site and disregards its context in favour of a banal formulaic response with a generic 'London Vernacular' style. The seemingly randomised arrangement of balconies and fenestration fight for attention, rather than respecting the quiet and dignified listed neighbours. The designers purport 'animation' but, by proposing a tripartite principal elevation with horizontal and vertical steps, their approach to architectural composition loses the rigour of the adjacent listed blocks.

The result is very disappointing. In considering the planning application, the Design and Conservation team should ask the architects to revisit their proposals in order to create a specific and exemplary response to the architectural context of this important mid 20th Century neighbourhood.

2. The height and mass of the proposed building is unacceptable in its context and constitutes over development of the site, significantly providing 50% more developed area than that suggested when the site was marketed by the City of London.

3. Loss of daylight and sunlight. The proposed development by virtue of its height and mass will overshadow an important local amenity space - Fortune Street Park - which is extremely well used as a resource by all members of the local community as well as local workers and children from 0 to 11 years using the Golden Lane Campus.

In particular the proposed new building is immediately adjacent to an educational provision for children with additional needs – Richard Cloudesley School - and will overshadow play and teaching provision for these vulnerable children.

The proposed development overshadows the playground of Prior Weston school where children within our local community learn to grow food and enjoy sunshine and fresh air.

The majority of children who attend these schools and the Early Years Centre at Golden Lane Campus do not have any significant open space attached to their own homes and benefit greatly from the ability to enjoy these outdoor spaces at school and in the adjacent park.

Due to the timing of the planning application at the end of the school year, has the school been properly consulted and given adequate time to comment on the proposal?

The proposed development will also have a detrimental effect on daylight and sunlight for adjacent dwellings on the Corporation's Golden Lane Estate and in the Barbican.

Whilst the Mayor of London's Housing Supplementary Planning Guidance (March 2016) document states that while ...'An *appropriate* degree of flexibility needs to be applied when using BRE guidelines....[these] should be applied sensitively to higher density development [and]....take in to account the local circumstances...

Moreover the same document states:

'The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on *broadly comparable residential typologies within the area* ... Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced **but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.**'

In the case of this proposed development, which does not look to offer any benefit to the established local community, the sole motive to optimise housing potential is additional profit for the developer and therefore the Corporation should consider that there should be no additional harm for their

existing tenants and for residents in buildings where the Corporation is the freeholder on the Golden Lane Estate and in the Barbican.

4. None of the proposed new homes will be available for social or affordable housing which might be accessible for local families. The development replaces key worker housing with flats for private sale. Dedicated teachers on Golden Lane Campus have long commutes due to the lack of affordable housing within the local area and many potential good teachers are put off from working at these schools for that reason. Key workers who support our local community face similar issues and their needs should be considered and provided for in all new housing developments.

5. Housing amenity: the Mayor of London's Housing Supplementary Planning Guidance (March 2016) document also refers to Standard 29: 'Developments should minimise the number of single aspect dwellings. Single aspect dwellings that are north facing, or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms should be avoided.' The majority of proposed dwellings in this development will be single aspect and do not reflect the generous typology of the adjacent homes on the Golden Lane Estate or in the Barbican.

6. Inadequate consideration has been given to pressure on local services and the social infrastructure in general. Health, education, leisure, community and sport facilities are already over subscribed and the proposed development will do nothing to alleviate this pressure.

7. Ecology and sustainability. The proposed development impinges on an area of land which has been identified as an area providing a habitat for biodiversity and it was interesting to see that one of the first features of the site to disappear after it was sold was the information sign about the black redstart. I have seen bats adjacent to the existing Bernard Morgan House and the developer should provide survey information and proposals to ensure their habitats will not be disturbed by this development.

Whilst not opposed to development per se and recognising the need for good affordable housing in Central London, as a local resident I strongly object to the approach taken for the proposed development which looks to over-develop the site with no regard nor benefit for the local community. Of particular concern is the lack of respect for the architectural heritage of the site with a proposal which would harm its significant listed context.

Yours sincerely

Anna Parkinson

Bernard Morgan House. 16/00590/FULL

attention of Catherine Linford

Dear Ms Linford, I trust you will have checked that the developers have done what is necessary to satisfy the technical aspects of planning law. I hope that you and the Committee will also accord weight to subjective public comments. My objections are administrative, aesthetic and political.

Administrative.

1. It has been hard to find in the planning application documents what the proposed new building will actually look like from the streets, from Fortune Park or from representative adjacent homes. No doubt technically adequate they do not seem to show proper respect either to honest democratic consultation, or even possibly to our non-technical Councillor representatives.

Aesthetic

2. Bernard Morgan House looks to have been carefully designed with pleasant surrounding space, gardens and many natural materials. It seems structurally sound but neglected. Why, even at this late stage, can it not be refurbished? The new building expresses overwhelming mass, aggressively filling the space to the maximum that the planning committee might permit. This increased mass will oppress and darken the surroundings, whatever the details of the finish.

The architecture of Chamberlin, Powell & Bon has now emerged from populist disdain and is an increasingly appreciated and admired City asset. Placing an obvious foreign lump at the centre of their combined works of Golden Lane estate and the Barbican would be an act of vandalism for future generations to wonder at and regret.

Political.

3. The Primary school playground environment is valuable for our children (who need our sensitivity and protection since they have no voice) and should not be degraded by this oppressive bulk and loss of light.

Those working to benefit all of us previously used these flats. In what sense is this plan of any public benefit at all? Construction jobs would also be provided by refurbishment.

I hope you will decide in favour of the wellbeing of the entire future local community and reject this scheme.



Mr & Mrs Bulman, 54 Breton House, EC2Y 8DQ.



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

For the attention of Robert Chipperfield and Catherine Linford

Re: Objection to application 16/00590/FULL

Dear Sir/Madam,

I write on behalf of the Barbican Association, a Recognized Tenants' Association representing residents of the Barbican Estate, to object to the application to develop the Bernard Morgan House site. In particular to the massing and extra height, which would damage residential amenity, as protected by planning policy DM21.3 and the character and appearance protected by policy DM12.1 in the Local Plan.

1. Residential amenity threatened by impact of extra height and greater massing.

Bernard Morgan House (BMH) lies in a residential area between two listed building estates, The Barbican and Golden Lane.

The Local Plan, Policy DM10.1 requires 'all developments to avoid harm to the townscape by ensuring that the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, character, historic interest of the locality.....'.

The Local Plan, Policy DM21.3, requires developments 'to be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation'.

The proposed design of the building very much larger in all dimensions than BMH is inappropriate to its surroundings. Neither does it consider the constricted site so close to residential blocks in two listed estates nor their surrounding narrow streets. The proposed substantial increase in height and massing would cut the daylight and sunlight to a substantial number of flats and leave residents overshadowed by a building significantly taller than its neighbours. Other design features such as the protruding balconies will cause much 'overlooking' and the long windows so close to other blocks will cause light pollution to

neighbouring flats.

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'.

There are a number of design features that will lead to noise disturbance: the loading bay on the narrow Brackley Street so close to people's homes, the protruding balconies on Golden Lane overlooking Breton House and Prior Weston and the roof terraces where people can congregate. 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 there now has to permanently lock the doors as all other measures have been ineffective. Juliet balconies are a better design than ones on which people can congregate and roof terraces close to other residences seem to be impossible to manage. Mitigating noise disturbance has been given little priority in this design.

3. Residential amenity threatened by over-density

The Local Plan requires the 'cumulative impact of individual developments on the amenity of existing residents'.

The increase of massing from the original proposed 80000sq ft to 120000sq ft and its increase in the number of units will also put a heavy strain on local amenities such as the Doctor's Surgery in Half Moon Court that already has a huge development on its doorstep.

4. The design of the development taking no heed to its surrounding context

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'.

Neither the listed Barbican estate nor the listed Golden Lane Estate has buildings with a complicated stepped-up plan. Barbican and Golden Lane blocks are notable for the clarity of the plans and the levelness of their roofs.

The Local Plan, Core Strategic Policy CS10 promotes 'a high standard of design ensuring that the bulk, height, scale, massing, quality of materials and detailed design of buildings are appropriate to the setting of surrounding buildings and spaces'.

As stated in the Twentieth Century Society report, Bernard Morgan House is a recognized non-designated heritage asset of local significance yet the developer's proposal takes no account of this nor its proximity to the listed estates, it is merely a design that is remarkably similar to those of their other developments in London.

We therefore ask the City to reject this application. I would be grateful if this letter could be posted on the portal as a response from the BA, there have been problems with this facility in the past.

Yours faithfully,

Helen Kay

☐ Chair, Barbican Association Planning Committee

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Ms Sue Pearson

Address: 21 Hatfield House Golden Lane Estate London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity
- Traffic or Highways

Comment: I object to the proposal for the following reasons

- 1 Overshadowing the park, our small green area, and the tokenism of providing the small patch of grossly shaded public access garden
 - 2 Reduced air quality with additional traffic from new residents, deliveries, visitors etc
 - 3 Proximity and overlooking of Golden Lane Campus - primary and special needs schools.
 - 4 Luxury flats when housing is needed in the City for lower paid workers who keep the City running,
 - 4 Addition numbers using local facilities, which are already oversubscribed.
 - 5 Unsympathetic building lacking in any architectural merit and bearing no relation to surroundings and the proximity to a number of Listed buildings, in fact a copy of their developments elsewhere and totally inappropriate in the City centre.
- I believe the site to be overdeveloped, with the wrong type of housing and with little architectural merit

Hassall, Pam

From: Linford, Catherine
Sent: 20 September 2016 10:15
To: DBE - PLN Support
Subject: FW: 16/00590/FULL Bernard Morgan House Redevelopment - Landscape
Attachments: City in Bloom 2013 Bernard Morgan Supporting Evidence.pdf; Initial proposal.doc; Bernard Morgan City in Bloom Gold Award 2013.pdf; Bernard Morgan Community Garden.docx; Plants in Bernard Morgan House.docx

Hello,

Please can this be uploaded to 16/00590/FULL and printed.

Thanks,
Catherine

From: Saskia Lewis [REDACTED]
Sent: 19 September 2016 09:00
To: Linford, Catherine; Eley, Ben
Cc: Mark Campbell; Emma Matthews; Frederick Rodgers; claudiamardante@gmail.com; Hudson, Sarah
Subject: RE: 16/00590/FULL Bernard Morgan House Redevelopment - Landscape

RE: 16/00590/FULL Bernard Morgan House Redevelopment - Landscape

Dear Catherine,

I am writing to notify you of the significant communal heritage value of the gardens at Bernard Morgan House, Golden Lane.

These gardens are significant for the following reasons:

1. Since 2007, the wildlife gardens of Bernard Morgan House were tended by the Barbican Wildlife Group and Friends of City of London Gardens – associations of residents and members of the local community – in conjunction with the City of London Police and residents of Bernard Morgan House. The planting and maintenance of these gardens was very much a collaborative effort.
2. These works were supported by the City Gardens Team together with funding provided by Legal and General Insurance Company.
3. The gardens contain over 100 different plant species and were originally conceived as a habitat for the Black Redstart – an endangered bird of which there are only 100 breeding pairs in the UK, with the City of London holding 5–10 % of the UK population.
4. The gardens regularly provided plant samples to the Natural History Museum, South Kensington. This provision continued at the request of the museum in its documentation of urban gardens. Samples from Bernard Morgan House are still being evaluated, documented and submitted in the present time.
5. The gardens at Bernard Morgan House were entered in – and won Gold Awards – in the City of London's own 'City in Bloom' garden competition in 2013 and 2014.
6. Since the sale of Bernard Morgan House in 2015 no volunteers have been allowed to tend the gardens. Prior to this sale these garden were regularly tended and maintained.

**City in Bloom 2013 - Registration of Bernard Morgan House
Category Biodiversity and Improvement**

Supporting Evidence

History and summary

Site was originally a private space for residents of the City of London Police Station House. Up to 2007, the sunken garden contained three small ornamental conifers and four hydrangeas. The paving was scraped and kept free of moss or other vegetation. There was little, if any benefit to wildlife.



Volunteers clear site in 2008

City of London Police gave permission for the garden to be transformed into a community wildlife garden in late 2007.

In spring 2008 volunteers from Legal and General (L&G) and Barbican Wildlife Group (BWG) cleared the site, which comprises around 290m², and created the 13 beds of approximately 22m² by lifting paving slabs and removing some cobbles. L&G provided funding and volunteers for the preliminary planting of wildlife friendly shrubs, bulbs and herbaceous plants (see attached list). In 2013 lifting a further 3 paving slabs created an additional 3m² of beds.

The garden has been maintained by BWG and more recently by Friends of City Gardens volunteers.

Selected wildflower species are encouraged to colonise the cracks in the pavings and moss is allowed to grow in the winter.

From a very impoverished flora in 2007, the number of species recorded has grown to over one hundred. The garden is regularly visited by eight species of bird and is home to great tits that have nested every year since 2008. It also hosts a diverse insect and spider population.



Summer flowers 2012

**City in Bloom 2013 - Registration of Bernard Morgan House
Category Biodiversity and Improvement**

Biodiversity

How we manage the site to improve biodiversity

Key species

1. Black redstart *Phoenicurus ochruros*



**Black redstart
(RSPB)**

Bernard Morgan House is a unique habitat in the City. It is one of only three dedicated wildlife gardens and the only one to provide a specific habitat for the Black Redstart - a key target species for the City.

The predominantly paved area provides the type of 'weedy', bare habitat where these birds like to forage. We have encouraged specific plant species that provide the preferred food of the Black Redstart, such as:

Perforate St John's Wort *Hypericum perforatum*
Kidney Vetch *Anthyllis vulneraria*
Betony *Stachys officinalis*
Devil's - bit Scabious *Succisa pratensis*
Ribwort Plantain *Plantago lanceolata*
Selfheal *Prunella vulgaris*

A juvenile black redstart was spotted in the garden in 2010.

2. House sparrow *Passer domesticus*

The house sparrow is also a target species of the City. Between 1977 and 2000, house sparrow numbers in the UK declined by 65%. This may be partly to do with lack of suitable food, particularly during the breeding season.

New this year - we have sown a mini meadow of 3m² with wildflower species recommended by the RSPB as being of particular benefit to sparrows. This mix includes traditional cornfield annuals with linseed, triticale, barley, white millet, phacelia and sunflowers.

3. Pollinators

The garden attracts a wide range of bees - honey and solitary, bee flies, hover flies and other insects. We have planted a range of plant species to provide a succession of pollen and nectar throughout the year, such as:

Early Spring bulbs - snow drops, winter aconites
Spring flowers - violets, wild garlic, primrose, wallflowers
Early flowering shrubs - berberis
Early summer flowering shrubs/trees - pyracantha, apple
Summer flowering plants - lavender, nettle-



Bumble bee on foxglove

**City in Bloom 2013 - Registration of Bernard Morgan House
Category Biodiversity and Improvement**

leaved bellflower, buddleia, phlox, toadflax, runner bean, evening primrose
Late summer and autumn - Michaelmas daisies, echinacea, golden rod.

Because the garden is extremely sheltered the flowering season of many of the plants extends into October and November.

4. Insects and spiders



Insect hotel with wild garlic and grape hyacinths in foreground

Insect surveys have revealed a diverse population of aphids, ground beetles, shield bugs, ants, ladybirds, butterflies (comma, common white, orange tip), moths (mint, white plume) and wolf and garden spiders. The most exotic insect recorded to date was a solitary great green bush cricket (*tettigonia viridissima*) in October 2012.

An insect hotel was constructed in spring 2011.

The dead birch tree was retained and provides a habitat for insects.

5. Birds

The garden is managed to provide food and water for birds throughout the year. The planting is designed to provide a succession of food - from aphids on the roses, enjoyed by blue tits and great tits, to teasels and thistles for gold finches to rose hips, pyracantha berries and seeds from the herb plants. The mature birch tree is used as shelter for small birds queuing up to use the bird feeder and travelling between Fortune Park and Fann Street feeders.

During the winter, moss is allowed to build up into a thick mat on the pavings and cobbles and leaves are left in drifts as a habitat for invertebrates that provide forage for black birds and robins until well into spring.

There is also a:

Bird bath - which is also used by squirrels.

Bird feeder - kept filled with peanuts throughout the year

Nest box - regularly used by great tits and cleaned by volunteers each year.

Surveys have identified, blue tits, great tits, green finches, robins, black birds, chaffinches, gold finches and wood pigeons as regular visitors.



Bird bath and spring flowers 2013

**City in Bloom 2013 - Registration of Bernard Morgan House
Category Biodiversity and Improvement**

New for 2013



Apple variety Sunset blossom
May 2013

As well as the mini meadow for sparrows, two apple trees have been planted - varieties Egremont Russet and Sunset. Both carried blossom in the spring for pollinators. Although the trees are not expected to be productive this year, any fallen apples will be a food source for blackbirds and late summer insects.

Appendix: Plants in Bernard Morgan House
Species in bold are the original planting in Spring 2008.

Achillea	Yellow, self sown
Annual wall rocket	Diploaxis muralis , known as stinkweed, flowering April, self sown
Antirrhinum	Self sown
Apple	Egremont Russet planted autumn 2012
Apple	Sunset planted autumn 2012
Autumn hawkbit	Leontodon autumnalis , self sown
Bearded Iris	
Betony	Betonica officinalis
Bistort	Polygonum bistorta , planted 2008
Black grape	Planted 2008
Bluebell	Hyacinthoides non-scripta
Borage	Borago officinalis , transplanted from Fann St Oct 2010
Buddleia	Buddleja davidii , self sown
Chamomile	Chamaemelum nobile , planted Sept 2010
Chive	Allium schoenoprasum , transplanted from Fann St 2008
Cleavers	Galium aparine
Coltsfoot	Tussilago farfara
Columbine	Aquilegia vulgaris , transplanted from Fann St Oct 2010
Comfrey	White, low growing, transplanted from Fann St Oct 2010
Common chickweed	Stellaria media

**City in Bloom 2013 - Registration of Bernard Morgan House
Category Biodiversity and Improvement**

Common Field-speedwell	Veronica persica
Corn cockle	Agrostemma githago, introduced in Fann St compost
Cotoneaster	Prostrate form, self seeded
Cowslip	P.veris
Creeping buttercup	Ranunculus repens
Crocus	
Cut leaved cranesbill	Geranium dissectum
Dandelion	Taraxacum officinale
Darwin's barberry	Berberis darwinii, planted 2010
Deptford pink	Dianthus armeria
Devil's bit scabious	Succisa pratensis
Evening primrose	Oenothera biennis
Fennel	Self seeded
Feverfew	Tanacetum parthenium, self seeding
Foxglove	Digitalis purpurea, now self seeding
Gallant soldier	Galinsoga parviflora, self sown and removed continually
Garlic	Allium ursinum now spreading
Garlic mustard	Alliaria petiolata
Golden rod	Solidago
Grape hyacinth	Muscari neglectum
Grape Vine	
Greater knapweed	Centaurea nigra, planted Spring 2010
Green Alkanet	Pentaglottis sempervirens
Groundsel	Senecio vulgaris
Hairy bitter cress	Cardamine hirsuta
Hedgerow cranesbill	G. pyrenaicum
Herb Robert	Geranium robertianum
Hieracium spp	
Honesty	Lunaria annua, transplanted from Fann St Sept 2010
Hop	Planted 2008
Hyacinth	Donated by City Spring 2013
Ice plant	Sedum spectabile
Kidney vetch	Anthyllis vulneraria
Lavender	
Lemon balm	Melissa officinalis, very invasive
Lungwort	Pulmonaria officinalis, transplanted from Fann St Oct 2010
Meadow buttercup	Ranunculus acris
Michaelmas daisy	Aster spp
Monkeyflower	Mimulus guttatus, self sown
Musk mallow	Malva moschata, self seeding in paving
Nettle leaved bellflower	Campanula trachelium Now self-seeding
Oxeye daisy	Leucanthemum vulgare, transplanted from Fann St Oct 2009
Perforate St John's Wort	Hypericum perforatum

**City In Bloom 2013 - Registration of Bernard Morgan House
Category Biodiversity and Improvement**

Phlox	Phlox paniculata
Primrose	Primula vulgaris, struggles in the hot dry summers
Procumbent yellow sorrel	Oxalis corniculata, self sown
Purple top	Verbena bonariensis
Pyracantha	
Red campion	Silene dioica
Red dead nettle	Lamium purpureum
Red valerian	Centranthus ruber, self seeding
Redshank	Polygonum maculosa, self sown
Rib wort plantain	Plantago lanceolata
Rock Rose	Helianthemum nummularium, planted 2010
Rose	Rosa rugosa
Rosemary	Rosmarinus officinalis (originally planted prostrate form which didn't survive the first winter)
Round leaved cranes's-bill	Geranium rotundifolium
Round leaved cranesbill	G. rotundifolium
Sage	Salvia officinalis
Salvia nemorosa	Salvaged from City planter
Silver birch	Betula pendula
Snowdrop	Galanthus nivalis planted spring 2013
Spear thistle	Cirsium vulgare
Spurge	Probably Petty spurge, Euphorbia peplus, self sown
Tansy	Tanacetum vulgare
Teasel	Dipsacus fullonum
Thrift	Armeria maritima, transplanted from Beech High Walk Sept 2010
Violet	Viola oderata
Wall flower	Erysimum cheiri, salvaged from Barbican gardens 2011
Wayfaring tree	Viburnum lantana, planted 2010
Welsh poppy	Meconopsis cambrica
White dead nettle	Lamium album
Wild marjorum	Origanum vulgare, now self seeding
Wild rose	Possibly sweet briar, Rosa rubiginosa, transplanted from Fann St 2008
Winter Aconite	Eranthis hyemalis, donated by Phillip and Leah Spencer from Norfolk. More added spring 2013 donated by City
Wisteria	Wisteria sinensis
Yarrow	Achillea millefolium, planted spring 2010
Yellow corydalis	Pseudofumaria lutea
Yellow flag	Iris
Yellow toadflax	Species: pseudacorus
	Linaria vulgaris, self seeding

CREATION OF A WILDLIFE GARDEN AT BERNARD MORGAN HOUSE

Bernard Morgan House is a residential section house for the City of London Police. It is situated at the corner of Golden Lane and Brackley Street on the northern edge of the City. Its Golden Lane frontage is bounded by a sunken 'garden' of approximately 80 m². This area is currently paved and contains a few struggling shrubs. The garden is opposite the new Golden Lane campus, a 450-place primary school due to open at Easter 2008.

The proposal

- To transform the sunken area into a wildlife friendly garden that is attractive not only to birds, butterflies and bees but also to the many City residents, workers and school children that pass it every day.
- To provide an opportunity for members of the residential community to work with volunteer City workers and volunteers from the City of London Police on a project of benefit to the whole community and to the environment.
- To provide an educational resource through interpretation boards.

Why?

- The Bernard Morgan garden would become part of a green corridor that extends from the Fann Street wildlife garden (substantially managed and maintained by volunteer Barbican residents in partnership with City Gardens) to Fortune Park.
- The proposed Local Development Framework encourages improvements to biodiversity in the City through the development of green corridors and additional wildlife areas, wherever possible.
- The reduction of hard landscaping in favour of 'green' areas may help to mitigate the potential problems of increased run off as a result of future climate change.
- Opportunity for residents, City workers and Police to co-operate on a high visibility project that will benefit the wider community.

How?

- The Police and City Gardens support the proposal in principle.
- Once funding is pledged in principle a detailed plan would be prepared by the Barbican Wildlife group conjunction with experts from City Gardens. The plan would then need to be approved by all parties - Police, City Gardens, Sponsor.
- Ideally the work should be carried out in autumn 2007.
- It is envisaged that clearing the site, digging a small pond and planting would take place in a series of work sessions over (say) a couple of weeks - to suit volunteer commitments and numbers and depending on the weather.
- Barbican residents and Police volunteers could provide on going maintenance with perhaps quarterly volunteer session for corporate volunteers to carry out bigger tasks (autumn clearing, cleaning bird boxes, spring sowing/planting etc.)

Open Spaces Department
Sue Ireland BSc, MSc, MIPGS
Director of Open Spaces



Date 13 August 2013

To Whom It May Concern

Re: City in Bloom, Bernard Morgan House

I'm delighted to inform you that Bernard Morgan House has been awarded Gold as part of the 2013 City in Bloom Awards for Biodiversity and Improvement. We are thrilled to enclose your City in Bloom certificate.

The City Gardens team would like to pass on our sincere thanks from both the City of London and our department for the hard work and care put into your space this summer and for your support during our London and Britain in Bloom campaigns. We will hear the results for these campaigns in the autumn and we will announce them in our next newsletter due out in October 2013.

This year we saw some wonderful spaces and displays. For our 2014 City in Bloom campaign we are keen to see window boxes and gardens that promote sustainability and biodiversity across the City. The judges will especially be looking out for this next year. I have enclosed a document with advice on creating sustainable and insect loving displays for next year's City campaign. I will keep you updated on news of our 2014 in Bloom campaign. In the meantime have a bloomin' lovely summer!

Yours sincerely,
Rosie Hardicker

Project Support Officer
City Gardens Department

City of London Open Spaces Department
PO Box 270 Guildhall, London EC2P 2EJ
Switchboard 020 7332 3505
www.cityoflondon.gov.uk

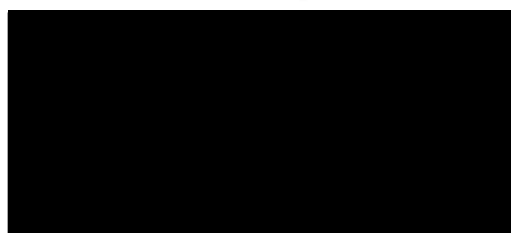
City in Bloom 2013

GOLD

presented to

**Friends of City Gardens for the City in Bloom Biodiversity
and Improvement Award at Bernard Morgan House Garden**

by the Director of Open Spaces



**LONDON IN
BLOOM**
A CAPITAL CAMPAIGN

Bernard Morgan Community Garden

History and summary

The garden was created in 2008 by volunteers from Legal and General (L&G) and Barbican residents. The site comprises around 290m² with 13 beds of approximately 25m². The garden is maintained by Friends of City Gardens volunteers.

Selected wildflower species are encouraged to colonise the cracks in the pavings and moss is allowed to grow in the winter to provide forage for birds.

From a very impoverished flora in 2007, the number of species recorded has grown to over one hundred. The garden has provided plant material for the Natural History Museum survey of City plant species being carried out by local artist Liz Davies and Dr Mark Spence of the NHM. The garden is regularly visited by eight species of bird and is home to great tits that have nested every year since 2008. It also hosts a diverse insect and spider population.



Summer flowers

The garden has been nominated for City in Bloom for the last three years and has been awarded Certificates of Excellence every year.

Biodiversity

How we manage the site to improve biodiversity

Key species

1. Black redstart *Phoenicurus ochruros*



Black redstart
(RSPB)

Bernard Morgan House is a unique habitat in the City. It is one of only three dedicated wildlife gardens and the only one to provide a specific habitat for the Black Redstart - a key target species for the City.

The predominantly paved area provides the type of 'weedy', bare habitat where these birds like to forage. We have encouraged specific plant species that provide the preferred food of the Black Redstart, such as:

Perforate St John's Wort *Hypericum perforatum*
Kidney Vetch *Anthyllis vulneraria*
Betony *Stachys officinalis*
Devil's-bit Scabious *Succisa pratensis*
Ribwort Plantain *Plantago lanceolata*
Selfheal *Prunella vulgaris*

Bernard Morgan Community Garden

2. House sparrow *Passer domesticus*

The house sparrow is also a target species of the City. Between 1977 and 2000, house sparrow numbers in the UK declined by 65%. This may be partly to do with lack of suitable food, particularly during the breeding season.

We have sown a mini meadow of 3m² with wildflower species recommended by the RSPB as being of particular benefit to sparrows. This mix includes traditional cornfield annuals with linseed, triticale, barley, white millet, phacelia and sunflowers. In spring 2014 for the first time house sparrows have been observed foraging amongst the plants growing in the paving.

3. Pollinators



Apple variety Sunset blossom
May 2013

The garden attracts a wide range of bees (honey and solitary), bee flies, hover flies and other insects. We have planted a range of plant species to provide a succession of pollen and nectar throughout the year, such as:

Early Spring bulbs - snow drops, winter aconites

Spring flowers - violets, wild garlic, primrose, wallflowers

Early flowering shrubs - berberis

Early summer flowering shrubs/trees - pyracantha, roses

Summer flowering plants - lavender, nettle-leaved bellflower, buddleia, phlox, toadflax, runner bean, evening primrose

Late summer and autumn - Michaelmas daisies, echinacea, golden rod.

Two apple trees were planted in 2013 - varieties Egremont Russell and Sunset. Both carried blossom in the spring for pollinators. Any fallen apples will be a food source for blackbirds and late summer insects.

Because the garden is extremely sheltered the flowering season of many of the plants extends into October and November.

4. Insects and spiders



Insect hotel with wild garlic and grape hyacinths in foreground

Insect surveys have revealed a diverse population of aphids, ground beetles, shield bugs, ants, ladybirds, butterflies (comma, common white, orange tip), moths (mint, white plume) and wolf and garden spiders. The most exotic insect recorded to date was a solitary great green bush cricket (*tettigonia viridissima*) in October 2012.

An insect hotel was constructed in spring 2011.

Bernard Morgan Community Garden

The dead birch tree was retained and provides a habitat for insects.

5. Birds

The garden is managed to provide food and water for birds throughout the year. The planting is designed to provide a succession of food - from aphids on the roses, enjoyed by blue tits and great tits, to teasels and thistles for gold finches to rose hips, pyracantha berries and seeds from the herb plants. The mature birch tree is used as shelter for small birds queuing up to use the bird feeder and travelling between Fortune Park and Fann Street feeders.

During the winter, moss is allowed to build up into a thick mat on the pavings and cobbles and leaves are left in drifts as a habitat for invertebrates that provide forage for black birds and robins until well into spring.

There is also a:

Bird bath - which is also used by squirrels.

Bird feeder - kept filled with peanuts throughout the year

Nest box - regularly used by great tits and cleaned by volunteers each year.

Surveys have identified, blue tits, great tits, green finches, robins, black birds, chaffinches, gold finches and wood pigeons and from 2014 - house sparrows - as regular visitors.



Bird bath and spring flowers

Bernard Morgan Community Garden

Appendix: Plants in Bernard Morgan House

Species in bold are the original planting in Spring 2008.

Achillea	Yellow, self sown
Annual wall rocket	Diploxia muralis, known as stinkweed, flowering April, self sown
Antirrhinum	Self sown
Apple	Egremont Russet planted autumn 2012
Apple	Sunset planted autumn 2012
Autumn hawkbit	Leontodon autumnalis, self sown
Bearded iris	
Betony	Betonica officinalis
Bistort	Polygonum bistorta, planted 2008
Black grape	Planted 2008
Bluebell	Hyacinthoides non-scripta
Borage	Borago officinalis, transplanted from Fann St Oct 2010
Buddleia	Buddleja davidii, self sown
Chamomile	Chamaemelum nobile, planted Sept 2010
Chive	Allium schoenoprasum, transplanted from Fann St 2008
Cleavers	Galium aparine
Coltsfoot	Tussilago farfara
Columbine	Aquilegia vulgaris, transplanted from Fann St Oct 2010
Comfrey	White, low growing, transplanted from Fann St Oct 2010
Common chickweed	Stellaria media
Common Field-speedwell	Veronica persica
Corn cockle	Agrostemma githago, introduced in Fann St compost
Cotoneaster	Prostrate form, self seeded
Cowslip	P.veris
Creeping buttercup	Ranunculus repens
Crocus	
Cut leaved cranesbill	Geranium dissectum
Dandelion	Taraxacum officinale
Darwin's barberry	Berberis darwinii , planted 2010
Deptford pink	Dianthus armeria
Devil's bit scabious	Succisa pratensis
Evening primrose	Oenothera biennis
Fennel	Self seeded
Feverfew	Tanacetum parthenium, self seeding
Foxglove	Digitalis purpurea, now self seeding
Gallant soldier	Galinsoga parviflora, self sown and removed continually
Garlic	Allium ursinum now spreading
Garlic mustard	Alliaria petiolata
Golden rod	Solidago
Grape hyacinth	Muscari neglectum
Grape Vine	
Greater knapweed	Centaurea nigra, planted Spring 2010
Green Alkanet	Pentaglottis sempervirens
Groundsel	Senecio vulgaris
Hairy bitter cress	Cardamine hirsuta
Hedgerow cranesbill	G. pyrenaicum
Herb Robert	Geranium robertianum
Hieracium spp	
Honesty	Lunaria annua, transplanted from Fann St Sept 2010
Hop	Planted 2008
Hyacinth	Donated by City Spring 2013
Ice plant	Sedum spectabile
Kidney vetch	Anthyllis vulneraria
Lavender	
Lemon balm	Melissa officinalis, very invasive

Bernard Morgan Community Garden

Lungwort	<i>Pulmonaria officianalis</i> , transplanted from Fann St Oct 2010
Meadow buttercup	<i>Ranunculus acris</i>
Michaelmas daisy	<i>Aster</i> spp
Monkeyflower	<i>Mimulus guttatus</i> , self sown
Musk mallow	<i>Malva moschata</i> , self seeding in paving
Nettle leaved bellflower	<i>Campanula trachelium</i> Now self-seeding
Oxeye daisy	<i>Leucanthemum vulgare</i> , transplanted from Fann St Oct 2009
Perforate St John's Wort	<i>Hypericum perforatum</i>
Phlox	<i>Phlox paniculata</i>
Primrose	<i>Primula vulgaris</i> , struggles in the hot dry summers
Procumbent yellow sorrel	<i>Oxalis corniculata</i> , self sown
Purple top	<i>Verbena bonariensis</i>
Pyracantha	
Red campion	<i>Silene dioica</i>
Red dead nettle	<i>Lamium purpureum</i>
Red valerian	<i>Centranthus ruber</i> , self seeding
Redshank	<i>Polygonum maculosa</i> , self sown
Ribwort plantain	<i>Plantago lanceolata</i>
Rock Rose	<i>Helleborus nummularium</i> , planted 2010
Rose	<i>Rosa rugosa</i>
Rosemary	<i>Rosmarinus officinalis</i> (originally planted prostrate form which didn't survive the first winter)
Round leaved cranes's-bill	<i>Geranium rotundifolium</i>
Round leaved cranesbill	<i>G. rotundifolium</i>
Sage	<i>Salvia officinalis</i>
Salvia nemorosa	Salvaged from City planter
Silver birch	<i>Betula pendula</i>
Snowdrop	<i>Galanthus nivalis</i> planted spring 2013
Spear thistle	<i>Cirsium vulgare</i>
Spurge	Probably Petty spurge, <i>Euphorbia peplus</i> , self sown
Tansy	<i>Tanacetum vulgare</i>
Teasel	<i>Dipsacus fullonum</i>
Thrift	<i>Armeria maritima</i> , transplanted from Beech High Walk Sept 2010
Violet	<i>Viola odorata</i>
Wall flower	<i>Erysimum cheiri</i> , salvaged from Barbican gardens 2011
Wayfaring tree	<i>Viburnum lantana</i> , planted 2010
Welsh poppy	<i>Meconopsis cambrica</i>
White dead nettle	<i>Lamium album</i>
Wild marjoram	<i>Origanum vulgare</i> , now self seeding
Wild rose	Possibly sweet briar, <i>Rosa rubiginosa</i> , transplanted from Fann St 2008
Winter Aconite	<i>Eranthis hyemalis</i> , donated by Philip and Leah Spencer from Norfolk. More added spring 2013 donated by City
Wisteria	<i>Wisteria sinensis</i>
Yarrow	<i>Achillea millefolium</i> , planted spring 2010
Yellow corydalis	<i>Pseudofumaria lutea</i>
Yellow flag	<i>Iris</i> Species: <i>pseudacorus</i>
Yellow toadflax	<i>Linaria vulgaris</i> , self seeding

Plants in Bernard Morgan House

Species in bold are the original planting in Spring 2008.

Achillea	Yellow, self sown
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Cut leaved cranesbill	<i>Geranium dissectum</i>
Dandelion	<i>Taraxacum officinale</i>
Darwin's barberry	<i>Berberis darwinii</i> , planted 2010
Deptford pink	<i>Dianthus armeria</i> (subsequently died out)
Devil's bit scabious	<i>Succisa pratensis</i>
Evening primrose	<i>Oenothera biennis</i>
Fennel	Self seeded
Feverfew	<i>Tanacetum parthenium</i> , self seeding
Foxglove	<i>Digitalis purpurea</i> , now self seeding
Gallant soldier	<i>Galinsoga parviflora</i> , self sown and removed continually
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Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

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 strongly object to this development on the following grounds:

1. The development has no consideration for the surrounding Golden Lane and Barbican estates, which are of architectural significance. This is in breach of the local plan.
2. The scale of the development means that daylight to the Prior West school and Fortune Park will be impacted, especially in winter
3. Local amenities for residents are already overstretched, particularly the Neaman Practise.
4. Privacy and Overlooking of the extensive balconies and roof terraces, both of the residents and the school. This is in breach of the local plan.

Regards

Gareth Randell

Comments for Planning Application 16/00590/FULL

Application Summary

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Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Ms Isobel Goodrich

Address: 5c 30 Hornsey Road London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to the demolition of Bernard Morgan House and the over development of the site and I feel the planning application should be refused.

I work opposite Bernard Morgan House in Bowater House and my light will be drastically decreased by the new building. The building work has already been very loud and disruptive for my working environment and the demolition of the building would be unbearable.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mrs Angela Pistilli

Address: 22 Bowater house Golden lane estate London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: Dear Catherine Linford,

I am writing you to express my concern for the new construction of the building at Bernard Morgan House.

I live in this estate since the past 9 year which I really enjoyed. (the estate, The surrounding area, the park, the market, the flat, the neighbors, Barbican centre, etc).

My lovely balcony is just opposite Bernard morgan house

Flat 22 Bowater house and for sure with the new high building will be overshadow.

Also Fortune street park won't see the sun anymore, which is not good, especially during the winter months where all childrens from the local school are playing.

My other concern is that lots of new people will be living in these flat so I think the area won't be so quiet as it is now.

Thank you for reading my comment.

Regards

Angela

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mr David Archer

Address: 721 Willoughby House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity
- Traffic or Highways

Comment: I write as a neighbour and as a parent of children at Prior Weston. Inevitably, my family and I are frequent users of Fortune Park and other spaces close to the proposed new building.

My concerns are therefore:

1\ the considerable bulk of the building and its affect on the immediate surroundings.

In particular, the building will have a marked impact on the level of the light in the Golden Lane campus and on Fortune Park towards the end of the day. During the winter season when days are shorter, this will thus have a significant affect on these key focal points of the community. The immediate area is not blessed with much green space so maintaining the quality of this space is key for the wellbeing of our children.

The size of the building is much great than the current structure and further, much greater than the floor space indicated in the original communications.

2\ The impact on local services

It is not clear what is being done to enhance local services to cope with the influx of people - schools, pools, doctors etc.

3\ Design of the building

The building design appears ill-considered and unsightly, making no attempt to either respond to the surrounding buildings or to demonstrate any level of innovation. The area has much high-quality, thoughtfully architected developments. This should be an opportunity to maintain this theme, no waste the chance.

4\ Dishonest developers

As with many of the developments that surround us, the progress to approval has been one of misinformation and disinformation, ahead of last-minute changes within inappropriate developments that push the boundaries of the original planning permission. The approach of Taylor-Wimpey has left a bad taste in my mouth and leads me to believe that they will push as hard as possible to pursue short-sighted self-interest to deliver this project to the detriment of the whole community. The problems cited by many commentators may only touch then on what is to come.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mr Russell Bell

Address: 222 Lauderdale Tower Barbican

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I object to the development of Bernard Morgan House on the grounds of the sheer size and the negative impact and inevitable loss of light the proposed structure will have on its neighboring Golden Lane residential buildings and the Fortune Park amenity.

Adjei, William

From: Linford, Catherine
Sent: 07 October 2016 11:55
To: DBE - PLN Support
Subject: FW: PLANNING APPLICATION REF NO. 16/00590/FULL - BERNARD MORGAN HOUSE

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

From: [REDACTED]
Sent: 23 September 2016 14:20
To: Linford, Catherine
Subject: PLANNING APPLICATION REF NO. 16/00590/FULL - BERNARD MORGAN HOUSE

Catherine, I would like to put my objections forward for the above re-development, if it is not too late. The building proposed is way too big, both in regards to width and height and looms over the surrounding buildings and roads. It butts up to Fann St and Viscount Street, and the same on the Golden Lane side, it is oppressive. The present building does not and is not, it gives a sense of space, which is not plentiful in London. The trees in the garden of Bernard Morgan House give Fann St. a further feeling of space and openness.

I have seen that Bernard Morgan House was built to complement Bowater House and the Golden Lane Estate anything new won't do that, so why can't Bernard Morgan House be refurbished internally and flats created?

I look forward to hearing from you in due course.

Thanks

Sarah Batty-Smith (Miss)
130 Crescent House
Golden Lane Estate
EC1Y 0SJ

[REDACTED]

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mr Lewis Jackson

Address: 322 Shakespeare Tower Barbican

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

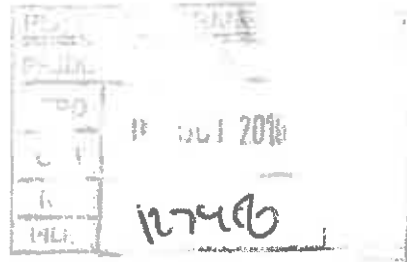
- Residential Amenity
- Traffic or Highways

Comment:Objections

1. destruction of a building empathetic to Golden Lane and Barbican estates and with significant architectural features from the 60s
2. no shadow diagrams were produced at public consultations - the building will overshadow and block light to the only public park in the area and materially affect rights to light and sunlight into Golden Lane estate
3. No parking requirement - new owners will inevitably bring cars into the area and there is no place to park them - this is a flawed policy. The developer knows this as it has already attempted to negotiate parking spaces in the barbican
4. building mass - it is a huge structure compared to existing building and will materially loom over neighbouring Golden Lane buildings. The current City policy of allowing whole blocks of buildings to be demolished to be replaced with a single wall of glass style building is destroying the character of London. Parts of London have already been reduced to looking like any other featureless city in the world - aesthetically awful
5. No architectural merit - standard off the shelf design used by the developer elsewhere with no real attempt to empathise to surrounding buildings
6. proposed mini park is a joke - it will exist in an inaccessible damp and dingy corner on the site without ever have direct sunlight - it will become a dumping ground for rubbish
7. no social housing - it is a flawed social policy to allow developers to buy off obligations to provide social housing by paying cash sums to the City or arranging set offs with councils outside the City

8. No new public amenity in the project - purely a very ordinary lumpish residential building designed to maximise land utilisation for developer profit - and current policies on parking and social housing simply work to enhance those objectives for the developer

Catherine Linford
Development Division
Department of the Built Environment
City of London
Box 270
Guildhall
EC2P 2EJ



September 2016

Dear Ms Linford,

I object to the Planning Application Ref. 16/00590/FULL for the redevelopment of Bernard Morgan House, Golden Lane, on the following grounds:

1. Excess Strain on Existing Public Infrastructure Amenity

The application scheme will place strain on overloaded services including: NHS Care, Open Public Space (Fortune St Park), local schooling, and traffic movement.

2. Daylight, Sunlight and Overlooking

The application scheme will reduce or block light to local buildings, including Prior Weston School Campus, Fortune St Park, Golden Lane Estate, Barbican Estate and the Cobalt Building.

The overshadowing of Fortune St Park will diminish the use (amenity level) of this important local park.

3. Design, Character and Appearance

The application scheme is grossly over-scaled and will have a negative impact on surrounding buildings and local area. The local area and buildings are of historical importance and this area should be conserved and enhanced.

Yours,



Name: *Rosalie Bolt*

Address: *103 JTC EL248NE*

Email address:



Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Ms Aya Sekine

Address: 40 Cullum Welch House Golden Lane Estate London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: I strongly object to this development on the following grounds:

1. The development has no consideration for the surrounding Golden Lane and Barbican estates, which are of architectural significance. This is in breach of the local plan and heritage.
2. The scale of the development means that daylight to the Bowater House and Fortune Park will be impacted, especially in winter
3. Local amenities for residents are already overstretched, particularly the Neaman Practise.
4. Privacy and Overlooking of the extensive balconies and roof terraces, both of the residents and the school. This is in breach of the local plan.

1 Hatfield House
Golden Lane Estate
London EC1Y 0ST

21 November 2016

Dear Catherine Linford,

16/00590/FULL

I am writing concerning the revised plans by Taylor Wimpey and AAHM architects for a residential building on the site of what was Bernard Morgan House in Golden Lane.

There are a number of matters causing concern to local residents with the revised plans for this site, notably the lack of attention in the revision to local concerns and to over 100 objections to the first proposal. This letter addresses the architectural design and its impact on the location and local community.

The site lies between two listed estates, the Barbican and Golden Lane, the latter now undergoing major works after long neglect that will restore its high quality architectural design. Golden Lane Campus has fitted in well, with a design corresponding to the skyline as they rise southwards into the centre of the City and the streetscape of Golden Lane which aligns from campus into the outlying buildings of the Barbican estate. Its facade offers a clever mix of materials and colours that relates to existing buildings and the local environment.

The main objection lies in the overbearing height and massive bulk of this undistinguished design and its lack of any relationship or sympathetic conversation with the location and neighbours. Neither the first or revised plans attempt to fit in with the existing skyline or street scape. The revised plans retain the proposed excessive height and bulk of the original design. In local consultation and elsewhere residents have expressed concerns about the size and scale of the building. The design with its assorted asymmetric window patterns, irregularly stepped facade, and projecting balconies have no relation to existing buildings. The unrelieved drab brick facades have none of the liveliness of Golden Lane's use of materials in which brick combines with coloured panels and concrete, nor the symmetry of repetition characterised by both the post-war modernism of Golden Lane nor the Barbican's Brutalist design. In this particular context it is needful that any design fits in well and converses with its architecturally distinguished neighbours. The proposed design looks like it has been dropped in with no awareness of any relation to the existing location. (References by AAHM to the unrelieved brick of the Welsh Church do not adequately justify the design choice since the church is not on Golden Lane and is not among the architectural gems of the area.)

The design will overshadow the adjacent Bowater House, resulting in less sunlight and daylight which is deleterious for existing residents. Local objections have pointed to miscalculations by the developers in this issue. The addition of an entry to Fann Street will cause unnecessary disturbance.

The Mayor of London's current London Plan states the capital-wide aims to 'sustain and enhance the distinctive environment and heritage of the CAZ, recognising both its strategic components such as the River Thames, the Royal Parks, World Heritage Sites, designated views and more local features including the public realm and historic heritage, smaller open spaces and distinctive buildings, through high quality design and urban management (2.10 Central Activities Zone - strategic priorities. <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-chapter-two-londons-places/policy>)

The proposed building signally fails to take account of historic heritage, and offers nothing that will 'sustain and enhance the distinctive environment and heritage of the Central Activity Zone.

The City of London Local Plan (2015) states the intention to 'protect existing housing and amenity' (p 176) as Core Strategic Policy. It also states that new housing will not be permitted where it will 'result in poor residential amenity within existing and proposed development, including excessive noise or disturbance'. In my view and in the views of many other local residents, the proposed design fails to take account of either of these plans for London's development.

It is quite possible to design an architecturally distinguished residential building that complements and extends the high architectural quality of this residential segment of the City of London.

Sincerely

Deborah Cherry

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

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.(REVISED DRAWINGS)

Case Officer: Catherine Linford

Customer Details

Name: Mr Tom Fowler

Address: 325 Willoughby House Barbican London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:With these revised drawings it seems a lot of work has gone into providing potential residents with increased levels of light and space in the apartments, but no consideration given to the actual appearance of the building and its impact on the immediate area generally.

It seems strange this is the case considering a large proportion of existing objections (from the public and heritage groups) directly mention the inferior design in comparison to Bernard Morgan House and Golden Lane and Barbican Estates, not to mention its overbearing physical presence.

I'm a designer and realise how tough it can be to create something that's original, satisfies the client and comes in on budget. What I don't understand is how the City of London, Taylor Wimpey and AHMM can think the designs as they stand are acceptable in such an architecturally sensitive area.

***BERNARD MORGAN HOUSE DEMOLITION and REDEVELOPMENT
PLANS***

We believe that the Bernard Morgan demolition and redevelopment will have a detrimental impact on Prior Weston Primary School and Children's Centre and, in particular, on the upper level, outdoor playground and learning areas at Prior Weston School, directly across from the proposed development. Toddlers and the under fives will also be affected at the ground floor level playground.

The playgrounds and outdoor learning space on the upper level of the building is a key resource for improving the learning, progress and achievement of children at the school. It is also a key resource for the physical, social and emotional well being of children at the school. We have current plans to make even further use of this area, with an upgraded playground and more frequent and better use of outdoor play, exercise and learning areas. We also plan to improve the Children's Centre playground facilities. These plans are outlined in the current Prior Weston School Improvement Plan (SIP).

It should also be noted that the effective use of the physical environment, in terms of integrated indoor/outdoor play and integration into the wider community (such as the mixed use of Fortune Street Park), is clearly identified as an indicator of 'Best Practice' by Ofsted (2015).

The school is seeking re-assurance that the Bernard Morgan proposals will not result in any significant loss of light to this area during the main hours of use (8am-6pm). The school objects to plans resulting in loss of light which have the potential to diminish this key resource for our children.

Prior Weston Governing Body also seeks re-assurance that the Bernard Morgan development does not create a situation where the children are inappropriately overlooked and that the safety and security of the children are not in any way compromised.

Noise and disruption during the development of the site is likely to be very intrusive and detrimental to children's learning and we wonder what measures are to be put in place to minimise that and compensate the primary school and children's centre.

The Prior Weston Governing Body has resolved to OBJECT to the demolition and redevelopment plans for Bernard Morgan House and to ask the City of London to REJECT the planning application.

We are willing to meet with appropriate officers and individuals in the light of decisions taken by the City of London. Please use Ruth Gee as the first point of contact.

Ruth Gee

Chair of the Governing Body,

Prior Weston Primary School and Children's Centre.



And

Andrew Boyes,
Headteacher.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.(REVISED DRAWINGS)

Case Officer: Catherine Linford

Customer Details

Name: Mr Kirill Arakcheev

Address: Flat 203, Crescent House, Golden Lane Estate London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment:Ms Linford,

I write to you on this matter, as both a resident of the Golden Lane Estate and a person, who appreciates mid-century architecture. I would like to second the comments that were made by the Twentieth Century Society (http://www.planning2.cityoflondon.gov.uk/online-applications/files/4C801AC2F421D5A213DA7C3F454311CE/pdf/16_00590_FULL-TWENTIETH_CENTURY_SOCIETY_COMMENTS-341159.pdf)

and in that to firmly object the demolition of the Bernard Morgan House.

If any changes are to be made, that has to be done in a way, similar to the old YMCA building, now dubbed Blake House. The original design and significant architectural features of the building must be kept, not just for the sake of preservation of a great architect's legacy, but also in order to avoid dealing harm to the local residents, by destroying a structurally sound, if disused building.

Hoping that my objection, as well as those of other residents will not be overlooked, I remain

Sincerely yours,

Kirill Arakcheev

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.(REVISED DRAWINGS)

Case Officer: Catherine Linford

Customer Details

Name: Mr Ovijit Paul

Address: Flat 48, The Cobalt Building Bridgewater Sq London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: Despite the revisions of the plan made by Taylor Wimpy, the below objects have not been considered and are still applicable with the new design.

The three main points for objection are:

- The height of the building is too high compared to the neighbouring buildings, and significantly impacts the light and views from the Cobalt building.
- The plans are encroaching too far west down Brackley St, further impacting the light and view to the Cobalt building.
- Brackley st is a narrow road. The increased number of vehicles using this road to access the new building would significantly increase the traffic in the area.

I am not against redevelopment of the site, and would like the final plans to incorporate the points above.

The recent revisions do not seem to have taken any of these points into consideration.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works.(REVISED DRAWINGS)

Case Officer: Catherine Linford

Customer Details

Name: Dr Sonal Gadhvi

Address: Flat 48, The Cobalt Building, London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: I have reviewed the new plans and I can see that no effort has been made to change any of my previous objections. I feel the company to be quite dishonest in the way they have behaved so far and am very disappointed that I have to object yet again.

1) Noise- From the proposed public park. There is already one nearby, noisy public park opposite Bernard Morgan House (Fortune Street). There is no additional benefit of a second public park - it will lead to loss of privacy for neighboring flats, especially those on the ground floor/overlooking proposed park.

2) Residential amenity - the proposed building has a significantly higher height and bulk (extending onto Vicount Street/Brackley Street) which will cause over shadowing and significantly change the outlook from the flats on The Cobalt Building facing directly onto the new building.

Please note - after initial consultation (when The Cobalt was not informed of) the height was reduced on the side facing Fann Street and subsequently added to the Brackley Street half of the building - thus impacting on flats the other side).

The extension towards Viscount Street/proposed balconies will lead to loss of privacy).

The height of the building will cause over-showing and lead to loss of light to the neighboring Cobalt Building.

Proposed public garden poses risk to safety and encouragement of crime (which has been a problem in the area in the past). This will lead to loss of privacy for people at The Cobalt and

nearby buildings).

3)Traffic/Highways - There is likely to be increased congestion in an already narrow roaded area. This will create noise.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works. (REVISED DRAWINGS)

Case Officer: Catherine Linford

Customer Details

Name: Ms F Jackson

Address: 532 Ben Jonson House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: The revised plans have made only cosmetic changes.

The majority of the objections were regarding the sheer mass of the proposed building. The mass has not changed.

The proposed building is bordered by listed buildings. The proposed new building is of a bland design, remarkable similar to other projects from the same company. Is this really good enough for this area? Can't the existing building be revamped? Much more interesting and totally in keeping with the area.

The proposed building doesn't related at all the environment.

The size is totally out of scale with its surroundings.

The planning documents do not acknowledge the building will radically alter/remove views from existing residences.

The development has claimed to provide much needed accommodation. I challenge that this is much needed as there appears to be no provision for essential workers (e.g. police). Of the number of units proposed how many are affordable & aimed at essential workers? This just looks like a money making opportunity and the current residents quality of life is being ignored.

I object to this development in its current form and hope the planning permission is rejected.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works. (REVISED DRAWINGS)

Case Officer: Catherine Linford

Customer Details

Name: Ms Eva Stenram

Address: Flat 7, Bayer House Golden Lane Estate London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: On the 19th of August 2016, I wrote to object to the plans to demolish Bernard Morgan House and to the redevelopment of the site.

I have gone through the revised plans. Very little has changed, from my point of view as a resident of Golden Lane Estate, a user of Fortune Park and a mother of children at Prior Weston School. I would like to restate my earlier objections. I object very strongly to the redevelopment.

- I am very concerned about the loss of light to Prior Weston School and Fortune Park. The building will be too high and will overlook and remove light to the school and the park. It also overlooks and removes light from the neighbouring blocks.

- The proposed building ignores The City of London Listed Building Management Guidelines for Golden Lane Estate (GLE): "The views from-as well as into-the estate have become important. Part of the special architectural interest of the estate lies in its relationship with adjacent buildings; their height, scale, mass, form, materials and detailing could, for example, have an impact on that special interest... The relevant local authority should, therefore, take into account the significance of the estate's setting to its special architectural interest when considering any developments on the immediate boundaries of the listed area."

- The overall footprint of the building is far too large. It is a lot bigger than the existing building and

is not in proportion with the area architecturally. It is architecturally disrespectful to the surrounding post-war modernist architecture and is much larger than that proposed when the site was sold.

- The impact of noise and dust - particularly in regard to Prior Weston School and how this will negatively impact on school children.

- The proposed building will result in a great increase of people to the area - putting a great strain on NHS practices, schools, roads and other public amenities. How is this being addressed?

- ☞ I am very concerned about the increase in traffic that

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works. (REVISED DRAWINGS)

Case Officer: Catherine Linford

Customer Details

Name: Mrs Vibeche Dart

Address: Flat 3 Pilgrims Court 2-5 Carthusian Street London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment:As a mother of two children at Prior Weston school and a frequent user of the rare inner-city green space that Fortune Park offers, I object to the demolition of the Berard Morgan House and the erection of the proposed colossus.

Mainly due to the negative impact it will have on the schools outdoor areas and the park, as it will steal a lot of precious daylight. Also, I object due to the lack of social housing the proposed project offers and due to the disruption it will cause the local community in form of pollution and noise and heavy traffic.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works. (REVISED DRAWINGS)

Case Officer: Catherine Linford

Customer Details

Name: Mrs martha cossey

Address: 32 cromwell tower Barbican barbican

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: The new building will restrict sunlight to the Prior Weston School and Fortune Park. The current building is beautiful and should be preserved. The lack of affordable housing in the development is a total disgrace. Last thing the area needs is more apartments for overseas investors.

Comments for Planning Application 16/00590/FULL

Application Summary

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Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works. (REVISED DRAWINGS)

Case Officer: Catherine Linford

Customer Details

Name: Mr PJ Haben

Address: Great arthur house, Golden lane Lodnon

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: Please do not demolish Bernard Morgan House. It is an integral part of the neighbourhood and contains some architectural gems (please see the tiling on the north elevation).

The existing structure could easily be reused for mixed social and private housing whilst retaining the local character. I am strongly opposed to a purely private development and a development which is any taller than the existing structure. Day light is an imperative especially on golden lane and fortune street park

Comments for Planning Application 16/00590/FULL

Application Summary

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Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works. (REVISED DRAWINGS)

Case Officer: Catherine Linford

Customer Details

Name: Mr MARK WALLER

Address: 110 GREAT ARTHUR HOUSE GOLDEN LANE ESTATE LONDON

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: This massive over development of the site will dwarf the surrounding buildings, casting shadow over the school's rooftop play areas and Fortune Street Park. London needs social housing, not further flats for the elite, this building was previously used to house police and families, so needs to continue in a civic function. The construction will entail enormous disruption, noise, pollution, dust and potential danger to local residents as heavy goods vehicles access the site. The demolition of Bernard Morgan House is strongly opposed by the 20th Century Society as well as myself, as it is structurally sound and an excellent example of the era's strong architectural standards. Its detailing and materials choices are unique and exemplify dying crafts. The demolition of Bernard Morgan House will compromise the architectural integrity of the area which includes a number of important post war listed buildings. I strongly oppose this development.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works. (REVISED DRAWINGS)

Case Officer: Catherine Linford

Customer Details

Name: Mr HUGO groves

Address: 27 GREAT ARTHUR HOUSE GOLDEN LANE ESTATE LONDON

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: The proposed development appears to be an over development and it will be out of kilter with the surrounding buildings

Comments for Planning Application 16/00590/FULL

Application Summary

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Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works. (REVISED DRAWINGS)

Case Officer: Catherine Linford

Customer Details

Name: Mr Edward Marchand

Address: Flat 103 Great Arthur House Golden Lane Estate London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The revised plans show no improvement to the detrimental impact on Fortune Park, Prior Weston School, Golden Lane Estate and the Barbican. The project is not in keeping with the context or history of the site and does not respect the main and most prominent character of the surrounding neighbourhood defined by modernist estates as Golden Lane and Barbican, and the existing building.

Furthermore this massive over development of the site will dwarf the surrounding buildings, casting shadow over the school's rooftop play areas and Fortune Street Park. It involves the total demolition of Bernard Morgan House and compromises the architectural integrity of the area which includes a number of exemplary post war listed buildings.

The current proposal is alien and disrespectful to the surrounding townscape, to the site's physical and unique historical context and its inhabitants.

Hassall, Pam

Subject: FW: Bernard Morgan House 16/00590/FULL

—Original Message—

From: Mark Lemanski [
Sent: 14 December 2016 21:37
To: Linford, Catherine
Subject: Bernard Morgan House 16/00590/FULL

Dear Catherine Linford,

I am writing with regards to proposals to demolish Bernard Morgan House to construct a much bigger building.

Bernard Morgan House is a beautiful piece of architecture that effortlessly knits the Golden Lane Estate to the former Cripplegate Library in both massing and architectural articulation, and to the Barbican further south. Siting, massing and facade treatment are all carefully balanced and complement the adjoining masterpieces, as indicated in the attached pdf. In stark contrast, the drawings of the proposed plans show a much bulkier mass that distracts from and compromises the refined language of the Barbican and Golden Lane Estate.

Of even greater concern is the harm that would be inflicted upon Fortune Park through the obstruction of sunlight. This is a park that is heavily used, especially during the late afternoon by school children, in an area of underprovision of green spaces. The increased height and increased footprint of the proposed building mean that precisely at the time of the highest use, direct sunlight to the park would be substantially reduced, as is evident in the attached document. This means that the amenity value of the park would be greatly reduced, through the reduction of health benefits such as the 'happiness factor' of sunlight. The City of London recognizes the value of Fortune Park in its play and open spaces policies, as both a means to alleviate the shortage of open space provision within its boundaries, and as a way to create meaningful partnerships with adjacent communities, which has been corroborated by the City's financial contribution to its enhancement and upkeep. To allow the proposed development to go forward would appear to be in direct contradiction to these commendable past efforts and many of your own planning policies.

I trust that you will consider conscientiously the detrimental effect the proposed development would have on the quality of life in the area, and especially its youngest residents.

With best wishes,

Mark Lemanski
528 Ben Jonson House

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works. (REVISED DRAWINGS)

Case Officer: Catherine Linford

Customer Details

Name: Mr Chamoun Issa

Address: 103 Great Arthur House London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to the proposed development replacing it

Bernard Morgan House is a significant postwar building and contains architectural gems such as the tiling on the north elevation. It was designed to compliment the surrounding architecture, making a harmonious transition from the 50s modernism of the Golden Lane Estate to the 60s brutalism of the Barbican. The esteemed 20th Century Society has strongly opposed the demolition of Bernard Morgan House and I agree with them.

The proposed development:

- is too high. At 10 storeys, even with the frontage being limited to 7, the building towers over its lower rise neighbours, in particular the Jewin Welsh Church, Golden Lane Estate, and Fortune Park and its school.
- is too large. It is a lot bigger than the existing building, and is not in proportion with the area architecturally. It is also 50 per cent larger than that proposed by the City when it sold the site. The building casts shadow over the children's playground in Prior Weston, Richard Cloudesley Special school, the children centre and Fortune Street Park. It also overlooks and removes light from the neighbouring blocks.
- disregards The City of London Listed Building Management Guidelines for Golden Lane Estate: "The views from-as well as into-the estate have become important. Part of the special architectural interest of the estate lies in its relationship with adjacent buildings; their height, scale, mass, form, materials and detailing could, for example, have an impact on that special interest."
- has no architectural merit. It does not empathise with the surrounding buildings, and has a bland design similar to other projects from the same company. It is not a design which one would expect

in such an architecturally significant neighbourhood.

- is contrary to the principles of the GLA's London Plan that planning policy should deliver "mixed and balanced communities". The development has no provision for affordable housing.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works. (REVISED DRAWINGS)

Case Officer: Catherine Linford

Customer Details

Name: Mr Roland Jeffery

Address: 209 Crescent House Golden Lane Estate London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: In spite of amendment this development remains too tall, too bulky and ugly.

Out of scale with adjoining buildings it damages the setting of two listed buildings: former Cripplegate Institute, and the Golden Lane Estate.

Catherine Linford
Development Division
Department of the Built Environment
City of London
Guildhall
EC2P 2EJ

PLANNING & TRANSPORTATION		
PSDD	CPC	PPD
TPD	19 DEC 2016	LTP
OM		SSE
No	127987	PP
FILE		DD

15 December 2016

Dear Ms Linford,

Town and Country Planning Act 1990
Bernard Morgan House 43 Golden Lane London EC1Y 0RS (BMH)
16/00590/FULL (REVISED DRAWINGS)

We refer to your letter of 2 December and our letter to you of 30 August (our letter). Very little in the Revised Drawings and the Design & Access Statement Addendum recently submitted by TWUK (the Revisions) affects the essence of the comments and objections set out in our letter and we repeat them.

Before commenting on the Revisions, we have an objection regarding process. Local residents have recently requested CoL to create a Barbican and Golden Lane Conservation Area, incorporating BMH and the surrounding listed and unlisted buildings. Golden Lane Estate Residents Association and Barbican Association, as well as paper and online petitioners, have supported the request.

Surely, the request to create a Conservation Area should be given due consideration before the Application proceeds any further? Perhaps you could take appropriate advice and confirm CoL's position on this point please.

In the meantime, as far as the Revisions are concerned:

1. TWUK now proposes building 99, instead of 104, flats. This may have benefits in there being fewer empty flats at any one time, as well as enabling a speedier sale of all the flats. However, the reduction in the number of flats will also affect the "in lieu" payment, since, despite the strict requirements of Policy CS21.2, CoL appears to have accepted there will be no on site "affordable" housing.
2. The London Boroughs of Greenwich and Lambeth, as well as the City of Bristol, have determined to impose a policy of transparency regarding Financial Viability Assessments. These are designed, of course, solely for the purpose of avoiding the "affordable" housing provision norm but, it seems, we will not have the opportunity of challenging any part of TWUK's Financial Viability Assessment because CoL has not determined to require transparency.
3. We note from Adrian Roche of Development Plans Team (18 October) that the "in lieu" payment under Policy CS21.2 should have been £10.6 million, against which TWUK had proposed paying £1.5 million. We also note that Gerald Eve, CoL's consultants, have recommended that CoL accept £5.9 million but that may now be unachievable as a result of the proposed reduction in the number of flats.



ACKNOWLEDGED

4. Not only has TWUK's Financial Viability Assessment not been disclosed, neither has its Community Infrastructure Levy Additional Information Requirement Form. As far as we are aware, there are no legal grounds for the latter's non-disclosure and, of course, despite there being apparent transparency in the rest of the planning process, the part that significantly impacts on a community's adhesion - the provision of "affordable" housing - is kept secret through denying disclosure of the Financial Viability Assessment to that community.
5. As mentioned in point 6 of our letter, TWUK's Planning Statement advocates the Application on the grounds of housing need. Despite this, TWUK has determined, for its own financial benefit, to reduce the number of flats, rather than create a credible and innovative scheme providing much needed "affordable" homes. Such a scheme could and should include retaining and incorporating the existing BMH building.
6. The reduction in the number of flats results from the recommendation of Adrian Roche to object under Local Plan Policy DM10.7 and London Plan policies 3.5 and 7.6. As such, the Revisions are simply a self-serving move by TWUK, which is in total disregard - if not worse - for the interests and amenities of local residents and other interested parties, as well as abusing the adjoining listed buildings.
7. Despite the substantial number of pre and post application objections, TWUK has made no effort to address those concerns. TWUK has not even offered to meet with objectors - or their representatives - to discuss these concerns, even though it has been requested to do so.
8. Another self-serving change proposed in the Revisions is to utilise existing foundations alongside Eglwys Jewin. This proposal may reduce the footprint of the proposed Building but it will not only save money, it will also lessen the risk of archaeological intervention causing any delay.
9. The proposal to re-align and widen the "secondary" entrance door in Fann Street seems logical. However, if approved, it will increase the use of that door, having a negative, even dangerous, impact on the pedestrian, cycle and vehicular use of Fann Street. This is unacceptable, especially as Fann Street is used daily by children attending Prior Weston School, in particular, as well as being a quick through route for cyclists from Golden Lane to Aldersgate Street.
10. Our objection to the overall appearance of the proposed Building remains. However, TWUK's need to remove the overhanging balcony on Floor 01 at the junction of Golden Lane and Brackley Street confirms that all of the proposed overhanging balconies are unnecessary.
11. Repeating the removal of the overhanging balconies along the Golden Lane frontage and elsewhere, where these are proposed, will not change our overall objections to the proposed Building's appearance. However, its appearance would be vastly improved if overhanging balconies were absent.
12. The proposed changes to the flats fronting Brackley Street include wider windows on the western elevation at Floor 04 and above. This proposed change may help meet Adrian Roche's concerns but, unacceptably, increases the surface area of the windows directly overlooking The Cobalt Building.
13. Adam Roche's other concerns included requesting (i) a revised Energy Statement; (ii) information on the proposed levels of water consumption; and (iii) that TWUK be made aware of the importance of designing open spaces to enable formal and informal play opportunities. We are not aware whether (i) and (ii) have been met but we mentioned (iii) in point 5 of our letter. The Revisions do not disclose proposed changes to the open spaces, so we assume TWUK considers the importance of

designing open spaces for children's formal and/or informal play to be secondary to the interests of its shareholders.

14. The proposed "pocket park" at the corner of Brackley Street and Viscount Street is, as pointed out in point 5 of our letter, of concern to residents of The Cobalt House. Its close proximity to that building will inevitably cause unacceptable nuisance for its residents and well as attracting antisocial behaviour, whether or not it is used as a play area, formal or informal.
15. Since we wrote our letter, It has been confirmed that CoL considers Eglwys Jewin to be a non-designated heritage asset. Nothing in the Revisions addresses or acknowledges this, let alone respects it.

Again, we request that the Application be refused.

Finally we would like to remind you that consideration of the Application must take into account the various policies set out below.

Yours sincerely,



Fred Rodgers



Joanna Rodgers

Policies

(A) Policy CS4 - Planning Contributions

To manage the impact of development, seeking appropriate developer contributions:

1. *Requiring contributions through the Community Infrastructure Levy to assist in the delivery of the infrastructure necessary to support implementation of the Local Plan.*
2. *Requiring s106 planning obligations, having regard to the impact of the obligation on the viability of development, for (i) site specific mitigation meeting statutory tests; (ii) affordable housing; (iii) local training, skills and job brokerage; and (iv) local procurement in the City and City Fringe.*

(B) Policy CS5 The North of the City

To ensure that the City benefits from the substantial public transport improvements planned in the north of the City, realising the potential for rejuvenation and "eco design" to complement the sustainable transport infrastructure, by:

5. *Identifying and meeting residents' needs in the north of the City, including protection of residential amenity, community facilities and open space.*
7. *Requiring the incorporation of sustainable drainage solutions (SuDS), such as green roofs, into development.*
8. *Requiring developers to make use of innovative design solutions to mitigate and adapt to the impacts of climate change, particularly addressing the challenges posed by heritage assets whilst respecting their architectural and historic significance.*
11. *Promoting the further improvement of the Barbican area as a cultural quarter of London-wide, national and international significance.*

(C) Policy CS10 Design

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

- 1. Ensuring that the bulk, height, scale, massing, quality of materials and detailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces.*
- 2. Encouraging design solutions that make effective use of limited land resources.*
- 3. Ensuring that development has an appropriate street level presence and roofscape and a positive relationship to neighbouring buildings and spaces.*
- 4. Requiring the design and management of buildings, streets and spaces to provide for the access needs of all the City's communities, including the particular needs of disabled people.*
- 6. Delivering improvement in the environment, amenities and enjoyment of open spaces, play areas, streets, lanes and alleys through schemes in accordance with public realm enhancement strategies.*

(D) Policy DM 10.1 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:

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;

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

appropriate, high quality and durable materials are used;

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;

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;

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;

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;

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

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;

there is provision of amenity space, where appropriate;

there is the highest standard of accessible and inclusive design.

(E) Policy CS15 Sustainable Development and Climate Change

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

3. Avoiding demolition through the reuse of existing buildings or their main structures, and minimising the disruption to businesses and residents, using sustainably sourced materials and conserving water resources.

4. Requiring development to positively address: (i) local air quality, particularly nitrogen dioxide and particulates PM10 (the City's Air Quality Management Area pollutants); (ii) protection of the City's quiet areas and quiet times of day for businesses (daytime) and residents (night time); (iii) the need to limit the City's contribution to 'sky glow'; (iv) water quality and flood risk particularly in areas at risk of sewer flooding; (v) land contamination, ensuring development does not result in contaminated land; and (vi) the need to enhance biodiversity and provide for its conservation and enhancement, particularly for the City's flagship species and the City's priority habitats (urban green spaces, churchyards and cemeteries, built structures and the tidal Thames).

5. Incorporating climate change adaptation measures into development and the City's infrastructure, including street scene, transport and utility infrastructure, social and emergency infrastructure, and heritage assets, having regard to the need to protect their historic significance.

(F) Policy CS19 Open Spaces and Recreation

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

1. Seeking to maintain a ratio of at least 0.06 hectares of high quality, publicly accessible open space per 1,000 weekday daytime population: (i) protecting existing open space, particularly that of historic interest, or ensuring that it is replaced on redevelopment by space of equal or improved quantity and quality on or near the site; (ii) securing public access, where possible, to existing private spaces; (iii) securing additional publicly accessible open space and pedestrian routes, where practical, particularly in the eastern part of the City; (iv) creating additional civic spaces from underused highways and other land where this would not conflict with other strategic objectives; and (v) encouraging high quality green roofs, particularly those which are publicly accessible.

2. Improving access to new and existing open spaces, including those in neighbouring boroughs, promoting public transport access to nearby open space outside the City and ensuring that open spaces meet the needs of all of the City's communities.

3. Increasing the biodiversity value of open spaces, paying particular attention to sites of importance for nature conservation such as the River Thames. Protecting the amenity value of trees and retaining and planting more trees wherever practicable.

4. Improving inclusion and access to affordable sport, play and recreation, protecting and enhancing existing facilities and encouraging the provision of further facilities within major developments.

(G) Policy CS21: Housing

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

1. Exceeding the London Plan's minimum annual requirement of 110 additional residential units in the City up to 2026: (i) guiding new housing development to and near existing communities; and (ii) protecting existing housing;

2. Ensuring sufficient affordable housing is provided to meet the City's housing need and contributing to London's wider housing needs by requiring residential developments with the potential for 10 or more units to: (i) provide 30% affordable housing on-site or 60% equivalent affordable housing units off-site (aiming to achieve an overall target of 30% affordable housing across all sites). These targets should be applied flexibly, taking account of individual site and scheme viability; and (ii) provide 60% of affordable units as social rented housing and 40% as intermediate housing, including key worker housing.

3. Providing affordable housing off-site, including the purchase of existing residential properties on the open market to meet identified housing needs, such as large units for families.

4. Requiring all new and, where possible, converted residential units to meet Lifetime Homes standards and 10% of all new units to meet Wheelchair Housing standards (or be easily adaptable to meet these standards).

(H) Policy CS22 Social Infrastructure and Opportunities

To maximise opportunities for the City's residential and working communities to access suitable health, social and educational facilities and opportunities, while fostering cohesive communities and healthy lifestyles, by:

2. Providing adequate health care facilities and services for City residents and workers and creating healthy urban environments: (i) protecting and enhancing existing public health facilities and providing new facilities where necessary; (ii) encouraging the provision of private health facilities; (iii) supporting the continued presence and improvement of St. Bartholomew's Hospital in the City; and (iv) ensuring that the use, design and management of new development and spaces help deliver healthy outcomes, particularly for more deprived residents.

3. Protecting and enhancing existing community facilities and providing new facilities where required, whilst allowing flexibility in the use of underused facilities, including places of worship. There should be no overall loss of community facilities (D1) in the City, where a need exists.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works. (REVISED DRAWINGS)

Case Officer: Catherine Linford

Customer Details

Name: Mr steven malies

Address: 14 basterfield house golden lane london

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment:Clear need for more social housing . New design is just dull and adds nothing to the character of the area.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works. (REVISED DRAWINGS)

Case Officer: Catherine Linford

Customer Details

Name: Ms Mary Loosemore

Address: 507 Ben Jonson House Barbican

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: Having reviewed the revised plans I can see no significant changes to Taylor Wimpey's proposal. Accordingly I restate my objections to the proposed development on the grounds of:

- scale (impact on light, neighbours, traffic flow, built environment)
- design
- loss of affordable housing
- impact on local amenities

See my previous comment for details.

Taylor Wimpey's failure to respond to the core themes in objections made by local residents and others is entirely in keeping with their attitude through the process to date - arrogant, and driven purely by profit.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works. (REVISED DRAWINGS)

Case Officer: Catherine Linford

Customer Details

Name: Mr Bruce Nockles

Address: 108 Waller Road London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I work regularly at the nearby Barbican Centre and have often made a detour just to go and look at the Golden Lane Estate, which I had previously stumbled across and consider to be an architectural gem. I later in reading about post war British history realised that the estate was one of the first of its kind and is an important part of architectural and social history and a grade 2 listed building. In my opinion it would be an act of cultural vandalism to demolish the estate and was deeply shocked when I saw the demolition notices. I have no personal knowledge of the residents of the estate, but from the outside it looks like a vibrant and cohesive community and note from the comments here that the residents strongly object. I can see no reason to destroy a successful community and deny the wider community an important piece of our cultural heritage. I therefore wish to object in the strongest possible terms to the proposed demolition.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works. (REVISED DRAWINGS)

Case Officer: Catherine Linford

Customer Details

Name: Ms m king

Address: 352 Shakespeare Tower London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I object to the proposed planning application on the following grounds:

- i) the design is out of scale and out of character with the surrounding buildings, in particular the old Cripplegate Institute building and Golden Lane Estate and the church. The proposed building is ugly and much too high, dwarfing the surrounding buildings. It is also in a totally different architectural style, and threatens to destroy the integrity of all the listed buildings in the vicinity.
- ii) it will cause overshadowing, in particular to the much used public Fortune Park and also the playground of Prior Weston school.

It is very disappointing that this revised application does not seem to have addressed the earlier objections or made any significant changes to the previous application.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works. (REVISED DRAWINGS)

Case Officer: Catherine Linford

Customer Details

Name: Mr Jacques Parry

Address: 110 Breton House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: The revised proposal does nothing to meet the concerns expressed in my letter of 25 August 2016.

Ms Catherine Linford
Development Division
Department of the Built Environment
City of London
Guildhall
EC2P 2EJ

19 December 2016

Subject: Town and Country Planning Act 1990
Bernard Morgan House (BMH) 43 Golden Lane London EC1Y 0RS
16/00590/FULL (REVISED PLANS)

Dear Catherine,

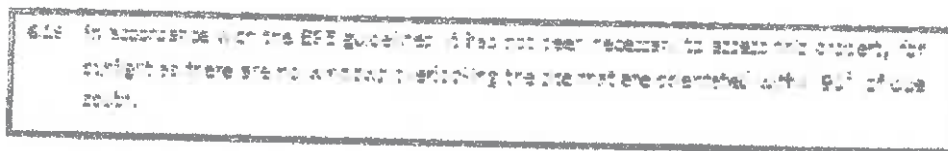
I have reviewed the documents and the revised plans published with Taylor Wimpey (TW) application for the proposed development of Bernard Morgan House (BMH).

REVISED PLANS and DRAWINGS:

- The revised version merely shows alterations made to the windows sizes and to the cosmetic appearance of the Proposed BMH development. This is to achieve more daylight and sunlight to the living environment of future occupants. This is in the aim to make BMH flats more attractive / marketable to Buyers and also to get the Committee's approval.
- TW have shown of no intention / no efforts made so to resolve or to address the concerns and the points raised in the Cobalt Petition and also in the objections logged on City Planning website against their planning application.
- I am quite disappointed and appalled at the unneighbourly manner of TW towards the Cobalt Residents/Leaseholders and also towards the Local Residents.

16 00590 FULL-REVISED DAYLIGHT SUNLIGHT OVERSHADOWING REPORT PART 1-356229

- In the Addendum Daylight, Sunlight and overshadowing report that Point2 Surveyors prepared for Taylor Wimpey I do not agree with the conclusion made in point 6.26 on page 21 – section The Cobalt Building (refer to extract below).



The decision of not providing an assessment of sunlight loss for the Cobalt Building is flawed and not right. There is a lack of objectivity from the Surveyors when the Daylight / Sunlight analysis report was done.

- It is obvious to me that the Proposed Development would:
 - Obstruct the outlook from my windows so that it will be changed from open sky to building façade.

Page 1 of 2

- o Infringe the rights to light of the Cobalt Building, the block of flats facing Viscount Street / Brackley Street / BMH site and specifically my flat (Flat1) and also Flat2 situated on the Ground Floor.
- o Please refer to the 3D drawings so to see the above points I made.
 - P486/03 –Existing Building (page 34)
 - P486/109 – Proposed scheme dated 18/04/16 – option15 (page 37).

PROOFS OF MORNING SUNLIGHT

- I also attach here proofs to show with the BMH current height and footprint all my three rooms (bedroom1 / Study room2 and Living Room) get a good direct morning sunlight throughout April to August. The four pictures attached are taken on 28-Jun-2016 between 07:00AM and 08:00AM as follows:
 - o Picture of the location of the morning sun in the sky against the roof top of BMH at its current footprint and height
 - o Sunlight effects in Flat 1 – Bedroom1
 - o Sunlight effect in Flat 1 - Bedroom2/study room
 - o Sunlight effect to Flat 1 Hall and Living room.
- I trust you will see the big difference that the morning sunlight effects to my rooms in a stark contrast with the darkness of the same rooms from the previous pictures taken on 13-Sep-2016 (autumn/winter) between 13:30 and 13:45 in daylight.

I therefore request Mrs. Annie Hampson and the Planning Committee to reject Taylor Wimpey application for the proposed development plan for BMH.

Thank you for your time in this matter.

Kind regards,



Mai Le Verschoye
Flat 1 The Cobalt Building
10-15 Bridgewater Square
London
EC2Y 8AH

cc.: Mrs Annie Hampson

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works. (REVISED DRAWINGS)

Case Officer: Catherine Linford

Customer Details

Name: Mr NICK LEE

Address: 116 GT ARTHUR HOUSE GOLDEN LANE LONDON

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: Bernard Morgan House fits in well with the surrounding buildings and residents of the area (especially Golden Lane Estate) and it would be far better if turned into social housing.

Rather a fine building of its type too.

The proposed building ugly and boring.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works. (REVISED DRAWINGS)

Case Officer: Catherine Linford

Customer Details

Name: Mr Gareth Quantrell

Address: 91 Breton House London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: reviewing the plans I am dismayed that:

- a perfectly sound building is not being renovated rather than demolished
- the proposed development is out of scale and out of style with the local area
- the development will block the evening sun for a large proportion of the west-facing Breton House flats (something that could be avoided if the scale of the proposal is reduced and the same elevation is applied to both sides of the proposal)
- there is insufficient provision for car parking or increases in local transport i.e. an increase in the size of the Golden Lane bike docking station

1 Bowater House
Golden Lane Estate
London EC1Y 0RJ

Catherine Linford & Annie Hampson
Department of the Built Environment
City of London
London
EC2P 2EJ

20 December 2016

Dear Ms Linford and Ms Hampson,

RE: Objection to Revised Planning Application 16/00590/FULL (Revised Drawings) 43 Golden Lane, EC1Y 0RS

I'm writing to OBJECT to the above revised planning application and to recommend it is REFUSED.

Please note that I would like to ensure that the entirety of my previous objection letter dated 17 August 2016 still stands. Taylor Wimpey have not revised their drawings in any way to take note of the objections made previously by myself or any others. This is hugely disappointing.

The new drawings in fact now show the addition of a significant entrance to the new building on the Fann Street side, within metres of Bowater House. During meetings with Taylor Wimpey, the architects and residents from Bowater we were assured that this would not be the case. Lewis Kent from TW and Nigel Hetherington from AHMM agreed that it would be too noisy for residents to have an entrance on Fann street due to increased noise from people, taxis, cars etc - in particular at all hours of the night - when our bedrooms are so close. They said time and time again that there wouldn't be a main entrance on Fann Street as it would be inappropriate.

Having re-looked at the drawings again this second time it is still shocking to see the building looming over the school, blocking sunlight to the playground and Fortune Park. This building is not being built to serve the community, it is not being built to solve a housing crisis. It is seriously detrimental to our community and entirely inappropriate.

I still feel strongly that the City Planners should be using the original footprint of Bernard Morgan as their guide, following the lead of the original Finsbury Council Planners who had the vision to create a building that was the correct proportions for the site. If the new building is built even a metre higher on the Fann Street side then it will block Bowater's Winter Sun, and with the current proposals the loss of Fortune Park's Winter sun is devastating.

Please note that these revised plans are still in contravention of the City of London's Golden Lane Estate Listed Buildings Management Guidelines with regard to height, scale and massing, as well as many areas of the Local Plan, which I understand the City must adhere to. In particular section CS5, CS10, CS15, CS19, CS21&22 and Policy DM 10.1 - these sections have been disregarded.

"The relevant local authority should, therefore, take into account the significance of the estate's setting to its special architectural interest when considering any developments on the immediate boundaries of the listed area."

Yours faithfully

Claudia Marcianti

1 Bowater House
Golden Lane Estate
London EC1Y 0RJ

Catherine Linford & Annie Hampson
Department of the Built Environment
City of London
London
EC2P 2EJ.

20 December 2016

Dear Ms Linford and Ms Hampson,

RE: Objection to Revised Planning Application
16/00590/FULL (Revised Drawings)
43 Golden Lane, EC1Y 0RS

I'd like to register my objection to the above planning application and ask you to REJECT it. I previously sent a joint objection with my wife, Claudia Marciante dated 17th August 2016. All the points made within that letter still stand.

And still remain unanswered.

I would like to bring to your attention my concern that Lewis Kent (Taylor Wimpey) and Nigel Hetherington (AHMM) may have suffered from serious memory loss. Previously in conversations with the tenants of Golden Lane Estate the two gentlemen were very enthusiastic in their assertion that the addition of an entrance on Fann Street would indeed be detrimental to the residents of Bowater House. This was due to the mutually noted disruption that would be caused by the increase in late night traffic from black taxi cabs, food delivery services and the like.

In the context of this conversation, and their assertion, the addition of an entrance on Fann Street has come as a surprise - they seemed so sure of their position on this. What was it that they feel has changed?

I am of course seriously worried about the affect this addition will have on our standard of living. For all the reasons stated above.

I am worried about the the loss of light we will suffer due to the height of the proposed building. Another detrimental affect on our standard of living.

I am worried about the loss of light that Prior Weston School will suffer also. This is a building that was designed to use the available light in the best way to nurture the attendant children. This has been ignored - for luxury flats.

I am worried about the additional air pollution that these works will cause to a borough that is already rated as high above acceptable This is not to be taken lightly.

I am mostly worried all of our concerns are being completely ignored and that we are being paid lip-service.

This makes a mockery of your process, makes it pointless. And in some ways makes the writing of this letter pointless - the tapping of the keys, an abuse of gravity.

This is your legacy to the City of London. This and another unnecessary apartment building. Please acknowledge our concerns and preserve the integrity of our community and your borough.

Yours, beyond disappointed,
Dan Davis

Flat 2, Cobalt Building
10-15 Bridgewater Square
London
EC2Y 8AH

21 December 2016

Catherine Linford
Development Division
Department of the Built Environment
City of London
Guildhall
EC2P 2EJ

Dear Catherine

**Objection to Planning Application. Ref. 16/00590/FULL (REVISED DRAWINGS)
(Bernard Morgan House, 43 Golden Lane, London, EC1Y 0RS)**

I have reviewed the revised drawings submitted by Taylor Wimpey UK (TWUK) in relation to the re-development of Bernard Morgan House (BMH). However, I am extremely disappointed that feedback from local residents has been ignored. Indeed, it appears that TWUK is determined to ride rough-shod over the views of Cobalt Building residents.

1. Lack of community engagement on planning matters

Boring as it may be to go over this ground again, I feel TWUK has made no effort to address the concerns raised by the local community. I do not believe either TWUK or its agent, Westbourne Communications, ran an inclusive process allowing residents to have a genuine opportunity to influence the future shape of where we live.

The Cobalt Building has been a feature of the local community since 1997, yet it feels that we were last to know - and have the most to lose - if CoL approves the BMH redevelopment plans. Cobalt Building residents were not invited to the first public consultation staged by Westbourne Communications in January. While Westbourne has a Royal Mail receipt for invitation letters (dated 5 January 2016) directed to properties in The Cobalt Building, Bowater House, Cuthbert Harrowing House and Tudor Rose Court - not one letter was received by the occupants of the 59 flats in the Cobalt Building, or its freeholder. As a result, we played catch-up when a neighbour heard about the plans in March. If we had been afforded the opportunity to attend the January exhibition, we would have had an early opportunity to influence the designs for the proposed new development.

Many Cobalt residents attended the second public exhibition in May. There had been a reduction in the height of the building, with the bulk and massing moved from one corner to

the back of the development – facing the Cobalt Building on Viscount and Brackley Streets. This change of design appeased the views of people who attended the January exhibition.

A petition signed by Cobalt residents was sent to Taylor Wimpey and the CoL planning team in June. It formally recorded residents' concerns with the consultation process; worries over the scale of the building; the opening of a public pocket park; the concomitant increase in noise and pollution from a large residential building. TWUK's original application failed to mention the Cobalt Building when referring to adjacent/adjoining buildings to BMH. Not one aspect of our concerns have been addressed in the original planning application that CoL validated in July. The revised drawings continue to disadvantage the Cobalt Building (see below) – pointing to a process that excludes the views of Cobalt residents.

At a meeting on 2 June, the CoL planning team (Rob Chipperfield and Catherine Linford) suggested a three-way meeting between TWUK, CoL and local residents to discuss the application to re-develop BMH. Despite repeated requests for confirmation of the date of this meeting, it has not been convened. In fact, any request to meet with objectors - or their representatives - to discuss planning concerns have been ignored. Why is this?

2. Cobalt Building suffers huge loss of residential amenity

The original plans made it clear that the Cobalt Building would suffer the most from the re-development of BMH. The revised plans add insult to injury. In no way do they address any of the objections submitted by Cobalt Building residents via our online petition – and individually submitted objections. I am at a loss as to how CoL can allow a developer to serially disadvantage one building in the local area over others. For example, the recent revisions introduce wider windows on the western elevation at Floor 04 and above on BMH facing the Cobalt Building along Viscount Street. Larger windows will provide greater light for future BMH residents at the expense of reduced privacy for Cobalt residents.

TWUK now proposes building 99 flats, instead of the original 104 flats. With a glut of flats being built in the local area, I can see that larger flats will be more attractive to purchasers. It may even reduce the demand on local amenities. The reduction in flat numbers in no way benefits existing local residents as the bulking, mass and height of the building remains exactly the same as the original planning application. It is the enormity of the building – and the fact it encroaches onto the Cobalt Building – that will have a negative impact on the residential amenity many of us enjoy.

The early internal clearance work at BMH has shown that the local area is not suited to the huge lorries that need to visit the building – which will increase exponentially once demolition and work starts in earnest. This disruption will continue once the building is open as the side of BMH facing onto Brackley Street is the designated “service” entrance. There will be continued traffic, noise and pollution as deliveries and refuse collection drive down the narrow roads of Brackley and Viscount Street – which face onto the Cobalt Building.

I request that the development is not allowed to extend beyond the current footprint along Brackley Street (the current proposal extends well beyond), and is lowered at the South West elevation to no more than two storeys. These changes would be a gesture in

mitigating the highly detrimental impact on the Cobalt Building.

3. Pocket Park

No change in designation has been made to the proposed "public pocket park" in the revised plans. Many of us requested that the green space is retained – for BMH's private use only. The park's proximity to the Cobalt Building is of immense concern for those of us with flats facing it – noise, antisocial behaviour, litter etc. I request that CoL takes into account the needs of residents who will no doubt call on the services of the local police force as soon as any problems arise.

4. Loss of daylight

The increased size of the proposed development will cause an obstruction to the light currently enjoyed in Cobalt flats facing Viscount Street. Point 2 Surveyors' Light Report says the five windows in my flat "all record minor transgressions of the BRE numerical targets, with reductions ranging from 20.07% to 22.94%." This loss of light in the lounge and bedrooms will impact the living conditions and enjoyment of the flat.

In the original planning application, Point 2 Surveyors' Light Report stated that extensive pre-application consultation was undertaken with CoL and local residents. I for one, did not hear of – or experience – any of the aforementioned consultation. 6.26 of the revised plans states that a light assessment is not needed for Cobalt Building flats facing onto Viscount Street. It is a staggering assertion. TWUK will no doubt deal with "right to light" complaints from affected Cobalt residents.

5. Conservation area

Once again, there appears to have been a lack of due process. Local residents have recently requested CoL to create a Barbican and Golden Lane Conservation Area, incorporating BMH and the surrounding listed and unlisted buildings. Golden Lane Estate Residents Association and Barbican Association, as well as paper and online petitioners, have supported the request. Surely, the request to create a Conservation Area should be given due consideration before the Application proceeds any further? CoL has confirmed that it considers Eglwys Jewin to be a non-designated heritage asset yet nothing in TWUK's revised plans addresses or acknowledges this, let alone respects it.

Again, I request that TWUK's application be refused. I also request that CoL communicates its views with local residents as our letters do not seem to merit responses.

Yours sincerely

Marie Morley

From: Linford, Catherine
To: DBE - PLN Support
Subject: FW: Planning Application 16/00590/FULL
Date: 21 December 2016 11:29:56
Attachments: [Bernard Morgan House Brochure.pdf](#)
[BMH ABA - REPORT_Redacted 2.pdf](#)
[BMH2 Whitehead.pdf](#)

Dear Planning Team

Following the revised application made by the developers I attach a further objection to the above application.

I also attach, for your information, the full copies of both the architectural report into the development of the site by Alison Brook Architects, that I refer to, and the promotional brochure for the site produced on behalf of the City by DTZ.

The first of these was supplied to me by the City under terms of confidentiality following a freedom of information request. You should seek advice from the Town Clerk's Department as to whether this should be posted on the planning portal.

Many thanks

John Whitehead

John Whitehead, 111 Breton House, Barbican, LONDON, EC2Y 8PQ.

From: Linford, Catherine
To: DBE - PLN Support
Subject: FW: Re Objection to revised plans for Bernard Morgan House (16/00590/FULL from Deborah Phillips
Date: 21 December 2016 09:57:32

To Catherine Linford

I had difficulty submitting my objection to the BMH revised plans. The site kept on timing me out. So I'm emailing you directly .

My name is Deborah Phillips . I live at 42 Bowater House , Golden Lane Estate , EC1 Y0RJ.

I object to the demolition of Bernard Morgan House (BMH) . BMH is a perfectly sound and well built post war modernist structure that should be incorporated into the proposed development . To demolish is not sustainable or a viable option for this architecturally sensitive area.

I object to the main door proposed to open onto Fann Street. This door will increase noise pollution and congestion (deliveries pedestrian and vehicular)to Fann street and to the residents of Bowater House .

I object to the revised plans continuing to propose a building that is excessive in size, bulk and height that overlooks and blocks valuable sunlight and daylight to the Fortune Park , Prior Weston School , Bowater House? Cobalt House and Breton House.

Thank you for your consideration .

Yours sincerely Deborah Phillips

From: Linford, Catherine
To: DBE - PLN Support
Subject: FW: Bernard Morgan House - House Group Response
Date: 21 December 2016 11:30:41

Catherine & Rob,

Regarding the new application 16/00590/FULL, notice dated 2nd Dec.
(<http://bjhg-blog.blogspot.co.uk/2016/12/bernard-morgan-house.html>)

There do not appear to be any changes which affect the Ben Jonson House Group view of application 16/00590/FULL, so our original comments stand for this new application (as below).

Could you confirm that all objections and comments received now and previously for the Bernard Morgan House proposals will be associated with this new application and will appear in the agenda pack for members when this application goes to committee?

Thanks,
Bruce Badger
Chair, Ben Jonson House Group
338 Ben Jonson House

City Planning Officer
Department of Planning and Transportation
City of London
Guildhall
London EC2P 2EJ

For the attention of Robert Chipperfield and Catherine Linford

(BCC'd to the Ben Jonson House Group Committee)

Re: Objection to application 16/00590/FULL

Dear Sir/Madam,

I write on behalf of the Ben Jonson House Group, a Recognised Tenants' Association representing residents of the Ben Jonson House on the Barbican Estate.

Ben Jonson House is very close to and overlooks the current Bernard Morgan House. Residents of Ben Jonson House will be directly affected by the proposed buildings.

The massing of the proposed building is out of proportion with the surroundings (it's huge!), and this appears to fly in the face of the City's own planning guidelines. The Local Plan was put together with the help of residents, and we were led to believe that the plan would act as a guide for future developments in our neighbourhood. The phrase "Design solutions must respect the sensitive nature of listed buildings" in the Local Plan seems to have been ignored in this application for an excessively bulky building. The proposed building will have a significant negative effect upon the adjacent listed buildings.

The proposal includes projecting balconies and patio areas which would overlook and give elevated views down into Ben Jonson House flats, reducing the privacy and residential amenity enjoyed by current residents.

The visual amenity of the area will be reduced. The current Bernard Morgan house is specifically lined up with Golden Lane Estate buildings (which was explicitly required in past planning conditions) and sits well in that context with complementary materials used in its construction. The proposed building blurs the lines and makes the southern end of Golden Lane more of a canyon. The proposed building materials seem to have come straight from the Taylor Wimpey parts bin rather than from any creative thinking. The proposal is really boring and unimaginative, putting it even further out of step with it's high quality listed neighbours.

In addition the visual amenity of Fortune Park would be reduced by the looming bulk of the proposed building. The park is in Islington, but is enjoyed by people from the City and from the adjoining school, so the impact of the proposed building on the park would be felt by many. Also the significant loss of the small garden area currently between Bernard Morgan House and Golden Lane should not be ignored. When locals were allowed to maintain this, it was a lovely green area creating a separation between the road and Bernard Morgan House, very popular with birds and making a very welcome contribution to the visual amenity of the area.

The current Bernard Morgan House has an off street service area accessible from Brackley St. which helps to reduce the traffic and services impact on the surrounding area. The proposed building has no such on-site service area, instead pushing all service access onto public pavements and streets. The lack of a service area, and the significant increase in demands for services with such a large building, will increase traffic (and noise) in the area, and will also have an impact on road safety which is already pretty dodgy with large waste trucks servicing the UBS building. Blockages in Brackley St. already cause traffic to back up on Golden Lane which in turn leads to jams, scary cycle weaving, and problems with vehicles servicing the Golden Lane school (in particular accessible vehicles for disabled pupils).

It should be noted that the developer has been unhelpful and has obscured and misrepresented their intentions. Images produced by the developer even tried to hide the proposed building behind foliage! The developers simply ignored pointers given to them which would have helped them to come up with a much higher quality proposal.

Another example of the unhelpfulness of the developer: In January we asked the developer for a simple 3D model (a .kmz file) which would allow everyone to get a sense of how the proposed building would look in context. Residents have produced a .kmz file on the basis of the submitted plans. I attach a copy of the .kmz file (viewable in Google Earth) plus before and after screenshots taken from Google Earth. The images reveal the huge difference in bulk between the existing and proposed buildings. It would have been quite easy for a competent CAD user to produce a .kmz file for us. I think we can see why they didn't want to.

In light of the above we ask officers and members to reject this application and call for a more enlightened proposal in it's place.

Regards

Bruce Badger
Chair, Ben Jonson House Group

--
Make the most of your skills - with OpenSkills
<http://www.openskills.org/>

Anna Parkinson
23 Hatfield House
Golden Lane Estate
EC1Y 0S

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

21 December 2016

Dear Ms Linford,

Bernard Morgan House Planning Application ref 16/00590/FULL

OBJECTION

On 4 September 2016 I wrote to object to the above referenced planning application with references to planning policy issues listed below.

Having considered the revised proposals, it is clear that the applicants and their architects have done little to ameliorate the scheme. In fact, having had an opportunity to review the drawings, I am increasingly convinced that the proposals represent a gross overdevelopment of the site with an unacceptable disregard for the amenity and enjoyment of established neighbours and the wider community.

Even having carefully selected the views from which to illustrate the building with cgis, the architects cannot disguise the huge bulk, mass and architectural insensitivity of the scheme. The view from the East across Fortune Street Park, when compared with the existing view, is particularly telling. Since the previous application scheme was proposed I have been noting the time at which the sun sets behind Bernard Morgan House after I pick up my 6 year old son from Prior Weston school. It is evident that if a building of this scale is to be approved the park, school and homes to the east of the building will be overshadowed much earlier and to the detriment of everyone in our community who use this park daily as a valuable resource to play, meet and enjoy green open space.

Equally the view and sections from the West along Brackley Street demonstrate a canyon of building; and along Fann Street the Welsh Church would become swamped by the looming mass of the proposed block. What this proposal highlights is a stark contrast to the generosity of post war urban planning, which was carefully considered to give space and light to each residential block on the Golden Lane Estate. Instead the application scheme cynically and crudely uses

the 'science' of a Rights of Light analysis to push the development beyond the limits of acceptability.

I also note that the proposed entrance on Fann Street has been given increased significance and am concerned for the amenity of the residents across the street in Bowater House, who would already be most affected by the increased height, mass and bulk of the proposed new block. Would they now be subjected to additional noise disturbance from use of this entrance more regularly?

The objections listed in my 4 September letter remain valid and are repeated below.

1. The proposed design disregards the City of London Listed Building Management Guidelines for the Golden Lane Estate.

There are a number of grave concerns about the proposed design approach:- The proposals are not in keeping with listed neighbours on the Golden Lane and Barbican estates, both of which demonstrate a rigorous and subtle rhythm of elevational treatment. The existing buildings are widely recognised for their significant architectural quality and contain a considered and well- proportioned regular composition of windows, balconies and bays within a predominantly horizontal and monolithic frame. This is lost in the design for the proposed building.

The proposed design is opportunistic in order to maximise the development of the site and disregards its context in favour of a banal formulaic response with a generic 'London Vernacular' style. The seemingly randomised arrangement of balconies and fenestration fight for attention, rather than respecting the quiet and dignified listed neighbours. The designers purport 'animation' but, by proposing a tripartite principal elevation with horizontal and vertical steps, their approach to architectural composition loses the rigour of the adjacent listed blocks. The result is very disappointing. In considering the planning application, the Design and Conservation team should ask the architects to revisit their proposals in order to create a specific and exemplary response to the architectural context of this important mid 20th Century neighbourhood.

2. The height and mass of the proposed building is unacceptable in its context and constitutes over development of the site, significantly providing 50% more developed area than that suggested when the site was marketed by the City of London.

3. Loss of daylight and sunlight. The proposed development by virtue of its height and mass will overshadow an important local amenity space - Fortune Street Park - which is extremely well used as a resource by all members of the local community as well as local workers and children from 0 to 11 years using the Golden Lane Campus.

In particular the proposed new building is immediately adjacent to an educational provision for children with additional needs – Richard Cloudesley School - and will overshadow play and teaching provision for these vulnerable children. The proposed development overshadows the playground of Prior Weston school where children within our local community learn to grow food and enjoy sunshine and fresh air.

The majority of children who attend these schools and the Early Years Centre at Golden Lane Campus do not have any significant open space attached to their own homes and benefit greatly from the ability to enjoy these outdoor spaces at school and in the adjacent park.

Due to the timing of the planning application at the end of the school year, has the school been properly consulted and given adequate time to comment on the proposal?

The proposed development will also have a detrimental effect on daylight and sunlight for adjacent dwellings on the Corporation's Golden Lane Estate and in the Barbican.

Whilst the Mayor of London's Housing Supplementary Planning Guidance (March 2016) document states that while ...'An *appropriate* degree of flexibility needs to be applied when using BRE guidelines....[these] should be applied sensitively to higher density development [and]....take in to account the local circumstances... Moreover the same document states:

'The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on *broadly comparable residential typologies within the area* ... Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced ***but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.***'

In the case of this proposed development, which does not look to offer any benefit to the established local community, the sole motive to optimise housing potential is additional profit for the developer and therefore the Corporation should consider that there should be no additional harm for their existing tenants and for residents in buildings where the Corporation is the freeholder on the Golden Lane Estate and in the Barbican.

4. None of the proposed new homes will be available for social or affordable housing which might be accessible for local families. The development replaces key worker housing with flats for private sale. Dedicated teachers on Golden Lane Campus have long commutes due to the lack of affordable housing within the local area and many potential good teachers are put off from working at these schools for that reason. Key workers who support our local community face similar issues and their needs should be considered and provided for in all new housing developments.

5. Housing amenity: the Mayor of London's Housing Supplementary Planning Guidance (March 2016) document also refers to Standard 29: 'Developments should minimise the number of single aspect dwellings. Single aspect dwellings that are north facing, or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms should be avoided.' The majority of proposed dwellings in this development will be single aspect and do not reflect the generous typology of the adjacent homes on the Golden Lane Estate or in the Barbican.

6. Inadequate consideration has been given to pressure on local services and the social infrastructure in general. Health, education, leisure, community and sport facilities are already over subscribed and the proposed development will do nothing to alleviate this pressure.

7. Ecology and sustainability. The proposed development impinges on an area of land which has been identified as an area providing a habitat for biodiversity and it was interesting to see that one of the first features of the site to disappear after it was sold was the information sign about the black redstart. I have seen bats adjacent to the existing Bernard Morgan House and the developer should provide survey information and proposals to ensure their habitats will not be disturbed by this development.

Whilst not opposed to development per se and recognising the need for good affordable housing in Central London, as a local resident I strongly object to the approach taken for the proposed development which looks to over- develop the site with no regard nor benefit for the local community. Of particular concern is the lack of respect for the architectural heritage of the site with a proposal which would harm its significant listed context.

Yours sincerely

Anna Parkinson

20 Bowater House
Golden Lane Estate
London
EC1Y 0RJ

21 December 2016

Catherine Linford & Annie Hampson
Department of the Built Environment City of London
London
EC2P 2EJ

Dear Catherine Linford and Annie Hampson

RE: Objection to Revised Planning Application 16/00590/FULL (Revised Drawings) 43 Golden Lane, EC1Y 0RS

I firstly would like to make it clear that I strongly OBJECT to the above planning application and recommend it is REFUSED.

When I received the letter notifying us that Taylor Wimpey had submitted a new planning application with 'revised' drawings I thought that maybe they had listened to the many objections from local people and that after discussions with the City Planners, Taylor Wimpey and AHMM had revised their plans accordingly. I was therefore shocked to see that every single complaint from local residents, Prior Weston School and Fortune Street Park had been completely ignored.

The new plans still blatantly disregard The City of London Local Plan as well as the Golden Lane Estate Listed Building Management Guidelines. It's as if Taylor Wimpey and AHMM know already that these policies are meaningless within the City of London. I hope that this is not true and that when it goes before the Planning and Transportation Committee, the members will have the integrity to make sure that City residents and workers are protected and that planning policy guidelines are followed.

The changes in the revised drawings make sure a few of the 99 flats have some sunlight where as Bowater House residents will still be losing 30% of light and sunlight, this contravenes BRE guidelines and can not be ignored.

The new application is worse for Bowater House. The door in Fann St has become a main entrance, another broken promise. AHMM and TW assured us that there would not be a main entrance in Fann St because as they told us themselves, this would mean a lot of noise disruption from deliveries, taxis etc. Lewis Kent from TW and Nigel Hetherington from AHMM also promised us that the front along Golden Lane of the new building would follow the same line as Bernard Morgan House. In fact it comes much closer to Golden Lane and the new build would block Bowater's view of the Barbican Towers. This contravenes the Golden Lane Estate Listed Building Management Guidelines.

The size, bulk and height remain the same as the original plan. Fortune Street Park, the only public park in the area, used by many City residents and workers will still lose all the Winter sun in the afternoon when children come out of school.

Bernard Morgan House itself should not be demolished. It was designed to complement the Golden Lane Estate, in scale and design. The Barbican, built later, in turn complements the design of Bernard Morgan House. We now know that English Heritage's decision not to list Bernard Morgan House was based on a completely inaccurate and contradictory report which had been commissioned by The City of London just before the site was sold.

Below are all my previous points of objection. These are all objections based on City of London planning policy and have all been ignored in the 'revised' drawings.

The City of London Local Plan goes on repetitively and at length about its good intentions regarding redevelopment. None of these is reflected the proposed development. The key issues referred to below are:

- 1) appropriateness the new build in terms of mass, scale etc in the context of a noted historical and world-famous architectural site

2) daylight and sunlight and intrusiveness of any new build in terms of mass, scale etc

3) the City's biodiversity policies and loss of garden and open space in an existing green corridor

In the City of London Local Plan of January 2015, page 9, 1.3 and 1.4: the overarching strategy is its sustainable community strategy supported by key themes including supporting our communities and protecting, promoting and enhancing our environment. The current proposed plans fail on all these points.

City of London Local Plan of January 2015

Page 16

Table 2.2 projects 430 new units in the whole of the City between 2016 and 2021. The Blake Tower and Bernard Morgan House developments will count for almost half the predicted amount in Fann Street alone! None of these are affordable homes.

Page 21

Makes reference to the Barbican and Golden Lane Estate and how careful planning is essential to retain the character and amenity of individual areas. These plans fail to retain in any way the very particular character of this area.

Page 24

Makes reference to integrating sustainability and equality of opportunity, accessibility and involvement. We suggest that the current proposal does none of these in terms of offering affordable homes and key-worker accommodation.

Page 28

Refers to the number of open spaces that will be increased; biodiversity will also be increased. One such site will be destroyed by the redevelopment as there was an existing wildlife garden on the Bernard Morgan site.

Page 62

Point 5 refers to identifying and meeting residents' needs in the north of the city including protection of residential amenity, community facilities and open space. Point 8 requires

developers to address the challenges posed by heritage assets while respecting their architectural and historic significance. The Bernard Morgan site is a key link between the listed Barbican and Golden Lane Estate. The current plans reflect none of this.

Page 90

3.10 Design, refers to human scale reflected in the relationship between buildings and their surroundings. The proposed plan dominates rather than fits in with its surroundings. Below is a view of the proposed building which the architects failed to provide even though in both public exhibitions we asked for a view of the building in relation to Bowater House. It clearly dominates grade two listed Bowater House, the scale is completely wrong.

Page 91

Talks of new buildings having regard to their surroundings ensuring that the bulk, height, scale, massing, quality of materials and detailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. The current plans fail to take any of this into account.

Page 92

Makes further reference to the bulk and massing of schemes being appropriate in relation to their surroundings and having due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality.

Page 95

Talks of environmental enhancement including the inclusion of trees and soft landscaping and the promotion of biodiversity linking up existing green spaces and routes to provide green corridors. The Bernard Morgan site is already part of a green corridor from Fortune Street Park to Charterhouse Square and its wild-life garden should be retained.

Page 98

Refers to daylight and sunlight and resisting development which would reduce noticeably daylight and sunlight available to nearby dwellings and open spaces. The proposed development would have a disastrous effect on both Bowater House in the Golden Lane Estate and Fortune Street Park. The park will lose sunlight, particularly autumn and winter afternoon sun. When school finishes at 3.30 Fortune Park is full of children. Because of the height and width of this proposed development there will be no winter sun in the park at that time. The blocking out of sunlight would also have a detrimental effect on parts of the Barbican and The Golden Lane Campus.

Page 109

Refers to how development proposals will be required to include supporting information describing the significance of any heritage assets whose fabric or setting would be affected and the contribution made by their setting to their significance and the potential impact of proposals on that significance. It also refers to how existing trees will be affected by a proposed development and how gardens and landscaping will be affected by a proposed development. All of these would be affected by this proposed development of Bernard Morgan House.

Page 111

Makes specific reference to the Barbican and Golden Lane Estates and how developers should take account of the Listed Building Management Guidelines SPDs.

(The City of London's Listed Building Management Guidelines 2013 (updated)

1.2.1.2 Holistic significance

The estate should be appreciated in its entirety: not only its various components – residential, community, recreational, commercial and the external spaces between buildings – but also its setting within the surrounding urban fabric. The views from and into the estate have become important, and part of its special architectural interest lies in its relationship to adjacent buildings. Any developments on the immediate boundaries of the listed area should take into account the significance of the estate's settings. No new buildings, infilling, removals or extensions should be introduced which would be detrimental to the integrity of the estate as a whole.)

"The views from – as well as into – the estate have become important. Part of the special architectural interest of the estate lies in its relationship with adjacent buildings; their height, scale, mass, form, materials and detailing could, for example, have an impact on that special interest.....The relevant local authority should, therefore, take into account the significance of the estate's setting to its special architectural interest when considering any developments on the immediate boundaries of the listed area."

It is entirely obvious to anyone who lives there and cares about scale and architecture that Bernard Morgan House when it was designed was entirely mindful in terms of height, mass, scale, function and sight lines of its position in relation to Chamberlain, Powell and Bon's very different works of the Barbican and Golden Lane estate and was designed to fit accordingly.

Page 125

Makes reference to avoiding demolition through the reuse of existing buildings or their main structures and we question the need to demolish Bernard Morgan House. We refer back to page 91 CS10: Design point 1. Ensuring that the bulk, height, scale, massing, quality of materials and detailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. And point 3. Ensuring that development has an appropriate street level presence and roofscape and a positive relationship to neighbouring buildings and spaces. All of this was clearly considered in 1960 when Bernard Morgan House was built: the scale and position in relation to Bowater House; the use of knapped flint and the decorative tiling as well as the integrated open spaces and gardens. I suggest that the knapped flint facade and the tiling on Fann Street be retained and incorporated into the new designs.

Page 162

Makes reference to major commercial and residential developments providing new and enhanced open space where possible. In the case of Bernard Morgan House open space already exists and will be lost.

Page 175 following,

Deals with the issue of key-worker housing. Bernard Morgan House accommodated key-workers in the City and the proposed redevelopment will contain no key-worker housing.

Page 179

Says that 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. In the case of Bowater House this has been ignored.

I think the City should commission an independent Light Survey to verify the findings of Taylor Wimpey's. The Over Shadowing report even suggests that the design of Bowater House is at fault;

"Bowater House, has a large number of windows that are self-obstructed by a combination of projecting balconies, recessed windows and brick-built privacy screens which materially limit the access of light to those windows facing the site. The upper portions of the sky dome are self-obstructed by the external amenity provisions on the façade of the building which has the effect of blocking out light from the top part of the sky. This of course creates

a significant burden on the site as any meaningful form of development beyond the profile of the existing building will inevitably have some effect upon this building"

They are criticising the design of the grade two listed Bowater House. This statement is ludicrous in every way. My flat is full of sunlight all through the year with wonderful views of the Barbican and a huge expanse of sky. With imagination it would be possible to design a building which doesn't block our sunshine for most of the day. The design of the new building means we will lose 30% of our sunshine and this is not acceptable.

With imagination it would be possible to design a building which conforms to all the above guidelines from the City of London Local plan. I am not against developing the site, I would like to keep the original building and a narrow tower could be added behind which would only block sunlight for a short period of time, both in our flats and on the park. A unique design for this area which compliments the unique design of the Golden Lane Estate and the Barbican.

The City of London Local Plan makes you think that the City really does care about and wants to protect it's residents. That it values the City's heritage and its community but in reality will any of its guidelines be followed?

Yours sincerely

Emma Matthews

16/00590/FULL

PLANNING & TRANSPORTATION		
PBDD	CPO	PPD
TPD	03 JAN 2017	LTP
OM		SSE
Nb	128043	PF
FILE		DD

Ms Catherine Linford
Development Division
Department of the Built Environment
City of London
Guildhall
EC2P 2EJ

22 December 2016

Dear Catherine,

Please find enclosed documents as follows:

1. My objection's letter after reviewing the Revised Plans published with Taylor Wimpey (TW) application for the proposed development of Bernard Morgan House (BMH).
2. 3 A4 pages of photos as follows:
 - o 1 page of two photos taken on 13/09/2016 between 13:30 and 13:45. This shows the lack of daylight in my rooms (Living Room and Bedroom2/Study Room) in comparison with the daylight outside (Page1).
 - o 2 pages of four photos taken on 28/06/2016 between 7:00AM and 8:00AM as proofs of morning sunlight effects to my Flat (Page2 and Page3).
3. Two drawings from the revised documents I refer in the letter:
 - o P486/03 -Existing Building (page 34)
 - o P486/109 - Proposed scheme dated 18/04/16 - option15 (page 37).

Kind regards,



Mai Le Verschoyle
Flat1 The Cobalt Building



Bedroom / Study Room

13/09/2016 13:30 ~ 13:45

Living Room 13/09/2016 13:30 ~ 13:45





morning sur

28/06/2016 7:00AM - 8:00AM

Bedroom1

28/06/2016 7:00AM - 8:00AM



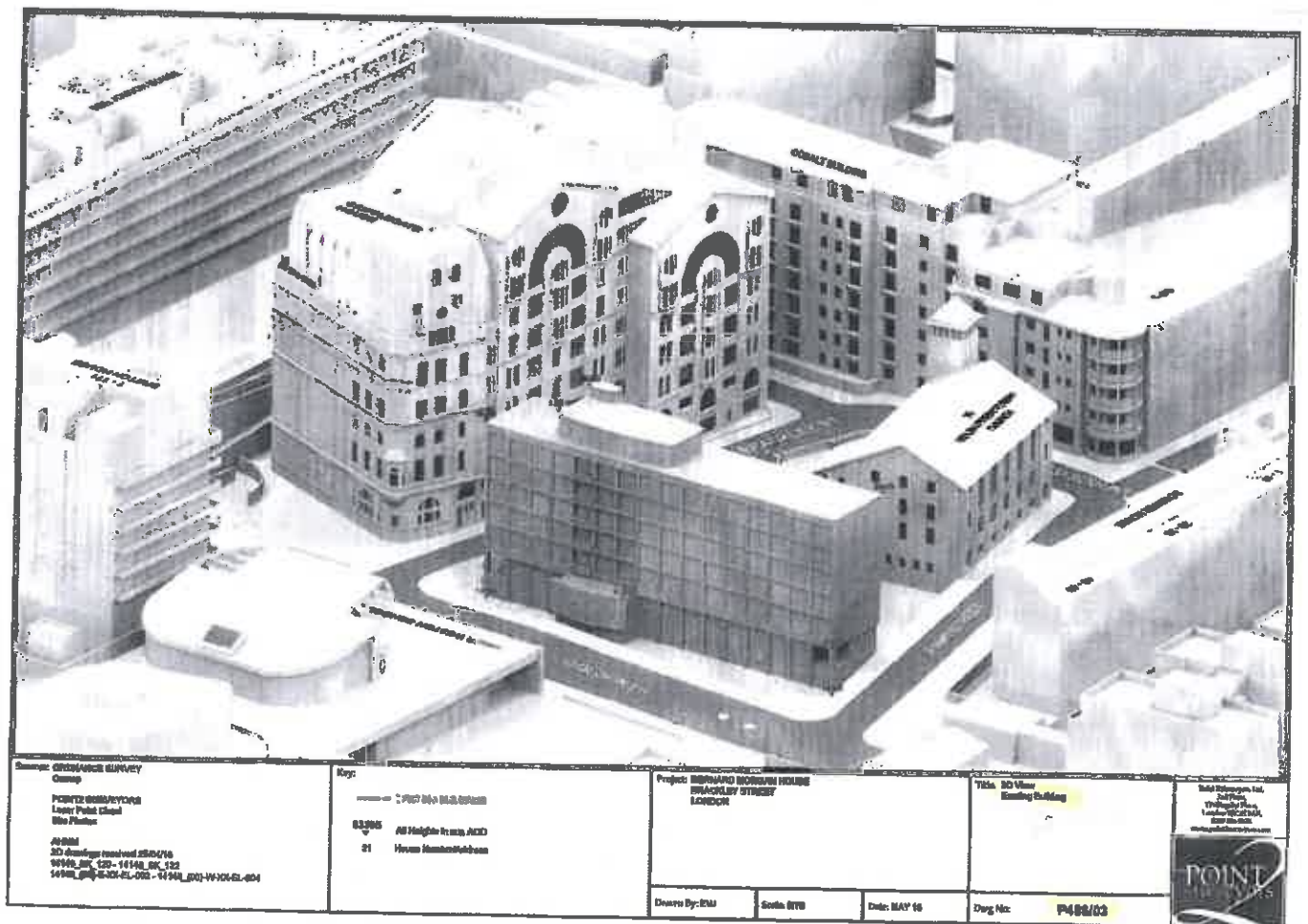


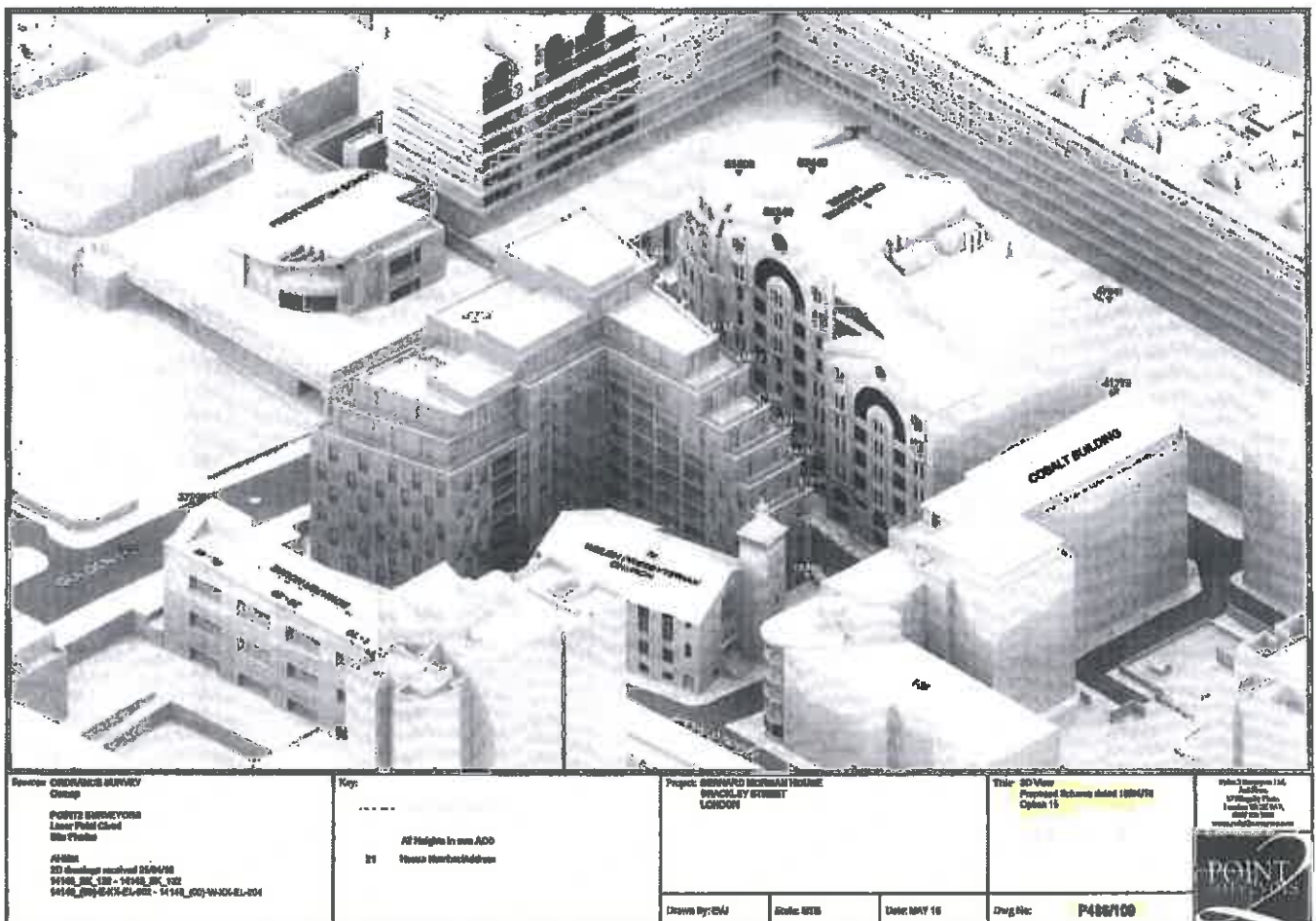
28/06/16 7:00AM - 8:00AM
Bedroom2 / Living Room

Hall & Living Room

28/06/2016 7:00AM - 8:00AM







Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works. (REVISED DRAWINGS)

Case Officer: Catherine Linford

Customer Details

Name: Mr Greg Turner

Address: 44 Bayer House London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: I object to the revised plans as I do not feel they do anything to address the issues of loss of daylight to neighbouring flats. I also think the development would detrimentally overshadow the school and Fortune Street Park.

Additionally the opening onto Fann Street will cause more noise to residents in Golden Lane and result in increased traffic.

26 Bowater House
Golden Lane Estate
City of London
EC1Y 0RJ

22 December 2016

Catherine Linford & Annie Hampson
Department of the Built Environment
City of London
London
EC2P 2EJ

Dear Catherine Linford and Annie Hampson

RE: Objection to Revised Planning Application 16/00590/FULL (Revised Drawings) 43
Golden Lane, EC1Y 0RS

First may we state that we object to the revised planning application in its entirety.

Although some changes have been made, a limited reduction in the number of flats, an increase in window size on a limited number of flats.in all essentials this proposal completely ignores all local objections.

The main entrance in Fann Street will add traffic and footfall and cannot be in line with the Corporation's clean air commitments.

The loss of natural light to Bowater House is unacceptable.

The design of the proposed building is a travesty of both Corporation and Listing policies and history.

The current proposals by the Golden Lane Residents Association and Barbican to create a Conservation Area should surely be allowed to move through its progress before any decision is made on this TWUK application.

Wimpey laid the foundation stone in Bowater House and there is a memorial to this in the outside and inside of the entrance wall. How tragic is it that the company today ignores the historical,architectural and community history it was party to in the past.

There is no affordable housing and no social housing. The Golden Lane Estate Listing guidance for residents states.that the City of London built the estate to bring people back into the City after WW2. they mention, Police officers, Nurses, Caretakers,Taxi Drivers. Today we could add,shop workers, young entrepreneurs, live and work homes. Is there documented evidence of a change in policy? Was there any consultation with residents

about a change to provide only luxury flats and investment opportunities rather than continue the stable long-term community planning of the past?

Bernard Morgan House should be retained and turned into truly affordable accommodation.

The idea that we can move all our housing waiting list out to Barking can only be one thought up by people who have never made that commute on a daily basis and on a low income.

Others have made technical objections and written architectural and planning informed letters.

We are older residents who see a disregard for residents and a threat to this wonderful residential community from purely commercial interests.

We do so hope that existing processes within the corporation can protect us from this planning disaster.

Yours Sincerely

Bill Clifford

Christine Clifford

Wells, Janet (Built Environment)

From: DBE - PLN Support
Subject: FW: Serious Objections to the Proposed development of the Bernard Morgan House site

From: Saskia Lewis [
Sent: 26 December 2016 23:53
To: Linford, Catherine
Subject: Serious Objections to the Proposed development of the Bernard Morgan House site

Dear Catherine,

Please note my continued objection to the plans for the development of the site at the present Bernard Morgan House. I am so disappointed that none of our objections have been considered in the development of the proposals for the site of the present Bernard Morgan House (a building that i continue to consider an excellent design for the area).

I also clarify that now the new design proposal is made worse by a new entry onto Fann Street not in the original proposal. Nothing in these design proposals respects the design clarity of the general designs for the development for an area of such special interest. I object to the proposal that we will no longer be able to allow us , from flat 8 Bowater House to fully see and appreciate, the Barbican Towers - a view protected, we thought, through the listing of the protected views between the sites.

Please note my objections in this email and the forwarded email from my original objection that I am copying in.

Kindest

Saskia

FROM:
Saskia Lewis
8 Bowater House
Golden Lane Estate
London, EC1Y 0RJ

TO:
Catherine Linford
Environment and Planning
City of London
Guildhall
PO Box 270
London, EC2P 2EJ

Re: 16/00590/FULL Bernard Morgan House Redevelopment - Recommendation to Reject the Planning Proposal

Dear Catherine,

I wish to object to this application in the strongest possible terms to both the demolition of the existing Bernard Morgan House and to the new proposed buildings and landscaping. I make a request that the proposal is rejected by the City of London on the following grounds –

Light – Overshadowing and Overlooking – Light, Sunlight and Views

Please refer to your own guidelines –

1.2.1.2 Holistic significance

The estate should be appreciated in its entirety: not only its various components – residential, community, recreational, commercial and the external spaces between buildings – but also its setting within the surrounding urban fabric. The views from and into the estate have become important, and part of its special architectural interest lies in its relationship to adjacent buildings. Any developments on the immediate boundaries of the listed area should take into account the significance of the estate's setting. No new buildings, infilling, removals or extensions should be introduced which would be detrimental to the integrity of the estate as a whole.

Golden Lane Estate Listed Building Management Guideline: Part 2 1 Introduction & executive summary 44

This proposed block of flats will utterly compromise the light and sunlight to my property, 8 Bowater House - (where I live with my partner and two children) and those of my neighbours in Bowater House and all other neighbouring properties surrounding the site of the current Bernard Morgan House. If this proposal were to get permission and be built it would have a profoundly negative affect on the quality of life that we as a family have until now enjoyed within our home, a place where we both work and enjoy time together as a family, in the interior spaces, balcony and communal garden. Given that the proposal would compromise the quality of light and views from my apartment it should be understood that it will also have a negative effect on the value of this property as I am a leaseholder and this property is my most major financial asset.

The interior volumes of apartments in Golden Lane are modest and rely on the exceptional qualities of light penetration and views to make the apartments happily liveable. We enjoy light throughout the day in all south facing rooms in winter as well as summer and use the balcony and communal garden daily throughout the year (these facts are appreciated in the guidelines referring to the listing of the Golden Lane Estate guidelines – please see above). We find the light and views essential to the feeling of wellbeing in our home. The proposed building is so enormous that it will block light to our property for substantial periods of time during the morning in summer and destroy any quality of morning winter light that we now enjoy. It will also entirely block a substantial portion of our views to the Barbican estate that we enjoy from both our living room and bedroom. The quality of light and views of the Barbican towers are the reasons why we chose to live on the Golden Lane Estate and why we so enjoy living there now. This proposal stands to entirely compromise the quality of light and views to and from our apartment.

Bowater House is one of only two buildings that sit on the southern edge of the Golden Lane Estate and face external views rather than the majority whose volumes face the interior qualities of the Estate. In this respect the views and light of this edge of the site must be equally protected as those apartments that find themselves more firmly embedded within the Estate itself. Bowater and its neighbour represents the southern façade of the Golden Lane Estate that introduces the Estate to a wider public by revealing the pattern of buildings laid out with reference to sunken gardens - we regularly have people photographing the displays of flowers and shrubs in this garden and this relationship of the architecture. The altered light level will make growing plants more difficult due to the significant reduction in light that will access the garden should this proposal go ahead.

I can find no satisfactory evidence that the impact on our light has been carefully assessed. I dispute the inference that the design of our apartments – Bowater House - inhibit light from entering the property – it does not – we are flooded with light all year round. I request further details of the applicant's determination of light levels in our apartment and request the opportunity to have this independently verified.

The Golden Lane Estate and Barbican Estate are specifically designed in modernist style influenced by the architecture of Le Corbusier to construct blocks of apartments to replace single dwellings to free up land for communal use and to allow maximum light into each property and extensive views to neighbouring blocks. The Golden Lane Estate and Barbican Estates are both Grade II listed and in being listed appreciate that the spaces between buildings and indeed between these two neighbouring Estates are of equal importance to the buildings themselves. Architecture is about appreciating the volumes between interior and exterior in differing scales not least of which addresses the volumes between buildings; in this respect the current Bernard Morgan House was designed to entirely complement Bowater House. Bernard Morgan House faces East West so as to have no directly overlooking views to Bowater House as the northern façade of the current building is reserved for circulation not residential occupation. And the external landscape to this site mirrors the sunken garden of Bowater so the imagery of the landscape of the Golden Lane Estate extends over Fann Street. Similarly the neighbouring Jewin Welsh Church has no overlooking windows and is of a height that compliments those buildings on the Golden Lane Estate.

There is a vibrant community on the Estate who regularly use the external spaces as a natural and intended overspill from the modest interior volumes. In particular the size of the proposed building will mean that our communal garden is overlooked in an oppressive and intrusive manner. Our enjoyment of this garden will be utterly compromised.

Scale and Massing

Please refer to your own guidelines -

5.3 The character and setting of a listed building, or group of buildings, is of course also dependent upon its urban composition in addition to the architectural aspect of the buildings themselves. In the case of a carefully conceived ensemble like Golden Lane the quality and details of the spaces between and around the buildings are a key part of its special interest and require equal care and consideration.

Listed Building Management Guidelines - Updated Edition 2013 - (Originally published May 2007)

The scale of the proposed building is of great concern. The current proposal is so enormous that it dwarfs the Jewin Welsh Church and the low-rise buildings on the Golden Lane Estate, it also compromises the integrity and scale to the façade of the listed Cripplegate Institute to its south by being too close to it in scale. It makes a mockery of the surrounding architecture, appearing to constitute an over-scaled blocky mass – please recognise that these existing estates all aimed to stack living units to offer up the majority of the landscape to garden whereas this project inverts this making pokey internal spaces sitting in pokey external spaces that will enjoy no light and an overwhelming amount of accommodation.

The dwelling units are stacked in such a way to appear vertiginous and overbearing, we will have the feeling of living under a cliff face or a ziggurat in Bowater House. The units being proposed are single aspect and pokey, unlike the existing surrounding buildings that are all dual aspect and were designed with ethics and aesthetics in mind. There is literally no architectural merit in this proposal, it is banal, dark and dense in its fabric and massing and seems to replicate at least two other schemes by AHMM in other London locations that bear no similarity to this site in the City.

Claims that this proposal is an architectural response to the character and materials of the local area must be dismissed as utterly absurd and untrue. I recognise that AHMM has won awards in the past but none of that care or understanding of design is present in this scheme – they are clearly quite capable of churning out work that is the manifestation of a vision from Taylor Wimpey, who, as a developer is clearly aiming to make maximum financial return from this central London site with no desire to communicate with the architecture or community that exists here.

There are such opportunities here to create a real dialogue with the superb surrounding post war buildings, an opportunity entirely ignored at the moment with a scheme that smacks of space planning and flooding the market with poorly designed spaces that constitute more of venue to park funds rather than places to live.

Amenities

There are grave concerns as to the impact that a development of this overwhelming scale will have on already stretched resources. There is already one new development on Fann St that will provide a large number of new residential units, with this proposed scheme all local amenities will be overwhelmed. In addition it seems that the Green Corridor that exists very successfully will be lost.

NHS - The Neaman Practice already struggles with the residents of Golden Lane and the Barbican, it is difficult to get an appointment with a doctor as the demand is already so high. There appears to be flagrant disregard for the already stretched amenities in this area, the addition of over development on this scale will only compound the problem.

Fortune Park - With limited external space and no play-space for children within the scheme the occupants will spill over into Fortune Park, a park already overwhelmed with existing local inhabitants.

Green Corridor - The existing Bernard Morgan House sits in a wild garden that has been tended by local residents to maintain the qualities sought in creating continuous green corridors within the City of London. There is much commitment from the local community to mitigate against pollution and support species and education. The residents within the city represent a minority community (as opposed to business) and this community must insist and see that the values that it upholds and the wellbeing of its residents and children is honoured by the council and planners – please see the following for guidance -

The City of London - Biodiversity Action Plan refers to the following as some examples among many -

3.6 Achievements and recommendations

During the period of the previous City of London Biodiversity Action Plan 2010-2015 there have been some significant achievements:

- The establishment of the City-based friends group, 'Friends of City Gardens' who focus on encouraging more biodiversity-friendly planting, such as native bulbs and hedges. Their work also includes monitoring wildlife across the Square Mile and supporting the monitoring and recording of target species.

3.8 Health and Wellbeing

... Biodiversity is also an important contributing factor in mitigating air pollution with specific planting used to improve local air quality and raise awareness within the community. The City of London Corporation is also working with external organisations based in the Square Mile such as Bart's Heath NHS Trust to increase green infrastructure across their sites. Access to green space and nature is also linked to improving the mental health and wellbeing of individuals.

3.9 Education and community engagement

The work of promoting and enhancing SINCs provides a valuable opportunity for individuals to share and learn new skills, knowledge and experience as well as bringing together residents, workers and visitors with a shared passion for biodiversity across the Square Mile. This form of engagement can be vital in local residents taking ownership of local parks and gardens and acting as champions to promote the quality and understanding of biodiversity in the City.

Key Worker Housing - I would like to know where the police who inhabited Bernard Morgan House for several decades are due to be housed now? In this era of increased rents, security threats and the dogged rise of the private market it is essential that Key Workers are supported to live in or near the areas that they work in. There are many key workers within this area; police, teachers, nurses etc. so no shortage of opportunity to continue to use Bernard Morgan House to fulfil this function.

Sustainability

I can find no evidence within this application of a fully sustainable proposal or reasons given for not exploring what it would be to retain the existing building and make additional works in response to that building. I did not see any evidence of sustainability being properly explored either during the ill-fated first consultation that was latterly re-titled a pre-consultation or indeed later at the final exhibition for consultation. The existing building is well built and sound – there is no clear defense as to why it would not be possible to include it in the future proposal. In this age we should be using what exists and building in response to it – we do not need to demolish sound well built, well conceived buildings only to replace them with a poorly designed over-developed proposal that will need mechanical ventilation to maintain the interior spaces.

Procurement and Planning

Procurement - I am interested to better understand the procurement of this site by Taylor Wimpey given that another party offered substantially more monies for the site with a scheme that retained the existing building with extensions. This alternative developer and scheme appeared to be more aware of the local community and appeared to want to commit to the infrastructure of the community and urban fabric on a long-term basis. I would request under freedom of information all correspondence that led Taylor Wimpey to acquiring the site. One would hope that there be no underhand reason why the those in charge would want Taylor Wimpey to take charge of the development.


Lack of Local List - I am surprised that the City of London does not have a Local List – a governmental scheme upheld by neighbouring Islington and Camden councils where a community can describe local non designated heritage assets. It appears as if the City of London has scant interest in safeguarding the qualities of its urban fabric and upholding clear policy described in its own guidelines. The authority needs to listen to local residents to understand the value of

Guardianship of Listed environments - The City of London is guardian to a wealth of post war building with the Barbican and Golden Lane Estate that continues to attract enormous amounts of visitors from around the world – these sites have been granted listed status that include views into and out of these sites and the sites relationship to one another – this must be respected and the guidelines upheld. It seems that the survey department of the City of London saw fit to sell this site with no guidelines for development leaving the open to gross over-development – I challenge that this was a negligent move and is in part the reason why we now see such a poor proposal to grossly over-develop this site. I feel that the City sought to discredit the existing building on the site by procuring and paying for a survey to negate or play down any factors of architectural interest in Bernard Morgan House in order to smooth the route to a lucrative sale. I am astonished that English Heritage seems to have based their advice on this survey procured by the City of London rather than making their own independent enquiries into the quality of the existing building. This sequence of events is fundamentally flawed and calls into question the relationship of these public bodies and their integrity. A wealth of local residents find the Bernard Morgan House to have ample post war qualities and parts of the English Heritage report are fundamentally flawed – it is within documents from the architectural press at the time of building that accurately describe how Bernard Morgan House was explicitly designed in relation to Bowater House (evident from scale, massing, orientation etc) so any statement to the contrary is untrue and should be thoroughly investigated. I request – under freedom of information – all information relation to the surveys of the qualities of Bernard Morgan House.

Timing - I have serious concerns regarding the relationship of the planning bodies at City of London with members of the public who are considered statutory consultees on this project. Many meetings were promised that have never materialized. The timing of this validation of the proposal has come during the summer holidays – this was discussed significantly in advance of the event and residents were assured that this would not happen. Communication between residents and the planning department have been slow and non-committal with often confusing messages. Many bodies were not appropriately notified and the conservation officer who is new to the job and council has been away on holiday during this consultation period as has the senior planner attached to the proposal. All of this I would consider bad practice as a public body – or practice that is failing to be appropriately transparent and honest about the events in process. I will under freedom of information like to request all material relating to the timing of this planning application that seems attempt to get a proposal through planning during a time when one would expect all neighbours to be absent due to summer vacation – a very cynical move on the part of all bodies.

Finally, works of the scale proposed in this application - 16/00590/FULL Bernard Morgan House Redevelopment - will horribly disrupt the peace and tranquillity of my home and communal garden (as well as that of my neighbours) for a considerable time and will totally compromise our ability to happily inhabit our homes. I urge you to turn down this application. I honestly believe it would ruin our treasured oasis of peace, quality of life and privacy within the confines of this unique central London location - treasured and much visited by those seeking to explore inspirational examples of excellence within examples of post-war twentieth century housing. I formally request the City of London refuse this application.

Yours faithfully



Saskia Lewis
Director of Foundation
Architectural Association

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FROM:

Dr. Mark Campbell
8 Bowater House
Golden Lane Estate
London, EC1Y 0RJ

TO:

Catherine Linford
Environment and Planning
City of London
Guildhall
PO Box 270
London, EC2P 2EJ

RE: 16/00590/FULL (Revised Drawings)

Dear Catherine,

I am writing to register my strongest possible objection to the planning application 16/00590/FULL (revised drawings). After reviewing the applicant's revised drawings for the application I wish to note that ALL of my original objections to the scheme are pertinent. NONE of my original objections to the scheme have been addressed or mitigated. Given these objections - listed below and fully detailed in my letter of 9 September 2016 - I request the City of London refuse this application.

My objections to the proposal comprise:

1. - Excess Strain on Existing Public Infrastructure Amenity; comprising 1.1 - NHS Healthcare Provision, 1.2 - Open Public Space, 1.3 - Local Traffic, 1.4 - Education Provision
2. - Daylight, Sunlight and Overlooking; comprising 2.1 - Daylight, Sunlight, 2.2 - Overlooking
3. Design, Character and Appearance; comprising 3.1 Massing and Scaling, 3.2 - Heritage; 3.3 - Generic Design, 3.4 - Failure to Consider the Reuse of the Existing Building)
4. Failure to address the Townscape Context
5. Lack of Adequate Public Consultation over the Proposal; comprising 5.1 - Public Exhibitions, 5.2 - Validation and Statutory Consultation Comments Period

In addition, I note that the revised scheme includes a main access on Fann Street directly opposite Bowater House, Golden Lane Estate. I wish to formally state that during all pre-application discussions with the Applicants and their representatives it was explicitly stated by these parties that there would be no such access along Fann Street. This is another example of the serial misrepresentations by the Applicant and their representatives toward the affected local community and neighbouring stakeholders. This is unacceptable and illustrative of the duplicitous manner the Applicant has represented the scheme to the local community - I urge the City of London also take this series of misrepresentations into account when considering the conditions under which the application has been made.

On the basis of these objections - as listed and detailed in my letter of 9 September 2016, which are not addressed in the applicant's revised scheme - I object in the strongest possible terms to the application 16/00590/FULL (revised drawings) Bernard Morgan House Redevelopment. I also formally request the City of London refuse this application.

Given these objections I formally request the opportunity as a statutory consultee to publicly present my objections to this application at any relevant meeting of the City of London Planning Committee.

Regards,

Dr. Mark Campbell

PhD (Princeton University), MA, B.Arch (Hons.)
Fulbright Scholar, Princeton Honorific Scholar

Director, MPhil in Media Practices / AA Research Cluster
Architectural Association
36 Bedford Square
London, WC1B 3ES

Visiting Professor
School of Architecture
Southeast University
2 Sipailou
Nanjing
China, 210018

Editor, The Journal of Architecture (Routledge & RIBA)
Royal Institute of British Architects
66 Portland Place
London, W1B 1NT

From: [David Whitehead](#)
To: [PlanningQueue](#)
Cc: [PLN - Comments](#)
Subject: Application Reference 16/00590/FULL - FTAO Catherine Linford
Date: 05 January 2017 20:59:06

Dear Ms Linford

I wish to register my objections to the scheme to redevelopment of Bernard Morgan House on Fann Street; these are as follows;

- 1) The proposals include windows and balconies directly opposite my flat allowing for direct overlooking of my living spaces. This loss of privacy will be prejudicial to my quality of life.
- 2) The proposals will overshadow my principle windows leading to a loss of light and sunshine within my home and will block off a portion of the already restricted view of the sky from my home; again all this will be prejudicial to my quality of life. I totally reject the perverse notion that the original design of Bowater House in someway makes the resident's rights to consideration in this matter less than they might otherwise be.
- 3) The proposals will lead to the loss of open space and the uprooting of mature trees, a clear diminution of visual amenity in the vicinity.
- 4) I believe the proposals represent a gross overdevelopment of the site, a view that would seem to be supported by fact that the gross area of the proposed development is greatly in excess of that of previous assessments of what might be feasible on the site and the observation made by one of the Corporation's officers that a surprisingly large percentage of the proposed habitable space do not meet the BRE standards for natural lighting in homes; not content with trying to foist this onto their unlucky buyers they seek to inflict it on innocent bystanders as well.
Hand-in-hand with this overdevelopment is the awkward, jarring and intrusive relationship the proposals would have with the existing adjacent buildings particularly the School, the Church and Bowater House all of which have considerable architectural qualities that can only be debased by the tactless proposed insertion into the existing harmonious ensemble.
- 5) If the Architects drawings are to be believed, and architects drawings notoriously tend to overstate the attractions of most proposals, then this one is ugly, overbearing and charmless; a misshapen, greedy, greedy, greedy, pedestrian lump entirely bereft of delight or visual interest. I object very, very strongly to having such a nasty mess imposed upon my daily consciousness.

yours sincerely d j whitehead

resident of Bowater House, registered architect and author of 'London, The Architecture Guide'

David Whitehead
23 Bowater House
Golden Lane
London EC1Y 0RJ



fourfoursixsix

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Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building together with ancillary car parking, hard and soft landscaping and all associated works. (REVISED DRAWINGS)

Case Officer: Catherine Linford

Customer Details

Name: Mrs D Browning

Address: 18/5 Garrett Street London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment:My family and I are regular users of Fortune Park. The impact this building will have on the sunlight over the park and the school is unacceptable. It seems little consideration has been made for the young children and older members of the community that benefit from these outside spaces.

Wells, Janet (Built Environment)

From: DBE - PLN Support
Subject: FW: Daylight and Sunlight report - Bernard Morgan House

From: JOHN WHITEHEAD
Sent: 06 February 2017 16:06
To: Unford, Catherine

Subject: Daylight and Sunlight report - Bernard Morgan House

Dear Catherine,

I would point out that this report is incomplete and should therefore be set aside, reviewed and revised.

Without contradiction, the premises that will be mostly adversely affected by this development are those of the Welsh Presbyterian Church (Eglwys Bresbyteraidd Cymru) and the flat of its caretaker.

The church was designed and built at the same time as Bernard Morgan House (BMH), which was clearly designed to afford the church maximum light, as well as BMH being lower than the top of the copper cupola atop the church tower.

The BRE Client Report prepared for the City and dated 3rd October 2016 admits that the impact on the west facing windows of the residential accommodation at the church would be 'moderate adverse'. There are also windows which face east and which would clearly be worse affected but these were not reviewed - "... *Point 2 have not analysed these windows. It is not known what sort of rooms they light ...*" (paragraph 3.5.3).

In respect of the impact on the church itself, again there is no formal assessment although it is stated that "... *the windows on the south side of the church, which appear to be clear glass, would lose a significant amount of light as a result of the new development ...*" (paragraph 3.5.1).

The surveyor states that it was not possible to obtain access to the interior of the church during a site visit, which suggests that they did not try very hard.

I am not a member of the congregation at Jewin church, but I have attended events (Eisteddfod's) and services (Carol Services) there and therefore I do have an interest in protecting the church.

Many thanks

John Whitehead

John Whitehead, 111 Breton House, Barbican, LONDON, EC2Y 8PQ.

Wells, Janet (Built Environment)

From: DBE - PLN Support
Subject: FW: Application to demolish Bernard Morgan House

From: JOHN WHITEHEAD [
Sent: 06 February 2017 15:16
To: Hampson, Annie
Cc:
Subject: Application to demolish Bernard Morgan House

Dear Ms Hampson

Would your team please record my objection to the demolition of Bernard Morgan House prior to the approval of any redevelopment. Although the City is clearly in a difficult position on this one, I know that several members find the proposed development ugly and inappropriate for its location.

Taylor Wimpey should not be permitted to in any way change the facts on the ground. This would prejudice the Committee's consideration of Taylor Wimpey's proposed development purely on its merits.

I doubt that the City would be willing to be manoeuvred in this way. My old school motto was "*tene propositum*" - "hold your resolve" - which I commend to your department and the Committee.

Many thanks

John Whitehead

John Whitehead, 111 Breton House, Barbican, LONDON

Wells, Janet (Built Environment)

From: DBE - PLN Support
Subject: FW: 16/00590/FULL - Bernard Morgan House, Golden Lane

From: Cennydd John

Subject: Re: 16/00590/FULL - Bernard Morgan House, Golden Lane

Ms Dwyer as the owner of the nursery school located in the chapel, I have been waiting for the environmental impact assessment that would clarify what risks the demolition works wouldn't have on our children.

We have 38 children aged 0-5 located only metres from the proposed demolition and during our meetings with Taylor Wimpey we were assured that there would be a full review prior to submission.

Nothing has been forthcoming and I would like to better understand what consideration, if any, had been given to the children and the impact on their health from the proposed demolition works and what how we can contest

Wells, Janet (Built Environment)

From: DBE - PLN Support
Subject: FW: 16/00590/FULL - Bernard Morgan House, Golden Lane

From: Fred Rodgers
Sent: 03 February 2017 13:07
To: Dwyer, Carolyn
Cc:
Subject: 16/00590/FULL - Bernard Morgan House, Golden Lane

Dear Ms Dwyer,

We wish to object to the demolition of Bernard Morgan House on the grounds that Bernard Morgan House and the adjoining Church combine to form a backdrop that is sympathetic to the listed Golden Lane Estate opposite, and as such contributes importantly to the listed building's setting.

It is likely that this issue will be raised in the planning consultation and review period regarding the replacement of Bernard Morgan House, and demolition of the building would pre-empt this discussion.

Because of this, we would urge the planners not to allow the building to be demolished until a satisfactory proposal had been received and approved.

Best regards,

Fred Rodgers

Chair, Bernard Morgan Liaison Group
100 Breton House
Barbican
London
EC2Y 8PQ

Wells, Janet (Built Environment)

From: DBE - PLN Support
Subject: FW: Bernard Morgan House (16/00590/FULL)

From: Emma Matthews
Sent: 06 February 2017 14:24
To: Linford, Catherine
Cc
Subject: BRE Client Report

Dear Catherine Linford

Ref. Re: Planning Application Consultation (16/00590/FULL)
BRE Client Report

I've just received your letter asking for observations on the BRE report from the date of this letter. I've already sent my observations but I will update and send again incase they won't count as they were sent last week.

Thank you for uploading the BRE Client Report. It's quite shocking that it wasn't uploaded and available for us to see before. The report seems very biased in favour of Taylor Wimpey and I wonder why BRE think it is acceptable to contravene its own guidelines in favour of making sure Taylor Wimpey makes huge profits. Maybe this is seen as more important than the City's own residents, a community the City of London should be proud of and protecting rather than destroying. The people that will suffer are those who have been living in the area for decades. If this development contained much needed key worker accommodation to replace what used to be there then I would understand that it was necessary for us to lose 27% of our sunlight. But this development has completely ignored the City of London's residential community and Taylor Wimpey has treated local residents with contempt.

There also are some strange inaccuracies in the report which need to be addressed.

It says that Bowater will suffer loss of daylight outside the BRE guidelines but blames this on the overhanging balconies. This is what TW's report said and BRE have just agreed with it.

Loss of light has been analysed for all the nearby dwellings that could be affected. In Bowater House, 26 main windows would have a loss of daylight outside the basic BRE guidelines. However this is mainly due to the balconies and overhangs above the windows. Without the overhangs, all windows would comply. Loss of sunlight to all living rooms would meet the guidelines, even with the overhangs.

How can this be acceptable? The overhanging balconies exist. What are they saying, that if we had them removed then our light would not be affected? Of course they can't be removed so this argument is nonsense. The balconies are part of a world famous listed building, the balconies are part of the design of this building. This statement leaves me very confused. I hope that you will have questioned this in your report because it is quite clearly a meaningless statement. We will lose nearly 30% of our daylight. That is a

fact. Whether the overhanging balconies contribute to this is irrelevant. Unless TW are saying they would like to redesign Bowater House and remove our balconies. This we know is insane.

The analysis of the affect on Fortune Park is another strange distortion. They ignore the most important fact. That there will be no sunshine on the playground after 3.30 in the winter. I hope this is something else which you will have pointed out in your report.

Loss of sunlight to nearby open spaces, including the park and school playground, would be within the BRE guidelines in all cases. There would be a small amount of extra shadowing of the park and playground in the afternoon, mainly in spring and autumn. However in the park it would be possible for people to enjoy the sun by moving out of the shadowed area, and in the playground the extra shadowing occurs after normal break times. The impact on the park and playground would be minor adverse.

On another matter -

I would also like to know why Mark Campbell's and Saskia Lewis' objections to the revised drawings were never listed in the comments section on the portal. Their letters are in the documents section. Their names would bring the number objecting to 130. I've written to you three times about this and had no reply.

I look forward to hearing from you this time.

Yours sincerely

Emma Matthews

20 Bowater House
Golden Lane
London
EC1Y 0RJ

Sent from my iPhone

From: Hazel Brothers
To: PLN - Comments
Subject: ref 16/00590/FULL
Date: 08 February 2017 13:13:38

Dear Ms Linford

re your letter of 6 February concerning Bernard Morgan House,
I object to the proposed demolition.

Yours sincerely
Hazel Brothers
86 Breton House



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www.avast.com

1 Bowater House
Golden Lane Estate
London EC1Y 0RJ

8th February 2017

Dear Catherine Linford

Ref. Re: Planning Application Consultation (16/00590/FULL)
BRE Client Report

Firstly I'm writing to strongly object to the recent application to demolish Bernard Morgan House. Taylor Wimpey have disregarded the City of London's "Golden Lane Estate Listed Buildings Guidelines", as well as many objections from residents and appear to be rushing ahead to demolish so they can build their luxury flats using a design that is completely unfit for its setting in order to make as much as money as possible. The demolition should not be given permission until they come up with a building that is appropriate. Bernard Morgan House currently fits into the setting between the two world famous listed estates and could easily be retained and refitted to supply housing in whatever form.

Secondly I'm writing to let you know my observations of the BRE sunlight/daylight report, which was only just made available to residents this Monday 6th February. Worryingly, Taylor Wimpey have now brought the date forward as to when they will go to committee - instead of April it will be 28 February. This allows local residents limited time to digest this important report as well as prepare to speak at the Committee.

My first observation is that the sunlight/daylight report appears biased in favour of Taylor Wimpey.

26 main windows of Bowater House will lose light above what is acceptable (nearly 30% of light) within the guidelines (consider there are only 30 flats in Bowater House, that's nearly everyone who lives here), however this is deemed acceptable by the light survey - could anyone confirm why this is acceptable? Surely this is unacceptable - a huge mass of a new build, building luxury apartments for the rich, will take away valuable light from residents, from a building that has been here for over 50 years. On what level is this acceptable - and what is the point of the guidelines if they don't matter? To get round this D9 do an additional calculation based on the removal of the overhanging balconies on Bowater House which then allows the results to fall within BRE guidelines - is this legal? Surely this is a nonsense? The overhanging are part of Bowater House, they have been for over 50 years. Why would you do a calculation without them there unless it was to be able to state that the results were only 'minor adverse'? The balconies are part of the flat and the ample light we receive in the flats is not impaired because of the balconies. However the new building will impact significantly on the light we receive. To add to this, the BRE guidelines state that if this amount of lost light occurs then dwellings will need to rely on electric lighting for more of the time. This is not going to add to quality of life of my family, my three children or my neighbours, it will decrease our quality of life.

I'm also concerned about the dismissive manner in which the report talks about Fortune Park. This park is hugely busy. It's the only park in the near vicinity. The fact that the new building will cause extra shadowing is actually extremely important to the park users. The report suggests that people can simply move to another part to enjoy the sun - it doesn't work like this. We are looking after our children who are playing in the playground. The benches get full up. Kids play in various areas - football, cycling, scootering. It's not the case that everyone will shift into the sunlight, this won't happen. Vitamin D has been shown to be an important factor in good health for children and adults alike. Taylor Wimpey's huge, profit-making building will impact of our kid's health and on our happiness. Vitamin D deficiency is linked to a number of major illnesses. Our park should be a

priority to the City of London and if the building is impacting on it, then the building should be re-designed.

I strongly disagree that the impact on both Fortune Park and Bowater House is 'minor adverse'.

With regard to the school playground, Prior Weston School hosts a number of after-school clubs on the playground - cricket club, gardening club to name a few. These are forever evolving and changing, however the report states that "at 3.00 - 3.30pm during the site visit there appeared to be a small number of children and adults on the school playground". This is because school has NOT finished at this point. School finishes at 3.30pm. After-school clubs start at 3.45pm. That would be why there were just a small number of children and adults in the playground as everyone would be in the classroom. For such a major build, surely it would have been more appropriate to do more research into the use of the playground and the times, instead of second guessing from a short site visit.

As you will infer from the tone of my letter, I have found the process of consultation on this important development perplexing, infuriating and demoralising and the application for demolition and the sunlight/daylight report only serve to add to this.

Yours sincerely,

Claudia Marciante (1 Bowater House)

Sent from my iPhone

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building to provide 99 dwellings, together with ancillary car parking, hard and soft landscaping and all associated works.

Case Officer: Catherine Linford

Customer Details

Name: Mr Cennydd John

Address: Hatching Dragons Barbican 1 Viscount street London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: I am writing to ask why our nursery school, located in the vestry of Jewin Chapel, has been disregarded in both the Air and Noise Impact Assessment reports, when paragraph 109 of the National Planning Policy Frameworks clearly state that full assessments are required to understand what impact our children would face from noise, soil and airborne pollutants.

We have attempted to engage DP9 and Taylor Wimpey repeatedly on this issue over the past year with no response from them since March 2016. Please can someone confirm the position on this

[REDACTED]

From: Mark Lemanski <[REDACTED]>
Sent: 11 February 2017 14:47
To: PLN - Comments
Cc: Linford, Catherine
Subject: Re: Planning Application Consultation (16/00590/FULL)

Dear Madam/Sir,

I would like to comment on the independent assessment of the lighting study, which you have kindly forwarded.

General comments

The report does not contain any calculations. Have the calculations submitted be verified by BRE? The suggestions to just remove the balcony from neighbouring listed buildings is absurd. Are the report's authors aware of the special status of the architectural value of neighbouring buildings?

Regarding Prior Weston School

Loss of daylight and sunlight to the small [Prior Weston Primary School Windows] would be outside the BRE guidelines. However, the larger windows in the same classroom looking towards the park would be scarcely affected by the new development (Page 13). It is self-evident that a north-facing window would not be affected as it does not have any direct light to start with. Which makes the small, west-facing window more important—this is not merely a secondary window, but the main source of daylight in a school classroom, the benefit of which is well documented.

The school playground will be shaded for most of afterschool club time (Page 15). The report concludes that this does not matter as not many children were observed to be using the terrace during this time, which surely had to do with the weather in December and January. A sunny school playground is essential in encouraging children to be active in after school in clubs, which in times of an obesity crisis shouldn't be dismissed so casually.

Regarding Fortune Park

The report states that On 21 March [], between 1300 and 1400, the shadow of the new development would start to encroach on the park []. At 1500 and 1600, more of the park would in in shadow and there would be some extra shading from the new development. On September 21 [], the shadow of the new development would start to encroach on the park between 1400 and 1500, and cover nearly all of it at 1700, and concludes that in the busy lunchtime period there would be no extra shading (Page 15) and In Spring, autumn and winter it would be possible for people to enjoy the sun by moving out of the shadowed area (Page 15).

This fails to state that the user groups at lunchtime and afternoon are entirely different. Lunchtime users are city workers, few of whom will live in the area. Afternoon users are predominantly local children and their carers, in one of the areas most deprived of green space in central London. It is entirely untrue that users could simply move 'out of the shadowed areas' to enjoy the sun: the western edge is used for ball games, sun bathing, picnicking of larger groups, and children's birthday parties, none of which are possible or desirable in the gated playground area or the seated area in the western part. The park is working extremely hard to accommodate a multitude of uses and user groups with very different needs, in a densely populated area with little green space provision. This report fails to understand the value the park brings to the area, and sunlight is one of its key assets.

The importance of green space is outlined in the Government Planning Policy is set out in Paragraph 73 of the National Planning Policy Framework, the National Audit Office's Enhancing Urban Green Space, as well as in the London Plan, which describes the whole of the City as deficient in open space, and of course your own The City of London Open Space Strategy, which appears to understand the need to increase the quality of open spaces within and adjacent to the City wherever possible, which the report fails to consider.

I have worked with BRE in a professional capacity, and have had no reason to be less than satisfied with them. This report and especially the points raised however make me question their professional judgement and/or their independence.

I hope that you will take the detrimental affect the proposed development will have on our neighbourhood into consideration and refuse the planning application as it stands.

With best wishes,

Mark Lemanski
528 Ben Jonson House
London EC2Y 8NH

On 6 Feb 2017, at 11:53, PLNComments@cityoflondon.gov.uk wrote:

Dear Sir/Madam

Please see attached consultation letter in relation to planning application 16/00590/FULL (Bernard Morgan House 43 Golden Lane London EC1Y 0RS).

The Daylight and Sunlight report submitted in support of the application by Point2 Surveyors has been independently assessed by BRE on behalf of the City of London. This report is now available online.

Any observations must be received within a period of 14 days beginning with the date of this email.

Kind Regards

Planning Administration
Department of the Built Environment
City of London
<ufm127.pdf>

Hassall, Pam

From: DBE - PLN Support
Subject: FW: Re Planning Application BMH Consultation(16/00590/FULL) Objection to BRE light survey

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

From: Deborah Phillips []
Sent: 13 February 2017 09:25
To: Linford, Catherine
Subject: Re Planning Application BMH Consultation(16/00590/FULL) Objection to BRE light survey

Dear Catherine Linford,

I object to the BRE light survey report . It clearly is in favour the claims of Taylor Wimpey developers!
The 30% loss of light to Bowater House(Grade II listed building) is due to the proposed development which is grossly oversized in height and mass . The loss of light is not due to the balconies on Bowater House. This claim is absurd . The balconies are exceptional in design ensuring protection and privacy .How absurd to suggest if the balconies were removed then our light would be improved !

I object to the loss of light to Gortune Park especially post 3:30 pm when the children play in the park . I object to the loss of light to the Prior Weston School playground especially post 3:30 pm when after school clubs occur . Children need light to be healthy in our community.

I object to this development entirely and I'm appalled by the way the developers and architects have treated this community .

Thank you for your consideration .


Yours sincerely

Deborah Phillips
42 Bowater House
Golden Lane Estate
London EC1Y0RJ

Sent from my iPhone

Adjei, William

From: Linford, Catherine
Sent: 20 February 2017 10:41
To: DBE - PLN Support
Subject: FW: Bernard Morgan House - 16/00590/FULL and 17/00088/DPAR

From: Fred Rodgers [mailto:**Sent:** 15 February 2017 23:08
To: Dwyer, Carolyn
Cc: Hampson, Annie
Subject: Bernard Morgan House - 16/00590/FULL and 17/00088/DPAR

Dear Ms Dyer,

It seems that some words were lost in copying and pasting text into my previous email.

Point 2 should have read as follows:

2. The safety and welfare of the children attending Hatching Dragons Nursery, and the congregation and caretaker of Eglwys Jewin, as well as the protection of the fabric of the church are paramount. The Applicant's approach to this is considered in comments on the Outline Method Statement for the Demolition and Associated Works for Bernard Morgan House ("Method Statement") in 6 below. The COSHH Assessment for Garfield School seems to suggest the same high (7/10) degree of risk as the one for Bernard Morgan House but is the former intended to justify the latter?

Please also post this email to the planning portal for 17/00088/DPAR

Best regards,

Fred Rodgers

100 Breton House
Barbican
London
EC2Y 8PQ
United Kingdom



Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building to provide 99 dwellings, together with ancillary car parking, hard and soft landscaping and all associated works. (RECONSULTATION DUE TO - ALTERATION TO THE GOLDEN LANE/BRACKLEY STREET CORNER AT GROUND FLOOR LEVEL TO REMOVE THE OVERHANG AND BRING THE GROUND FLOOR IN LINE WITH THE UPPER FLOORS)

Case Officer: Catherine Linford

Customer Details

Name: Mr Dominic Bampton

Address: 6 Brandon Mews Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment:As a long term resident of cripplegate ward, I feel the proposed demolition of Bernard Morgan house is completely inappropriate. Rather than demolish the existing building it should be renovated and used as a community amenity. It is an attractive and properly proportioned building in one of the few areas of the city of London which has not become dominated by oversized developments. I feel that the church, the low level golden lane estate buildings and the other nearby buildings will not benefit from a larger new building. I strongly feel this demolition should not go ahead.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building to provide 99 dwellings, together with ancillary car parking, hard and soft landscaping and all associated works. (RECONSULTATION DUE TO - ALTERATION TO THE GOLDEN LANE/BRACKLEY STREET CORNER AT GROUND FLOOR LEVEL TO REMOVE THE OVERHANG AND BRING THE GROUND FLOOR IN LINE WITH THE UPPER FLOORS)

Case Officer: Catherine Linford

Customer Details

Name: Ms Clare Carolin

Address: 28 Bowater House Golden Lane Estate London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: I am writing to register my very strong objection to the proposed demolition of Bernard Morgan House. The application contains multiple factual errors and should be refused for the following reasons:

1. It involves the destruction of Bernard Morgan House a heritage asset which the proposal states dates from the 1970s. In fact the building was completed in 1961 and was designed to respond to the context of other listed buildings surrounding it. Moreover Bernard Morgan House contained key worker housing, vital for the area of central London.
2. The COSHH Assessment is for Garfield Primary School. This school is not near the site. Indeed there is no school with this name in either CoL or Islington.
3. The section of the Outline Method Statement dealing with proximity of sensitive buildings wrongly identifies buildings surrounding the site as follows:

To the north of the site the report indicates Golden Lane with commercial and office premises. It is Fann Street with a block of flats opposite, Bowater House in which I live with my young family. The block is grade two listed and the proposal makes no mention of this.

To the East of the site the report indicates Brackley Street with commercial and office premises opposite. It is Golden Lane with a the Golden Lane Campus which houses a primary school, Prior Weston; a special needs school, Richard Cloudesley and the Golden Lane Children's Centre, which my four year old son attends. Also Breton House, another grade two listed residential block.

To the south of the site the report indicates Viscount Street with a day nursery and church. It is Brackley Street with an office building.

To the west of the site the report indicates Viscount Street with a church and day nursery. This is correct but there also is a residential building Cobalt House, and sheltered accommodation for elderly people, Tudor Rose Court, the report make no mention of this at all.

These inaccuracies undermine the legitimacy of the proposal. They suggest little or no consideration has been given to the issues surrounding demolition in a tight urban context. Until the applicant can demonstrate that they can operate the site safely and with minimal disruption to the lives of surrounding residents this application should be refused.

Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building to provide 99 dwellings, together with ancillary car parking, hard and soft landscaping and all associated works. (RECONSULTATION DUE TO - ALTERATION TO THE GOLDEN LANE/BRACKLEY STREET CORNER AT GROUND FLOOR LEVEL TO REMOVE THE OVERHANG AND BRING THE GROUND FLOOR IN LINE WITH THE UPPER FLOORS)

Case Officer: Catherine Linford

Customer Details

Name: Ms Eva Stenram

Address: Flat 7, Bayer House Golden Lane Estate London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to the demolition of Bernard Morgan House. The demolition should not begin until plans for a new building have been approved.

After reading the BRE sunlight/daylight report, it is also clear that most flats in Bowater House will lose nearly 30% of light. This is unacceptable and the plans need to be revised. I do not understand why one calculation is based on a fantasy scenario of the flats in Bowater House not having overhanging balconies. This is pointless. The balconies are part of Bowater House (a listed building) so this calculation is totally irrelevant.

Furthermore, the loss of light to the park during the post-school hours (after 3:30) in the spring, autumn and winter is unacceptable. The park is very busy during this time, and it is simply not possible to just move from the shaded area to the sunny area. Different areas of the park are used for different activities - it is no use telling boys playing football, or a family having a picnic, that they have to move into the bit of the playground intended for under 5s. This is an unreasonable suggestion.

Vitamin D from sunlight is vital to childrens' and adults' health. Exercise is important to combat the obesity epidemic. Fortune Park is the only park in the area - any loss of light to this park will have a very detrimental effect on local residents. Children in London face a multitude of health problems already, from lack of green spaces to run around to excessive pollution. Do you really want to approve of a development which will make the children living in the City of London suffer further?

Fortune Park needs to be a priority in this development - our parks need to be protected.

After-school clubs use the Prior Weston school playground Mon-Fri, 3:45-4:45. It is heavily used at this time. For the sunlight/daylight report to state anything else is simply false and badly researched.

I hope our concerns will finally be heard. The planning application, as it currently stands, needs to be refused.

Adjei, William

From: Linford, Catherine
Sent: 27 February 2017 14:02
To: DBE - PLN Support
Subject: FW: Bernard Morgan House

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

From: Deborah Lambkin [REDACTED]
Sent: 17 February 2017 09:05
To: Linford, Catherine
Subject: Bernard Morgan House

Message dated 21st September 2016

Dear Catherine

I am writing to object to the new block of flats that are due to take the place of the Bernard Morgan House.

My main reason for objecting is because the new building is so much bigger than the old one and will therefore block out even more sunlight from Fortune Park and the play areas on the roof of Prior Weston School. My son goes to Prior Weston and we are very regular park users. This is where the children get all their sunlight and fresh air as most live in flats.

A significant proportion of children do not have the recommended levels of Vitamin D in the their blood. Vitamin D is produced in the skin when exposed to sunlight. It is essential for health and well being. It is especially difficult to get enough vitamin D during the winter months in London.

This new building will obscure the light even further.

Added to this the planting in the park - including a very old cherry tree may struggle with the change in light quality. I also object to the small garden around Bernard Morgan House being removed.

Bernard Morgan House is an architecturally interesting building in the style of golden Lane estate and also fitting in well with the Barbican. These building have proved to be in very high demand over the last 20 years. Why is this not taken into consideration before replacing it with a boring, generic glass block of 'bling' flats that are marketed abroad to people who may never live here.

The community would be much better served to renovate the existing building and creating affordable homes for teachers, police and NHS workers etc, the people who we need to be able to have access to the city in emergency circumstances i.e., security issues, extreme weather.

If this building goes ahead it will be in direct contravention of what is right and good for the city and it's inhabitants.

Sincerely
Deborah Lambkin
130 Thomas More House
Barbican
London
EC2Y 8BU

From: Linford, Catherine
To: DBE - PLN Support
Subject: FW: Objection to Taylor Wimpey Prior Application to demolish Bernard Morgan House - 17/00088/DPAR & Observation regarding BRE reports
Date: 20 February 2017 10:50:36
Attachments: image003.png

From: Mai Le Verschoyle [mailto:]
Sent: 19 February 2017 22:22
To: Linford, Catherine
Cc: Chipperfield, Rob; Hampson, Annie; Hayward CC, Christopher; Anderson, Randall; Nash Deputy, Joyce; Newman CBE CC, Barbara
Subject: Objection to Taylor Wimpey Prior Application to demolish Bernard Morgan House - 17/00088/DPAR & Observation regarding BRE reports

Dear Catherine,

1. Taylor Wimpey (TW) Prior Application to demolish Bernard Morgan House (BMH) - 17/00088/DPAR

I am writing to sincerely request you and the Corporation of London (CoL) to refuse TW Prior application for the demolition of Bernard Morgan House (BMH) which, will be scheduled before their planning application to redevelop BMH (16/00590/FULL) is reviewed by the Planning Committee. The reasons for my objection are as below:

- The supporting document for the prior application to demolish BMH was not prepared up to the professional standard required because it provides CoL with inaccurate position of BMH within the surrounding environment and buildings therefore it is not reliable and would impair the decision of the Planning Committee.
- The demolition of BMH before the planning application is considered would alter the review / assessment from the Planning Committee regarding the impact caused by the new redevelopment plan. Without the footprint and the existence of the current BMH, it would be difficult for the members of the Planning Committee to visualise the massive scale in height and in mass of the proposed redevelopment plan which, would engulf the current site and would destroy the pleasant and attractive environment that residents in the surrounding buildings, facing Viscount Street, Fann Street and Golden Lane, are currently enjoying. This would in turn mislead the members of the Planning Committee in their decision regarding TW planning application (16/00590/FULL).
- The approval of BMH demolition before the consideration of TW planning application would give the wrong impression:
 - that CoL supported the heavy-handed and unneighbourly manner of TW towards Local residents.
 - that CoL were not impartial in the judgement / decision about this BMH redevelopment Project.

2. BRE reports – Review on Point 2 Daylight & Sunlight report

2.1 16_00590_FULL-BRE_CLIENT_REPORT-361320.pdf - dated 03-Oct-2016

2.2 16_00590_FULL-DAYLIGHT__SUNLIGHT__OVERSHADOWING_REVIEW-360577.pdf – dated 09-Dec-2016

I have read thoroughly the BRE reports together with Point2 Daylight & Sunlight report. I strongly believe that TW application to re-develop BMH with the revised proposed plan should be refused / rejected for the reasons below:

- The **minimum** values of the Average Daylight Factor (ADF) - measure of the daylight factors in an interior- recommended in BS 8206-2 (the British standard on daylight) are quoted as Bedroom: 1%; Living Room: 1.5% and Kitchen:2%
- In Point 2 report ADF in all rooms of Flat1 and Flat2 of the Cobalt Building are already below the recommended values (screenshot-1 & 2 below). The height, the scale and the massing of the new BMH development towards Brackley Street and Viscount Street would reduce the ADF in our rooms further and would make them gloomier than they already are. Thus, this will not meet the British standard on daylight, BS8206 – Part2, required.
- I also note that all the values used in Point 2 report are assumed values. As the rooms layouts are not known, BRE reports state that the results for Point2 Daylight Distribution may be unreliable. This would be applicable to most of the values produced in Point2 report

BERNARD MORGAN HOUSE LONDON
EXISTING VS PROPOSED SCHEME

DAYLIGHT ANALYSIS
PROPOSED SCHEME RECEIVED 18/04/16

APR 2016

Room	Room Use	Window	EXISTING VSC	PROPOSED VSC	%Loss	Room	Room Use	Window	EXISTING ADF	TOTAL ADF	PROPOSED ADF	TOTAL ADF	%Loss	ADF
COBALT BUILDING														
R1100	ASSUMED	W1100	9.98	8.88	10.6	R1100	ASSUMED	W1100	6.55	6.55	0.51	0.51	0.08	13.63
R2100	ASSUMED	W2100	10.43	8.83	15.39	R2100	ASSUMED	W2100	6.76	6.76	0.68	0.68	0.09	13.00
R3100	ASSUMED	W3100	11.73	12.51	3.40	R3100	ASSUMED	W3100	6.77	6.77	0.71	0.71	0.05	15.45
R4100	ASSUMED	W4100	18.23	18.33	3.90	R4100	ASSUMED	W4100	6.21	6.21	0.54	0.54	0.07	16.41
R4100	ASSUMED	W5100	18.15	18.29	3.50	R4100	ASSUMED	W5100	6.27	6.27	0.71	0.71	0.04	16.41
R5100	ASSUMED	W6100	25.01	15.20	39.22	R5100	ASSUMED	W6100	0.99	0.99	0.65	0.65	0.15	14.30
R6100	ASSUMED	W7100	31.06	17.24	44.72	R6100	ASSUMED	W7100	0.94	0.94	0.40	0.40	0.13	14.91
R7100	ASSUMED	W8100	19.94	13.55	31.54	R7100	ASSUMED	W8100	0.95	0.95	0.34	0.34	0.12	14.44

BERNARD MORGAN HOUSE LONDON
EXISTING VS PROPOSED SCHEME

DAYLIGHT DISTRIBUTION ANALYSIS
PROPOSED SCHEME RECEIVED 18/04/16

APR 2016

Room	Room Use	Window	Prop sq ft	New sq ft	Loss sq ft	%Loss
COBALT BUILDING						
R1100	ASSUMED		114.5	42.5	32.2	28.1
R2100	ASSUMED		113.7	72.8	39.1	34.4
R3100	ASSUMED		68.5	79.8	70.7	81.2
R4100	ASSUMED		175.0	158.7	148.5	84.8
R5100	ASSUMED		158.4	153.7	121.5	76.7
R6100	ASSUMED		109.4	75.1	64.9	59.3
R7100	ASSUMED		151.3	161.8	132.6	87.5

Bedroom1
Bedroom2 / Study Room
Living Room

- The BRE report and Point2 reports have overlooked that the height and the scale and massing of the proposed BMH redevelopment will obstruct completely the direct morning sunlight - the only natural light - to my windows. This would have adversely affected my rooms and my living room the most. Therefore, my living room would not meet the British standard and BRE recommendation that living rooms receive 25% of annual probable sunlight hours, including 5% in the winter.
- BRE report also mention that 60 out of 99 new flats will not meet the above guidelines and recommendation.
 - Why would you allow TW to build an ugly development (a) with most of the new flats narrowly meet the standard required and (b) which will have a negative impact to the local Environment and (c) will render local Residents unhappy and lose trust in CoL?

Dear Catherine, I personally think you / CoL and the Planning Committee have a chance to

influence Taylor Wimpey to find a different development plan which, will fit in harmoniously with the listed Buildings, which will preserve BMH, a part of the history that the Community love to keep , which will provide the same number of flats with good daylight and sunlight, which will not block the natural sunlight to my flat, to the Cobalt Building, to Bowater House, to the Church,... I am sure that Taylor Wimpey Architects will be able to design and to build a wonderful /elegant building for us and for the future generation to admire and to be proud of.

I have lived in this Community and area for twenty years. From my past experiences whenever I needed CoL assistances, CoL officers have always responded and acted with great care. I will now continue to put my trust in you / the Corporation of London and the Planning Committee to use your wisdom and authority to influence Taylor Wimpey and to make the right decision in this important matter. Sometimes the pride and the achievement of a worthwhile Project is the merit that will bring us more satisfaction than money and any material value amassed.

Thank you for your time at reading my long email.

Kind regards,

A black rectangular box redacting the signature of the sender.

Flat 1 The Cobalt Building

From: Linford, Catherine
To: DBE - PLN Support
Subject: FW: Ref. Planning Application Consultation (16/00590/FULL)
Date: 22 February 2017 12:06:39

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

From: Tim Chapple
Sent: 22 February 2017 12:01
To: Linford, Catherine
Cc: Roberto Mingrino
Subject: Ref. Planning Application Consultation (16/00590/FULL)

3 Bayer House
Golden Lane Estate
London EC1Y 0RN

22nd February 2017

Dear Catherine Linford

Ref. Re: Planning Application Consultation (16/00590/FULL) BRE Client Report

We are writing to object to the application to demolish Bernard Morgan House. The demolition application submitted firstly is full of errors - there is no mention of the Richard Cloudesley School and Prior Weston Primary school being directly opposite the site and Bowater House and other residential buildings are also missed off. We feel The report will be misleading to the Planning Committee. We are concerned that Taylor Wimpey are rushing to demolish the building before the Planning Committee have time to consider their plans for a replacement. There is also no mention of what efforts will be made to save the beautiful original tiles, as promised by the developers. The demolition will need to be a carefully considered operation to avoid disruption to the School and ensure children and local residents safety and the lack of care taken in the application does not bode well.

We would also like to comment on the sunlight/daylight report as it appears biased in favour of Taylor Wimpey. Not only will residents in Bowater House lose 30 per cent of light, the report ludicrously suggests that this can be rectified by removing the balconies from the building. Therefore they suggest that with this in mind their calculations are acceptable. These balconies are an integral part of Bowater House (a listed building) and so they will not be removed, residents will lose light and their quality of life diminished for the sake of luxury apartments, which are unwanted by the local community.

The newly proposed building will also cause extra shadowing in Fortune Park. We use and enjoy this park on a daily basis, as do most of our neighbours on Golden Lane Estate, many of whom are elderly. To take away precious sunlight in our only green space is not acceptable. The new building should be kept at the same height as the current Bernard Morgan House to maintain the light we have in the park and also to fit in with the surrounding listed buildings.

Yours sincerely,

Tim Chapple and Roberto Mingrino

Adjei, William

From: Linford, Catherine
Sent: 20 February 2017 10:40
To: DBE - PLN Support
Subject: FW: Bernard Morgan House - 16/00590/FULL and 17/00088/DPAR

Hello,

Please could this email chain be uploaded to 16/00590/FULL and 17/00088/DPAR.

Thanks,
Catherine

From: Hampson, Annie
Sent: 17 February 2017 15:40
To: Fred Rodgers
Subject: RE: Bernard Morgan House - 16/00590/FULL and 17/00088/DPAR

Dear Mr Rodgers

I refer to your email addressed to Carolyn Dwyer below. The DPAR application is under consideration and the matters that you refer to will be investigated.

best wishes

Annie Hampson
Chief Planning Officer and Development Director
Department of the Built Environment
Tel: 020 7332 1700
www.cityoflondon.gov.uk



From: Fred Rodgers [REDACTED]
Sent: 15 February 2017 21:48
To: Dwyer, Carolyn
Cc: Hampson, Annie
Subject: Bernard Morgan House - 16/00590/FULL and 17/00088/DPAR

Dear Ms Dwyer,

I refer to the above and, in particular application 17/00088/DPAR which, I understand, is to be determined on 28 February. Although we wrote to you on 3 February to object to the application to demolish being considered in isolation to the application for the proposed new building, I have only recently been able to access the planning portal relating to the new application. As a result, I have the following comments:

1. It is Cennydd John - not John Cennydd. It is questionable that his email can be said to be "neutral".
2. The safety and welfare of the children attending Hatching Outline Method Statement for the Demolition and Associated Works for Bernard Morgan House ("Method Statement") in 6 below. The COSHH Assessment for Garfield School seems to suggest the same high (7/10) degree of risk as the one for Bernard

Morgan House but is the former intended to justify the latter?

3. It seems that Greater London Demolition has not been contracted by the Applicant to carry out the demolition, even though that company is currently in control of the site. The contract may be awaiting permission to demolish but presumably, if another demolition contractor is engaged, this will negate application.

4. The following are extracts from draft comments, yet to be submitted to City Corporation, on the Preliminary Ecological Appraisal, Sustainability Statement and Tree Survey & Arboricultural Impact Assessment lodged under application 16/00590/FULL, which are particularly relevant to the proposed demolition but these do not take into account anything of relevance in the Method Statement:

"The removal of the Hawthorn in the SW corner of the site (Ref 5) should be strongly resisted. The Tree Survey says it is in good condition and well grown. Hawthorn trees of this size in the City are very rare and it should be retained. It is a native tree with a high ecological value and efforts should be made by the developer to retain it and make sure it is not damaged during the demolition and construction processes.

The Greengage survey found evidence of nesting birds and they have been observed on site. Their report calls for any clearance or pruning of shrubs, trees or dense vegetation should be undertaken outside of the breeding season or following confirmation of absence by a suitably qualified ecologist. The developer should make sure this happens.

The City's Biodiversity Action Plan was updated and the new plan for 2016 to 2020 was adopted in spring 2016. The Greengage survey was in Jan 2016 and references the old BAP.

Over 100 flora spp. have been recorded in the wildlife portion of the Bernard Morgan House garden.

Nesting birds - report calls for clearance of trees only outside the nesting season Mar - Oct. Developer must abide by this.

Bird boxes should include sparrow boxes since Fortune Park hosts a small colony that is very important since there are only two in the fringes of the City - the other is at the Tower.

There is nothing about mitigating the loss of habitat during the demolition and construction phase. As a minimum the developer should provide a biodiverse green wall surrounding the site on the hoarding to compensate for the loss of forage in the wildlife garden for pollinators and as visual amenity for the surrounding residents.

The developer should use its best efforts to improve air quality rather than meet air quality neutral benchmark. The developer should be required to use greening during the development phase to mitigate NOx and PM emissions - greening would be part of this - green planting/walls and screens, with special consideration given to planting that absorbs or suppresses pollutants.

As the proposed development lies in the Low Emission Neighbourhood, other emissions.

We would like to see the Dust Assessment Report prior to Planning permission being granted.

We would also like to see the developer's plans to mitigate idling engines on demolition and construction vehicles by having a marshalled Switch off policy; use electric vehicles wherever possible, publish monthly air quality data relating to the site. The developer should measure and publish NOx and particulate levels before, during and after the development.

The developer seems to be unaware of the year long Kings College London Mapping for Change project that monitored NOx and particulate levels extensively in the surrounding area.

The levels of air quality concentrations seem to have been calculated to make sure they are below the 40 µg/m³ EU standard for annual NO2 levels.

The developers should have looked at the data from the Kings College London Mapping for Change project 2013 - 14 <https://communitymaps.org.uk/project/air-quality-monitoring/contribution/4462?center=51.5208;-0.0945;19&tab=1>

The closest data point to the development is 6th floor north facing fire escape on Ben Jonson House overlooking Golden Lane, less than 70 metres from the development. Annual average exposure at this point recorded levels of annual NOx of 40 - 60 µg/m³. Based on this data, it is likely that east facing balconies on the BMH development will experience NOx levels above the EU safe limit for health.

The statement that the base line shows levels below the 40 µg/m³ should be questioned as it is not based on the best available information - and looks suspiciously like a massaged figure to make sure it is below the EU standards.

A colony of Red book Birds of Conservation Concern - i.e. House sparrows is within 50 m of the Site and should be upgraded to be of High Ecological concern.

Given the inaccuracies and omission in the methodology of calculating exposure and risk more work needs to be done. This report is superficial and inadequate - particularly given that the site is located in the LEN and is next to a site of High Ecological importance.

The statement that:

“As a consequence of the proposed development, there will mitigation is not seen to be necessary, other than those routinely used to control construction dust, as detailed in the previous section. Similarly, concentrations of all pollutants are below the National Air Quality Objectives at the development site and therefore it is not necessary to implement mitigation to reduce the exposure from NOx or any other pollutant to future occupiers of the proposed development.”

Should be revisited and a more rigorous analysis carried out using all available data."

5. The letter from Dentons UKMEA LLP immediately asks the question why the Applicant considered it necessary to instruct a leading City law firm to complete a simple form and make the application on its behalf.

Dentons have repeated DP9 Ltd's lack of direction in 2.1 of its Planning Statement for 16/00590/FULL. Golden Lane is to the east of the site and Viscount Street to its west. Under "planning history" Dentons should have stated that application 16/00590/FULL also includes the demolition of the existing building but "as a consequence of the time taken for the application to be determined, it is proposed to proceed with the demolition of the existing building" demands explanation.

The "time taken for the application to be determined" is entirely due to the Applicant's failure to submit an application that could first be validated and then considered by Planning and Transportation Committee within a reasonable period, culminating in the need to submit revised drawings last November. Even so, it now seems that the Applicant is coalescing in the current delay by accepting 2 May as the date for determining its planning application.

Dentons should also be required to explain why the Applicant's agreement to a further delay in determining 16/00590/FULL justifies the immediate, or any, demolition of BMH. The proposed three-month programme does nothing to address the points in 4 above but application 17/00088/DPAR could be explained as a manipulating tactic. A tactic aimed at denying the opportunity for the new Planning

and Transportation Committee to consider the retention of the existing BMH building on 2 May. The latter point is to be addressed by the City Solicitor.

6. As far as the application form is concerned it seems that despite having submitted application 16/00590/FULL over eight months ago, the Applicant has not sought pre-Application advice from City Corporation (Q4). The form explains the reason for demolition is set out in Dentons' letter (Q5) but, as mentioned in 5 above, the letter does not appear to offer any sustainable reason for separate applications.

The reply to Q5 refers to a Demolition Management Plan - presumably the Method Statement. However, is it correct (Q5) that the site does not adjoin a public right of way? The first paragraph of comment under 4 above relates to item 5 on the Tree plan and requires that this tree be retained (Q5). Finally, the form is unsigned, unlike Dentons' letter.

7. As far as the Method Statement is concerned:

i) On page 4 under "the following works have already been carried out" and on page 5 under "pedestrian protection", reference is made to the erection of hoardings around the site. However, hoardings have not been erected around the entire perimeter of the site, especially on the Brackley Street frontage, where plastic covered steel railings have been slotted into breeze blocks. These railings are constantly being blown over, which, as can be seen from the attached photo, causes a significant pedestrian hazard.

ii) "Partly outside the site boundary" on page 5 suggests that the pavements around the site, if not roads, are likely to be blocked for, at least, three months. This is unacceptable.

iii) Also on page 5, it must be understood that the site entrance adjoins the Nursery entrance and, as such, is also unacceptable.

iv) A diesel generator, silenced or not, is unacceptable for the site, let alone its proximity to the nursery and residential properties. A temporary electricity supply must be obtained.

v) The proximity of sensitive buildings on page seven is confusing - Viscount Street is to the west, Fann Street to the north, Golden Lane to the east and Brackley Street to the south.

1 Golden Lane is a Viscount Street, part being directly opposite the site. Already lorries carrying out the pre-demolition waste disposal have caused nuisance and annoyance to some residents, particularly on the ground floor. Residents of Bowater House on Fann Street and Breton House on Golden Lane have also had reason to complain about noisy and/or dangerous lorry movements.

Worse though is the total failure to acknowledge the existence of both Golden Lane Campus and the adjoining Fortune Street Park. The effect on children and other occupiers of proposed demolition must be assessed before consent is given.

vi) The monarflex sheeting must be secured at all times to prevent noise disturbance from flapping sheets, as has happened at Blake Tower. Also under "Temporary works required" (page 8), what steps are being taken to prevent the lower ground floor slab collapsing under the weight of a high-reach excavator? The items in "Temporary works designed" offer little comfort.

vii) The provisions on pages 9 and 10 are admirable as regards the contractors' operatives but do nothing to ensure the safety of occupants of adjoining properties, particularly children.

viii) The extract from City Corporation's Code of Conduct on page 11 does not mention Saturday working at all. In any event all work should be restricted to weekdays with no work at all between 18.00 and 08.00. Consideration must also be given to protecting children in the Nursery and Schools from noise pollution, as well as the children living close by.

ix) Pressure washers are very noisy - "Road Cleaning" on page 14.

x) "Fires on Site", also page 14, should acknowledge that passive smoking causes actual harm and there will be

xi) There is no mention under either 12, "Traffic Management", or 13, "Unloading/loading of skips", of engines being turned off on stationary vehicles. This is a minimum requirement, as all vehicles should have "stop-start" systems fitted. The pollution, from on-site operations, especially as the site adjoins the highly polluted Beech Street, will be bad enough without the added pollution from idling engines.

xii) The lack of consideration for the safety of children at the Nursery under 14, "Refuelling Operations", and 15, "Burning/hot cutting, welding or grinding operations", is alarming. Also what is the difference in Nox and particulate emissions, between the latest spec low sulphur diesel fuel and red diesel? Is there any added pollution danger from the colour additive?

xiii) Under 18 "Emergency Procedures", what arrangements are proposed for the notification and evacuation of adjoining properties?

xiv) There appears to be no concern for residents, office workers, school and nursery children and their carers under 20, "Noise Assessment for Demolition Works". The high levels of noise generation adjoining the Nursery and Schools is completely unacceptable, especially as noisy working is intended during school break times. Added to that, local residents, including children should not be expected to endure any, let alone noisy, Saturday working.

xv) Under 20 "plant is not to be left running unnecessarily". This must be amended to "idle plant is not to be left running".

xvi) Nowhere in the Method Statement is there an acknowledgement that site deliveries are not permitted before 07.00 weekdays and 08.00 Saturdays and after 18.00 weekdays and 13.00 Saturdays. Noise disturbance generated outside these times, particularly from running engines, slamming doors and even talking will be reported to Environmental Health.

Best regards,

Fred Rodgers

100 Breton House
Barbican
London
EC2Y 8PQ
United Kingdom





Comments for Planning Application 16/00590/FULL

Application Summary

Application Number: 16/00590/FULL

Address: Bernard Morgan House 43 Golden Lane London EC1Y 0RS

Proposal: Demolition of existing building, retention of existing basement and construction of new residential building to provide 99 dwellings, together with ancillary car parking, hard and soft landscaping and all associated works. (RECONSULTATION DUE TO - ALTERATION TO THE GOLDEN LANE/BRACKLEY STREET CORNER AT GROUND FLOOR LEVEL TO REMOVE THE OVERHANG AND BRING THE GROUND FLOOR IN LINE WITH THE UPPER FLOORS)

Case Officer: Catherine Linford

Customer Details

Name: Ms Rita Makanjee

Address: 31 Hatfield House Golden Lane Estate London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to the demolition of Bernard Morgan House on grounds that it presupposes planning approval for proposals currently under consideration for the site. There are contentious heritage issues associated with the demolition and proposed redevelopment of the site, and it would appear irresponsible of the planning authority to approve demolition of the existing building prior to these being addressed.

The numerous errors, omissions and inaccuracies in the application documents suggest lack of care and thoroughness by the developer.

From: Linford, Catherine
To: DBE - PLN Support
Subject: FW: 16/00590/FULL - Bernard Morgan House
Date: 21 March 2017 15:28:00
Attachments: [1600590FULL Comments on Ecological Sustainability Air Quality and Trees .pdf](#)
[ATT00001.htm](#)

From: Fred Rodgers; [REDACTED]
Sent: 21 March 2017 15:18
To: Linford, Catherine
Cc: Bruce Badger; Smith, Jane; SMCX34; Emma Matthews; Helen Hulson; Ba Planningchair; Claudia Marciante; Hazel Brothers; John Whitehead; Sonal Gadhvi; Judy George; Marie Morley; Mai Le Verschoye; Stephen Tromans QC; Christine & Bill Clifford; Joe Ruffles; Mark Campbell; Saskia Lewis; Deborah Phillips; Pat Smith; Daniel McClean; David Gregory; Ruth Gee; Clementine Cecil; Gill Kimber; Tim Godsmark; Elizabeth Patterson; Richard Douglas; Fred Scott; Julia Chalkley; Andy Harrison; Clare Carolin; Mark Lemanski; Cennydd John; Iago Griffith; Heather Page
Subject: 16/00590/FULL - Bernard Morgan House

Dear Ms Linford,

Attached are comments on the following documents submitted as part of the above application>

- Preliminary Ecological Appraisal and Living Roof Design Specification
- Air Quality Assessment
- Sustainability Statement
- BS5837 Tree Survey and Arboriculture Impact Assessment

These comments, which are by Sarah Hudson, Chair of Barbican Association's Sustainability Committee, raise a number of serious concerns. If these concerns have not already been addressed in subsequent discussions and/or documentation, could you please ensure that the Applicant addresses them without further delay.

Best regards

Fred Rodgers

Chair, Bernard Morgan Liaison Group
100 Breton House
Barbican
London
EC2Y 8PQ
United Kingdom



Re: 16/00590/FULL: Demolition of existing building, retention of existing basement and construction of a new residential building together with ancillary car parking, hard and soft landscaping and all associated works (the Application).

Applicant: Taylor Wimpey (UK) Limited

Property: Bernard Morgan House, 43 Golden Lane, EC1Y 0RS



Comments on Greengage Environmental Ltd's Preliminary Ecological Appraisal and Living Roof Design Specification (EA)

Executive Summary

1.6 The EA found evidence of nesting birds and they have been observed on site. It states that *any clearance or pruning of shrubs, trees or dense vegetation should be undertaken outside of the breeding season or following confirmation of absence by a suitably qualified ecologist*. The Applicant should be required to make sure this happens.

1.7 The Bernard Morgan House Wildlife garden was **actively** managed until the Property was vacated in spring 2015. From that point most plants that could be rescued were removed up to August 2016, leaving shrubs and trees that had been in place since before 2010 and were too well established to move. The birdbath and feeders were also removed.

1.9 The EA recommends the installation of a living roof of high ecological value - not just a sedum lip service to greening of low ecological value. The habitats most vital in this location are those of the black redstart and the house sparrow - both on the Red Book of Conservation Concern. The proposed species mix and provision of invertebrate habitats looks good (sand piles, rope, rocks) but the Applicant must be required to ensure that this is implemented. Provision of water for birds is important and should be included. The Applicant should monitor the roof with on-going ecological surveys - and interventions to enhance the biodiversity, if necessary.

Most importantly, the roof is unlikely to replace the importance of the BMH Wildlife Garden for pollinators and as a link in the green corridor from Fortune Street Park through to Barbican Wildlife Garden, Fann Street.

Introduction

2.3 The EA was carried out in January 2016, not an ideal time to carry out such a survey, which is acknowledged not only in 2.3 but also its title. More than a whole year has elapsed since then and it is surprising that a survey was not carried out in the spring/summer of 2016, when a more representative sample would have been obtained. Just one example is pollinators and the lack of a further survey is considered unacceptable.

Site Description

3.3 Does not mention Barbican Wildlife Garden, Fann Street. This is a wildlife space of over 2500 square metres less than 75 metres from the Property.

Baseline Conditions

5.3 City of London Corporation's Biodiversity Action Plan (BAP) was updated and the new plan for 2016 to 2020 was adopted in spring 2016. The EA is from January 2016 and references the superseded BAP. Since then the London Wildlife Trust have updated the SINC surveys, so the data in 5.3, which dates from 2010 or earlier, should be updated with current data. For example all the quoted bird and plant information is very incomplete and out of date for the SINCs and Postman's Park, which lies within 2km distance of the Property, has been added as an additional SINC.

5.22 Over 100 flora species have been recorded in the wildlife portion of the BMH garden.

5.38 To protect nesting birds, the EA requires that clearance of trees takes place only outside the nesting season March - October. The Applicant must be required to abide by this.

Discussion

8.5 Bird boxes should include sparrow boxes since Fortune Street Park hosts a small colony that is very important since there are only two on the fringes of the City - the other is at the Tower of London.

Further comments

The EA does not specify what wildlife enhancing features there should be in the ground level landscape area. As a minimum there must be dense ground cover, medium level shrubs as well as mature trees to enable birds to travel throughout the canopy.

The EA is silent about mitigation of the loss of habitat during the demolition and construction phases. As a minimum, the Applicant should provide a biodiverse green wall on the hoarding surrounding the site to compensate for the loss of forage in the wildlife garden for pollinators and as visual amenity for the surrounding residents.

A request to the Applicant to green the Property, in conjunction with City in Bloom's Greening Grey Britain Challenge 2017, which adjoining non-residential owners have taken up, has so far failed to achieve a positive response. However, that failure appears to be indicative of the Applicant's attitude to the Property, its immediate vicinity and those who live and work there.

The landscaping should be a priority to the development and not left as an add-on at the end. The Applicant should ensure that improved habitats are created from the

start to enable trees and shrubs to establish and to mitigate the loss of habitat from the demolition process.

A final Preliminary Ecological Appraisal and Living Roof Design Specification is awaited.



Comments on Hawkins Environmental Limited's Air Quality Assessment (AQA)

Planning Policy

2.18 Following on from the issue of greening, the Applicant must be required to improve air quality rather than meet air quality neutral benchmarks. The Applicant must be required to use greening during the development phase to mitigate NOx and PM emissions - greening must be part of this as set out in 2.18:

2.18. Where developments do not meet the 'air quality neutral' benchmark after appropriate onsite mitigation measures have been incorporated, developers *"will be required to off-set any excess in emissions. The developer should investigate options for providing NOx and PM abatement measures offsite in the vicinity of the development. This will involve working with the relevant planning authority or nearby property owners to identify suitable mitigation measures. Measures could include:*

- green planting/walls and screens, with special consideration given to planting that absorbs or suppresses pollutants.*

Low Emission Neighbourhood (LEN)

As the Property is in the LEN, the Applicant must be required to use electric plant on site during the construction phase and be rigorous in its intentions and practice to minimise dust, exhaust pollution and other emissions.

Construction Dust Impact Assessment

We require sight of the Dust Assessment Report (Step 5) prior to any planning permission being granted.

We would also like to see the Applicant's plans to mitigate idling engines on construction vehicles by having a marshalled Switch off policy; use electric vehicles wherever possible, publish monthly air quality data relating to the site The Applicant must measure and publish NO2 and particulates before, during and after the development.

Baseline Conditions

The Applicant seems to be unaware of the yearlong Kings College London Mapping for Change project that monitored NO2 and particulate levels extensively in the surrounding area.

Table 6.1 Baseline Air Quality Concentrations 2014 – Development Site

These levels seem to have been calculated to ensure they are below the 40 µg/m³ EU standard for annual NO2 levels.

The Applicant should have looked at the data from the Kings College London Mapping for Change project 2013 - 14 <https://communitymaps.org.uk/project/air-quality-monitoring/contribution/4462?center=51.5208;-0.0945:19&tab=1>

The closest data point to the Property is 6th floor north facing fire escape on Ben Jonson House overlooking Golden Lane, less than 70 metres from the development. Annual average exposure at this point recorded levels of annual NO2 of 40 - 60 µg/m³. Based on this data, it is likely that east facing balconies on the proposed building will experience NO2 levels above the EU safe limit for health and provide another justification for their exclusion from the proposed building.

6.11 The statement that the base line shows levels below the 40 µg/m³ requires evidencing, as it is not based on the best available information. It looks suspiciously like a massaged figure to make sure it is below the EU standards.

Air Quality Neutrality

9.5 The estimate of vehicle movement of 26 per day is questionable. The AQA does not seem to have given sufficient importance to the number of trips to the site such as food and shopping deliveries. The estimate of an average of 26 vehicle movements a day for [104] dwellings seems to be a considerable underestimate given the nature of modern urban living where residents do not drive to shops.

Couriers, grocery and other shopping deliveries, especially from online purchases, visits by maintenance personnel and personal cab use are more and more frequent. And, of course, there are the separate collections of recycling, food waste and general waste, as well as postal deliveries.

10.11 and 10.12 A colony of Red Book Birds of Conservation Concern - House Sparrows - is within 50 m of the Site and it should be upgraded to be of High Ecological concern.

Mitigation

Given the inaccuracies and omission in the methodology of calculating exposure and risk more work needs to be done. The AQA is superficial and inadequate, particularly given that the site is located in the LEN and is next to a site of High Ecological importance.

11.1 The statement that:

As a consequence of the proposed development, there will not be a significant increase in pollutant concentrations and therefore mitigation is not seen to be necessary, other than those routinely used to control construction dust, as detailed in the previous section. Similarly, concentrations of all pollutants are below the National Air Quality Objectives at the development site and therefore it is not necessary to

implement mitigation to reduce the exposure from NO2 or any other pollutant to future occupiers of the proposed development.

must be revisited and a more rigorous analysis carried out using all available data.



Comments on Dalen Group 2016's Sustainability Statement (SS)

The SS just seems to be a general statement of national and local government policy with very little specific information about the development. A site-specific sustainability statement is required.

Noise and Light Pollution (Policy CoL 15.7)

9.5 Use of lighting that is turned on by presence detectors is unacceptable. Lights coming on and then going off are much more disturbing to surrounding residents than low level lighting on all the time. Consideration should be given to using solar powered lighting at very low levels in courtyards etc. and to not having any additional lighting in garden areas. There are bats in the local area and night migrating birds, such as woodcock that are adversely affected by lighting.

Waste Policy (CS 18)

10.1 Food waste recycling is not specifically mentioned and it should be a requirement.

Further comments

The SS does not mention the provision of EV charging for the two disability spaces. The Property is in the LEN EV charging must be a requirement.



Comments on Greengage Environment Ltd's BS5837 Tree Survey and Arboriculture Impact Assessment (TS)

The PDF Appendix to the TS was badly reproduced and difficult to read. The removal of the Hawthorn in the SW corner of the site should be strongly resisted. The TS states it is in good condition and well grown. Hawthorn trees of this size in the City are very rare and it should be retained. It is a native tree with a high ecological value and the Applicant must make efforts to retain it and ensure it is not damaged during the construction process.

21 March 2017

Sarah Hudson
Chair, Barbican Association, Sustainability Committee

Committee(s):	Date(s):	Item no.
Planning and Transportation Committee	2 May 2017	
Subject: Enforcement Plan Draft Supplementary Planning Document	Public	
Report of: The Chief Planning Officer	For Decision	
<div><p style="text-align: center;"><u>Summary</u></p><p>A draft Enforcement Plan Supplementary Planning Document (SPD) was issued for public consultation during October/December 2016. In response to comments received two amendments are proposed, as set out in Appendix B to this report.</p><p>Recommendations</p><ul style="list-style-type: none">• That the amendments to the Enforcement Plan Supplementary Planning Document listed in Appendix B be agreed.• That Members resolve to adopt the amended Enforcement Plan SPD.</div>		

Main Report

Background

1. The National Planning Policy Framework (NPPF) 2012 supports the preparation of an Enforcement Plan. It advocates that local planning authorities should consider publishing a local enforcement plan to manage enforcement in a way that is appropriate to their area. This should explain how the local authority will monitor the implementation of planning permissions, investigate alleged cases of unauthorised development and take action where appropriate to do so. The NPPF acknowledges that effective enforcement is important as a means of maintaining public confidence in the planning system.
2. The National Planning Practice Guidance for Tree Preservation Orders and trees in conservation areas advocates that local

planning authorities should consider publishing tree protection enhancement policies and have clear written procedures to deal with cases.

3. In accordance with these recommendations an Enforcement Plan, has been prepared to ensure public confidence in the system (Appendix A). The Enforcement Plan sets out the City's approach to planning enforcement. It explains the principles and procedures to be followed to ensure that development is properly regulated; standards and targets to be worked to and includes tree protection enhancement policies.
4. The Local Development Scheme (LDS) sets out the planning policy documents to be prepared and the timetable for preparing them. The LDS which came into effect on December 2015 includes a programme to complete an Enforcement Plan.
5. The City of London Local Plan, adopted in January 2015, establishes a presumption in favour of sustainable development in line with the NPPF. It contains policies which include the protection of local residents amenities, the townscape, the protection of trees and designated heritage assets including their settings. The Enforcement Plan is consistent with the approach outlined in the Local Plan.

Current Position

6. On 26 July 2016 your Committee agreed the draft text for the Enforcement Plan for formal public consultation. The draft SPD was made available for formal public consultation for a six week period from 31 October 2016 until 12 December 2016.
7. Prior to the consultation, in response to comments made by your Committee, additional text was added to the draft SPD dealing with short term let properties and faculty requirements.

Results of the SPD consultation

8. In total, 3 responses were received to the consultation. Natural England confirmed that they did not wish to comment and Transport for London confirmed that they had no comments. The Director of Open Spaces who was notified in advance of the formal consultation made comments but was broadly in support of the draft SPD.
9. Before adopting a SPD the local planning authority must prepare a consultation statement. A consultation statement has been

prepared that sets out the persons consulted, summarises the main issues raised at both the informal and formal public consultation stage and explains how these were addressed in finalising the SPD for adoption. The Statement is attached as Appendix B.

10. It is recommended that two amendments to the SPD are made in response to the Director of Open Spaces comments and these are set out in Appendix B to this report. Appendix B incorporates the Schedule of Proposed Changes included in the SPD document attached at Appendix A.

Corporate & Strategic Implications

11. The Planning and Compulsory Purchase Act 2004 and the 2012 Local Planning Regulations set out matters to be taken into account in preparing SPDs. In preparing the draft SPD regard has been had to these matters, including the London Plan, City of London Local Plan and the NPPF.
12. The Enforcement Plan supports the Strategic ambitions of the Departmental Business Plan by advocating a planning enforcement service that is both effective and appropriate to the City.
13. An Equality Analysis Test of Relevance has been carried out for the draft SPD and no equality issues were identified. (Appendix C).
14. A Sustainability Appraisal Screening Assessment has been carried out for the draft SPD which has concluded a full Sustainability Appraisal/Strategic Environmental Assessment is not required. This has been confirmed by statutory consultees. (Appendix D).

Implications

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

Conclusion

16. Subject to the amendments in Appendix B it is recommended that the SPD be adopted by resolution. Under its terms of reference your Committee is authorised to adopt SPDs without reference to Common Council. After adoption the SPD and the supporting documents will be publicised in accordance with statutory requirements.

Appendices

- Appendix A - Enforcement Plan Draft Supplementary Planning Document
- Appendix B - Statement of Consultation and Proposed Changes
- Appendix C - Equality Analysis Test of Relevance
- Appendix D - Sustainability Appraisal Screening Statement

Contact:

Susan Bacon

02073321708

Susan. Bacon@cityoflondon.gov.uk

Enforcement Plan Draft Supplementary Planning Document

Contents

1. Introduction	4
2. Legislative background and principles.....	5
Is planning permission or consent required?	5
What is a breach of Planning Control?	6
Is it an offence to carry out unauthorised works?	7
Principles of good planning enforcement	7
Expediency and harm.....	8
Available enforcement and legal action	9
How is this exercised?.....	10
Recording Notices	10
3. Managing enforcement, the complaint procedure and priorities	11
Managing enforcement	11
Enforcement priorities.....	11
Who can complain, how a complaint is made and confidentiality	12
The investigation.....	12
Negotiation	13
Submitting a planning application	13
Enforcement action	13
Serious breaches of Planning Control: Stop Notices, Temporary Stop	14
Notices and injunctions.....	14
Appeal process.....	15
Prosecution action	15
Direct action.....	16
Proceeds of Crime Act 2002.....	16
4. Other enforcement processes	16
Tree protection	16
Advertisements.....	19
Designated Heritage Assets: listed and unlisted buildings in conservation areas	21
Section 215 Notices	23
5. Reactive and proactive enforcement, monitoring and working relationships....	24
Reactive/proactive enforcement.....	24
Monitoring enforcement	24
Working relationships.....	25
Feedback on the enforcement process	26
Dissatisfied with the Planning Enforcement Service?	26

How to contact us.....	26
Bibliography.....	27
Acts.....	27
Orders	27
Regulations	27
Policy, Guidance and Byelaws.....	27

1. Introduction

The City of London Corporation, (the City), is unique in its economic role as a business district with a world class environment. It is home to approximately 9,000 residents and 400,000 workers and host to over 10 million visitors each year. It is important that the quality of its built environment is maintained and that its character is protected. Planning enforcement has an important role to play.

The City is keen to promote sustainable development and where possible seeks to resolve breaches through negotiation rather than formal legislative action.

It is proposed that, subject to available resources, proactive enforcement projects will be identified as emerging trends arise. In identifying potential targets for action regard will be given to the views of Members, businesses, local residents and other stakeholders concerned with planning. This may be in the form of complaints, changes in planning policy and legislation, or specific issues that arise in the City. An annual report to be put before the Planning and Transportation Committee will identify future enforcement trends.

This Supplementary Planning Document (SPD) sets out the City's approach to planning enforcement. It comprises the Enforcement Plan for the City of London and explains the principles and procedures the City will follow to ensure that development is properly regulated. It contains standards and targets to be worked to and where possible the City will continue to seek a resolution without recourse to formal enforcement action. The SPD does not address enforcement in relation to CIL as this is addressed through separate CIL Regulations.

This SPD includes the approach to enforcement in relation to the protection of the City's trees, having regard to the City of London Tree Strategy SPD, to ensure the protection of a good quality sustainable environment. There are currently approximately 2,300 trees in the City.

The display of advertisements and works to listed buildings are subject to separate consent processes within the planning system and sections have been included in this SPD to deal with their enforcement. Included within the listed building section are procedures to deal with unauthorised works of demolition to unlisted buildings in conservation areas. A section on requiring land or buildings to be tidied or cleaned up has been included as this is also a separate process.

Users of the service are encouraged to provide feedback on the enforcement process in order to ensure that the City's planning enforcement service is effective. See section 5.

This document is not a statement of law and individuals should seek their own legal advice. Any action will be carried out in accordance with the current legislation as amended.

2. Legislative background and principles

Is planning permission or consent required?

- 2.1. To be effective planning enforcement must meet legislative requirements and this is often tested at appeal through the scrutiny of evidence. In this context the meaning of development is defined in the legislation as 'the carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land'.
- 2.2. Works that may require planning permission include:
 - Physical works comprising:
 - Building operations
 - Engineering operations
 - Mining operations
 - Subdivision of a building (including any part of it) used as a dwellinghouse for use as two or more separate dwellinghouses
 - A material change of use
- 2.3. Many changes of use and certain types of building works are defined as 'permitted development' and do not require planning permission. In addition certain operations or uses do not, (as a matter of law), constitute development and these are set out in legislation.
- 2.4. Other permissions and consents may be required, for example:
 - Listed building consent for works to a listed building which affect the special architectural or historic interest
 - Express Consent for the display of advertisements
 - Consent to carry out works to trees the subject of a Tree Preservation Order or trees within a conservation area
 - Scheduled Monument Consent (Administered by Historic England)
- 2.5. This list is not exhaustive. It is for the local planning authority to determine whether planning permission or consent is required. Planning officers will be able to advise on what does and does not require planning permission. If in doubt advice should be sought.
- 2.6. The planning system is separate from other systems of public control relating to land. In order to proceed some developments or uses may need other consents or licences administered for example by Building Control, Licensing and Environmental Health. The onus is on the developer or operator to comply with all relevant legislation – see City of London Corporation's web site for guidance www.cityoflondon.gov.uk. In the case of church land or buildings a faculty may be required and this would be administered by the church authorities.

What is a breach of Planning Control?

2.7. A breach of planning control is defined as:

- the carrying out of development without the required planning permission, or
- failing to comply with any condition or limitation subject to which planning permission has been granted

2.8. It could also include but not exclusively:

- any contravention of the limitations on, or conditions associated with, permitted development rights
- unauthorised works to a listed building which affect the building's special architectural or historic interest, or failure to comply with conditions attached to a listed building consent
- advertisements displayed without the benefit of express consent or non-compliance with the standard advertisement conditions.
- unauthorised works to trees the subject of Tree Preservation Orders, trees within a conservation area and works to trees in breach of a planning condition
- untidy land or buildings
- failure to comply with a planning notice or legal agreement attached to a planning permission

2.9. Planning enforcement action cannot be taken if the works or changes of use do not require planning permission or consent; are permitted by planning legislation, unless there is a breach of any terms or conditions; or the development is immune from enforcement action. Development becomes immune from enforcement action if no action is taken within:

- 4 years of a substantial breach of planning control consisting of operational development
- 4 years of an unauthorised change to a single dwellinghouse
- 10 years for any other breach of planning control; essentially other changes of use or a breach of condition except a condition relating to the use as a single dwellinghouse where the period of immunity is 4 years.

2.10. After these time limits the use or works become lawful. A landowner may apply for a Certificate of Lawful Existing Use or Development (CLEUD) to regularise the situation, the onus of proof resting with the landowner. If an Enforcement Notice or Breach of Condition Notice is served the clock is stopped in relation to these time limits.

2.11. Government advice clearly states that it is not appropriate to take enforcement action where the breach can be addressed through non-related legislation for example the Environmental Health Acts. See City of London web page.

Is it an offence to carry out unauthorised works?

2.12. In most cases it is not a criminal offence to carry out works without planning permission. It is, however, a criminal offence to carry out the following works:

- unauthorised works to a listed building where the works materially affect the historic or architectural significance of the building, or fail to comply with a condition attached to a listed building consent
- relevant demolition of an unlisted building in a conservation area without planning permission, or fail to comply with a condition attached to the planning permission
- unauthorised works to a tree with a Tree Preservation Order or located within a conservation area
- to display advertisements without the appropriate consent or in breach of the standard advertisement conditions

2.13. In general a criminal offence arises when a notice has been served and not complied with or for example a person makes a false statement in relation to a Notice or Certificate of Lawful Existing Use or Development (CLEUD).

Principles of good planning enforcement

2.14. The SPD aims to incorporate and implement the principles and policies set out in the following documents:

National Planning Policy Framework and Planning Practice Guidance

2.15. The National Planning Policy Framework issued by the Government in 2012 states that enforcement action is discretionary and local planning authorities should act proportionately in responding to suspected breaches of planning control. It advocates that local planning authorities should consider publishing a local enforcement plan to manage enforcement in a way that is appropriate to their area. This should set out how the local authority will monitor the implementation of planning permissions, investigate alleged cases of unauthorised development and take action where it is appropriate to do so.

2.16. The NPPF acknowledges that effective enforcement is important as a means of maintaining public confidence in the planning system. National Planning Practice Guidance 'Ensuring effective enforcement', published 6 March 2014 and updated regularly, provides advice which the City will have regard to in its decision making process.

2.17. The City's enforcement plan and enforcement policy are adopted as an SPD to be read in conjunction with the City's local Plan.

The Local Plan

- 2.18. The Local Plan, adopted 15 January 2015, sets out the planning priorities for the City reflecting the NPPF and London Plan. This establishes a presumption in favour of sustainable development and requires that when considering development proposals the City Corporation will take a positive approach and will work proactively with applicants to jointly find solutions. It sets out a number of policies which include policies to protect the amenities of local residents and townscape, the protection of trees and designated heritage assets, including listed buildings, unlisted buildings in conservation areas, scheduled ancient monuments, world heritage sites, registered parks and gardens and their settings.

The European Convention on Human Rights

- 2.19. Article 1 of the First Protocol, Article 8 and Article 14 are relevant to enforcement action. These Articles set out a need to look at the potential impact on the health, housing needs and welfare of those affected by the proposed action as well as those affected by a breach of planning control.

Equality Act 2010

- 2.20. Section 149 of the Equality Act 2010 requires the City to have regard to equality in the exercise of its functions.

The Regulators' Code

- 2.21. This sets out Government's expectations in respect of the provision by local authorities of clear and accessible complaints and appeal processes, for use by businesses and others that they regulate. Local authorities have a statutory duty to have regard to the Code in developing the principles and policies which guide their regulatory activities. This code is underpinned by the statutory principles of good regulation, which require regulatory activities to be carried out in a way which is transparent, accountable, proportionate and consistent and should only be targeted at cases where action is needed.

Expediency and harm

- 2.22. The City has responsibility for taking enforcement action necessary in the public interest. The power to issue an Enforcement Notice is discretionary and will only be issued where the City is satisfied that there has been a breach of planning control and it is expedient to do so. Expediency requires having regard to the provisions of the development plan and to any other material considerations including case law and human rights.

2.23. The City is not required to take enforcement action because there has been a breach of planning control and action will only be taken where there is harm. Planning harm is not defined in the regulations. Some of the factors that may contribute to an assessment of planning harm include:

- **Planning background** - History and related decisions, undesirable precedent, cumulative impact, age of breach
- **Policy** - Impact on planning policy
- **Amenity** - Noise, smell, daylight/sunlight, privacy/over bearing development, health and safety, fear of crime, culture/language, loss of access for disabled persons, wind mitigation
- **Visual impact** - poor design, inappropriate location, untidy sites, loss of protected trees
- **Change in character** – Sensitive sites including loss or damage to listed buildings, demolition of unlisted buildings in conservation areas, damage to a scheduled ancient monument, world heritage site and Registered Park and Garden and adverse effects on the setting of these heritage assets
- **Economic impact** – Effect on businesses
- **Impact on ecology** – Loss of bio-diversity
- **Road safety** – Access, traffic and pedestrian safety

2.24. The key tests are whether the breach of planning control would unacceptably affect public amenity and whether planning permission or other consents would have been granted having regard to the Development Plan.

2.25. The following are not material considerations: the applicant, land ownership, private rights, (e.g. access), restrictive covenants, property values, loss of private view, competition, 'better' use of site, change from a previous scheme.

2.26. It should be noted that the process, including the gathering of evidence and the potential for appeal, may mean that enforcement action may take some time to complete.

Available enforcement and legal action

2.27. There are a number of measures available to the City when considering enforcement and legal action. These measures will be carried out in accordance with the current legislation as amended and include, (but are not exclusive to), the following:

Table 1: Enforcement and Legal Action

Type of enforcement	Effect of action
Right of Entry	Authority to enter land to ascertain whether there has been a breach of planning control
Section 330 Notice	To require information as to interests in the land
Planning Contravention Notice	To request information and to set up a meeting with the 'offender'

Enforcement Notice	To remedy a breach of planning control
Breach of Condition Notice	To secure compliance with the terms of a planning condition
Planning Enforcement Order	To remedy a breach of planning control relating to the concealment of a building
Repairs Notice	To secure works considered to be reasonably necessary for the long term preservation of a listed building
Urgent Works Notice	To secure immediate works to stop deterioration of a listed building, or an unlisted building in a conservation area with the Secretary of State's permission
Listed Building Enforcement Notice	To remedy a breach of planning control relating to listed buildings
Section 215 Notice	To require steps to be taken to clean up land or buildings where their condition adversely affects the amenity of the area
Tree Replacement Notice	To secure a replacement tree removed in contravention of the Tree Regulations
Section 225 Notice	To require the removal or obliteration of posters or placards
Section 225A - Removal Notice	To require the removal of structures used for unauthorised display of advertisements
Section 225C - Action Notices	To remedy persistent problems with unauthorised advertisements
Section 225F - Defacement Removal Notice	To remedy the defacement of premises by advertisements
Discontinuance Action	To require the discontinuance of advertisements
Stop Notice	To prohibit any or all of the activities which comprise the breach as specified in the related enforcement notice
Temporary Stop Notice	To require an activity which is in breach of planning to stop immediately
Injunctions	To stop breaches that have occurred or are likely to occur causing serious harm with immediate effect
Prosecution	Steps taken when a criminal offence is committed
Direct Action	Authority to enter onto land to take steps required by a Notice and to recover costs
Proceeds of Crime Act	To seek to recover any monies or assets gained during the time a Notice was breached

How is this exercised?

2.28. The Chief Planning Officer and Development Director and other authorised senior officers have delegated authority to exercise a number of these enforcement powers and legal actions. Matters not within the scope of delegation are decided by the Planning and Transportation Committee.

Recording Notices

2.29. Details of enforcement notices, stop notices and breach of condition notices are recorded on an Enforcement Register

available for viewing at the Guildhall north wing reception. See section 5.5. It is proposed to convert this to an online format. There is a requirement to notify Land Charges of the service of some of these notices for inclusion on the Land Charges Register. Those registered would be revealed on a property search.

3. Managing enforcement, the complaint procedure and priorities

Managing enforcement

- 3.1. Enforcement will be managed in a way appropriate to the City having regard to the objectives of the Development Plan. Complaints will be investigated in accordance with the principles of good planning enforcement as set out in section 2.14-2.21 and to minimise costs of compliance.
- 3.2. To make the most effective use of resources enforcement may be carried out by planning officers in relation to applications or projects they are currently managing. Complaints will be prioritised, priority being given to breaches where harm is being caused and it would be expedient to take enforcement action or be in the public interest to prosecute. This may not always relate to who is complaining and how vocal they are.

Enforcement priorities

- 3.3. Enforcement priorities are set out in the following targets:

Table 2: Targets

Targets
Investigate all reported alleged breaches of planning control and acknowledge receipt
Within 1 working day start investigation of serious breaches including irreversible or serious damage to the environment and or a building, works/uses causing substantial harm, works to protected trees and traffic hazards.
Within 10 working days start investigation on 90% of all complaints.
Following initial investigation carry out a site visit or monitor if appropriate, (City to determine if this is necessary at this stage), make an assessment and negotiate or commence action
At key stages during the investigation update complainant and offender in accordance with the procedures set out below
Aim to resolve complaints and monitor outcome in accordance with the procedures set out below
Notify complainants of outcome in accordance with the procedures

Targets
set out below

Who can complain, how a complaint is made and confidentiality

- 3.4. Breaches of planning control may be identified and reported in a number of ways, including by members of the public. A complaint can be reported via the City of London web page on the enforcement form, by email, telephone or in writing (See section 5.9). These will be acknowledged upon receipt and details of the case officer and how the alleged breach will be assessed and managed will be provided.
- 3.5. Every effort will be made to keep the details of any individual reporting an alleged breach confidential where requested. As far as possible, anonymous reports will be investigated and dealt with in the same way as any other. In some cases there may be a need to identify a complainant, for example where a witness statement is required to demonstrate harm from a noise disturbance or where a case is taken to prosecution. This would be discussed with the complainant before any further action is taken.

The investigation

- 3.6. An initial investigation of the alleged breach of planning control will be carried out and will include a review of the planning history and any other relevant records. Checks may be made with other departments to see if they have any relevant information that may impact on the consideration of the case.
- 3.7. This will be followed by a site inspection to view the alleged breach if required. Sometimes it may be necessary to visit the complainant's premises and they may be asked to monitor the site to gather evidence. Advice will be given as to precisely what is required.
- 3.8. Officers have powers to enter land or buildings to carry out their enforcement duties. It is an offence to obstruct officers when carrying out this duty and if this results in potential prosecution a formal interview under caution may be required. If entry is refused officers can apply for a warrant from the Magistrates' Court which would permit them to use force if required to enter the property. The police would be informed and might be in attendance.
- 3.9. Depending on the complexity of the case legal advice may be sought which may result in further investigations and monitoring. Once all the background information and evidence has been gathered a decision will be made as to whether a breach of planning control has occurred, having regard to the criteria set out in section 2 and what action will be taken.

Negotiation

- 3.10. Negotiation has proved to be an effective means of resolving the majority of enforcement matters in the City. However, where it is not possible to negotiate a solution and harm is proven enforcement action will be taken.
- 3.11. In some cases it may not be justifiable or expedient to take formal action. If no action is to be taken interested parties will be notified of the reason why.

Submitting a planning application

- 3.12. Where a planning application could be made to regularise a breach of planning control, those in breach will be provided with an opportunity to discuss this with a planning officer and will be invited to attend a meeting if required at this stage. Advice will be given as to whether the application is likely to be recommended for approval, including whether any revisions need to be made to the works and any fees to be incurred. A Section 330 Notice or Planning Contravention Notice may be issued at this stage to seek further information or to set up the meeting. Failure to respond to any Notice is a criminal offence.
- 3.13. If an application is submitted interested parties, including the complainant, will be consulted and given the opportunity to comment on the application. A report setting out the planning history, (where relevant), planning policies, considerations and recommendation will be considered by the Planning and Transportation Committee or a nominated senior officer under delegated powers.
- 3.14. If permission or consent is granted conditions may be imposed that require alterations to works already undertaken or to the way the property is used in order to make the unauthorised development acceptable. If the application is considered unacceptable it will be recommended that planning permission or other consent be refused and reasons will be given. At the same time authorisation will normally be sought to take enforcement action. The complainant will be advised of the decision.

Enforcement action

- 3.15. In taking enforcement action the local planning authority will act proportionally. Where negotiation fails and a breach results in significant harm the City will commence enforcement action. See Table 1 for options.
- 3.16. 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 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. If the breach is remedied and the case is closed the complainant will be notified either in writing or by telephone.

3.17. The Enforcement Notice will be served on those with an interest in the land and will set out:

- who has served the Notice
- the land to which the Notice relates
- the matters which appear to constitute the breach of planning control
- reasons for issuing the Notice
- what they are required to do to comply with the Notice
- time for compliance
- when the Notice takes effect
- their right of appeal
- what happens if they do not appeal

3.18. Other Notices vary slightly in format. See National Planning Practice Guidance – Ensuring effective enforcement – for model Notices. See Bibliography for link.

3.19. The time frame for compliance with the Notice will depend on the nature of the breach. Once an Enforcement Notice has been served the City has the power to decline a retrospective planning application if it does not accord with the provisions of the Development Plan or other material considerations including case law and human rights.

3.20. Complainants will be informed in writing of the requirements of the Notice and the timescale for compliance.

Serious breaches of Planning Control: Stop Notices, Temporary Stop Notices and injunctions

3.21. Where there is a serious breach of planning control a Stop Notice may be issued. It would be issued either when an Enforcement Notice is served, or afterwards, if the City considers it expedient that the activity should cease before the expiry of the period for compliance with the Enforcement Notice.

3.22. Where the City needs to act quickly to address certain breaches of planning control and it is expedient to do so, a Temporary Stop Notice may be issued to stop an unauthorised development or use for a period of up to 28 days. The effect of a Temporary Stop Notice is immediate and it does not have to wait for an Enforcement Notice to be issued. During this time the impact of the development or use will be assessed and consideration given to issuing a formal Enforcement Notice and Stop Notice.

- 3.23. An injunction may be sought to stop unauthorised works or uses. These powers would only be used where there is clear evidence that a breach of planning control has already occurred or is likely to occur and that the breach is or will cause serious harm and injunctive relief is a proportionate remedy in the circumstances of the case.

Appeal process

- 3.24. Anyone who has an interest in the land to which an Enforcement Notice relates or who is a relevant occupier, whether or not they have been served with a copy, has a right of appeal. A person having an interest in the building to which a Listed Building Enforcement Notice relates or a relevant occupier may also appeal to the Secretary of State. An appeal suspends the effect of a Notice. Not all Notices can be appealed. A Breach of Condition Notice is not subject to an appeal, nor is a Stop Notice or Temporary Stop Notice.
- 3.25. Appeals are dealt with by means of Written Representations, involving an exchange of statements, or at a Hearing, or Public Inquiry which is more formal depending on the nature of the case.
- 3.26. If an appeal is made to the Planning Inspectorate against an Enforcement or other Notice those with an interest in the land will be advised of the procedure, including the grounds of appeal and the timescale by the Planning Inspectorate. The City will notify the complainant and information will be provided about the appeal process and the statutory time frames. If an appeal is unreasonable the City may seek the award of costs.
- 3.27. Complainants should be aware that a right of appeal may substantially increase the time taken to resolve any breach and that it may result in a different decision from that of the City.

Prosecution action

- 3.28. Once an Enforcement Notice takes effect and no appeal has been made, there is a set period within which the requirements of the notice must be complied with. A criminal offence is committed if these requirements are not met. Some unauthorised works can also lead to a prosecution. See section 2.12.
- 3.29. In deciding whether to bring a prosecution the Code for Crown Prosecutors will be followed. The City will consider whether there is sufficient evidence to provide a realistic prospect of conviction and whether it is in the public interest to bring the prosecution.
- 3.30. The offender will be given notice of the offence and if the non-compliance continues, or other factors determine that the tests for prosecution have been met, prosecution action will be pursued.

Prior to service of the summons, those in breach will be informed in writing what is required, the time scales involved and options available. The complainant will be notified at the same time of the decision to take prosecution action and will be notified of the outcome of the court's decision.

Direct action

- 3.31. If the offender fails to comply with the Enforcement Notice Direct Action may be considered. This is where the City would undertake remedial action to ensure compliance with a Notice. Costs incurred would be recovered from the owner and would become a charge on the property via the Land Registry. Chargeable costs would include officer time, pre-application advice, notices served, costs of any compliance visits and cost of remedial action.

Proceeds of Crime Act 2002

- 3.32. Where it appears that there has been significant financial benefit in failing to comply with a Notice the City may use the Proceeds of Crime Act 2002 to seek to recover any monies or assets gained during the time the Notice has been breached. In most cases it will be necessary to obtain a criminal conviction before confiscation can be sought.

4. Other enforcement processes

Tree protection

- 4.1. The National Planning Practice Guidance for Tree Preservation Orders (TPO) and trees in conservation areas advocates that local planning authorities should consider publishing tree protection enforcement policies and have clear written procedures to deal with cases.
- 4.2. Trees are an important asset in the City and are protected by planning legislation if they are the subject of a Tree Preservation Order or lie within a conservation area. Trees may be protected by means of conditions attached to permissions, consents or legal agreements.
- 4.3. The City of London Tree Strategy Supplementary Planning Document (SPD) sets out what works require consent and the exemptions. Consent continues to be required if permitted development rights impacts on protected trees. Anyone proposing works to a tree is advised to refer to the SPD prior to undertaking any works and should consult a qualified arboriculturalist or tree surgeon.

- 4.4. There are additional controls on the felling of trees however a felling licence is currently not required to fell a tree within the City. Advice on this issue should be sought from the Forestry Commission before undertaking any works.
- 4.5. Common breaches of tree protection include:
- the unauthorised removal of a protected tree
 - unauthorised works to a protected tree
 - breach of a condition on a consent for works to a TPO'd tree or planning permission
- 4.6. Anyone who contravenes an Order by damaging or carrying out work on a protected tree without consent, or breaches a condition on a consent for works to a tree the subject of a Tree Preservation Order, or carries out works to a tree in a conservation area without notifying the City, subject to some exemptions, is guilty of an offence.
- 4.7. If it appears that an offence has been committed those committing the offence will be identified and cautioned. Anyone carrying out works likely to destroy a protected tree or any other unauthorised works are liable if convicted to a fine.

Investigation

- 4.8. Cases should be reported in the same way as other complaints, (with urgency if felling is involved) and will be investigated and dealt with in a similar manner to a planning enforcement complaint. See section 3.
- 4.9. The initial investigation will check whether the tree is protected, whether any consent or permission has been granted, who is the owner and who is carrying out the works. This will be followed by a site inspection. Officers have a right of entry and it is an offence to refuse entry. If entry is refused a warrant can be sought.

Options for action

- 4.10. The City will consider the following options when determining action in relation to unauthorised works to a protected tree:
- Consider whether action is justified by the particular circumstances. The City will normally require replacement trees to be planted whether or not a person is prosecuted.
 - Negotiate with the owner to remedy the breach to the City's satisfaction ensuring that remedial works to repair or reduce the impact of the unauthorised works are carried out
 - Consider issuing an informal warning to impress on the tree owner or others suspected of unauthorised works that such works may lead to prosecution

- Seek an injunction to stop on-going works and prevent anticipated breaches
 - Consider whether the test for commencing a prosecution are met i.e. whether there is a realistic prospect of prosecution and that it is in the public interest
- 4.11. Other related action that will be considered includes the issuing of Enforcement Notices, Breach of Condition Notices, Stop Notices and Temporary Stop Notices which will be carried out in accordance with the procedures as set out in section 3 including direct action and recovery of costs.
- 4.12. The City takes very seriously any unauthorised loss or damage to any tree and will take action to ensure their protection. In considering individual cases regard will be had to the impact that such works have had on the visual amenity of the tree and its resulting impact on the townscape, including conservation areas and bio-diversity of the area.
- 4.13. Landowners have a duty to replace a tree removed, uprooted or destroyed in contravention of the Tree Regulations. This duty applies also if a tree, (except a tree protected as part of a woodland), is removed, uprooted or destroyed because it is dead or presents an immediate risk of harm, the onus of proof rests with the person who carries out the works. In the case of a tree the subject of a Tree Preservation Order the replacement tree is automatically protected by the original Order except where it is lawfully removed and the replacement tree is planted under a condition of the consent.
- 4.14. The City's power to enforce tree replacement is discretionary. When serving a Tree Replacement Notice the City will consider:
- The impact on amenity of the removal of the trees and whether it would be in the interests of amenity to require their replacement. Amenity is not defined in law but guidance is given in the National Planning Practice Guidance on Trees
 - Whether it would be reasonable to serve a Tree Replacement Notice in the circumstances of the case
 - The possibility of a wider deterrent effect
- 4.15. If a Tree Replacement Notice is breached consideration will be given to entering the land and planting the tree(s) and any expenses reasonably incurred will be recovered. Chargeable costs could include officer time, notices served, cost of compliance visits and advice, costs of replacement trees and associated work.
- 4.16. Where a new TPO consent or Section 211 Notice is required for works to rectify damage to a tree, or in the case of a breach of condition on a permission or consent requiring, for example, details of the means of protection of trees, the installation of a root protection zone or the planting of a replacement tree, the same

principles will apply as set out in section 3. There is a right of appeal in respect of a refusal of TPO consent and any conditions on a TPO consent or planning permission. See sections 3.24 -3.27.

- 4.17. In all cases the City will consider and may pursue compensation and replacement costs to the full Capital Asset Valuation for Amenity Trees (CAVAT).
- 4.18. CAVAT is a system of expressing the value of individual trees according to their public amenity value which enables compensation and replacement costs to be awarded at a more realistic level. Information can be found on CAVAT at the following link: <https://www.ltoa.org.uk/resources/cavat>

Advertisements

- 4.19. The display of advertisements is subject to a separate consent process within the planning system and there are 3 categories of advertisement consent:

- Those permitted without requiring either deemed or express consent from the local planning authority subject to standard conditions
- Those which have deemed consent subject to standard conditions
- Those which require the express consent of the local planning authority

See Bibliography for link to the National Planning Policy Guidance Advertisements

- 4.20. The City has for many years sought to exercise careful control over the display of advertisements and seek improvements where appropriate. In order to protect and enhance the character of the City's streets, the City considers that advertising material should be restrained in quantity and form.

Investigation

- 4.21. Cases can be reported in the same way as other complaints and will be investigated and dealt with in the same manner as a planning enforcement complaint. See section 3.
- 4.22. The initial investigation will check which of the above three categories the advertisement falls within. This will be followed by a site inspection to determine the owner and identity of the person responsible for displaying and benefiting from the advertisement. If consent is required and the advertisement is considered to be in accordance with the Local Plan policies an application will be sought.

Options for action

- 4.23. The City is required to exercise control on advertisements having regard to visual amenity and public safety and has at its disposal a number of options for enforcement action see Table 1. The City's Street Enhancement Officers will ensure the removal of unauthorised advertisements on the public highway and some fly posting etc. mainly under the Highways Act 1980.
- 4.24. The advertisement regulations state that where an advertisement is displayed with the benefit of deemed consent and it results in substantial injury to the amenity of the locality or a danger to members of the public the City can take discontinuance action. There is an appeal process for those responsible for its installation. See section 3.24--3.27.
- 4.25. If an advertisement is displayed without the benefit of express consent or a person fails to comply with a discontinuance notice or the standard conditions, it is an offence. Those in breach will be asked to remove the advertisement or comply with the standard conditions if applicable. If they fail to do so, or other factors determine that it is in the public interest, consideration will be given to taking prosecution action. See sections 3.28-3.30.
- 4.26. There are a number of other actions which can be used to remedy a breach of the Advertisement Regulations where for example there is a need to:
- remove or obliterate a poster or placard,
 - remove structures used for unauthorised display of advertisements
 - resolve persistent problems with the display of unauthorised advertisements
 - remedy the defacement of premises by advertisements
- 4.27. Some of these actions are subject to the appeal process and the advertiser will be advised of any rights of appeal see sections 3.24-3.27. Consideration may also be given to serving an injunction and to recovering costs. Each complaint will be considered having regard to the most appropriate action. See Table 1 section 2.27 and sections 3.23 and 3.32.

City Sign Byelaws

- 4.28. The City operates The City Sign Byelaws. These control street projections for securing the safety and protection of the public and amenities of the street. Any person who erects any street projection so as to project into or over any street, except in accordance with byelaws is liable to a fine and the City may remove the street projection and recover its expenses in doing so.

Designated Heritage Assets: listed and unlisted buildings in conservation areas

- 4.29. The City currently has 607 listed buildings and 26 conservation areas which are designated heritage assets that contribute significantly to the townscape and contribute positively to visual amenity. The City takes very seriously any unauthorised works or damage to a listed building or an unlisted building in a conservation area and will take action to safeguard any building at risk. In assessing individual cases consideration will be given to the impact on the special architectural or historic fabric of the listed building and its setting or on the impact on the character and setting of any unlisted building in a conservation area, in line with local and national planning policies.
- 4.30. Carrying out work without the necessary listed building consent, demolishing an unlisted building in a conservation area without the required planning permission and failing to comply with a condition attached to that consent or planning permission, is a criminal offence – whether or not an Enforcement Notice has first been issued. Both large fines and custodial sentences can be applied on successful prosecution.

Investigation

- 4.31. Cases can be reported in the same way as other complaints and will be investigated and dealt with in a similar manner to a planning enforcement complaint, although urgency is key with irreplaceable fabric. See section 3.
- 4.32. The initial investigation will check relevant facts, whether any consent or planning permission has been granted, who is the owner and who is carrying out the works. A site inspection will be carried out. Officers have a right of entry and it is an offence to refuse entry.

Options for action

- 4.33. The City will consider the following when determining the course of action to take:
- Whether action is justified by the particular circumstances
 - Negotiating with the owner to remedy the breach to the City's satisfaction ensuring the remedial works to repair or reduce the impact of the unauthorised works are carried out
- 4.34. If remedial works are considered to be in accordance with the Local Plan policies.
- Seeking an application for consent or planning permission. [However, listed building consent and planning permission for relevant demolition cannot be granted retrospectively]

- 4.35. If the works are considered to be detrimental to the special architectural or historic character of the listed building and its setting or the character and setting of the unlisted building:
- taking enforcement action in accordance with the procedures as set out section 3.
 - issuing a Stop Notice, Temporary Stop Notice or seeking an injunction to stop on-going works or to recover listed items removed without consent from a listed building or to prevent anticipated breaches
 - issuing an informal warning to impress on the owner or others suspected of unauthorised works that such works may lead to prosecution
 - commencing prosecution if the relevant tests are met i.e. if there is a realistic prospect of prosecution and is it in the public interest
- 4.36. There are no time-limits for issuing listed building enforcement notices or enforcement notices in relation to a breach of planning control relating to demolition. The length of time that has elapsed since the apparent breach may be a relevant consideration when considering whether it is expedient to issue a Listed Building Enforcement Notice or planning Enforcement Notice.
- 4.37. Where a Listed Building or planning Enforcement Notice is not complied with direct action will be considered enabling the City to enter the land and carry out the works. Costs will be recoverable see section 3.32.
- 4.38. Where a listed building is under threat consideration will be given by the City to serving a Repairs Notice and this will set out the repairs needed for the proper preservation of the building. See section 3 for general principles. This procedure is designed to ensure that a listed building is properly preserved and not allowed to deteriorate. There is no right of appeal.
- When served with a Notice the owner has the option to:
- comply with the Notice
 - do the works which he or she considers necessary
- 4.39. If the building is not repaired within 2 months a Compulsory Purchase order can be served. This would enable the City or the Secretary of State to acquire the building.
- 4.40. Where there is a need to secure immediate works to arrest the deterioration of a listed building consideration will be given by the City to serving an Urgent Works Notice in parallel to the Repairs Notice. This will enable the City to execute any works which are urgently necessary for the building's preservation. There is no right of appeal and the City will seek to recover costs. See section 3 for general principles.

4.41. There is no provision to serve a Repairs Notice on an unlisted building in a conservation area. Where there is a need to secure immediate works to stop the demolition of an unlisted building in a conservation area, in order to maintain the character or appearance of an area, an Urgent Works Notice can be served with the Secretary of State's permission. If these circumstances arise the City will give consideration to obtaining the necessary permission to proceed with the service of an Urgent Works Notice. See section 3 for general principles.

Section 215 Notices

4.42. A Section 215 Notice provides the power, in certain circumstances, to require land and buildings to be cleaned up when their condition adversely affects the amenity of an area including neighbouring land and buildings.

4.43. The City takes very seriously the amenity of its area and will serve such a Notice if it is considered that the condition of the site or building is detrimental to the amenity of the area. Their use is discretionary and it is for the City to decide whether a Notice under these provisions would be appropriate taking into account all the local circumstances for example:

- the condition of the site
- the impact on the surrounding area
- the scope of their powers

4.44. In some circumstances a section 215 Notice may be used in conjunction with other powers for example Repair Notices in respect of listed buildings or Dangerous Structure Notices.

Investigation

4.45. Cases can be reported in the same way as other complaints and will be investigated and dealt with in the same manner as a planning enforcement complaint. See section 3.

4.46. The initial investigation will check who owns the land or building and who is responsible for the works or mess in the case of land. This will be followed by a site inspection. Officers have a right of entry and it is an offence to refuse entry. If entry is refused a warrant may be sought.

Options for action

4.47. If action is not taken to remedy the situation to the City's satisfaction a Section 215 Notice may be served on the owner requiring the situation to be remedied. It will set out the steps to be taken and the time within which they must be carried out. See section 3 for general principles. There is a right of appeal to the Magistrates' Court.

4.48. In the case with non-compliance of the Notice the City has a number of options, the power to undertake the clean-up works and to recover the costs from the landowner and or prosecution. See sections 3.31, 3.32 and 3.28-3.30.

5. Reactive and proactive enforcement, monitoring and working relationships

Reactive/proactive enforcement

- 5.1. The City aims to provide an effective planning enforcement service i.e. to be reactive and effective in dealing with complaints that arise in relation to breaches of planning control.
- 5.2. The use of residential premises in the City as temporary sleeping accommodation is one issue. Temporary sleeping accommodation is defined as sleeping accommodation which is occupied by the same person for less than 90 consecutive nights. The Deregulation Act 2015 created a new section which provides that the use of any residential premises in Greater London as temporary sleeping accommodation does not constitute a material change of use for which planning permission would be required if certain conditions are met as set out in the Act. This includes a ceiling of ninety nights per calendar year. Often the lettings exceed the permitted number of nights and are therefore in breach of planning control. If expedient the service of an Enforcement Notice is an option for which it is an offence not to comply. For further guidance refer to the City of London Corporation web site.
- 5.3. The use of residential premises in the City as temporary sleeping accommodation is one issue. Temporary sleeping accommodation is defined as sleeping accommodation which is occupied by the same person for less than 90 consecutive nights subject to compliance with a number of conditions as set out in the relevant Act. The use of premises in compliance with the terms and conditions of this definition would not involve a material change of use. However, often the lettings exceed the permitted number of consecutive nights and are therefore in breach of planning control. If expedient the service of an Enforcement Notice is an option for which it is an offence not to comply.

Monitoring enforcement

- 5.4. The City deals with over 1,100 planning cases annually. Given the scale of development and resources available, it is not possible to monitor all the cases. The City has to rely on local people, its officers and ward Members to identify breaches.
- 5.5. Monitoring of serious breaches, as listed in Table 1, will be a priority. In addition checks will be made of:

- enforcement cases to ensure the breach has ceased
- enforcement cases where there is a potential for the breach to reoccur
- Notices issued to ensure compliance
- temporary planning permissions or consents to ensure that they are still valid
- works dealt with by the District Surveyor to identify breaches of planning
- legal agreements or obligations attached to any permissions or consents to ensure compliance

The City will monitor its own performance by preparing an annual report to be submitted to the Planning and Transportation Committee which will review priorities, targets and scope for charging. Any charges will be notified on the City's web page.

Working relationships

- 5.6. Particular care will be paid in working with small businesses by advising on and assisting them with compliance to help support activities which contribute to economic growth. Care will be taken to ensure that residents and others are protected from substantial harm. The City aims to continue to foster good working relationships with developers to help them deliver the high quality buildings that the City is renowned for and to continue fostering good working relationships with residents to protect their amenity.
- 5.7. Regular communication will occur with those in breach with regular updates for those who have complained. Comments will be sought and views incorporated into enforcement practices. The annual monitoring report will be used to encourage Members to engage with officers on enforcement matters.
- 5.8. Co-operation between City of London Corporation service areas such as Environmental Health, District Surveyors, Licensing, Safety Thirst, Police, Fire Authority, Comptroller and City Solicitor and Open Spaces, are essential to deliver an effective enforcement service and will continue to be fostered and protocols will be drawn up as and when required. Working parties such as the Licensing Liaison Partnership Group and the Built Environment User Panel will be used to seek views on enforcement and to provide enforcement advice.
- 5.9. Contacts will be maintained with other authorities and Government web sites accessed to keep abreast of good practice, national policy and recommended best guidance.

Feedback on the enforcement process

5.10. If you would like to comment on the enforcement process or web site in order to ensure its continuing effectiveness see contact details below.

Dissatisfied with the Planning Enforcement Service?

5.11. Every effort will be made to ensure that you receive a good quality service. If you have a complaint about our service please contact us directly. If you continue to be unsatisfied please contact the Performance and Standards Officer at the Department of the Built Environment. Your complaint will be investigated and you will receive a written response within ten working days with an explanation or a progress report if it has not been possible to deal with your complaint within that period. If you are still dissatisfied you may make a complaint under the City of London Corporation's Complaints Procedure as set out on City's web page.
www.cityoflondon.gov.uk

How to contact us

The Department of the Built Environment
City of London Corporation
PO Box 270
Guildhall
London EC2P 2EJ
020 7332 1710
PlanningEnforcement@cityoflondon.gov.uk

Counter service

Between 9.15am-4.30pm Monday to Friday at Ground Floor of Guildhall, North Wing (entrance from Basinghall Street and Aldermanbury). You can find a map and directions on the 'How to find us page' on the City of London web site. See above.

Bibliography

This SPD is mostly acting under, but not exclusively, the following documents. The bibliography covers current legislation and any subsequent amendments

Acts

- Town and Country Planning Act 1990
- Localism Act 2011
- Planning and Compensation Act 2008
- Planning and Compulsory Purchase Act 2004
- Planning Act 2008
- Planning (Listed Buildings and Conservation Areas) Act 1990
- Housing and Planning Act 2016
- Building Act 1984
- Scheduled Ancient Monuments & Archaeological Areas Act 1979
- Police and Criminal Evidence Act 1984
- Proceeds of Crime Act 2002
- Regulation of Investigatory Powers Act 1984
- Human Rights Act 1988
- Equality Act 2010

Orders

- Town and Country Planning (General Permitted Development) (England) Order 2015

Regulations

- Town and Country Planning (Use Classes) Order 1987
- Town and Country Planning (Tree Preservation) (England) Regulations 2012
- Town and Country Planning (Control of Advertisements) (England) Regulations 2007

Policy, Guidance and Byelaws

- National Planning Policy Framework – Department for Communities and Local Government
- National Planning Practice Guidance 2014 – Government publications
Link: planningguidance.communities.gov.uk
- Planning Inspectorate website
- London Plan 2015 – Mayor of London website
- City of London Local Plan Adopted 15 January 2015 – City of London website
- City of London Corporation Sign Byelaws
- Department for Business Innovation and Skills: Regulators' Code
- Stopping the Rot A Guide to Enforcement Action to Save Historic Buildings – Historic England website
- Scheduled Monuments Guide for home owners and occupiers - Historic England website

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Appendix B

CITY OF LONDON ENFORCEMENT PLAN SUPPLEMENTARY PLANNING DOCUMENT

CONSULTATION STATEMENT AND SCHEDULE OF PROPOSED CHANGES MAY 2017

The City of London Corporation is preparing an Enforcement Plan Supplementary Planning Document (SPD) which sets out the City's approach to planning enforcement including trees. The legislation requires a Consultation Statement to be produced referring to any consultation carried out before the adoption of the draft SPD and a Schedule of Proposed Changes. Two rounds of consultation have been undertaken in compliance with regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and is in accordance with the City of London Statement of Community Involvement.

Consultation Statement

Details of the two consultations carried out are set out below.

First Consultation

This was an informal consultation carried out with 4 key members of the Built Environment User Panel and took place between 28 June 2016 and 5 July 2016.

The consultation triggered three responses. The representations were reviewed and appropriate changes were made to the Enforcement Plan.

Responses

Two consultees were of the view that the draft SPD had been pitched at the right level. The first consultee stated that the proposed User Panel liaison sounded like a good idea. The second consultee requested that, in the introduction, 'businesses' should be separated out from the reference to stakeholders as they are the largest group affected by planning decisions. The text has been amended accordingly.

The Third consultee commented that in general the draft seemed fine and sets out expected protocol on enforcement action. They listed a number of points which they stated did not raise anything significant.

- Lack of paragraph numbering to the introduction
Response: It is not intended to number the introduction.
- Examples of breaches that can be addressed through other legislation would be helpful
Response: Readers will be guided to the City of London web page.
- Further clarification of planning permission required for demolition of unlisted buildings in conservation areas and non-compliance with conditions

- Response: It would be up to an individual to seek further legal advice
- Examples should be provided of Notices that can end up on a property search
Response: Property searches are a separate issue
- Need to explain that complainants would be given precise instructions as to what they would be asked to monitor to avoid snooping
Response: A sentence has been added to deal with this point
- Clarification needed as to when an application relating to the retention of works can be amended
Response: A comment has been added to deal with this point
- Helpful to state that the content of an advertisement can't be controlled
Response: This amount of detail is not a matter for the draft SPD
- Need to explain what a CPO is.
Response: A sentence has been added to deal with this point
- Noted an absence of managing expectations as to timescales involved in enforcement
Response: The City will monitor its own performance by preparing an annual report which will review priorities and targets and scope for charging. This has been noted in the draft SPD

In response to comments received the amendments were made to the Draft Enforcement Policy and reported to the Planning and Transportation Committee on the 26 July 2016.

Second Consultation

The draft SPD was made available for public consultation for a six week period from 31st October 2016 until 12th December 2016. The following measures were taken to consult the public on the draft SPD during the consultation period:

- **Website.** The SPD, the SPD documents and a statement of the SPD matters were made available in the City Corporation's web site. Information and a link were provided on the home page of the City's website and on the planning page.
- **Inspection copies.** A copy of the SPD, the SPD documents and a statement of the SPD matters were made available at the information desk at the Guildhall and the Guildhall, City Business, Barbican, Artizan Street and Shoe Lane public libraries.
- **Leaflet.** A leaflet was produced inviting comment on the Draft Enforcement Plan SPD copies of which were distributed to the public libraries at Guildhall, City Business, Barbican, Artizan Street and Shoe Lane.
- **Notifications.** Letters and emails containing information about the SPD and inviting comments were sent to relevant specific and general consultation bodies. The City Corporation maintains a database of all those who have expressed an interest in the Local Plan and letters or emails were also sent to all those on the list (about 1,350 in total). Direct email notifications were sent to a small number of additional individuals likely to have an interest in this SPD, including officers with responsibility for licensing issues at the City of London Police and adjoining local authorities.

- **Meetings.** A presentation on the SPD was given to the Conservation Area Advisory Committee

Responses

The consultation triggered three responses comprising:

Natural England - who did not wish to comment
 Transport for London - who had no comments
 Director of Open Spaces - who commented as follows:

- Should loss of shelter/wind mitigation be mentioned as a form of ‘harm’ (paragraph 2.23)
- Is there any scope for monetary compensation as part of a negotiated settlement? In some circumstances it may be impossible to put in a replacement tree following loss of a tree. Also any replacement is likely to be far less mature and take many years (if ever) to have the same benefit in a location. It is possible to calculate the monetary value of the amenity, etc. provided by a tree, e.g. using the CAVAT system. Does this come under ‘enforcement’?

Schedule of Proposed Changes in Response to the Second Consultation

The representations were reviewed and in response to the Director of Open Spaces comments appropriate changes were made to the Enforcement Plan:

- Wind mitigation was added to the list of planning harm as set out in paragraph 2.23 of the draft Enforcement Plan
- The issue of CAVAT was addressed as follows by the addition of two paragraphs in the draft Enforcement Plan:

4.17. In all cases the City will consider and may pursue compensation and replacement costs to the full Capital Asset Valuation for Amenity Trees (CAVAT).

4.18. CAVAT is a system of expressing the value of individual trees according to their public amenity value which enables compensation and replacement costs to be awarded at a more realistic level. Information can be found on CAVAT at the following link: <http://nato.org.uk/cavat>

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TEST OF RELEVANCE: EQUALITY ANALYSIS (EA)

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?	How to demonstrate compliance
<p>Page 789</p> <ul style="list-style-type: none"> • 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. <p>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.</p> <p>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.</p> <p>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.</p>	<p>Case law has established the following principles apply to the PSED:</p> <ul style="list-style-type: none"> • 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. <p>However there is no requirement to:</p> <ul style="list-style-type: none"> • 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:** City of London Enforcement Supplementary Planning Document (SPD).
- 2. Brief summary (include main aims, proposed outcomes, recommendations / decisions sought):** The Enforcement SPD sets out the City Corporation's approach to planning enforcement. It explains the principles and procedures the City Corporation will follow to ensure that development is properly regulated. It contains standards and targets and promotes the resolution of enforcement issues without recourse to formal enforcement action.
- 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Breaches of planning control could result in development that could impact negatively on this group.
Disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Breaches of planning control could result in development that could impact negatively on this group.
Gender Reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Breaches of planning control could result in development that could impact negatively on this group.
Marriage and Civil Partnership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Breaches of planning control could result in development that could impact negatively on this group.
Pregnancy and Maternity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Breaches of planning control could result in development that could impact negatively on this group.
Race	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Breaches of planning control could result in development that could impact negatively on this group.
Religion or Belief	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Breaches of planning control could result in development that could impact negatively on this group.
Sex (i.e gender)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Breaches of planning control could result in development that could impact negatively on this group.
Sexual Orientation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Breaches of planning control could result in development that could impact negatively on this group.
4. There are no negative/adverse impact(s) Please briefly explain and provide evidence to support this decision:	The Enforcement SPD seeks to ensure that development in the City complies with planning policies. The City of London Local Plan contains planning policies that do not result in a negative impact on equality groups.			
5. Are there positive impacts of the proposal on any equality groups? Please briefly explain how these are in line with the equality aims:	The Enforcement SPD will have a positive effect on all equalities groups, as without the Enforcement SPD, there may be breaches of planning control which would have a negative impact on equality groups.			
6. As a result of this screening, is a full EA	Yes	No	Briefly explain your answer: A full EA is not necessary as there is not expected to be any	

necessary? (Please check appropriate box using <input type="checkbox"/>)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	negative impacts on equalities groups resulting from the Enforcement SPD.
7. Name of Lead Officer: Lisa Russell		Job title: Senior Planning Officer	Date of completion: 04 July 2016

Signed off by Department Director :		Name: Paul Beckett	Date: 04/07/16
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Appendix D

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:

Enforcement Supplementary Planning Document

11 July 2016



Sustainability Appraisal/Strategic Environmental Assessment Screening

Enforcement 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 Enforcement SPD

- 2.1. The Enforcement SPD sets out the City's approach to planning enforcement. It explains the principles and procedures the City will follow to ensure that development is properly regulated. It contains standards and targets and seeks to resolve breaches through negotiation rather than formal legislative action.
- 2.2. This strategy is a Supplementary Planning Document which provides guidance regarding the City's Local Plan policies for enforcement of planning law. It defines the approach that the City will follow in the event of a breach of planning control, associated with for example failure to secure the required planning permission or consent prior to commencing development, failure to comply with any condition or limitation associated with a permission, consent or permitted development or failure to comply with a Notice.
- 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 enforce planning decisions to comply with London Plan and Local Plan policies.

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 Enforcement SPD.

4. Screening and Consultation Outcome

- 4.1. This screening demonstrates that the Enforcement 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	No response
Natural England	Do not wish to comment
Historic England	No response

5. Determination

6. The Enforcement 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 Enforcement 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	This SPD sets out the approach that the City Corporation will take to enforcement action in line with the policies of the Local Plan. It does not set a framework for other projects.
(b) The degree to which the SPD influences other plans and programmes including those in a hierarchy	This SPD does not influence any other plans or programmes. It will uphold the policies in the Local Plan which has been subject to Sustainability Appraisal fulfilling the requirements of the SEA Directive.
(c) The relevance of the SPD for the integration of environmental considerations in particular with a view to promoting sustainable development	The City Corporation's planning policies promote sustainable development. This SPD describes how breaches of planning control will be dealt with in line with these planning policies.
(d) Environmental problems relevant to the SPD	This SPD may involve enforcement action associated with environmental issues such as noise, air quality, biodiversity, tree protection and other amenity matters. Investigation will begin within 1 day where serious breaches including irreversible or serious damage to the environment and / or a building, works/uses causing substantial harm, works to protected trees and traffic hazards. This will ensure that environmental problems are tackled quickly avoiding further damage.
(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 guidance in this SPD will assist in implementing Community legislation in line with the City of London Local Plan.

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 positive effects of this SPD in preventing or reversing harm caused by breach of planning controls will be on-going for the life of each development.
(b)The cumulative nature of the effects of the SPD	Any cumulative impacts will be positive in reinforcement of adopted planning policy which has been subject to Sustainability Appraisal
(c)The trans boundary nature of the effects of the SPD	This SPD is not likely to have any trans-boundary effects
(d)The risks to human health or the environment (e.g. due to accident)	Enforcement of planning controls will reduce any potential risks to human health and the environment.
(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 applies to development in the City of London geographic area which has a resident population of 9,000 and 400,000 workers. Some breaches of planning control (e.g. views protection, biodiversity and pollution control measures) could have potential impacts beyond the City's boundary. This SPD will prevent or reverse potential harm from breach of planning controls.
(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 area includes 26 conservation areas and over 600 listed buildings which will be protected through application of this SPD. The City is an air quality management area for nitrogen dioxide and fine particulates. Breaches of planning control which could lead to deterioration will be prevented or reversed by this SPD. Land use in the City is very intensive – this SPD will reduce adverse impacts of planning control breaches.
(g)The effects of the SPD on areas or landscapes which have recognised national Community or international protected status	Views of nationally important landmarks in and near the City will continue to be protected through the implementation of this SPD.

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Committee: Planning and Transportation Committee	Date: 2 May 2017
Subject: Thames Court footbridge	Public
Report of: Director of the Built Environment	For decision

Summary

A temporary private footbridge across Upper Thames Street at Thames Court was erected following an agreement reached in 1997 between the City and the owners of Thames Court. The agreement provided that the owners make the footbridge available for use by the public throughout its operating life.

The Thames Court footbridge is now closed and its owners are in discussions with Transport for London, the current local highway authority for Upper Thames Street, about a road closure to allow the footbridge removal works to be undertaken. Although the footbridge is across Upper Thames Street parts of the abutments and footings of the footbridge on either side are located on adjoining highways for which the City is the local highway authority.

There is a local desire for the footbridge to be retained although crossing points both east and west can be found within 120 m and therefore the wider public need for the footbridge is not demonstrated. Transport for London is willing, without prejudice, to consider having the footbridge vested in Transport for London as a highway structure in order to allow it to be retained if all parties consider this to be desirable.

Recommendations

I recommend that:

1. Transport for London be approached to have the Thames Court footbridge vested in it as a highway structure should the owner of the structure be willing to transfer it to Transport for London.
2. Should Transport for London and the owner of the structure be willing to have the footbridge vested in Transport for London as a highway structure the Director of the Built Environment be authorized to enter into any necessary agreements with Transport for London to enable to Transport for London to exercise the City's local highway authority functions in respect of those parts of the footbridge that are located on highways for which the City is the local highway authority.
3. Should either Transport for London or the owner of the structure not be

willing to effect vesting of the Thames Court footbridge in Transport for London as a highway structure, it be removed as planned.

Main Report

Background

1. A temporary private footbridge across Upper Thames Street at Thames Court (referred to in this report as “the Thames Court footbridge”) was erected following an agreement reached on 30 October 1997 between the City of London and Deutsche Immobilien Fonds Aktiengesellschaft and DG Bank Deutsche Genossenschaftsbank London Branch (the owners of Thames Court). This agreement authorized the owners of Thames Court to construct a temporary private footbridge over Upper Thames Street, for which street the City was at that time the local highway authority, in order to improve pedestrian access to their property provided that the owners make the footbridge available for use by the public throughout its operating life. The agreement provided that the owners maintain the Thames Court footbridge structure but that the City would, in acknowledgement of the benefit to the public of being able to use it, light, cleanse and, as necessary, repave the surface of the footbridge.
2. Planning permission for the Thames Court footbridge was granted by the City in 1997. Permission was granted until 22 July 2006, after which time it was agreed that the footbridge would be removed. In February 2007 the City granted a further planning permission for the footbridge to be retained until 28 February 2017, after which time it was again agreed that the footbridge would be removed.

Current Position

3. The footbridge is now closed and its owners are in discussions with Transport for London, the current local highway authority for Upper Thames Street, about a road closure to allow the footbridge removal works to be undertaken. Although the footbridge is across Upper Thames Street parts of the abutments and footings of the footbridge on either side are located on adjoining highways for which the City is the local highway authority.
4. Your Committee has asked officers to report on the Thames Court footbridge and whether, if it could be agreed, the local benefit of retaining it would outweigh other considerations such as the need for repair works and ongoing maintenance costs.
5. The Thames Court footbridge is a pedestrian crossing of Upper Thames Street. Approximately 80 metres to the west is the Fye Foot Lane city walkway bridge and approximately 120 metres to the east are the Queen Street/Queen Street Place pedestrian crossings. Usage of these three pedestrian crossing places

was last comprehensively surveyed on Wednesday 13 February 2008. This survey was conducted over 12 hours, between 7 a.m. and 7 p.m., and it captured 13 339 pedestrians crossing during this period, broken down as follows:—

- Fye Foot Lane city walkway bridge: 1 213 pedestrians (9.1% of total crossing demand);
 - Thames Court footbridge: 1 107 pedestrians (8.3% of total crossing demand);
 - Queen Street/Queen Street Place pedestrian crossings: 11 019 pedestrians (82.6% of total crossing demand).
6. Clearly, at least in 2008, the vast majority of pedestrians crossing Upper Thames Street in this location found the surface-level pedestrian crossings to be more convenient than the footbridges. Of these three crossing places, only the Queen Street/Queen Street Place pedestrian crossings are usable by those persons, such as wheelchairs users, who require step-free access, and this will be a factor in the overwhelming preference for these pedestrian crossings.
 7. Apart from the Thames Court footbridge, there are 17 formal pedestrian crossing places of the A3211 (Victoria Embankment–Blackfriars Underpass–Upper Thames Street–Lower Thames Street–Byward Street) within the City of London. These are listed in Appendix 1 to this report.
 8. Some of these crossing places are so close together that they effectively form a single crossing place that can be traversed at multiple levels, e.g., the Suffolk Lane pedestrian crossing and the Mondial House city walkway bridge and the Byward Street subway and the Great Tower Street pedestrian crossing.
 9. A total of 17 crossing places over the approximately 2.35 km of the A3211 within the City is an average of approximately 138 m between crossing places. If the paired crossing places are regarded as single crossing places, there is a total of 15 crossing places over the route, with an average of approximately 157 m between crossing places. The approximately 200 m between the Fye Foot Lane city walkway bridge and the Queen Street/Queen Street Place pedestrian crossings is therefore a normal distance between crossing places over the A3211 within the City and the approximately 80 m between the Fye Foot Lane city walkway bridge and the Thames Court footbridge and the approximately 120 m between the Thames Court footbridge and the Queen Street/Queen Street Place pedestrian crossings are therefore short distances compared to the City average.
 10. The Fye Foot Lane city walkway bridge is the closest crossing place to most of the residential buildings between the A3211 and the River Thames in this location (Norfolk House, Sir John Lyon House and Globe View). With Queen's Quay the Fye Foot Lane city walkway bridge and the Thames Court footbridge are approximately equidistant.
 11. Given the relatively short distance between the alternative crossing places (the Fye Foot Lane city walkway bridge and the Queen Street/Queen Street Place

pedestrian crossings); the strong preference of the majority of pedestrians for the surface-level pedestrian crossings; and the better location of the Fye Foot Lane city walkway bridge for most of the residential buildings between the A3211 and the River Thames, the need for the Thames Court footbridge appears to be relatively low. It is noted in this regard that the footbridge has always been a private structure and that it was proposed and built as a facility for a single commercial occupier (Thames Court), although it was always also available to the public to use if they wished to do so until its recent closure.

12. Your officers have consulted Transport for London about the Thames Court footbridge as Transport for London is now the local highway authority for Upper Thames Street (and the whole of the A3211) and the owners of the footbridge are in discussions with Transport for London about its removal. Transport for London officers have advised that they can see some benefit in the footbridge being retained, given the impermeable nature of Upper Thames Street, and they are therefore willing, without prejudice, to consider having the footbridge vested in Transport for London as a highway structure in order to allow it to be retained. As a result, if your Committee considers, despite the *above* analysis indicating that there is little public need for the Thames Court footbridge, that it would be desirable for the footbridge to be retained, the City could ask the owners of the structure and Transport for London to formally consider a transfer of the footbridge to Transport for London.
13. In respect of those parts of the abutments and footings of the footbridge on either side that are located on adjoining highways for which the City is the local highway authority, responsibility could be passed to Transport for London by agreeing that the City's local highway authority functions relating to those parts of the footbridge be exercised by Transport for London (cf. section 8 of the Highways Act 1980). Such an agreement would be on the basis that all relevant future costs and liabilities rest with Transport for London.
14. The City would be able to assist with this consideration through providing details of how it lit, cleansed and repaved the surfaces of the footbridge during its 20-year operating life and through providing an estimate by the City's engineers of what it would likely cost to repair the surfaces of the footbridge, principally the stair nosings, to bring the surfaces back to a fit state for public use: these repair works are estimated as costing £15 000. (The City's maintenance regime for the surfaces of the footbridge has assumed that it would reach the end of its operating life and be removed this year, in accordance with the decision made by the City in 2007 in granting planning permission to allow the footbridge to be retained in place for an additional 10 years.)
15. If the footbridge was to be vested in Transport for London, the local highway authority for Upper Thames Street, as a highway structure, planning permission would not be required for its retention as improvement of a road by a highway authority does not constitute development within the meaning of the planning legislation (cf. section 55(2)(b) and section 336(1) of the Town and Country Planning Act 1990 and section 70(1) and section 329(1) of the Highways Act

1980; in particular, within these provisions, “improvement” includes maintenance).

Corporate and Strategic Implications

16. This report raises no corporate or strategic implications.

Implications

17. This report raises no financial implications, significant risks, legal implications, property implications or human resource implications. However, if the Thames Court footbridge was to be vested in Transport for London as a highway structure that authority would incur repair costs and future maintenance costs. The costs of repairing the surfaces of the footbridge are likely to be around £15 000 and there will likely be costs involved in assessing and, if necessary, repairing the structure of the footbridge. If there are structural defects in the footbridge these costs could be considerable.

Conclusion

18. The Thames Court footbridge is now closed and its owners are in discussions with Transport for London, the local highway authority for Upper Thames Street, about a road closure to allow the footbridge removal works to be undertaken. There appears to be little public need for the footbridge but Transport for London is willing, without prejudice, to consider having the footbridge vested in Transport for London as a highway structure in order to allow it to be retained if all parties consider this to be desirable.

Appendix 1: Pedestrian Crossings over the A3211 in the City of London

1. Temple Avenue pedestrian crossing
2. Blackfriars Bridge
3. Baynard House city walkway
4. White Lion Hill flyover
5. Peter's Hill city walkway
6. Fye Foot Lane city walkway bridge
7. Queen Street/Queen Street Place pedestrian crossings
8. Dowgate Hill/Cousin Lane pedestrian crossing
9. Suffolk Lane pedestrian crossing
10. Mondial House city walkway bridge
11. Arthur Street/Swan Lane pedestrian crossing
12. King William Street bridge
13. Fish Street Hill pedestrian crossing
14. Saint Magnus House city walkway bridge
15. Old Billingsgate Walk pedestrian crossing
16. Byward Street subway
17. Great Tower Street pedestrian crossing

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Committee(s)	Dated:
Planning & Transportation Committee	2 May 2017
Port Health and Environmental Services Committee	9 May 2017
Subject: Electric Vehicle Charging Update	Public
Report of: The Director of the Built Environment	For Information
Report author: Ian Hughes, Assistant Director (Highways)	

Summary

In the context of the current debate on air quality, Members of the Port Health & Environmental Services Committee recently requested an update on the current provision of electric vehicle charging facilities in the City.

This report covers three specific areas, namely:

- Standard electric charging facilities in the City's car parks;
- Rapid charging facilities in the City's car parks;
- General on-street charging facilities.

Matters are progressing in all three areas, with a particular focus on improving the technology in our car parks to make it more reliable, and on taxi recharging facilities given that taxis are the primary source of NO₂ pollution from road based transport in the City. However, the urban realm impact, utility constraints and the ambition to better manage (and ideally reduce) traffic levels mean that the support for electric vehicles must be considered in a wider context.

As a result, this report just covers the most recent developments, and a further report considering the cross-cutting policy implications arising from this workstream will be brought to both the Port Health and Planning & Transportation Committees in due course.

Recommendation(s)

Members are asked to receive this report.

Main Report

Background

1. The City has provided some form of charging equipment for electric vehicles for nearly 15 years, during which time there has been a gradual increase in interest (if not necessarily demand) for using this equipment. This was firstly encouraged by the Congestion Charge concession for electric cars, and more recently by the increasing public awareness of air pollution issues.

2. During that time, the City's electric charging points have been exclusively provided in its five public car parks, namely:
 - Baynard House (Queen Victoria St)
 - London Wall
 - Minories
 - Smithfield
 - Tower Hill
3. By contrast, the City's constrained urban realm environment has meant that the opportunity to accommodate recharging equipment on-street has been extremely limited, typically because of the difficulty in finding available room for this equipment (both above and below ground) and because of its potential impact on the urban realm. In addition, the City's continual turnover of building development activity has not necessarily provided the steady state urban realm within which long-term locations for electric charging equipment could be selected.
4. Given the City's limited roadscape, and the need to address a wide range of policy objectives such as road danger reduction, green infrastructure provision, reducing congestion and supporting placemaking, officers have policy approval to reduce the amount of traffic in the City overall, to spread it over a longer period and to better manage it. Therefore the support for electric vehicles must be considered within the context of the need to have fewer vehicles in the Square Mile overall.
5. Nevertheless, the City's focus on air quality as a high corporate priority, and the establishment of the Low Emission Neighbourhood (LEN), has meant these opportunities and constraints are now being reconsidered, and the City's direction on electric charging provision will partly be informed by the various workstreams outlined in this report.
6. In particular, the Low Emission Neighbourhood is a scheme designed to improve local air quality by reducing traffic and encouraging / supporting low & zero emission vehicles. It centres on the Barbican and Golden Lane Estates, the Guildhall area and St Bartholomew Hospital, and improvements in air quality are expected both within these areas and more widely across the City due to an increase in low & zero emission vehicles. The City Corporation was awarded £990,000 over three years by the Mayor of London to implement the LEN, and the most successful measures will then be rolled out across the City.

Current Position

Standard electric charging facilities in the City's car parks

7. The City first offered off-street electric charging points nearly 15 years ago, and at that time, it came with free parking as well as free power supply. The use of electric vehicles was rare, but this concession became so popular as a marketing tool for electric vehicle manufacturers that by 2006 there were more free parking permits in circulation than we had spaces in our car parks.

8. Although actual uptake was still relatively low (given the number of electric vehicles available at the time), it did serve to bring vehicles to the City that would not otherwise have come here, and as the popularity of electric vehicles began to rise, the concession had the potential to become a major problem in terms of lost income and attracting vehicles without City destinations. As a result, Members approved for the concession to be withdrawn at that time.
9. Since 2006, drivers of electric vehicles have had to pay to park as a normal car park user, whether a residential season ticket holder or an hourly parker, but once inside the car park, they have been able to use one of 10 charging units in each of our facilities.
10. Those units had previously been supplied and operated by TfL under a pan-London scheme called Source London, but for various reasons, the equipment proved extremely unreliable, and TfL's contractor appeared unable or unwilling to resolve these issues. As a result, the equipment caused frequent public complaints, and usage levels were undoubtedly suppressed. (Surveys of our car parks last year typically found no more than one or two electric vehicles charging across all five car parks at any one time.)
11. It was felt this substandard service could not continue, particularly given the increasing focus on air quality, and a change in the Source London contract at TfL allowed the City to opt out of that commitment. As a result, the City has now procured its own contractor to replace Source London, reporting directly to the Department of the Built Environment through an appropriate Service Level Agreement to ensure much higher standards of reliability.
12. That contractor is Chargemaster, who have considerable experience in operating schemes of this type throughout the UK. Their agreement with the City has contractual standards for repair times, reliability, management information & customer care, and their equipment is suitable for use by all types of electric vehicle manufacturer. To charge a car, drivers sign up to Chargemaster's membership scheme called Polar, which can be done as a one-off user ('pay as you go') or as a scheme member for regular users. Details can be found at www.polar-network.com.
13. The process of swapping over equipment, installing new power supplies and improving communication links (all part of the underlying problem with Source London) is currently underway, with units already installed and operational in Minories and Tower Hill car parks. London Wall, Baynard House and Smithfield are due to follow in April, so that by the end of that month (at the time of writing), fifty 7kw recharging points should be available across the City's public car parks. Discussions are also underway to install this equipment in the Barbican Estate car parks, ensuring that like-for-like facilities are also available for local residents there.
14. We fully expect this initiative to resolve what have been justifiable complaints about TfL's equipment, which may result in an increase in usage as people find the new chargers to be much more reliable. Equally, developments in 'green fleet' micro consolidation centres may also increase the demand for charge points. If

either happens and we find that demand starts to outstrip the current supply, our contract with Chargemaster allows us to increase the number of units at nil cost to the City.

Rapid charging facilities in the City's car parks

15. Rapid charging equipment is similar in concept to a standard charging unit, but it can deliver the necessary charge in a much shorter timescale (ie 20-30mins rather than 3-4 hours). Such 50kw equipment has only recently become available and affordable, so this is likely to be the next stage of technology rolled out.
16. Traditional charging equipment is aimed at someone who is likely to leave their car all day to charge, meaning our typical customers have been commuters and residents. By contrast, rapid charging is aimed at those drivers who only want to stay for short periods, making it more suitable for taxi, delivery & courier drivers if they are prepared to enter our car parks to use it.
17. Initial assessments of our car parks suggest that finding an appropriate location for this equipment (to facilitate the faster turnaround) may be more of a challenge, but that review is currently on-going. In particular, the momentum and funding provided by the LEN initiative may help identify possible locations for this equipment to be installed within that geographical area.

General on-street charging facilities

18. As noted earlier, the City currently does not offer recharging facilities on-street, but given the impetus provided by the LEN, a small number of locations are now being considered for the trial of 22kw semi-rapid charging points. These are being targeted for use by taxis to begin with, with the equipment able to 'top up' an electric taxi's charge by 25%-40% in 30-40mins.
19. By focusing on taxis, who are the primary source of NO2 pollution from road based transport in the City, this will help support the creation of a critical mass of London-wide infrastructure to facilitate a shift from diesel to electric taxis. The taxi rest bays in Noble Street and Ropemaker Street are the first locations being considered, although these and any other locations will still have to be subject to the usual constraints caused by the City's unique density of underground utility infrastructure.
20. The 22kw taxi rest bay trial is likely to form just one part of the wider solution, as research commissioned by TfL suggests that London will require a network of at least 150 rapid (50kw) charging points to cater for electric taxis in the long-term, many of which will need to be in Central London. With this in mind, the Mayor of London and the Chairman of London Councils' Transport & Environment Committee have recently written to the Chairman of the City's Policy & Resources Committee, asking for greater support to identify locations to install such equipment.
21. As the provision of on-street recharging facilities would become a new function for the City, it would incur new contractual costs in terms of energy &

maintenance, as well as a potential long-term liability should the equipment need to be removed. In addition to meeting a public need, the service must also be viable and cost-effective in the long term, and the recent examples of redundant electronic litter bins and seldom used pay phone kiosks means the City would not want to leave itself open to the risk of having to meet the cost of removing redundant equipment left in situ on-street.

22. TfL may have another Source London-type framework contract available to procure a supplier, but the physical size of the equipment, the maintenance aspects, the operational control and the urban realm issues will all need to be considered before commencement. However, exploring the viability and appropriateness of a wider trial within the LEN area is one of the project's ambitions for 2018, and although the initial priority is to accommodate charging provision for taxis, future consideration also needs to be given to the needs of delivery and servicing vehicles as more types of commercial electric vehicles are launched every year.

Corporate & Strategic Implications

23. Addressing issues of air quality, transport policy, car parking provision and urban realm design are all priority areas for the City Corporation, and are being proactively managed in co-operation between the Department of the Built Environment and the Markets & Consumer Protection Department.
24. The operational activities outlined here are serving to inform the aims and aspirations of the City Corporation, which will need to balance the benefits of facilitating a switch to electric vehicles by residents, taxis and servicing vehicles with the disbenefit of potentially attracting more traffic, adding to congestion and cluttering the urban realm. With the Mayor's Transport Strategy due to be published in May, a series of longer-term policy options to consider the dependencies between these areas will be brought to Members of both Committees later this year.

Conclusion

25. Progress is being made to upgrade the City's off-street electric charging equipment, so that it becomes reliable, fit for purpose and meets the needs of the City's car park users. Other options for electric vehicle charging trials are being considered given the momentum and funding provided by the Low Emission Neighbourhood, but are more likely to be implemented in the medium term.

Appendices

None.

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Committee:	Date:
Planning and Transportation Committee	2 May 2017
Subject: Decisions taken under Delegated Authority or Urgency since the last meeting of the Committee	Public
Report of: Town Clerk	For Information
Report author: Amanda Thompson, Town Clerk's Department	

Summary

This report advises Members of action taken by the Town Clerk since the last meeting of the Committee, in consultation with the Chairman and Deputy Chairman, in accordance with Standing Order Nos. 41(a) and 41(b). This action was:

- Accept the Government's offer to increase planning application fees by 20% with effect from July 2017; and
- Note the Government had stipulated that the additional revenue should be retained by planning departments and that existing baseline and income assumptions will not be adjusted down as a result during this Parliament.

Recommendation

Members are asked to note the report.

Main report

1. Agreement was sought to accept the Government's offer to increase planning application fees by 20% from July 2017 as outlined in the letter from the Department for Communities and Local Government (DCLG) dated 21st February. A response was required by 13th March.
2. The Government's offer was conditional on the additional revenue being retained by planning departments and the baseline and income assumptions not being adjusted down as a result during this Parliament.
3. Accepting the offer would increase the basic full planning application fee from £195 to £234 and generate estimated additional income of £156,000 in a full year based on 2016/17 forecast outturn. The additional income would be used to improve the planning services provided to applicants from the pre application stage through to construction on site.
4. The options were limited to accepting or rejecting the Government's offer as there was no scope to vary the rate of increase as stated above.
5. The option to increase the fees would increase the basic full planning application fee from £195 to £234 and generate an estimated £100,000

additional income in 2017/18 and £156,000 in 2018/19 based on 2016/17 forecast outturn.

6. The additional funding will be utilised to improve the planning services provided by ensuring a more joined up service for applicants from the pre application stage through to construction on site and will be used to facilitate and expedite processing times by ensuring the expertise and staff resources are in place to do that.

Action Taken

7. The Town Clerk, following consultation with the Chairman and Deputy Chairman, agreed to accept the Government's offer to increase planning applications fees by 20% from July 2017 to generate additional income that could be used to improve the planning service.

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TO: **PLANNING & TRANSPORTATION COMMITTEE**

2 MAY 2017

FROM: **POLICY AND RESOURCES COMMITTEE**

Thursday, 16 March 2017

4. **APPOINTMENT OF SUB-COMMITTEE CHAIRMEN**

The Committee considered a report of the Town Clerk concerning the process for appointing chairmen of sub-committees.

The Chairman stated that the purpose of a sub-committee was to deal with matters referred to it by its parent committee. It was noted that whilst the Policy and Resources Committee was responsible for governance, without a change to standing orders, its recommendation regarding the appointment of chairmen of sub-committees was on the basis of the adoption of a convention only. Detailed discussion ensued during which the following comments were made:-

- The Chairman advised that the resolution to committees from the December meeting aimed to set a convention which enabled the Chairman of a grand committee who did not wish to chair a sub-committee to identify and nominate for the role another Member with the necessary experience and qualities, for approval of that Committee. In the interests of clarity the initial resolution would have benefited from being circulated with the substantive report.
- Members questioned the need for the convention particularly given the different nature of some committees, for example some were quasi-judicial and therefore required a different approach.
- As the intention of the convention was to clarify the process it might be better for grand committees to set out its approach to appointments in its terms of reference.
- Rather than seeking the adoption of a convention, Committees should be provided with some general guidance instead. Without being too prescriptive, could also include reference to the length of time a chairman could serve. Several Members supported this.

RESOLVED: that the following guidance be given to all Grand Committees:

1. **in the event of a Grand Committee having no prior arrangement or custom in place for the way in which the chairmen of its sub-committees are selected, it should be usual practice for the Chairman of the relevant Grand Committee, should they not wish to serve themselves, to nominate an individual to serve in that capacity for the approval of the Grand Committee; and**
2. **that the term of office of a chairman of a sub-committee would usually be no longer than the term of office of the Chairman of the Grand Committee e.g. three, four or five years, subject to the relevant Grand Committee being able to extend the term of the sub-committee's chairman on an annual basis.**

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Committee:	Date:
Policy & Resources Committee	16 March 2017
Subject: Appointment of Sub-Committee Chairmen	Public
Report of: Town Clerk	For Decision
Report authors: Simon Murrells, Assistant Town Clerk	

Summary

This report concerns the process for appointing chairmen of sub-committees. There is no hard or fast rule and Members felt that the rather ad-hoc approach taken by the various Committees would benefit from greater consistency across the board. In light of this, the Policy & Resources Committee decided that when a Chairman of a Grand Committee does not wish to be the chairman of a sub-committee, a convention is adopted whereby the Chairman submits his or her nomination for chairman of the sub-committee to the Grand Committee for approval. Where no specific Member is nominated by the Chairman of the Grand Committee, the selection process would be by election from all eligible Members of the Grand Committee.

This proposal was promulgated to the various Committees and was met with a mixed response. It was also discussed at the all-Member informal meeting on 9 February, with differing views being expressed. The Policy Chairman agreed that the issue should be reconsidered. To assist Members, set out are several options for Members to consider, including retaining the status quo, implementing the convention proposed by this Committee for Grand Committee Chairmen to nominate the chairman of the sub-committees, election of chairmen of sub-committees by the Grand Committee and election of Sub Committee chairmen by the sub-committee itself.

At the informal meeting of all Members in February, it was suggested that the introduction of term limits for chairmen of sub-committees should also be considered and the views of Members are sought on that matter.

Recommendations

It is **recommended** as follows:

- a) that further consideration be given to the implementation of a new convention for the appointment of chairmen of sub-committees, namely, when a Chairman of a Grand Committee does not wish to be the chairman of a sub-committee a convention is adopted whereby the Chairman submits his or her nomination for chairman to the Grand Committee for approval. Where no specific Member is nominated by the Chairman of the Grand Committee, the selection process would be by election from all eligible Members of the Grand Committee;

- b) that consideration be given to the introduction of term limits for sub-committee chairmen.

Report

Background

1. This report concerns the recent review of the process for appointing chairmen of sub-committees.
2. The current arrangements for selecting the chairmen of sub-committees is for that to be determined by the relevant Grand Committee and quite often it can be the Chairman of the Grand Committee who takes on the responsibility, depending on circumstances. If not, it is usual practice for the sub-committee to decide, most often by election from amongst its membership. There is no hard or fast rule and Members felt that the rather ad-hoc approach taken by the various Committees would benefit from greater consistency across the board
3. In light of this, in December 2016 the Policy Committee proposed the introduction of a convention for the selection of sub-committee chairmen to ensure consistency across all Committees. The convention provides that, when a Chairman does not wish to be the chairman of a sub-committee and wishes a specific member to be appointed, the Chairman shall submit his or her nomination for chairman to the Grand Committee for approval. A resolution to that effect was circulated to all relevant Committees asking for the convention to be endorsed.
4. The Policy Committee based its decision on the following principles:
 - it should be accepted practice for the Chairman of a Grand Committee to chair any Sub-Committee appointed by it;
 - where the Chairman of a Grand Committee does not wish to chair a sub-committee, the Chairman should be able to nominate another Member of the Grand Committee with the necessary experience and qualities, for approval to fulfil that role; and
 - where no specific Member is nominated by the Chairman of the Grand Committee, the selection process would be by election from all eligible Members of the Grand Committee.
5. The Chairman of the Finance Committee was particularly supportive of the P&R recommendation. Under his Chairmanship of Finance, he has been able to propose and to gain support for some significant changes in the way sub-committees operate and who chairs them. These changes have enabled more Members to play a more valuable part in, and to contribute to, the Committee's overall work, whilst also recognising that sub-committees should be servants of the Grand Committee's policies and priorities. Any changes should not get in the way of these two objectives.

6. It was noted at the informal meeting that the Policy & Resources Committee would take another look at the position. In addition, several Members asked for consideration to also be given to whether terms limits should be introduced for Chairmen of sub-committees, as they are for Chairmen of Grand Committees.

Options for Chairmanship of sub-committees

7. There are several options open to Members to consider for how Chairmen should be selected for sub-committees, including the following:
 - i) Retain the status quo. Currently, a Grand Committee has the option of choosing who should take the chair of a sub-committee that it appoints. In a number of cases that is the Chairman of the Grand Committee but not always. Grand Committees can also decide to leave such matters to the sub-committee who usually select their Chairman through a process of election. This has been the position for a number of years.
 - ii) Adopt the convention agreed by the Policy & Resources Committee in December, as described in paragraphs 3 and 4 above. This provides for a process whereby the Chairman of a Grand Committee does not wish to chair a sub-committee and has instead identified another Member for that role with the necessary experience and qualities. In those circumstances, the Chairman would submit his or her nomination to the Grand Committee for approval. Where no specific Member is nominated by the Chairman of the Grand Committee, the selection process would be by election from all eligible Members of the Grand Committee who would nominate themselves.
 - iii) Grand Committees to appoint all sub-committee chairmen. In this case, when sub-committees are appointed (which they are annually), the Grand Committee would be asked to decide at that stage who should take the chair. This could be the Chairman of the Grand Committee or by inviting eligible Members of the Grand Committee to nominate themselves, followed by an election if there is more than one candidate.
 - iv) Sub-committees to appoint their own chairmen. In this case, the question of chairmanship would be left entirely to the sub-committee to decide, usually by election. Whilst this is an option, it should be noted that there are a number of sub-committees where Members may consider it appropriate, because of the nature of the business ie: it is sensitive or strategic, for the Chairman of the Grand Committee to be the chairman. In those circumstances, imposing such a rigid rule may not serve the City Corporation's best interests as it does not allow for any flexibility.
8. It should also be noted that the Chief Commoner automatically chairs several sub-committees including the Privileges Sub-Committee.

Term Limits

9. At the informal meeting of all Members reference was made to the possibility of introducing terms limits for chairmen of sub-committees. Currently there are no restrictions on the number of terms (or years) that a Member can serve as chairman of a sub-committee as there are for Grand Committees (there are, however, conventions affecting the chairmanship of the Property Investment Board, Financial Investment Board and Social Investment Board, all of which report directly to the Court of Common Council). Standing Orders provide for the Chairmanship of most Grand Committees to be no more than three years with three exceptions - the Policy & Resources and Finance Committees where the term is a maximum of five years and the Police Committee where the term is no more than four years.
10. Members' views are sought on whether term limits should be introduced for chairmen of sub-committees and, if so, what the term should be eg: three years. If Members decide to introduce a term limit, it would be prudent, where the Chairman of the Grand Committee chairs the sub-committee, for any limit to correspond with the term of chairmanship of the relevant Grand Committee.
11. Members should bear in mind that in a number of cases sub-committees are appointed to give more detailed consideration to certain topics and, over time, chairmen can develop an expertise and considerable knowledge of the area. This does, however, need to be balanced against the need for others to be given opportunities to serve and to bring fresh skills and experience to the work of the sub-committee. The loss, through the imposition of a term limit, of an experienced chairman does not necessarily mean that individual and their knowledge of a particular topic need be lost to the sub-committee.

Conclusion

12. The proposed convention agreed by the Policy & Resources Committee for appointing chairmen of sub-committees has been met with mixed views and at the recent informal meeting of all Members it was noted that the Committee would look again at the matter. This report asks Members to review the position and sets out some options that could be considered. It also asks Members for a view on whether a term limit should be introduced for chairmen of sub-committees and, if so, what that term should be.

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