



Planning and Transportation Committee

Date: TUESDAY, 20 FEBRUARY 2018

Time: 10.30 am

Venue: LIVERY HALL - GUILDHALL

Members:

Christopher Hayward (Chairman)	Oliver Lodge
Deputy Alastair Moss (Deputy Chairman)	Alderman Nicholas Lyons
Rehana Ameer	Paul Martinelli
Randall Anderson	Andrew Mayer
Sir Mark Boleat	Deputy Brian Mooney
Mark Bostock	Sylvia Moys
Deputy Keith Bottomley	Barbara Newman
Henry Colthurst	Graham Packham
Peter Dunphy	Susan Pearson
Emma Edhem	Judith Pleasance
Sophie Anne Fernandes	Deputy Henry Pollard
Marianne Fredericks	Jason Pritchard
Graeme Harrower	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
Alderman Vincent Keaveny	

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

John Barradell
Town Clerk and Chief Executive

AGENDA

Part 1 - Public Agenda

1. **APOLOGIES**
2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
3. **MINUTES**
To agree the public minutes and summary of the meeting held on 29 January 2018.
For Decision
(Pages 1 - 10)
4. **OUTSTANDING REFERENCES**
Report of the Town Clerk.
For Information
(Pages 11 - 18)
5. **DELEGATED DECISIONS**
Report of the Chief Planning Officer and Development Director.
For Information
(Pages 19 - 24)
6. **VALID APPLICATIONS LIST FOR COMMITTEE**
Report of the Chief Planning Officer and Development Director.
For Information
(Pages 25 - 28)
7. **21 MOORFIELDS, LAND BOUNDED BY MOORFIELDS, FORE STREET AVENUE, MOOR LANE & NEW UNION STREET**
Report of the Chief Planning Officer
For Decision
(Pages 29 - 130)
8. **1 & 2 GARDEN COURT & 3 GARDEN COURT (BLACKSTONE HOUSE) MIDDLE TEMPLE LONDON EC4Y 9BL - 17/00937/FULL**
Report of the Chief Planning Officer
For Decision
(Pages 131 - 164)

9. **1 & 2 GARDEN COURT & 3 GARDEN COURT, MIDDLE TEMPLE LONDON EC4Y 9BL - 17/00938/LBC**
Report of the Chief Planning Officer
- For Decision**
(Pages 165 - 178)
10. **FREIGHT AND SERVICING SUPPLEMENTARY PLANNING DOCUMENT - UPDATES AND ADOPTION**
Report of the Director of the Built Environment
- For Decision**
(Pages 179 - 224)
11. **RENAMING OF PEDESTRIAN ROUTE: BARKER BRIDGE**
Report of the Director of the Built Environment.
- For Decision**
(Pages 225 - 228)
12. **CITY CORPORATION'S RESPONSE TO CONSULTATION ON THE DRAFT LONDON PLAN**
Report of the Director of the Built Environment
- For Decision**
(Pages 229 - 264)
13. **COMMITTEE TERMS OF REFERENCE**
Report of the Town Clerk
- For Decision**
(Pages 265 - 268)
14. **INTERNATIONAL COMPARATIVE STUDY**
Report of the Director of the Built Environment
- For Information**
(Pages 269 - 310)
15. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
16. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
17. **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

18. **MILLENNIUM INCLINATOR PROJECT**
Report of the City Surveyor

For Information
(Pages 311 - 320)

19. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
20. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

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

PLANNING AND TRANSPORTATION COMMITTEE

Monday, 29 January 2018

Minutes of the meeting of the Planning and Transportation Committee held at Livery Hall - Guildhall on Monday, 29 January 2018 at 10.00 am

Present

Members:

Christopher Hayward (Chairman)	Paul Martinelli
Deputy Alastair Moss (Deputy Chairman)	Andrew Mayer
Randall Anderson	Deputy Brian Mooney
Sir Mark Boleat	Sylvia Moys
Deputy Keith Bottomley	Barbara Newman
Henry Colthurst	Graham Packham
Emma Edhem	Susan Pearson
Marianne Fredericks	Deputy Henry Pollard
Graeme Harrower	Jason Pritchard
Christopher Hill	James de Sausmarez
Alderman Robert Howard	Oliver Sells QC
Deputy Jamie Ingham Clark	Deputy James Thomson
Alderman Gregory Jones QC	William Upton
Alderman Vincent Keaveny	

In Attendance

Officers:

Amanda Thompson	-	Town Clerk's Department
Jennifer Ogunleye	-	Town Clerk's Department
Deborah Cluett	-	Comptrollers & City Solicitor
Alison Hurley	-	City Surveyors Department
Annie Hampson	-	Department of the Built Environment
Paul Beckett	-	Department of the Built Environment
Paul Monaghan	-	Department of the Built Environment
Ian Hughes	-	Department of the Built Environment
Iain Simmons	-	Department of the Built Environment
Richard Steele	-	Department of the Built Environment

1. APOLOGIES

Apologies for absence were received from Deputy Alastair Moss, Rehana Ameer, Mark Bostock, Peter Dunphy, Oliver Lodge, Alderman Nicholas Lyons, Judith Pleasance and Graeme Smith.

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

There were no declarations of interest.

3. **MINUTES**

RESOLVED – That the minutes of the meeting held on 9 January be agreed as a correct record subject to the following amendments:

The deletion of William Upton under Members Present and instead being recorded under Apologies for Absence.

Annie Hampson had been awarded 'an Officer' of the Order of the British Empire.

Matters Arising

Thames Court Footbridge

The Committee was advised that the Corporation of London now owned the footbridge and an initial assessment had been undertaken which had highlighted a number of repair issues. Consultants would be carrying out further assessments, the results of which would be reported to the Committee.

The Chairman asked that urgency be maintained with a view to the bridge being open by the end of the year.

4. **OUTSTANDING REFERENCES**

RESOLVED – That the Outstanding References be noted and updated as appropriate.

5. **DELEGATED DECISIONS**

The Committee received a report of the Chief Planning Officer and Development Director in respect of development and advertising applications determined by the Chief Planning Officer and Development Director or those so authorised under their delegated powers since the last meeting.

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 detailing valid development applications received by the Department of the Built Environment since the last meeting.

RESOLVED - That the report be noted.

7. **PUBLIC LIFT REPORT**

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

In response to questions concerning the Millennium Inclinor, the City Surveyor advised that the Inclinor had been taken out of service whilst undergoing a major refurbishment as various parts were nearing the end of their shelf life and needed to be replaced.

As the works involved were significant the project was estimated to take 4 months with the Inclinor being brought back into service at the end of April, although officers would work with the contractor to try and achieve as early finish to the works as possible to avoid any unnecessary disruption.

Members expressed concern that the lift would be out of service for such a long time and asked that a full report on the works being undertaken including an equality assessment and future maintenance regime be reported back to the next Committee.

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

8. **54 - 58 BARTHOLOMEW CLOSE LONDON EC1A 7HP**

The Committee received a report of the Chief Planning Officer concerning the refurbishment and extension of the existing office building, including the erection of an additional floor of office accommodation and the creation of an amenity terrace at fifth floor level, at 54-58 Bartholomew Close.

The report advised that the proposed alterations and extension were considered acceptable in terms of their bulk, height, massing and design and would enable the building to continue to make a positive contribution to the character and appearance of the conservation area.

Mr Jonathan Brower, John Weeks and Helen Clifford spoke in objection to the application on the grounds of overshadowing and loss of light, increased noise from the proposed terrace, and the fact that during the consultation process the builders had advised that there would not be any further extension.

Mr Gerald Kaye, Chief Executive of Helical, was heard in support of the application which he advised had been submitted and developed entirely in accordance with planning policy and with open and honest dialogue with all relevant parties.

The Committee noted that 51 objections had been received from 37 residents which related to the design of the proposed extension and alterations, the impact on the Smithfield Conservation Area, increased traffic and congestion, the lack of provision for people with disabilities and the potential impact of the development on residential amenity including loss of daylight and sunlight, loss of privacy from increased overlooking and increased noise from the proposed terrace and construction works.

Members asked a number of questions in relation to the proposed roof terrace, the daylight and sunlight assessment and any cumulative impact, and the extent to which residents had been consulted.

Debate ensued and several Members spoke in support of the application as officers had concluded that the daylight and sunlight assessment had demonstrated that the majority of windows and rooms in neighbouring properties would not experience noticeable reductions in daylight and sunlight. The proposed development would provide additional and upgraded office accommodation

Other Members spoke against the proposal which they considered would impact heavily on residential amenity, especially the proposed roof terrace and the construction works.

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

12 votes in favour of the application
11 votes against

RESOLVED – That planning permission be granted for the proposal in accordance with conditions set out in the attached schedule.

9. **TELEPHONE KIOSK O/S ROYAL EXCHANGE BUILDINGS LONDON EC3V 3NL**

The Committee received a report of the Chief Planning Officer relating to two Grade II listed K6 telephone boxes located to the east of the Royal Exchange on a pedestrianised area that linked Cornhill and Threadneedle Street.

The boxes were within the Bank Conservation Area and within the setting of the Grade I listed Royal Exchange and the Grade II listed Royal Exchange Buildings. Planning permission was sought to convert the telephone boxes into retail units

The Committee considered that the proposed use would obstruct the highway and detract from the public realm to an unacceptable degree.

RESOLVED - That the application be refused for the reasons set out in the attached schedule.

10. **TELEPHONE KIOSK O/S ROYAL EXCHANGE BUILDINGS LONDON EC3V 3NL - LISTED BUILDING CONSENT**

RESOLVED - That Listed Building Consent be refused for the reasons set out in the attached schedule.

11. **BT TELEPHONE KIOSK - 1 LOTHBURY**

The Committee received a report of the Chief Planning Officer relating to one K6 telephone box located on the south side of Lothbury, east of its junction with Old Jewry and opposite its junction with Coleman Street.

The Committee considered that the proposed use would obstruct the highway and detract from the public realm to an unacceptable degree.

RESOLVED - That the application be refused for the reasons set out in the attached schedule.

12. **POSTMAN'S PARK CONSERVATION AREA CHARACTER SUMMARY AND MANAGEMENT STRATEGY**

The Committee considered a report of the Chief Planning Officer in relation to the Character Summary and Management Strategy that had been prepared for the Postman's Park conservation area.

RESOLVED – To

- 1) Approve the draft text of the Postman's Park Conservation Area Character Summary and Management Strategy SPD, appended as Appendix A to the report; and
- 2) Agree to it being issued for public consultation for six weeks in Spring 2018.

13. **DECLARATION OF CITY WALKWAY - LONDON WALL PLACE**

The Committee received a report of the Director of the Built Environment concerning the declaration of a new city walkway bridge through London Wall Place.

RESOLVED - To

Approve the vesting in the City Corporation of the City Walkway Bridges at Saint Alphage Highwalk over Fore Street; (ii) Saint Alphage Highwalk over Fore Street Avenue; (iii) Bassishaw Highwalk over London Wall; and (iv) Saint Alphage Highwalk over Wood Street; acknowledging in doing so that the city walkway bridge at Bassishaw Highwalk over London Wall is at a clearance height of 5.3 metres.

Declare to be a city walkway the highwalks through London Wall Place and over the city walkway bridges to be known as Bassishaw Highwalk (part) and Saint Alphage Highwalk (part) on a date to be determined in terms of the resolution set out at Appendix 1 to this report.

Delegate authority to the Transport Planning and Development Manager to insert an appropriate date for the declaration to come into force, such a date to be within 30 days of your Committee resolving to declare the highwalks to be a city walkway.

14. **MAYORAL COMMUNITY INFRASTRUCTURE LEVY 2 DRAFT CHARGING SCHEDULE - COL RESPONSE**

The Committee received a report of the Director of the Built Environment concerning the City Corporation's proposed response to the consultation on the Mayoral Community Infrastructure Levy.

RESOLVED – To agree the key points of the City Corporation’s proposed response set out below and that the detailed comments set out in paragraphs 7 - 18 of this report will be forwarded to the Mayor as the City Corporation’s response to the Mayor’s consultation on the Mayoral CIL2 Draft Charging Schedule.

The City Corporation:

Has supported the delivery of the Crossrail 2 railway and supports in principle for the introduction of a new Mayoral CIL charge to contribute towards the cost of delivering this strategic transport infrastructure.

Has no objection to the proposed Mayoral CIL charge rates applicable within the City of London, but seeks the Mayor’s commitment that he will keep these charges under review and work with the City Corporation and London Boroughs to review the Mayoral CIL if evidence emerges of an adverse impact on development.

Requests that the Mayor consider in full the impacts on development costs of the emerging draft London Plan on the viability of the Mayoral CIL before CIL rates are confirmed.

Requests that the Mayor extend his CIL nil charge rate to cover development used wholly or mainly for the operational purposes of the emergency services.

Agree that the detailed comments set out in paragraphs 7 - 18 of this report will be forwarded to the Mayor as the City Corporation’s response to the Mayor’s consultation on the Mayoral CIL2 Draft Charging Schedule.

15. AMENDMENT TO SCHEME OF DELEGATIONS

RESOLVED – To agree a minor amendment to the Scheme of Delegation as shown tracked on Appendix 1 (by replacing the word ‘application’ in the second line with ‘decisions’) for onward approval by the Court of Common Council.

16. APPROVAL OF A NON-IMMEDIATE ARTICLE 4

RESOLVED – To approve the making of a non-immediate Article 4 Direction for the whole of the City of London, removing permitted development rights granted by Class O, Part 3 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 for the change of use of a building or any land within its curtilage from offices (Use Class B1(a)) to dwellinghouses (Use Class C3), as set out in Appendix 1 to this report.

17. INTERNATIONAL COMPARATIVE STUDY

The Committee received the final report relating to the International Comparative Study which had examined international traffic management best practice and benchmarked the City of London Corporation's approach against 11 other cities.

Members noted that the study found that the City Corporation and Transport for London's approaches to traffic management and reduction were in line with international best practice. In some aspects, such as improving the experience of walking and cycling, congestion charging and public transport provision, the City and London were seen as global leaders.

The report made a series of recommendations for future transport policies, projects and programmes which would help inform the development of the City of London Transport Strategy and Local Implementation Plan.

In response to a question concerning the regulation of cyclists, officers advised that this could be looked at.

RESOLVED – That the report be noted and a copy of the study itself be included on the agenda for the next meeting.

18. DEPARTMENT OF THE BUILT ENVIRONMENT RISK MANAGEMENT - QUARTERLY REPORT

The Committee received a report of the Director of the Built Environment detailing the risk management procedures in place within the Department of the Built Environment and providing assurance that these were satisfactory and that they met the requirements of the corporate Risk Management Framework.

Members noted that since the last report there had been no changes in the list of Corporate or Departmental risks managed by the department. All risks had been reviewed since the last report but no increase or decrease in the Current Risk score had been identified.

RESOLVED – To note the report and the actions taken in the Department of the Built Environment to monitor and manage effectively risks arising from the department's operations.

19. PLANNING APPEAL DECISIONS

The Committee received a report of the Chief Planning Officer advising of the decisions made by the Planning Inspectorate on appeals made against the decisions of the City Corporation since the last report on 5th July 2016.

RESOLVED – That the report be noted.

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

There were no questions.

21. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
Richard Cloudesley School-Site

The Committee received a report of the Chief Planning Officer (CPO) concerning the delegation of a decision on a planning application relating to the Richard Cloudesley School Site.

The Committee was advised that a small part of the site lay within the administrative boundary of the City of London Corporation, but the majority of the site lay within the administrative boundary of the London Borough of Islington. As such it was a “cross-boundary application” and the applicant was required to submit the identical application to both Local Planning Authorities (“LPA’s”).

The report recommended that the Planning and Transportation Committee’s function of deciding the application be delegated to the London Borough of Islington (subject to Islington agreeing).

Several members expressed the view that although the majority of the site fell within Islington, the majority of residents affected were those with in the City of London, significantly the Golden Lane Estate, therefore both authorities should make a decision.

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

9 votes in favour of the proposal

11 votes against

RESOLVED – To refuse

To request Court of Common Council to delegate the Planning and Transportation Committee’s function of deciding planning application ref: 17/00770/FULL (and any amendments) to the London Borough of Islington under section 101(1)(b) of the Local Government Act 1972, subject to LB Islington’s agreement (and authorise any necessary agreement under section 101 of the Local Government Act 1972 to give effect to the delegation.)

To Authorise the Chief Planning Officer and Development Director to send comments on planning application ref: 17/00770/FULL to the London Borough of Islington, subject to prior consultation on the comments with the Chairman and Deputy Chairman of the Planning and Transportation Committee.

21 Moorfields

The Chairman reported that the site visit to 21 Moorfields was due to take place on 13 February and urged as many Members to attend as possible.

Bernard Morgan House

The Comptroller & City Solicitor advised that the challenge to the Committee's decision had been refused by the High Court.

22. **EXCLUSION OF THE PUBLIC**

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

23. **NON-PUBLIC MINUTES**

RESOLVED – That the minutes of the meeting held on 9 January be agreed as a correct record subject to the following amendments.

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

There were no questions.

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

None.

The meeting ended at 1.00 pm

Chairman

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PLANNING AND TRANSPORTATION COMMITTEE – OUTSTANDING ACTIONS

Item	Date	Action	Officer responsible	To be completed/ progressed to next stage	Progress Update
4.	9 January 2018 23 January 2018	<p><u>Matters Arising</u></p> <p><u>Ludgate Circus</u></p> <p>The Director of the Built Environment advised that an additional letter would be prepared as a matter of urgency, and gave her assurance that the issue would be treated as a priority.</p>	Steve Presland	SP arranging meeting between senior TfL reps and chairman and Deputy of P&T	<p>Completed – Letter sent on 9 January and circulated to Members on 10 January.</p> <p>Meeting between Chairman, Deputy Chairman and TfL representatives took place on Tuesday 23rd January to discuss this issue.</p> <p>The meeting between TfL and CoL safety officers to conduct H7S audit (informal) needs to take place prior to committee and the data exchange be completed tec</p>
9.	9 January 2018 23 January 2018	<p>Freight and Servicing Supplementary Planning Document - Consultation and Adoption</p> <p>RESOLVED – That officers review the comments made by Members of the Committee and recirculate the document with the amendments.</p>	Bruce McVean		<p>All comments reviewed and SPD updated. Awaiting confirmation from Chairman that revised SPD can be tabled at 29 January Committee under urgency.</p> <p>On Agenda for 20 Feb</p>

Item	Date	Action	Officer responsible	To be completed/ progressed to next stage	Progress Update
	9 January 2018 23 January 2018	Major Highway Works for 2018 In response to a question concerning 'lane rental', officers advised that the Government was currently consulting on this initiative and undertook to report back to the Committee following the outcome of this.	Ian Hughes		The consultation has now closed and DfT are analysing the feedback. As a minimum, they will need to publicise a decision before the current Lane Rental trials with TfL and Kent County Council expire in March 2019.
11.	9 January 2018	<u>'Green' Initiative</u> A Member for Dowgate Ward reported that 'green' initiatives were a priority for his ward and asked if a report detailing these could be brought to a future meeting. The Director of the Built Environment suggested that this could be done by way of an annual report as many of the initiatives came under the remit of other Committees.	Paul Beckett		Initial response email sent 25/01/2018. Existing 'green' monitoring reports are being reviewed for Dowgate-specific material. Investigating the scope for an annual 'green' report contributed to by several departments. Review of 2017/18 could be prepared in mid-2018

Item	Date	Action	Officer responsible	To be completed/ progressed to next stage	Progress Update
	9 January 2018	<p><u>Transport for London</u></p> <p>A Member reported that an issue she had raised with TfL on behalf of a constituent had been answered with a 'not within our jurisdiction' response and asked if regular dialogue took place?</p> <p>The Director of the Built Environment advised that were aware of this and undertook to provide the member with a detailed response.</p>	Ian Hughes	COMPLETED	The Member was sent a detailed response on 26/01/2018.

Item	Date	Action	Officer responsible	To be completed/ progressed to next stage	Progress Update
	9 January 2018	<u>Dowgate Hill/Cannon Street</u> A member asked if the provision of a taxi rank in this area could be explored which officers agreed to look into.	Sam Lee	NFA	<p>There is insufficient space to provide a taxi rank in Dowgate Hill or on Cannon Street in the vicinity of Cannon Street station, without causing obstruction/congestion or taking away loading spaces.</p> <p>A location on the eastern end of Cloak Lane (very close to the station) was however, identified but recent engagement with TfL Taxi & Private Hire and the trades representing taxi drivers did not support a rank in this location.</p>

Item	Date	Action	Officer responsible	To be completed/ progressed to next stage	Progress Update
	9 January 2018	<u>Yellow Bikes</u> It was agreed that a copy of the Code of practice should be circulated to all members of the Committee together with details for how to report obstructions.	Bruce McVean		Completed - Update circulated to members on 11/01/2018 An update report and review of our current policy will be presented to Streets and Walkways Sub Committee on 21 May 2018 and Planning and Transportation Committee on 29 May 2018. This update will cover the first six months of dockless cycle hire operations in the City.

Item	Date	Action	Officer responsible	To be completed/ progressed to next stage	Progress Update
	9 January 2018 23 January 2018	<p><u>Millennium Inclinor</u></p> <p>A Member reported that this had recently been out of service again and it was agreed that the City surveyor should be asked to provide an update.</p> <p>Members expressed concern that the lift would be out of service for such a long time and asked that a full report on the works being undertaken including an equality assessment and future maintenance regime be reported back to the next Committee</p>	Alison Hurley		<p>Completed – Update circulated to members on 11/01/2018.</p> <p>On agenda 20 Feb</p>
	9 January 2018	<p><u>Blackfriars Bridge Underpass</u></p> <p>A Member expressed concern regarding the poor state of the underpass at Blackfriars Bridge and asked who was responsible for the cleaning and maintenance of it.</p> <p>Officers advised that there were overlapping responsibilities between the CoL and TfL and discussions were taking place with TfL to address the problem.</p>	Jim Graham		<p>A detailed response was sent to the Member on 09/01/2018.</p> <p>The City are Monitoring it, increasing inspections, scheduled and adhoc cleaning as required is now in place.</p> <p>Put a request in with TfL with a view to arranging a site meeting to agree an allocate clear responsibilities and explore CoL taking over TfL responsibilities.</p>

Item	Date	Action	Officer responsible	To be completed/ progressed to next stage	Progress Update
	23 January 2018	<u>International Comparative Study</u> RESOLVED – That the report be noted and a copy of the study itself be included on the agenda for the next meeting	Avrill Partlett		On agenda 20 Feb
	23 January 2018	<u>Thames Court Footbridge</u> The Committee was advised that the Corporation of London now owned the footbridge and an initial assessment had been undertaken which had highlighted a number of repair issues. Consultants would be carrying out further assessments, the results of which would be reported to the Committee. The Chairman asked that urgency be maintained with a view to the bridge being open by the end of the year.	Paul Monaghan	Gateway 3/5 report for July Committee	Consultant instructed to commence structural assessment and review defects identified in inspection report. Progressing towards next Gateway report in usual Projects process.

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Committee(s)	Dated:
Planning and Transportation	20th February 2018
Subject: Delegated decisions of the Chief Planning Officer and Development Director	Public
Report of: Chief Planning Officer and Development Director	For Information

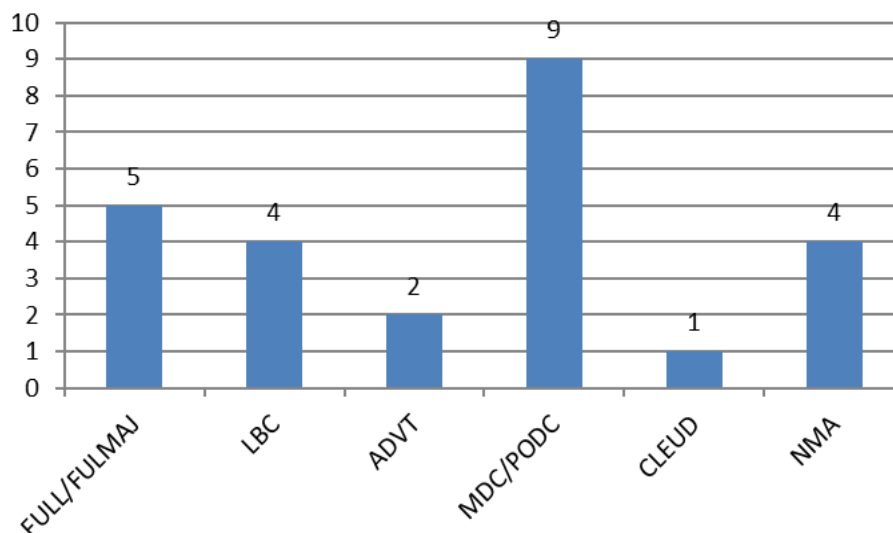
Summary

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

Twenty-five (25) matters have been dealt with under delegated powers. Nine (9) relate to conditions of previously approved schemes. Four (4) for works to listed buildings. Five (5) applications for development have been approved including one (1) change of use. Two (2) relate to advertisement consents, one of which was refused. The remaining applications are four (4) non-material amendments and one (1) Certificate of Lawfulness for Existing Development.

Breakdown of applications dealt with under delegated powers



FULL- Full Planning Permission
FULMAJ - Full Major Application
LBC - Listed Building Consent
ADVT - Advertisement Consent
MDC - Submission of Details (Planning)

PODC - Planning Obligations
CLEUD - Certificate of Lawfulness (Existing)
NMA - Non-material Amendments

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
17/01102/FULL Aldgate	Creechurch House 24 Creechurch Lane London EC3A 5JX	Change of use of part of the ground floor to a health and fitness centre (Class D2) (310sq.m).	Approved 31.01.2018
17/01206/MDC Aldgate	6 Lloyd's Avenue London EC3N 3AX	Details of vibration measures pursuant to condition 3 of planning permission 17/00837/FULL dated 21.11.2017	Approved 18.01.2018
17/01256/LBC Aldersgate	153 Shakespeare Tower Barbican London EC2Y 8DR	Internal alterations including reconfiguring of non-structural walls.	Approved 30.01.2018
18/00015/NMA Broad Street	4-6 Copthall Avenue London EC2R 7DA	Non-material amendment under Section 96A of the Town and Country Planning Act 1990 (as amended) to planning permission 17/00508/FULL dated 18.07.17 to allow for minor changes to the approved internal layout.	Approved 31.01.2018
17/01270/MDC Bridge And Bridge Without	33 King William Street London EC4R 9AS	Submission of an acoustic report for new plant pursuant to condition 20 of planning permission dated 24th June 2015 (App No 14/00860/FULMAJ).	Approved 02.02.2018
17/00929/MDC Bishopsgate	135 Bishopsgate London EC2M 3TP	Submission of a scheme of protective works for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects pursuant to condition 2 of planning permission 17/01122/FULL dated 12th December 2017.	Approved 30.01.2018

17/00951/MDC Bishopsgate	Octagon Mall & Land Adjacent To 100 Liverpool Street Including The Fulcrum & Parts of Eldon Street & Blomfield Street London EC2	Details of a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects; method statement to include arrangements to secure that, during any period when concurrent construction is taking place of both the permitted development and of the Crossrail structures and tunnels in or adjacent to the site of the approved development, the construction of the Crossrail structures and tunnels are not impeded pursuant to conditions 2 and 3 of planning permission dated 8 May 2017 (17/00202/FULL).	Approved 18.01.2018
17/01225/FULL Bishopsgate	Liverpool Street Station Liverpool Street London EC2	External alterations to the western elevation of Liverpool Street Station and the provision of a public information kiosk within the station concourse.	Approved 25.01.2018
17/01226/LBC Bishopsgate	Liverpool Street Station Liverpool Street London EC2	Internal and external alterations to the western elevation of Liverpool Street Station and the provision of a public information kiosk within the station concourse.	Approved 25.01.2018
18/00095/NMA Bishopsgate	135 Bishopsgate London EC2M 3TP	Non-material amendment (under Section 96a of the Town and Country Planning Act 1990) to vary the wording of condition 3 of planning permission 17/01122/FULL dated 12th December 2017.	Approved 02.02.2018
17/00585/FULMAJ Bassishaw	Garrard House 31 Gresham Street London EC2V 7QA	External alterations comprising (infilling of central bay and inset corners, works to facade), extension to existing office building at levels 7 and 8 (2687sq.m), change of use at ground floor level from office (Class B1) use to retail (Class A1) use (378sq.m), the creation of ancillary cycle parking and shower facilities at basement level.	Approved 01.02.2018

17/00987/MDC Bassishaw	St Alphage Gardens St Alphage Garden London EC2Y 5DE	Submission of details of a programme of archaeological work pursuant to condition 2 of planning permission dated 13 June 2017 (application number 16/01358/FULL)	Approved 30.01.2018
17/01261/CLEUD Castle Baynard	10 Godliman Street London EC4V 5AJ	Certificate of lawful existing use or development for the lightweight structure forming a lateral extension of the top storey of the development in accordance with the as-built drawings.	Grant Certificate of Lawful Development 18.01.2018
17/01079/LBC Candlewick	The Olde Wine Shades Public House 6 Martin Lane London EC4R 0DJ	Application under Section 19 of the Planning (Listed Building and Conservation Areas) Act 1990 as amended to enable retention of works carried out together with minor amendments without complying with condition 7 (approved drawings) of listed building consent dated 13th December 2016 (16/00786/LBC).	Approved 18.01.2018
17/01080/FULL Candlewick	The Olde Wine Shades Public House 6 Martin Lane London EC4R 0DJ	Application under S73a of the Town and Country Planning Act 1990 (as amended) to allow the retention of works carried out together with minor amendments without complying with condition 5 (approved drawings) of planning permission 16/00785/FULL dated 13th December 2016.	Approved 18.01.2018
17/01250/NMA Coleman Street	City Point Plaza 1 Ropemaker Street London EC2	Application under Section 96A of the Town and Country Planning Act 1990 (as amended) for a non-material amendment to vary condition 5 of planning permission dated 10th November 2017 (17/00268/FULL) to allow the replacement of bollards at the north-east corner of the Plaza with a removable bench and the relocation of bollards at the south-east corner of the Plaza to the area adjacent to Stair 13.	Approved 30.01.2018

18/00017/NMA Coleman Street	55 Moorgate London EC2R 6PA	Non material amendment under section 96A of the Town and Country Planning Act 1990 to planning permission 16/00405/FULMAJ dated 11 October 2017 for amendments to the Moorgate elevation, Nun Court, Coleman Street, north elevation and to remove condition 19.	Approved 31.01.2018
18/00006/MDC Cheap	1-3, 4, 5, 7 & 8 Frederick's Place & 35 Old Jewry London EC2R 8AE	Details of the appearance of the plant enclosures and materials pursuant to condition 3(d) [in part] of planning permission (application no. 15/01308/FULL) and condition 2(d) [in part] of Listed Building Consent (application no. 15/01309/LBC) both dated 4th October 2016.	Approved 30.01.2018
17/01042/ADVT Dowgate	Cannon Railway Bridge Upper Thames Street London EC4R 2SB	Two internally illuminated (L.E.D. lighting) poster advertising panels each measuring 12.6m wide x 3.4m high displayed at a height of 6m designed into the east and west facades of the over road bridge at Upper Thames Street for the display of digital images showing public information and poster advertising images.	Refused 25.01.2018
17/01093/FULL Dowgate	Foreshore From Allhallows Lane To Angel Lane London EC4	The installation of a new steel sheet pile retaining wall and fill material associated with the campshed at foreshore level.	Approved 18.01.2018
17/01220/MDC Farringdon Within	Land Bounded By Charterhouse Street, Lindsey Street, Long Lane And Hayne Street London EC1	Submission of revised details relating to the width of the masonry frame and of the colour scheme for the faience work pursuant to condition 5 of planning permission 13/00605/FULEIA (allowed on appeal - reference APP/K5030/A/15/3069991) dated 20.01.16.	Approved 31.01.2018

17/01259/ADVT Farringdon Within	20 Old Bailey London EC4M 7AN	Installation and display of: (i) one halo illuminated fascia sign measuring 0.4m high by 4.6m wide situated at a height above ground level of 4.8m and (ii) one halo illuminated projecting sign measuring 0.9m high by 0.6m wide at a height above ground level of 4.2m.	Approved 23.01.2018
17/01205/MDC Lime Street	5 - 7 St Helen's Place London EC3A 6AB	Details of plant noise levels pursuant to condition 2 of planning permission dated 12.10.2017 (17/00830/FULL).	Approved 18.01.2018
17/01264/LBC Tower	10 Trinity Square London EC3N 4AJ	Installation of eight curtain rails within the entrance lobby.	Approved 25.01.2018
17/01301/PODC Tower	Emperor House 35 Vine Street London EC3N 2PX	Submission of the Local Skills, Training and Job Brokerage Strategy (Construction) and Local Procurement Strategy pursuant to schedule 3 paragraph 4.1.1 and 4.2 of the section 106 agreement dated 09 November 2017 associated planning application reference 17/00239/FULMAJ.	Approved 23.01.2018

Committee(s)	Dated:
Planning and Transportation	20th February 2018
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
18/00055/FULL Aldgate	37 Houndsditch, London, EC3A 7DB	Erection of a two storey extension for office (Class B1) use and the internal and external refurbishment and alterations to the existing building. (369sq.m GIA)	19/01/2018
18/00082/FULL Billingsgate	Custom House, 20 Lower Thames Street, London, EC3R 6EA	Works associated with conversion of existing storage area at basement level into new work space; installation of replacement external escape stairs from basement level to ground floor; installation of 11 external condenser units in sunken external gulley pit below ground level at rear of building.	30/01/2018
17/01224/FULL Bishopsgate	8 Devonshire Row, London, EC2M 4RH	Change of use of the ground floor and basement from a shop (Class A1) to a wine bar (Class A4) 98sq.m.	11/01/2018
17/01290/FULL Castle Baynard	60 Fleet Street, London, EC4Y 1JU	Alterations to the shopfront including replacement of glazing and door.	22/12/2017
17/01141/FULL Castle Baynard	St Andrews House, 18 - 20 St Andrew Street, London, EC4A 3AG	Use of part of ground floor and part basement for a flexible use for either Class B1 or Class A3 in lieu of permitted flexible use for either Class B1 or Class A1 (478sq.m).	10/01/2018
18/00088/FULL Castle Baynard	146 Fleet Street, London, EC4A 2BU	Erection of mansard roof extension (44sq.m).	30/01/2018

18/00033/FULL Cordwainer	8, 9 & 13 Well Court, London, EC4M 9DN	Extension of the existing building to provide a proposed fourth, fifth and sixth floor of office (Class B1) floorspace plus removal of existing plant at fourth floor level and installation of plant and plant enclosures at sixth floor roof level. (469sq.m GIA).	12/01/2018
18/00059/FULL Cornhill	1 Old Broad Street, London, EC2N 1DW	Replacement of glazing with ventilation louvres at second floor level.	19/01/2018
17/01135/FULL Farringdon Within	14 - 17 Carthusian Street, London, EC1M 6AD	Installation of (i) a new internally illuminated canopy (ii) new timber entrance doors.	12/01/2018
18/00034/FULL Farringdon Within	1 - 2 St Andrew's Hill, London, EC4V 5BY	Replacement of rooftop extension and roof level alterations (16sq.m), together with replacement plant.	12/01/2018
17/01184/FULL Farringdon Within	Priory Court, 29 Cloth Fair, London, EC1A 7JQ	Removal of existing roof top plant room and erection of new office accommodation (Use Class B1) within a mansard roof with associated roof terrace and the relocation of existing plant.	16/01/2018
18/00036/FULL Farringdon Without	28 Chancery Lane, London, WC2A 1EN	Change of use of part ground floor from office (Class B1) to a flexible use for either office (Class B1) or cafe/restaurant (Class A3) and creation of two doors to provide access from Bream's Buildings (445sq.m).	18/01/2018
18/00031/FULMAJ Langbourn	120 Fenchurch Street, London, EC3	Application under section 73 of the Town and Country Planning Act 1990 to vary condition 48 (approved plans) of planning permission dated 08 February 2016 (ref: 14/00237/FULMAJ) to enable minor material amendments to the consented scheme including: i) the introduction of seating at level 15 in association with the level 14 restaurant (Class A3); ii) increase the capacity and amend the opening hours of the publicly accessible roof garden.	02/02/2018
17/01227/FULL Portsoken	Staff Mess Room, Sixth Floor, Petticoat Square, London, E1 7EA	Conversion of staff mess room at GIA 19.3sq.m to form a studio flat at GIA 36sq.m for social rent on the sixth floor of Middlesex Street Estate, with extensions onto balconies and new opening for walkway.	16/01/2018

18/00097/FULL Portsoken	Aldgate House, 33 Aldgate High Street, London, EC3N 1AH	Change of use of part of the ground floor and mezzanine (395sq.m) from office (Class B1) to restaurant (Class A3) and associated works including ground floor extension (170sq.m) and extension of existing internal mezzanine (165sq.m).	29/01/2018
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Committee:	Date:
Planning and Transportation	20 February 2018
Subject: 21 Moorfields, Land Bounded By Moorfields, Fore Street Avenue, Moor Lane & New Union Street London EC2P 2HT Construction of a mixed use development above and around the new Crossrail station entrance to provide office (Class B1) space[63,008sq.m GEA], retail (Use Class A1/A3/A4) space [182sq.m GEA], a replacement City Walkway, a new urban square, cycle parking, servicing, storage, plant, landscaping [12,587sq.m GEA] and associated works. [Total 75,777sq.m GEA]	Public
Ward: Coleman Street	For Decision
Registered No: 17/01095/FULEIA	Registered on: 27 October 2017
Conservation Area:	Listed Building: No

Summary

This planning application amends previous schemes for the site which were approved in 2015 and 2017, to deliver a development that provides trading floors and accommodation for Deutsche Bank to meet its requirements for a City headquarters, which is significant in supporting the City's role as a world financial centre.

The alterations to the scheme involve reducing the size and height of the western building onto Moor Lane and increasing the size and, in parts, the height of the eastern building.

The design approach accords with the previous schemes and is informed by the surrounding buildings and the requirement to span the underground station and lines below. The site has been cleared and works carried out in respect of the previous approved schemes which are considered implemented.

The scheme would provide an enhanced City Walkway along the southern edge of the site (accessed by escalators, stairs and lifts) which would run from Moorfields to the Barbican and Barbican Centre over Moor Lane. There would be a publicly accessible square at the western end of the site which would be landscaped.

There would be a reduction in the quantity of open space and retail on the site necessitated by Deutsche Bank's space requirements. Although this would be

contrary to policy, it is a change welcomed by the majority of respondents to the proposal due to an anticipated reduction in potential noise and disturbance.

This scheme differs from the two previous approved schemes by accessing the service yard from Moor Lane rather than Fore Street Avenue. This is the main ground of objection from neighbouring residents. It is a requirement of Deutsche Bank that this is achieved in order to meet its delivery management and security requirements.

The impact of this change has been mitigated by negotiations through restricting the number of service vehicles to 85 through consolidation (of which five are anticipated to be HGVs), by noise mitigation measures and by allowing no vehicular access to the service area from this point other than between 7am and 9pm Monday to Friday, between 9am and 6pm on Saturday and not at all on Sunday or Bank Holidays. Limited deliveries, motorbike and cycle couriers will access a 'Post room' facility on Fore Street Avenue.

The site was previously serviced from Moor Lane before its demolition and, while the use of Moor Lane in this case is not in accordance with previous approvals, it is considered that, through the agreed mitigation measures, the impact on the amenity of neighbouring residential occupiers would not be significant and would not warrant a refusal on this ground. The location of the service area would not prevent the agreed enhancement scheme for Moor Lane being implemented.

There were 51 respondents from neighbouring residential and commercial occupiers; 47 objected, two were neutral and two supported the scheme.

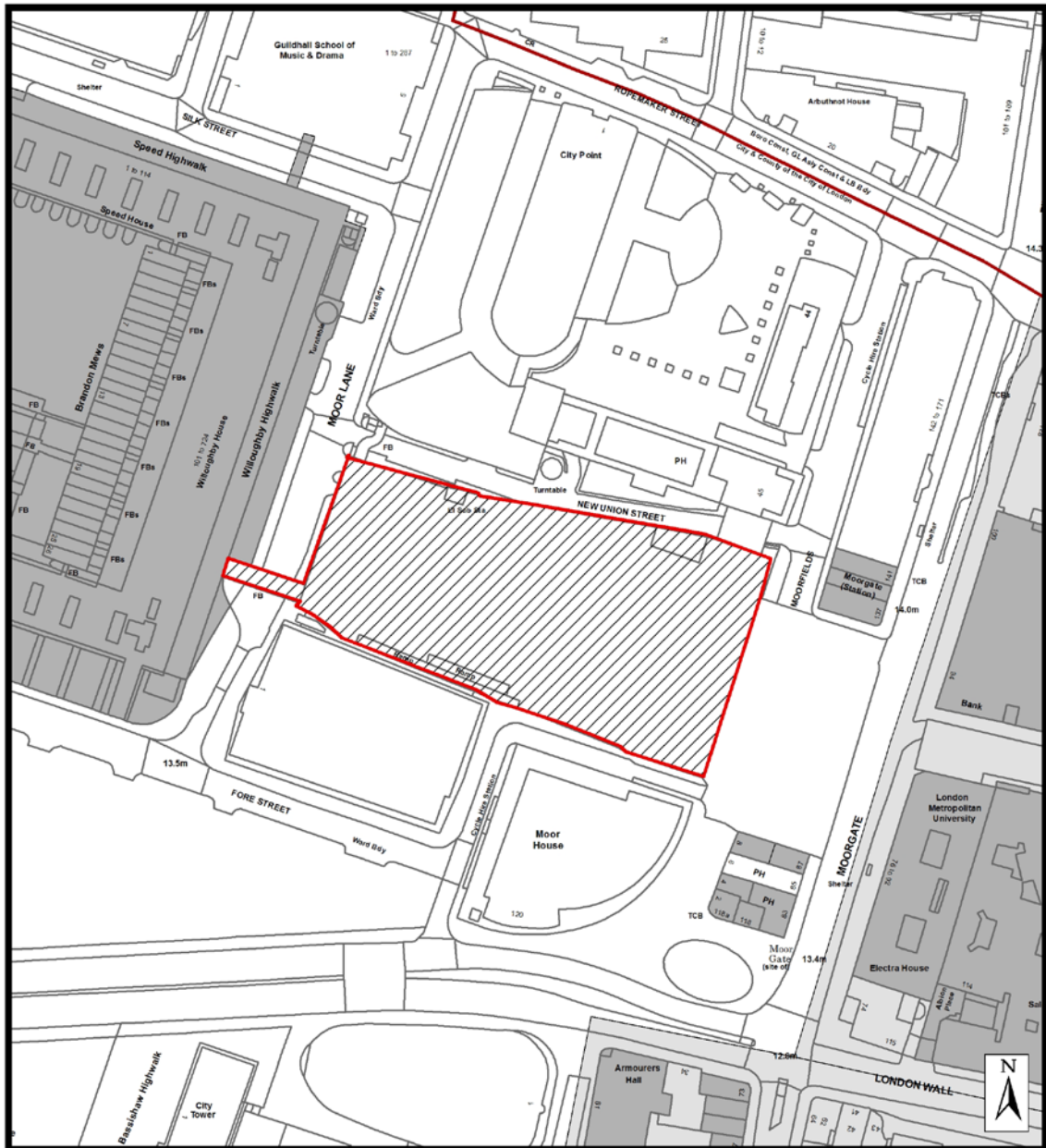
Changes to the City Walkway will require separate approvals in respect of declaration and in relation to maintenance. Legal agreements related to those approvals and reports will be placed before your Committee at the appropriate times.

On balance, the proposals are in substantial compliance with the development plan policies that relate to it. In particular, through the retention of a major European bank with 7,000 employees in London, and supports the objective of promoting the City as the leading international financial and business centre. The impact of the scheme has been assessed and it is concluded that the proposal overall is acceptable subject to conditions and to a Section 106 agreement being entered into to cover the matters set out in the report.

Recommendation

- (a) 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;
- (b) That your officers be instructed to negotiate and execute obligations in respect of those matters set out in the report under Section 106 and any necessary agreements under Section 278 of the Highway Act 1980.
- (c) That the draft statement set out at Appendix A and in the report are agreed as the Reasons for Grant and the Reasoned Conclusion of the Local Planning Authority on the significant effects of the proposals.



City of London Site Location Plan



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ADDRESS:
21 Moorfields

CASE No.
17/01095/FULEIA

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



DEPARTMENT OF THE BUILT ENVIRONMENT

21 Moorfields, Pre-demolition



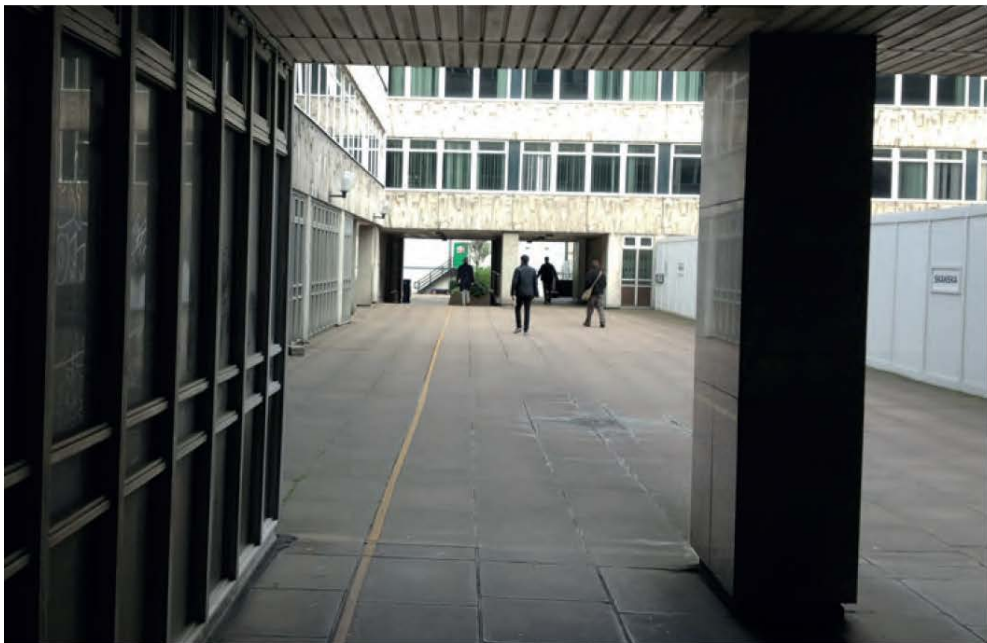
Moorfields looking north



Moor Lane towards New Union Street

Case No. 17/01095/FULEIA

21 Moorfields, Pre-demolition



Case No. 17/01095/FULEIA

Main Report

Environmental Statement

1. The application is for EIA development and is accompanied by an Environmental Statement (ES). The ES is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This is to ensure that the importance of the predicted effects and the scope for reducing them are properly understood by the public and the competent authority before it makes its decision.
2. The Local Planning Authority must take the Environmental Statement into consideration in reaching its decision as well as comments made by the consultation bodies and any representations from members of the public about environmental issues as required by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
3. The duties imposed by regulation 26 of the EIA Regulations require the local planning authority to undertake the following steps:
 - a. To examine the environmental information;
 - b. To reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account the examination referred to at (a) above, and where appropriate, their own supplementary examination;
 - c. To integrate that conclusion into the decision as to whether planning permission is to be granted; and
 - d. If planning permission or subsequent consent is to be granted, consider whether it is appropriate to impose monitoring measures.
4. The local planning authority must not grant planning permission unless satisfied that the reasoned conclusion referred to at paragraph 3(b) above is up to date.

The draft statement attached to this report at Appendix A sets out the conclusions reached on the matters identified in regulation 26. It is the view of the officers that the reasoned conclusions set out in the statement are up to date.
5. Representations made by anybody required by the EIA Regulations to be invited to make representations and any representations duly made by any other person about the environmental effects of the development also forms part of the environmental information before your Committee.
6. The Environmental Statement is available in the Members' Room, along with the application, drawings, relevant policy documents and the representations received in respect of the application.

Site and Surroundings

7. The proposal site is bounded by Moorfields to the east, New Union Street to the North, Moor Lane to the west and Fore Street Avenue/Fore Street to the south:
 - Moorfields is a busy commercial street that provides access to Moorgate Underground Station. On completion of the Crossrail works, the southern end, from London Wall to just north of the station entrance, will become pedestrianised subject to timed access for service vehicles.
 - New Union Street is a privately owned street that provides servicing access to the developments at City Point and Tenter House. There is also some pedestrian usage.
 - Moor Lane has a mixed character. Post-War, the whole of the eastern side has been characterised by large commercial office developments. The western side, in contrast, is defined by the residential buildings of the Barbican - one of four areas (Barbican, London Wall, Paternoster Square and Golden Lane) compulsorily purchased and designated for large-scale, precinct like redevelopment, as part of the plan for the 'Reconstruction of the City of London' by Holden & Holford in 1947. It should be noted that the Barbican Estate is currently being assessed for conservation area status.
 - Fore Street Avenue provides servicing access for the large office developments of Moor House and Moorgate Exchange. It is currently a cul-de-sac pending completion of the Crossrail and related over site development of 21 Moorfields. Following completion of these developments it will provide a significant street level pedestrian route from Moorgate Station to the Barbican and the western part of the City.
8. This proposal site is currently a construction site that was previously occupied by an office building (21 Moorfields), part of Moorgate Underground Station and several retail units at ground and Highwalk levels. The previously existing building on the site was relatively small and access to the offices was obtained from the podium level above Moorgate Station. The servicing yard was accessed from Moor Lane. The frontage to Moorfields will form part of the Crossrail station for the Elisabeth Line at Moorgate/Liverpool Street and is part of the Crossrail construction site and Underground station.
9. The site includes areas previously occupied by Moorfields Highwalk, leading to the Barbican, together with the stairs and escalators adjacent to Moorgate Station and a ramp in Fore Street Avenue (all now demolished).

10. Prior to demolition the total commercial floorspace on the site was:
- Offices (B1) - 21,346sq.m (GEA)
- Retail (A1/A3) - 1,715sq.m (GEA)
11. On the western side of Moor Lane is Willoughby House in the Barbican. This has 7 floors above the second floor podium and is in residential use. The Barbican is listed (grade II).
12. On the eastern side of Moorfields there are 137/141 Moorgate, 101-107 Moorgate and 2, 4 & 8 Moorfields. 137/141 Moorgate and 2, 4 & 8 Moorfields are 19th century listed buildings (Grade II) with ground and 3 to 5 upper floors. 101-107 Moorgate is currently part of the Crossrail work site. Planning permission was granted in March 2012 for over site development at 101-107 Moorgate with a building containing ground, mezzanine and six upper floors for office and retail uses.
13. To the north and south there are the following buildings:
- City Point - Ground and 34 upper floors; office and retail uses. Extensively refurbished in 1998-2001;
 - Moor House - Ground and 17 upper floors; office and retail uses. Completed in 2005;
 - Tenter House - Ground and 10 upper floors office and pub uses (built in 1960s). Outline planning permission was granted in 1997 (renewed three times) to construct a new 10 Storey office and retail building. The last permission has now expired. There is a current application to provide an 18 storey office building with ground floor retail together with works to the two basements and the ground floor level with associated servicing, waste storage and plant facilities, cycle parking and public realm improvements at City Point Plaza and New Union Street [29,221sq.m GEA];
 - Moorfields House - Ground and 7 upper floors in office use. Built in 1960s;
 - Moorgate Exchange, Fore Street – Ground and 12 upper floors in office and gymnasium/fitness centre use. Built in 2012-13.
 - London Wall Place, bounded by London Wall, Fore Street and Bread Street is nearing completion. This development will provide two buildings. The east building, 121 London Wall, is 14 storeys, 74.9m, high providing 41,785sq.m of office floorspace and 1,020sq.m of retail floorspace. The west building, 123 London Wall, is 18 storeys, 91.37m, high, providing 26,030sq.m of office floorspace and 225sq.m of retail floorspace.

Relevant Planning History

14. In 1997 planning permission was granted subject to a Section 106 agreement for redevelopment of 21 Moorfields with offices, a new

station entrance and retailing. This agreement was not completed until 4th July 2001, when the planning permission was issued.

15. The building approved in 2001 had ground and 6 upper floors on Moorfields and ground and 5 floors on Moor Lane, setting back and rising in 2 and 3 storey steps to ground plus 11 floors at the centre of the site. The approved uses were offices - 51,122sq.m and retail - 1,751sq.m.
16. In 2008 planning permission was granted for two new office buildings at 21 Moorfields with a broad pedestrian way provided in an atrium between them. The approved uses were offices (55,494sq.m) and retail (2,737sq.m).
17. The combined new buildings were similar in height and form to the development approved in 2001 but, by reducing floor to floor heights, it was possible to incorporate one more floor. A replacement high level City Walkway was included along the southern edge of the new buildings, with new bridges over Moor Lane and Fore Street Avenue. Lifts, stairs and an escalator were proposed on Moorfields and stairs and a lift on Moor Lane.
18. These planning permissions were not implemented and the time limits for commencement have expired.
19. Approval has been given under the Transport & Works Act for a single storey structure on Moorfields to form a new station entrance. Three angled folds of blue glass would frame the ticket hall entrance creating a visual marker in views along Moorfields. Escalators and stairs to the Highwalk were approved to replace those that had existed. The replacement escalators and stairs would be on the corner of Moorfields and Fore Street Avenue. They would be independent of the new ticket hall and London Underground operations and would be operated and maintained by the City.
20. On 25th November 2015 planning permission (application no. 14/01179/FULEIA) was granted for the demolition of the existing building and structures to ground slab level and construction of a mixed-use development above and around the new Crossrail station entrance to provide office (Class B1) space [64,683sqm GEA], retail (Class A1/A3/A4) space [1,156sqm GEA], a replacement City walkway, a new public square, cycle parking, servicing, storage, plant, landscaping and associated works. [Total 65,839sqm GEA]. All existing structures on the site were demolished and this permission was partially implemented and as such remains valid.
21. On 10th November 2017 planning permission (application no. 16/00883/FULEIA) was granted to enable minor material amendments to the scheme approved in 2015 including: (1) retention of the west building piles; (2) alterations to the external envelope including a reduction in the massing of the west building and an additional storey to the east building; and (3) alterations to the internal layout [Revised GEA 62,543sq.m]. The proposals were a response to site investigations and enabling works. As an amendment to the previous

scheme, this permission is also considered implemented and is referred to in this report as the “extant” or “previous” scheme.

Proposal

22. The current scheme proposes several alterations to that approved in November 2017 to reflect the requirements of a significant pre-let tenant; Deutsche Bank.
23. The principal aspects in the current proposals which vary from the previously approved scheme are:
 - The east building (fronting Moorfields) would be extended westward to provide larger floorplates to accommodate trading floors.
 - The east building would vary in height between 8 and 16 storeys (including mezzanines levels) above podium level with the top two storeys enclosing mechanical plant (93.465m AOD – an overall increase of 3.365m);
 - The west building (fronting Moor Lane) would be reduced in height from 8 storeys (51.95m AOD) to three storeys above podium level (37.59m AOD);
 - There would be no accessible terrace spaces on the western building onto Moor Lane;
 - Terraces for use by the office occupiers would be provided at level 11 on the eastern elevation and levels 9, 10, 12 and 13 on the western elevation of the east building. A small terrace would also be provided at level 14 on the south elevation;
 - The publicly accessible route through the building at podium level would not be included;
 - The publicly accessible urban square to the west of the podium level would be reduced in size from 980sqm to 521sqm and the number of retail units reduced to one;
 - An improved public route through the south side of the site would be provided;
 - The loading bay and servicing area would be accessed from Moor Lane with a secondary “Post Room” provision for couriers on Fore Street Avenue.
24. The London Underground ticket hall at ground level and the structures and station at basement levels do not form part of the application and are unaltered by this proposal.
25. There would be no basements in the new building as all the land below ground level is occupied by the Underground station and tunnels.
26. The office lobby for the eastern building would be at podium level with stair, escalator and lift access from ground level in Moorfields. There would be a secondary entrance from the new urban square.

27. Access to the western building would be at podium level from the new urban square.
28. The proposed floorspace is:
Offices – 63,008sq.m GEA
Retail – 182sq.m GEA
City Walkway, urban square, landscaping, plant, etc. - 12,587sq.m GEA
29. The existing Highwalk escalators and stair on Moorfields are to be replaced by new escalators, stairs and a lift in lieu of the existing ramp in Fore Street Avenue. On Moor Lane there are existing stairs and a lift that would no longer be used. These would be replaced by a new lift and stairs. The Highwalk bridge over Moor Lane is proposed to be increased in width and the bridge over Fore Street Avenue would be altered to meet changes in levels.
30. The scheme would be serviced from a service area in Moor Lane and from a secondary on-street 'post room' facility on Fore Street Avenue. Other than a single parking bay within the loading area for people with disabilities, no car or motor cycle parking is proposed. Pedal cycle parking and changing facilities would be provided on site.

Consultations

31. A Statement of Community Involvement has been submitted with the application outlining the developer's engagement with the statutory authorities, other interest groups and with residents, building owners and occupiers in the surrounding area. A public exhibition was held at St. Giles Cripplegate Church, Fore Street, on the 26th and 27th September 2017 attended by approximately 102 people.
32. A total of 43 written responses were submitted during the public exhibition. Analysis of the submissions indicated that the majority of respondents felt neutral to positive about the proposals while approximately a quarter responded negatively:

Response	Tally	%
Positive	16	37%
Neutral	15	35%
Negative	11	26%
No responses provided	1	2%
Total	43	100%

33. Following receipt of the planning application by the City the application has been advertised and widely consulted upon. Following receipt of

additional information under Regulation 25 of the EIA Regulations the application was re-advertised and all previous consultees re-consulted. Copies of all letters and e-mails making representations are attached in your separate bundle.

34. The views of other City of London departments have been taken into account in considering the redevelopment scheme. Some detailed matters remain to be dealt with through conditions and the provision of an agreement under Section 106 of the Town and Country Planning Act 1990.
35. The Greater London Authority (GLA) has assessed the details of the application and concludes that the level of amendment to the previously approved scheme does not give rise to any new strategic issues. Therefore, the City is free to determine the application without further reference to the Mayor of London.
36. The Surveyor to the Fabric of St. Paul's Cathedral questioned why, as part of a substantial redesign of the scheme, the applicant did not take the opportunity to completely remove the area that breaches the protected view of St. Paul's Cathedral from Westminster Pier (LVMF view 8A.1).

In response the applicants have provided the Surveyor to the Fabric with details of the technical constraints that have informed the new design. It is noted that the impact from both the current proposal and the extant approved scheme on the protected view would be identical. That impact was previously agreed by the City, the GLA, and the Cathedral to be minimal (not visible to the naked eye from the view point) and acceptable. No further comments have been received.

37. No response has been received from Crossrail. To deal with this issue the conditions imposed on application no. 16/00883/FULEIA would be carried forward.
38. Historic England advises that they do not wish to offer any comments on this proposal.
39. The Environment Agency considers that there are no environmental constraints that fall under their remit.
40. Natural England has no comment on the application.
41. Thames Water recommended that a number of conditions and Informatives be attached to the planning permission if approved.
42. The London Borough of Lambeth raises no objection.
43. The City of Westminster did not wish to comment on the application.
44. The Residents Committee of the Heron building, 5 Moor Lane, raised concerns in relation to the lack of provision of street level pedestrian routes through the site from Moorfields to the Barbican, the lack of active frontages at street level on Moor Lane and suggested that as a result the proposals do not adequately respond to the City's Culture Mile aspirations. In response, the constraints of the site including the underground structures and the need to provide for sufficient servicing,

cycle parking, shower/changing facilities and plant areas to enable the development to function appropriately mean that the ability to provide additional routes through the site is extremely limited.

However, on completion of the currently proposed development there would be a narrow pedestrian route from Fore Street Avenue to Moor Lane between the south elevation of 21 Moorfields (the treatment and lighting of which will be subject to condition) and the north elevation of Moorgate Exchange. There are existing pedestrian routes to the north along New Union Street and through City Place to Moor Lane and to the south through Fore Street Avenue to Fore Street and onward to Moor Lane and the Barbican. As noted below, the reduction of retail and active frontages within the development has been welcomed by the Barbican Association and many of the individual residents from the Barbican who have commented on the proposals.

Therefore, the addition of retail and active frontages at street level on Moor Lane is unlikely to be welcomed. The facade treatment and greening of the street level facade on Moor Lane will be subject to condition.

45. The Barbican Association welcomes the site having such a prestigious tenant, the lowering of the west building, the reduced 'piazza' and consequential reduction in the number of bars, the increased distance to the first terrace from the Barbican, assurances in relation to light spillage, the wider bridge link and the lift from street level. However, the Association objects to the proposed location of the servicing entrance on Moor Lane on the following grounds:

- a) Noise nuisance generated by "80 lorries a day";
- b) It is incompatible with the Moor Lane Enhancement Scheme approved in 2011 – "...some 220 lorries servicing City Point, 21 Moorfields and Tenter House would be a tragic addition to the plans";
- c) Increased numbers of service vehicles will impact on the safety of cyclists using the north south cycle highway system (Quiet Cycleways) as "*Lorries cutting across a continuous stream of cyclists will not be safe.*"

These issues are dealt with in the relevant sections of this report.

46. Representations have been received from 49 residents in the Barbican. Their full comments are attached to this report. The table below summarises the concerns raised:

Topic	Objection	Response
Noise	<ul style="list-style-type: none"> Changing service access point to Moor Lane increases noise. Increase in noise due to traffic, especially as Moor 	<ul style="list-style-type: none"> See paragraphs 229-240 See paragraphs 229-240

	<p>Lane has unique acoustics.</p> <ul style="list-style-type: none"> • Ventilation ducts opening onto Moor Lane would create additional noise. • Due to listed status of Barbican estate, all windows are single glazed, exacerbating noise issue. 	<ul style="list-style-type: none"> • Noise from plant controlled by condition. • A number of residents have installed appropriate double-glazing modules or secondary glazing (LBC required)
Residential Amenity	<ul style="list-style-type: none"> • Moor Lane previously identified for improvement for local community, with pedestrian space and pocket park. • Loss of natural light due to overshadowing. • Proposed building blocks air movement north of New Union Street. • Overlooking residential building. • Loss of views. • Aluminium curtail walling could be more beneficial as 'green wall'. • Light pollution. • Motion sensor lights should be installed to reduce light pollution. • Decrease in safety of pedestrians & cyclists on Moor Lane. • Planned seating area on footbridge will cause noise & disturbance. • Undermines Local Plan to integrate street level 	<ul style="list-style-type: none"> • See paragraphs 249-251 • See paragraphs 179-211 • Development would have little impact on local wind micro-climate. See paragraphs 225-228 • Principal facade 47m away • There is no right to, or protection of, private views • See paragraph 105 • See paragraphs 212-218 • See paragraph 217 • See paragraph 251 • The seating has been removed from the proposal • See paragraph 44

	<p>contact between Barbican Centre, residences and new retail developments.</p> <ul style="list-style-type: none"> • Hours of use. 	<ul style="list-style-type: none"> • See paragraphs 159-166
Traffic	<ul style="list-style-type: none"> • Increase of additional 80 lorries per day down Moor Lane created by relocation of service access point is inappropriate for residential road. • Delivery trucks will likely have to wait for delivery slot down Moor Lane, creating more traffic. • Relocating of access point will add to traffic already caused by City Point. • Limits means of access to residents' homes. • Increase in air pollution. • Increase in traffic means more difficulty in parking. 	<ul style="list-style-type: none"> • This is incorrect. The anticipated number of lorries (HGVs) is five. See paragraph 164-165 • All deliveries scheduled with no waiting on Moor Lane • See paragraphs 159-166 • All deliveries scheduled with no waiting on Moor Lane • See paragraphs 241-248 • All deliveries scheduled with no waiting on Moor Lane
Other Material Considerations	<ul style="list-style-type: none"> • If moving access point from Fore Street Avenue to Moor Lane was for security reasons, the move puts residents at risk. • Proposed design of building unattractive & out of scale. • Turning the development into a shopping centre/ office complex will create too much pedestrian traffic, impeding access to Moorgate Station. • Impact on the historic environment, listed buildings or conservation 	<ul style="list-style-type: none"> • See paragraphs 160-162 and 168-171 • See paragraphs 98-109 • The proposed development reduces the quantum of both retail and office. • See paragraphs 114-131

	areas.	
Other Non-Material Considerations	<ul style="list-style-type: none"> • Moor Lane access point could have negative effect on Willoughby House property prices. 	<ul style="list-style-type: none"> • Impact on property values is not a material planning consideration.

No further representations were received following the re-consultation in respect of the additional information submitted under Regulation 25 of the EIA Regulations.

47. Two letters of support were received:

The landowner of Moor Place welcomed the proposal to relocate the service area to Moor Lane, avoiding conflict with their main entrance and 2,000 staff.

Moor House Management Service Ltd. welcomed the proposal to relocate the service area to Moor Lane “the location of the original loading bay for Lazards” as it would avoid additional congestion in Fore Street Avenue. They stated, “It will become impossible to service the buildings and keep pedestrians safe when using street level from Moorgate station should the loading bay be positioned in Fore Street Avenue”.

48. Two neutral comments were received from Barbican residents. Concerns raised have been incorporated into the table above for completeness and are addressed within the body of this report.

Policy Context

49. The development plan consists of the London Plan, the Draft London Plan (out for consultation) and the Local Plan. The London Plan, draft London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report. Relatively little weight should be afforded to the Draft London Plan as it is at an early stage prior to adoption.
50. Government Guidance is contained in the National Planning Policy Framework (NPPF).

Considerations

Introduction

51. 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 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) and;

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 (S72 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).

52. The NPPF 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”.
53. Paragraph 14 states 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...”
54. It states at paragraph 7 that sustainable development has an economic, social and environmental role.
55. 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 development;
 - communities including their economic vitality; and
 - the desirability of new development making a positive contribution to local character and distinctiveness.”
56. In considering the planning application before you, account must be taken of the environmental information including the Environmental Statement, the statutory and policy framework, the documentation accompanying the application, and views of both statutory and non-statutory consultees.
57. The Environmental Statement is available in the Members’ Room, along with the application, drawings and the representations received in respect of the application.
58. The principal issues in considering this application are:
 - The extent to which the proposals comply with Government policy advice (NPPF).

- The extent to which the proposals comply with the relevant policies of the London Plan and the Local Plan.
- The impact of the proposals on neighbouring residential occupiers.
- The impact of the proposals on heritage assets.
- The impact on nearby buildings and spaces, including daylight/sunlight and amenity.

Economic Development

59. The National Planning Policy Framework establishes a presumption in favour of sustainable development and places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity.
60. The City of London, as one of the world's leading international financial and business centres, contributes significantly to the national economy and to London's status as a 'World City'. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities series (PwC) consistently score London as the world's leading financial centre, alongside New York. The City is a leading driver of the London and national economies, generating £45 billion in economic output (as measured by Gross Value Added), equivalent to 13% of London's output and 3% of total UK output. The City is a significant and growing centre of employment, providing employment for over 450,000 people.
61. London's status as a world city is founded to a substantial degree on its concentration of international service activities and, most noticeably, by the clustering of financial and business services in the City of London.
62. The City is the home of many of the world's leading markets. It has world class banking, insurance and maritime industries supported by world class legal, accountancy and other professional services and a growing cluster of technology, media and telecommunications (TMT) businesses. These office-based economic activities have clustered in or near the City to benefit from the economies of scale and in recognition that physical proximity to business customers and rivals can still provide a significant competitive advantage.
63. The City's dense Financial Services (FS) business cluster allows firms to benefit from access to a large pool of specialist labour, skilled workers, and support services (accounting, legal services, actuarial etc), as well as supporting demand in those businesses.
64. In 2016 the FS Industry provided 182,000 FS jobs in the City with 60,000 of these being in Banking. Large FS firms in the City employ 75% of workers in the financial services sector compared to 25% in SMEs.
65. The City Supply Chains research, based on its important cluster of SMEs found that 63% of firms in the City buy from other firms within the City. Whilst a similar proportion (68%) sold to other firms in the City, highlighting the importance of those local trade relationships and the

importance of the presence of large FS firms for other City firms and SMEs.

66. Some of the key reasons given for purchasing within the City included the proximity of businesses, speed of delivery and the expertise and reputation of the firms found in the concentrated industry clusters around the business district. The effect of sales to other City firms by SMEs surveyed showed that more than one third of SME respondents' sales to City firms accounting for more than half of their annual trading income. (City of London and Bone Wells Urbecon, 2013, <https://www.cityoflondon.gov.uk/business/economic-research-and-information/research-publications/Pages/City-SME-supply-chains-.aspx>)
67. The importance that is attached to the maintenance and enhancement of the City's role as one of the world's leading financial and business centres is reflected in the policies of the London Plan and Local Plan.
68. The City of London lies within the Central Activities Zone (CAZ), which is London's geographic, economic and administrative core and contains London's largest concentration of financial and business services. The London Plan 2016 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally-oriented financial and business services centre' (policy 2.10). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and policies 2.11 and 4.3 provide for exemptions from mixed use development in the City in order to achieve this aim.
69. The contribution of the banking sector to public finances in 2017 was £35.4bn, comprising £17.3bn from foreign banks and £18.1bn from UK banks. This is equivalent to almost a quarter of the FS sector's total tax contribution. Foreign-based banks make up almost 3% of the UK's total tax receipts. (City of London, Total Tax contribution of UK financial services, 2017)
70. Foreign-based banks account for over half of all employment taxes generated by banks (UK Finance total tax study, 2017). Of the £18.4bn, 53.7% was paid by foreign-headquartered banks, which employed 25.3% of the employees in the study.
71. The London Plan projects future employment growth across London, projecting an increase in City employment of 151,000 between 2011 and 2036, a growth of 35.6%. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.
72. Strategic Objective 1 in the City of London Local Plan is to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross during the period 2011-2026, to

provide for an expected growth in workforce of 55,000. Local Plan Policy DM1.2 encourages the provision of large office schemes.

73. The provision of a substantial office development in this location has been established by the extant planning permissions for the site. It meets the aims of policy CS1 in delivering a significant growth in both office floorspace and employment. The current application provides for an additional increase in floorspace and employment in line with the requirements of the Local Plan.
74. The proposed development would result in an additional 41,662sq.m gross of Class B1 office floorspace compared to the previously existing buildings on the site and 1,545sq.m more than the extant 2017 permission, further consolidating the nationally significant cluster of economic activity in the City and contributing to its attractiveness as a world leading international financial and business centre. This amount of floorspace would contribute towards meeting the aims of the London Plan for the CAZ and deliver approximately 3.62% of the additional office floorspace sought in Local Plan policy CS1.
75. Using the London Plan's assumed density of one person per 12sq.m Net Internal Area (NIA) the number of office workers in the new building could be 4,305 compared to approximately 791 in the previously existing buildings. It is noted that many businesses within the FS sector operate at higher densities and a rate of one person per 8sq.m NIA would result in up to 6,458 new office employees. Deutsche Bank have indicated an anticipated 5,000 employees would work on the site.
76. The proposed development includes large uniform floor plates maximising internal usable areas and addressing the needs of international business in accordance with Local Plan policy DM1.2 and could provide flexible floor space for a variety of occupiers.
77. This site is ideally located to benefit from the proximity of the Crossrail/Elizabeth Line now nearing completion. Office use on this site would complement the core business function of the City by taking advantage of the substantial public transport improvements created by Crossrail and realise the potential for rejuvenation of the area, in accordance with CS5, North of the City Key City Places strategy.

Deutsche Bank

78. Deutsche Bank is a German global banking and financial services company and has more than 100,000 employees in over 70 countries, and has a large presence in Europe, the Americas, Asia-Pacific and the emerging markets. It employs 7000 people in a number of London locations. As of June 2017, Deutsche Bank was the 16th largest bank in the world by total assets.
79. Having Deutsche Bank based in the City means that any exports of their financial services globally count as part of London's contribution to UK trade – London contributes around 56% of Britain's financial service exports (not including insurance and pension services)
(<http://colresearch.typepad.com/colresearch/2017/05/londons-trade-contribution-to-the-economy.html>)

80. Large firms such as Deutsche Bank make a significant contribution to City of London business rates. The City accounts for around 3% of England's total business rate revenue, and similar properties to that currently occupied by DB have a rateable value in the region of £3-4m.
81. The present scheme has been redesigned to meet the bespoke requirements for Deutsche Bank's occupation as its new London HQ. Deutsche Bank has agreed to take a 25-year lease of the building, subject to obtaining planning permission. Deutsche Bank is currently in occupation of a number of City buildings at Winchester House, Throgmorton Avenue, 1 Appold Street, 30 Fenchurch Street, Pinners Hall and 10 Bishops Square with a combined area of over 60,000sqm.
82. The decision to occupy 21 Moorfields would see all their remaining City assets consolidate into a single building. This would allow Deutsche Bank to complete the rationalisation of its property portfolio which has recently seen them occupy space in Victoria (9,000sqm) for its asset and wealth management functions and 35,000sqm at 10 Upper Bank Street, Canary Wharf to provide back office support.
83. Deutsche Bank has undertaken an extensive review of properties available for occupation as a new HQ building in 2023 when most of their existing City leases expire. There were no other options that are available in the Square Mile that would fulfil their specific needs.
84. When reviewing the City options available and choosing this site, Deutsche Bank has confirmed that the following factors were pertinent to their decision-making process:
- This is the only site in the City that could offer unimpeded trading floorplates of circa 5,000sqm; The scheme provides four such floors.
 - The proximity to their current principal office at Winchester House would allow existing commercial links to be retained and encourage staff retention;
 - The ability to deliver the building by autumn 2021 to allow fit out work to commence and guarantee relocation prior to expiry of existing leases; and
 - The sites excellent public transport connections.
85. The site would provide Deutsche Bank with the quantum of floorspace and floorplates required in the appropriate timeframe. As outlined above, this is the only City site that can meet the bank's requirements and, therefore, if planning permission were not achieved for this site Deutsche Bank would, of necessity, review its non-City options which could lead to it moving its operations out of the Square Mile.

Retail

86. The previously existing retail provision on the site comprised a wine bar on the Highwalk and a cafe on Fore Street Avenue and several shops on the Moorfields frontage. The total floorspace was 1,715sq.m GEA.

87. The retail provision proposed in the partially implemented 2017 scheme was 1,079sq.m GEA.
88. The retail provision now proposed would be 182sq.m GEA, 897sq.m less than previously approved on the site. This is contrary to policy DM20.3 which seeks to resist the loss of retail uses outside Principal Shopping Centres and Retail Links that form an active frontage, particularly Class A1 units near residential areas, unless it is demonstrated that they are no longer needed.
89. No evidence has been provided to demonstrate that the replacement of the previously approved retail provision is no longer needed.
90. Residential neighbours in the Barbican Estate, concerned with the potential for noise generation, have welcomed the reduction in retail provision.
91. The retail unit would face onto the proposed publicly accessible square at Highwalk level. The square is separated from Moor Lane and the Barbican Estate by the western building, helping to minimise any potential noise disturbance from the retail use.
92. The proposed retail unit, whilst not replacing the existing floorspace, would provide amenity for workers, residents and visitors and complement the nearby Moorgate PSC.
93. The supporting text to policy DM20.3 states “When considering proposals to change from shops to other retail uses or for the loss of retail uses, particular consideration will be given to the contribution that individual units make to the locality, having regard to:
 - the composition and distribution of retail uses locally.
94. There are additional factors to consider where there are existing retail facilities but in this instance, as the last remaining units on the site were demolished in early 2016, these are not considered relevant to the considerations of this case.
95. The site is just outside the Moorgate Principal Shopping Centre (PSC) and within walking distance of both the Liverpool Street and Cheapside PSCs. To the north of New Union Street are City Point and Tenter House which provide several bars, cafes and restaurants. To the north of the Barbican Estate is Whitecross Street with numerous shops, bars, restaurants, market stalls and a supermarket. To the east of the Estate is Smithfield Market with extensive surrounding retail provision. The Barbican Estate also contains a number of bars and restaurants.
96. There is no opportunity to provide retail on Moorfields because of the requirements of the station entrance, office entrance and escalators, stairs and lift to the Highwalk.
97. The composition and distribution of retail uses locally indicates that the area around the proposal site is well served by a variety of retail uses. It is considered that, on balance, the reduced level of retail provision

within the site is acceptable in relation to policy DM20.3 and its supporting text.

Underground Railway and Crossrail

98. The proposal would not affect the construction or operation of Crossrail or the other Underground railways on the site.

Design

99. The height and massing of the proposal, as with the previous permissions, is informed by the commercial buildings to the east, north and south and the lower residential buildings to the west. The height is constrained by the location of the site within the background consultation area of the Protected Vista from Westminster Pier to St. Paul's Cathedral and local views from Finsbury Circus.
100. The current scheme differs from the permitted scheme in a number of respects. There would be a significant reduction in height along Moor Lane while the east building would rise to a greater height towards the centre of the site. There is an increase in height in elements of the eastern end of the building but not in a manner which would additionally impact on the Protected Vista. Of greater significance is the omission of the public square and its replacement with a smaller courtyard pocket park.
101. The taller eastern element has been designed to respond to the scale and character of the commercial buildings in the vicinity. The street facade would be seven storeys high above podium level and be similar in height to the existing Tenter House. Above that, the building would set back and rise another seven storeys towards the taller Moor House which would also relate satisfactorily with the height of Moorgate Exchange. These upper floors would have an inclined fully glazed facade to differentiate it from the street facade and to address local views.
102. The design approach is similar to the permitted scheme with the cantilevered form of the building and the diagonal structural truss bracing expressed on the elevation with glazed curtain walling behind contrasting with the calmer crystalline glazed upper storeys. There would be a recessed glass screen above the station box to mark the office foyer. The glass screen would provide a 'street frontage' with the Crossrail ticket office building remaining a separate identifiable structure distinguished by its blue glazed portal. The light glass screen would extend to ground level in the north-east corner of the site, beyond the station entrance, where it would enclose an undercroft containing escalators and a stair up to the office foyer.
103. The design of the proposed development is strongly influenced by the need to over-sail Crossrail and the existing Underground infrastructure as well as the provision of need the City Highwalk. This places severe limitations on where foundations can be located, and the structures need to span the whole railway. The architectural approach is therefore informed by structural railway architecture.

104. The palette of facing materials on the principal facades is silver and grey including bead blasted stainless steel, glazing with a significant degree of reflectivity and a dot fritted finish. The building maintenance and cleaning cradles are discreetly located at roof level, generally concealed from surrounding viewpoints.
105. The Moor Lane elevation is lower than the permitted scheme by three storeys and comprises a fully glazed elevation at podium level with dark bronze coloured metal vertical fins on the upper two storeys. This visually separates the two parts of the building and relates satisfactorily to the adjacent Barbican. The glazing would incorporate fritting to reduce the extent of clear glass and mitigate any light spillage.
106. As part of the greening strategy it is proposed to introduce vertical/hanging planting from podium level onto the Moor Lane elevation as well as on the upper facades of the east elevation of the west building facing the new urban square. The planting would relate to the greenery of the Barbican and the planting proposed on the pedestrian bridge over Moor Lane. The strategy is continued across the site with vertical greening, climbers and trailing planting, on walls and wires. There would be planters and trees on the pedestrian routes at podium level as well as large areas of green roof.
107. It is proposed to reinforce the importance of the Highwalk pedestrian route between Moorgate Station, the Barbican, the Cultural uses in the Barbican and to the west by introducing a light artwork installation on the wall fronting the Highwalk, details of which will be conditioned. A lighting strategy highlighting key architectural elements and the pedestrian routes would enliven the scheme and the public realm during the hours of darkness. The lighting scheme would be designed to reduce light spillage.
108. The roofscape is considered acceptable with areas of roof terraces, green roofs and roof level plant screened from view by louvres.
109. Although there are concerns over the reduction in the amount of publicly accessible space, retail units and the removal of the central pedestrian route approved as part of the previous permissions for the site, it is recognised that these changes would enable the development to meet Deutsche Bank's floorspace and layout requirements.
110. It is considered that the proposed scale and design of the scheme would contribute to the dynamism and hierarchy of scale in the area. In that respect the scheme is considered broadly in accordance with policies CS10 and DM 10.1 of the Local Plan, policy 7.6 (Architecture) in the London Plan 2015 and the guidance set out in paragraphs 56 to 68 of the National Planning Policy Framework.

London Views Management Framework

111. The London View Management Framework (LVMF) provides a London wide policy framework to protect and manage strategically important views of London and its major landmarks. The eastern part of the site falls within the background assessment area of the Protected Vista of St. Paul's Cathedral from Westminster Pier (view 8A.1).

- 112. The proposed building would be marginally visible to the left of the south west tower of the Cathedral when trees are not in foliage. The proposal would otherwise be concealed by the cathedral and is considered to have very little impact on the views.
- 113. In accordance with paragraph 170 of the Visual Management Guidance in the LVMF, the development would preserve the viewer's ability to recognise or appreciate the dome, peristyle and south-west tower of St. Paul's Cathedral, ensuring these elements retain a backdrop of clear sky. The development does not harm the Protected Vista and is in accordance with policy 7.12 of the London Plan 2015 and policy CS13 of the Local Plan.
- 114. No other LVMF views would be affected.

Impact on the Significance of the Finsbury Circus Conservation Area

- 115. Finsbury Circus was laid out in 1815-17 by William Montague to the designs of George Dance the Younger. The garden has tall plane trees and, until it became a Crossrail worksite, had serpentine paths from the 19th century layout, with a bowling green that was laid in the centre in 1909. An impressive range of buildings encircle the gardens which form the central character of the conservation area and an important townscape group. There are long views of significant 19th century buildings along the external elevations of the conservation area.
- 116. The effects of the proposed development on Finsbury Circus have been studied using accurate visual representations (AVRs) from within the Circus. In many of these views the development would be obscured by foreground buildings in the Circus and heavy tree foliage. It would be visible from the western side of the Circus as the viewer exits towards Moorgate where much of the proposed building would be obscured by the approved development at 101 Moorgate. The visible upper levels of the development would be angled glazing to relate formally to Finsbury Circus and provide an appropriate closure to the view.
- 117. It is considered that the proposed building would not have a detrimental effect on the significance of the Finsbury Circus Conservation Area.

Impact on the Significance of the Bank Conservation Area

- 118. The Bank Conservation Area is the commercial heart of the City of London, focused on Bank junction, extending to the north, west, east and south to include the radiating historic streets, yards and interlinking alleys. It is an area where buildings and streets are harmonised by their predominant use of solid masonry facades with regular punched architectural openings, enriched by abundant classical modelling and surface detail. The area contains several nationally significant and well-known buildings.
- 119. The proposed building would be visible from few locations within the Bank Conservation Area. It would be visible from the edge of this conservation area in Coleman Street and London Wall. In these views the proposed development would have a similar impact on the

significance of the conservation area to the existing high buildings at Moor House and City Point.

120. It is considered that the proposed building would not have a detrimental effect on the significance of the Bank Conservation Area.

Impact on the Significance and Setting of Listed Buildings

121. The impact of the development on the setting and significance of listed buildings is considered in the Heritage Assessment forming part of the Environmental Statement. The assessment considers 17 listed buildings which have the potential to be affected. The impacts would be very similar to the permitted scheme.
122. Barbican (Grade II). There will be a relationship between the listed Barbican complex and the western element of the proposed building across Moor Lane. The immediate street frontage of the development would be of a similar scale to the previously existing building and to other frontages on Moor Lane. The office buildings on the eastern side of Moor Lane are modern and vary in appearance. The proposed building would continue this run of modern commercial buildings and would not have an adverse effect on the setting or significance of the Barbican.
123. The Highwalk pedestrian bridge over Moor Lane is proposed to be retained and widened by the addition of a lightweight cantilevered structure on its southern side so that there would be a sufficiently wide pedestrian space next to the new lift on the Moor Lane frontage. The proposed design would be subject to condition and will need technical approval from the City as part of the rescinding and declaration of walkway. The bridge is attached to the Barbican Highwalk but is not part of the listed structure of the Barbican and the alterations would not have a material impact on the setting or significance of the Barbican.
124. 137-141 Moorgate (Grade II). This is a six storey corner building built in 1900 for the Underground railway. It has modern taller buildings immediately to its north, south (the site of the proposed Crossrail over site development) and west (Tenter House and City Point). The proposed building would change the setting of this listed building by the addition of another building of considerable height and mass in the background views. However, this listed building is of a robust Victorian/Edwardian design in a tight urban location and although the setting would be altered by the proposed development it would not be in a way that would be detrimental to the listed building's significance.
125. 87 Moorgate (Grade II) was constructed as a terraced house in the early 19th century with later changes. The building adjoins the site of the proposed Crossrail over site development at 101 Moorgate and will be significantly lower than its new neighbour. The proposed building at 21 Moorfields would increase the general scale on Moorfields but would be diagonally opposite this listed building where it would be seen only in oblique views with the new 101 Moorgate in the foreground. The effect on the setting and significance of the listed building is considered negligible.

126. The Globe Public House, Fox's Umbrellas and 2 Moorfields (Grade II). These three buildings form a group of attractive Victorian buildings with good detailing, including Fox's shopfront and fascia which is a later addition dating from the 1930s. The large commercial buildings at City Point and Moor House form the backdrop in views of these buildings from the southeast. The proposed development would add another larger building and would obscure City Point in the background. The setting would be changed but not in a way that would be detrimental to the significance of the listed buildings.
127. 4 and 8 Moorfields (Grade II) were constructed as two terraced houses dating from the early 19th century with later changes. The current setting of these buildings is determined principally by the large commercial building of Moor House and the pedestrian area in front of them. On completion of Crossrail it will include the over site development at 101 Moorgate. The proposed building would increase the general scale on Moorfields but would be slightly further away from these small listed buildings. The setting would be changed but not in a way that would be detrimental to the significance of the listed buildings.
128. 80 Coleman Street (Grade II) and 81 Coleman Street (Grade II* and Scheduled Monument) are fine buildings constructed in 1840 and the mid-18th century respectively. The setting of these buildings includes the taller modern developments of Moor House and 1 Coleman Street. Moor House will largely obscure views of the proposed development and any impact on their setting and significance would not to be detrimental.
129. 63-73 Moorgate (Grade II) were constructed as terraced houses built in the 1830s. They are detached from the larger scale development to the north by the major junction of London Wall with Moorgate. However, in views from the south-east of the junction their setting is strongly influenced by Moor House. The proposed development would be visible in these views but its distance would result in a negligible effect on the setting and significance of these listed buildings.
130. Lutyens House (Grade II*), Salisbury House and Electra House (Grade II) are robust City buildings in the classical style. They occupy the southern and western sides of Finsbury Circus and have frontages to the surrounding streets. The upper parts of the proposed development would be seen above the roofscape of these buildings in various westward views from around the Circus, although in most views this would be mitigated by significant levels of tree cover (even when not in leaf). The westward setting of these buildings is dominated by Moor House and the tower of City Point. The approved 101 Moorgate building would sit in the foreground of the axial view (see section on Finsbury Circus Conservation Area above). In this respect, the proposed scheme would not be detrimental to the setting of these listed buildings.
131. Park House, Finsbury House and London Wall Buildings, (Grade II) are on the east, north and south-east sides of Finsbury Circus. There is no

clear visual connection between them and the proposed development. The effect on their setting and significance would be negligible.

Impact on the Significance of Historic Parks and Gardens

132. Finsbury Circus and the Barbican Open Spaces are Registered Historic Parks and Gardens. The proposal would have a minor effect on views out of these two gardens but is not considered to be detrimental to their setting or significance. In this respect the scheme is in accordance with policy DM 12.5 of the Local Plan.

Public Realm

133. The previously permitted scheme included a generous public square (980sqm) framed by retail units accessed by two pedestrian routes from the east and west which were intended to replace the previously existing, and larger, areas of public open space on the Highwalk which had not provided a public realm of high quality. The current scheme proposes a further reduction in publicly accessible space necessitated by the requirements of Deutsche Bank.
134. The current scheme provides a smaller publicly accessible urban square (521sqm) on the western end of the scheme. Approximately half of the square would be located under the cantilevered upper storeys of the main east building. There would be a single retail unit on the eastern side of the square. The remaining elevations comprise office floorspace which includes the 'Wellness Centre' for the office occupiers. The square would include raised planters with low level planting and trees which, combined with the vertical greening on the western elevations, would appear as an attractive green soft landscaped area.
135. The square has been assessed for wind and sunlight levels and, given the high-density context, these would be acceptable in terms of BRE and Lawson Criteria (see paragraphs 222 – 225).
136. the covered piazza area at the eastern end of the Highwalk located over the underground entrance, would be landscaped with planters and would include a small retail kiosk to assist in enlivening this area.
137. The publicly accessible square and private realm would be controlled and maintained by the developer under terms to be agreed through the Section 106 agreement.
138. Although reduced in size, the landscaping of the proposed publicly accessible square would be of high quality. Together with reduced retail activity, it would provide for a quieter green space for the benefit of office workers and members of the public and has been welcomed by the Barbican Residents Association and a number of individual Barbican residents. The proposals are considered to be in accordance with paragraph 73 of the NPPF which recognises the health and well-being contribution of access to high quality open spaces, and policy 7.5 of the London Plan which seeks landscape treatment and infrastructure of the highest quality that contributes to the easy movement of people through the space.

City Walkway and Escalators

139. The proposals reflect the extant permission to build a new upper level walkway along the southern side of the new building connecting the bridge over Moor Lane with the escalators, stair and a lift on the corner of Moorfields and Fore Street Avenue. The lift would provide an accessible link to the Highwalk in lieu of the previously existing ramps which did not meet the appropriate standards.
140. The new City Highwalk route to the Barbican and Barbican Centre would be on the southern edge of the site and provide a direct line of sight between Moor Lane and Moorfields. It would be 1m wider than previously approved (typically 4m - 4.2m wide) improving permeability and legibility and, reinforcing the importance of the Highwalk as a pedestrian route between Moorgate Station, the Barbican and the Cultural uses in the Barbican. The northern edge of the City Walkway would be fronted by a covered plaza, the flank wall of the building (including clear glazed areas giving views into the building) and the new publicly accessible urban square.
141. On Moor Lane there would be a new stair and lift between the Highwalk and street levels. This would make the bridge over New Union Street and the adjacent stairs and lift at City Point redundant. The proposal would provide a more direct route and would be an improvement over the City Point stairs and lift, which are poorly located next to New Union Street.
142. The bridge over New Union Street and the staircase are proposed to be demolished by the applicants in agreement with the owners of City Point. A separate planning application would be submitted to make good the facade of City Point.
143. The position of the lifts, stairs and escalators would create good links between ground level and the Highwalk and would encourage its use. Overall, the proposal would create a high-quality link.
144. The escalators and stairs on the Moorfields/ Fore Street Avenue corner form part of the Crossrail proposal. The proposed development requires space for under floor services above the Crossrail box. This causes the new Highwalk to be 0.4m higher than the existing level in this area. The new escalators and stairs would therefore need to be longer than those previously proposed by Crossrail. Crossrail and the applicant have entered into a separate S106 legal agreement for the provision of the escalators as part of the extant permission.
145. The northern end of the bridge over Fore Street Avenue will need to be raised by 0.4m to the new walkway level. The gradient of the slope would be 1:85.
146. As with the extant permission, the escalators and stairs would be covered by the overhang of the new building. This would create an open, visible marker to encourage the public use of the Highwalk as a link to the Barbican Centre and the Culture Mile.

- 147. All escalators, stairs, lifts and Highwalk routes will be required to be available before occupation.
- 148. The improved permeability, legibility and quality of the pedestrian routes through the site would be in accordance with policies CS5 and DM16.2 of the Local Plan and policy 7.5 of the London Plan.

Temporary Highwalk works

- 149. All previously existing Highwalk areas within the site have been demolished as part of the implementation works. As previously agreed the applicants have provided route marking to help pedestrians move around the area.
- 150. The nearest replacement pedestrian routes between Moorgate Station and the Barbican are via Moorfields/City Point plaza/Moor Lane, Moorfields/Ropemaker Street/Silk Street or Fore Street Avenue/Fore Street/Moor Lane. There are alternative public lifts at the Moor Lane/Silk Street junction and 125 London Wall. The additional lift proposed as part of the redevelopment of St. Alphage Highwalk (London Wall Place) is proposed to become available (subject to technical approvals) in the first quarter of 2018.

Transport and Servicing

Trip Generation

- 151. The site is located in an area with a Public Transport Accessibility Level (PTAL) rating of 6b. This is the highest level of accessibility and rated as “Excellent”.
- 152. The submitted transport assessment predicts that the proposed development would generate a total of 1,434 two-way person trips during the AM peak and 1,250 trips during the PM peak; this represents an increase of 987 trips during the AM and 886 trips for the PM when compared with the previously existing buildings on the site. The figures represent a reduction in AM and PM peak trips of 477 and 173 respectively when compared to the extant permission which reflects the reduction in office floorspace.
- 153. The majority of trips are expected to be made by public transport (89%), walking (5%) and cycling (4%). TfL advised that it did not expect the previously proposed development to have any significant impact to the local highway network. The GLA/TfL have reiterated that this proposal raises no new strategic issues.
- 154. A Travel Plan will be required under the Section 106 Agreement.

Parking

- 155. In accordance with Local Plan policies, no car or motor cycle parking is proposed other than a single accessible parking bay within the loading area. There are existing accessible parking bays on Moor Lane and Fore Street (Currently suspended during construction works).

156. The proposal includes a total of 830 long-stay cycle parking spaces within the building which would be accessed from Moor Lane. This level of provision is fully compliant with the London Plan 2016 and would provide approximately 98.6% of the long-stay cycle parking spaces identified as a requirement in the draft London Plan.
157. A total of 830 lockers and 60 showers would be provided to facilitate cyclists commuting to and from the site. The shower provision would be below the City's recommended ratio of 1:10 cycle spaces but given the site constraints and lack of basement space it is considered acceptable in this instance.
158. For a development of this scale table 6.3 of the London Plan requires a minimum of 29 short-stay cycle parking spaces for visitors to the office and retail facilities. No short-stay cycle parking is proposed within the site as the development covers 100 percent of the site and there is no street level curtilage available on which short-term cycle parking spaces could be provided (cycles are prohibited from City Highwalks by Byelaw and these areas would not be available for such use). Security concerns prevent the provision of access for the visiting public to the internal cycle parking areas and all unbuilt space around the site, including the City Highwalk, is required to facilitate pedestrian circulation.
159. The proposed long-stay cycle parking provision accords with policies 16.3 of the Local Plan and 6.9B(a) of the London Plan. The lack of short-stay provision would be contrary 6.9B(a) of the London Plan but is mitigated by a contribution of £60,000 to the operation of the Mayor's Cycle Hire Scheme which has previously been agreed with TfL and would be secured through the S106 agreement. Given the limitations of the site and the broad compliance with the relevant standards and policies, it is considered that the proposed cycle parking provision is acceptable in this particular case.

Servicing

160. A servicing area with loading bays for two HGVs and two panel vans, an accessible parking space and two refuse compactors would be provided. This would be accessed from Moor Lane and is sufficient for the size of the proposed development.
161. The servicing area for the previously existing development on the site was accessed from Moor Lane (see image below). The previously approved scheme would be accessed from Fore Street Avenue. Due to the proximity of the site to the Barbican, the City's officers have sought to encourage the new servicing area to be accessed from Fore Street Avenue. The City are advised that the specific delivery management and security requirements of Deutsche Bank prohibit this arrangement being continued into the current proposals.



162. As part of Deutsche Bank's delivery management strategy, it is proposed to use a number plate recognition system to identify scheduled vehicles. This is more easily achieved on Moor Lane where there is clearer line of sight. On Fore Street Avenue, which is a Cul-de-sac, any unscheduled vehicles would be required to turn in the eastern arm of the street in order to proceed south towards Fore Street and London Wall. On Moor Lane unscheduled vehicles could continue southbound towards Fore Street and London wall or northbound to Silk Street and Chiswell Street without having to make any turning manoeuvres.
163. In terms of security, the applicant's structural engineers have stated that the retained deck above Moorgate Station was designed specifically for vehicular access from Moor Lane and ramps down in this location for this reason. It is also more structurally robust in this area than on Fore Street Avenue. Due to the 90 degree turn required to access the service area in Moor Lane, vehicle speeds approaching the servicing area would be reduced meaning that the rating of the security blocker would need to be sufficient to withstand a 7.5t vehicle travelling at 30mph. In Fore Street Avenue vehicles would approach the service entrance in a straight line and at potentially higher speeds, therefore, the security blocker would need to be of a much higher rating to be able to withstand a 7.5t vehicle travelling at 50mph. The force applied to the retained deck at Fore Street Avenue would also be a much greater force. This, in combination with the reduced robustness of the structure in this area, could lead to the deck not being able to withstand the applied load of a vehicle impacting the blocker. To address this on Fore Street Avenue, any appropriately rated security blocker would need to be sited outside of the site boundary within the highway. This would not be acceptable in highway terms.

164. To mitigate any potential noise impacts on the nearby residential occupiers from the operation of the loading bay the following measures are proposed:
- Hours of operation would be limited to a 14 hour period between 7am and 9pm from Monday to Friday;
 - Hours of operation would be limited to a 7 hour period between 9am and 6pm on Saturdays with no servicing on Sundays or Bank Holidays;
 - All deliveries to the site would be pre-booked to ensure that all deliveries could be accommodated within the four loading bays within the servicing area;
 - Any out of hours (before 7am or after 9pm Monday to Friday and 9am and 6pm on Saturdays) vehicular deliveries (limited to two) and all cycle and courier deliveries would be via a secondary on-street facility on Fore Street Avenue;
 - The gate to the servicing area would be set back approximately 27m from Moor Lane and all loading and unloading activity and compaction would take place only when the exterior doors were closed and would cease once they were opened;
 - All vehicles would enter and leave the loading bay in a forward gear to ensure no reversing on-street;
 - A Banksman would be positioned at the loading bay access during the hours of operation controlling access to and egress from the loading bay.
165. The anticipated composition of vehicles servicing the building has been forecast based on survey data of Deutsche Bank's existing operations and is laid out below:

Delivery Vehicle Type	Proportion of Deliveries	Number of Deliveries per day
Heavy Goods Vehicles (HGVs)	6%	5
Medium Goods Vehicles (MGVs)	3%	3
Cars and Light Goods Vehicles (LGVs)	88%	74
Other	3%	3
Total	100%	85

166. This means that 88% of vehicles would not be HGVs or lorries, contrary to concerns set out in residents' comments.
167. In compliance with policy DM16.5 of the Local Plan the proposed on-site servicing area is of sufficient size to meet the requirements of the building and allow refuse collection and service vehicles to be loaded and unloaded conveniently and enter and leave in a forward gear. Potential impacts on residential amenity from the operation of the servicing area are addressed in the Noise & Vibration and Air Quality sections below.

Stopping-Up

168. A small area of public highway on the north end of the Moorfields frontage would be affected by the edge of the steps to the office entrance at podium level (the main office lobby would have stair, escalator and lift access from ground level in Moorfields) and would need to be stopped-up to allow these steps to be provided. The total area that would need to be stopped up is 6.2sqm (0.34m wide by 15.3m long, plus the projection of three handrails which equates to a combined projection distance of 0.915m). The footway is approximately 4m wide at this point and the reduction in its width is not considered to be problematic. This was agreed as both the 2015 and 2017 approvals.

Security

169. The building will be designed to withstand attack from a hostile vehicle. However, due to the location above an active major transport hub, there may be a need for additional on-street hostile vehicle mitigation (HVM) measures, in the form of bollards.
170. Details of HVM measures incorporated within the building would be required by condition.
171. Any on-street installations would be subject to S278 negotiations.
172. The appropriate implementation of security measures would make the building less vulnerable to, and therefore, less attractive to, a potential hostile vehicle attack.

Sustainability and Energy

173. The applicants have submitted a Sustainability Statement, including a BREEAM new construction 2014 pre-assessment and an Energy Assessment.
174. By utilising passive design and energy efficiency measures, the development is estimated to achieve 26.9% carbon emissions savings over a Building Regulations 2013 compliant baseline scheme. The intention is to connect the development into the local district heating network, whereby Citigen would provide a proportion of the development's heat demand for the offices and retail uses. This would achieve a further 9.6% carbon emissions savings. No renewable or low carbon technologies are proposed due to constraints imposed by the location of the Underground station underneath the building and resulting roof plant requirements.

175. The submitted energy strategy demonstrates that the development has the potential to achieve a 36.5% carbon emission reduction over a Building Regulations compliant building.
176. The BREEAM pre-assessment for the commercial element of the building indicates a likely rating of “Excellent” is achievable. A condition has been attached to request post construction confirmation that this rating has been achieved.
177. The sustainability statement addresses climate change and sustainable design of the development, including energy efficiency, sustainable materials, conserving water resources, waste management, pollution, urban greening and biodiversity.
178. The proposed landscaping strategy includes planting in the public realm areas and green roofs on the upper terraces of the east building, thereby enhancing site ecology and biodiversity compared to the existing situation. Implementation of the landscaping strategy would be subject to appropriate conditions to ensure the size, quality, maintenance and diversity of the landscaping and green roofs.
179. Subject to conditions in respect of the green roofs, Citigen connection and post construction BREEAM the proposed range of climate change and sustainable design measures are considered to be in accordance with policies CS15, DM15.5, DM10.2 and 19.2 of the Local Plan and policies 5.10 and 5.11 of the London Plan.

Residential amenity

Daylight and Sunlight

Introduction

180. An assessment of the impact of the development on daylight and sunlight to surrounding residential dwellings (Willoughby House, Andrewes House, 83 Moorgate and 85 Moorgate) has been undertaken in accordance with the Building Research Establishment (BRE) Guidelines and considered having regard to Policies 7.6 and 7.7 of the London Plan and DM10.7 and DM21.3 of the Local Plan.
181. The assessment of daylight and sunlight is a comparative one measured against a baseline condition. In this case the buildings on the proposal site have been demolished and the residential units within the Barbican currently enjoy increased levels of both daylight and direct sunlight. However, there is an extant permission (application no. 16/00883/FULEIA) for development of the site which has been implemented and for which the impacts on daylight and sunlight have been tested and approved. If the current proposals were not to be implemented, the extant permission would be built out to completion. Therefore, the extant permission provides the “Future Baseline” against which any impacts on daylight and sunlight generated by this development should be measured.

Policy Background

182. 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.
183. London Plan policies 7.6 (Architecture) and 7.7 (Tall and Large Buildings) seek to ensure that development does not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate and additionally, in the case of tall and large buildings, noise, reflected glare, aviation, navigation and telecommunication interference.
184. BRE guidelines consider several 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 a 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 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.

185. Average Daylight Factors (ADF) may also be considered. 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, therefore, ADF has not been assessed in this case.
186. The applicant's assessment has been carried out in accordance with the Building Research Establishment (BRE) guidelines "Site Layout Planning for Daylight and Sunlight 2011, A Guide to Good Practice".
187. The impact of the development upon the daylight amenity to residential rooms is considered by the consultants to be minor adverse in situations where:
- despite VSC alterations to the windows serving the room, the NSL alteration to the room is fully BRE compliant;
 - despite NSL alterations to the room, the VSC alteration to all windows serving the room is fully BRE compliant; or
 - all VSC and NSL alterations applicable to the room are either less than 30% of their baseline values and/or the windows and room retain VSC or NSL levels of at least 70% of the BRE recommended minimums.
188. It should be noted that where there are existing low levels of daylight in the baseline figures any change in the measured levels can appear to have a disproportionate impact. To give a more complete picture the same level of change can be described in two ways:
- Percentage change - 10% reduced to 8% = 20% reduction
- Actual change - 10% reduced to 8% = 2% reduction

Daylight

189. There are 346 windows serving 235 residential rooms surrounding the site that require assessment. These have been assessed in terms of both VSC and NSL.

Vertical Sky Component

190. In terms of VSC the development would have a negligible impact (less than a 20% reduction) on:
- 31 of 42 windows within Andrewes House
 - 214 of 295 windows within Willoughby House

191. There would be a minor adverse impact (20% to 29.9% reduction)
 - 8 of 42 windows within Andrewes House
 - 66 of 295 windows within Willoughby House
192. Of the remaining windows, 3 at Andrewes House and 15 at Willoughby House would experience reductions greater than 30% of existing VSC levels with 4 of the windows at Willoughby House subject to reductions of more than 40%.
193. The BRE guidelines recommend a minimum existing VSC level of 27%. The 18 windows that would experience a greater than 30% "Percentage" change have very low baseline VSC values of between 1.71% and 4.73%. Therefore, the very small "Actual" change in VSC of between 0.57% and 1.64% results in a disproportionate percentage reduction which would, in reality, be unlikely to be noticed by the occupants.
194. BRE guidance states, *"Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction opposite may result in a large relative impact on the VSC, and on the area receiving direct skylight. One way to demonstrate this would be to carry out an additional calculation of the VSC and area receiving direct skylight, for both the existing and proposed situations, without the balcony in place this would show that the presence of the balcony, rather than the size of the new obstruction, was the main factor in the relative loss of light."*
195. Calculations have been carried out and the results show that without balconies all the windows within Andrewes House and Willoughby House would meet the BRE guidelines for VSC with the proposed development in place. This demonstrates that the design of the existing building, rather than the proposed development, is the principal factor in the relative loss of light in terms of VSC.

No Skyline

196. In terms of NSL the development would have a negligible impact (less than a 20% reduction) on:
 - 21 of 21 rooms within Andrewes House
 - 203 of 208 rooms within Willoughby House
197. There would be a minor adverse impact (20% to 29.9% reduction)
 - 1 of 208 rooms within Willoughby House
198. The remaining 4 rooms at Willoughby House would experience reductions of 36.5% - 47.9% of the existing NSL level. These rooms serve bedrooms which the BRE guidelines consider to be of less importance than living rooms, dining rooms and kitchens in terms of

NSL daylight distribution. It is noted that in this case daylight would still penetrate to approximately 43% - 57% of the rooms.

Sunlight

199. There are 341 windows serving 231 residential rooms surrounding the site which are relevant for sunlight amenity assessment. These have all been assessed in terms of the annual probable sunlight hours (APSH).

Annual Probable Sunlight Hours

200. BRE guidance states that “...*the sunlighting of the existing building may be adversely affected...if the centre of the window receives less than 25% of annual probable sunlight hours, or less than 5% of annual probable sunlight hours between 21 September and 21 March and receives less than 0.8 times its former sunlight hours during either period and has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours.*”
201. On this basis, the impact to the sunlight amenity of the following number of rooms within the surrounding properties would be negligible, with an overall sunlight compliance rate of 96%:
- All rooms within Andrewes House;
199 of the 208 rooms within Willoughby House; and
All rooms within 85 Moorgate.
202. Of the nine rooms within Willoughby House which would experience APSH alterations greater than outlined in the BRE guidance in terms of total APSH, two would not meet the winter APSH guideline levels.
203. The nine rooms within Willoughby House which would experience sunlight amenity alterations greater than outlined in the BRE guidelines are all located beneath large balconies serving the upper floors. As a result of their location the majority of these rooms already have baseline APSH values below the BRE recommended minimums. The actual APSH alterations that the windows serving the rooms would experience result are, therefore, disproportionate in percentage terms. The impact to the sunlight amenity of the nine rooms is, considered to be moderate adverse to substantial in nature.
204. BRE guidance states that, “*Balconies and overhangs above an existing window tend to block sunlight, especially in the summer. Even a modest obstruction opposite may result in a large relative impact on the sunlight received. One way to demonstrate this would be to carry out an additional calculation of the APSH, for both the existing and proposed situations, without the balcony in place...this would show that the presence of the balcony, rather than the size of the new obstruction, was the main factor in the relative loss of sunlight.*”
205. This calculation has been carried out and the results show that, without balconies, all windows within Willoughby House would meet the BRE guidelines for APSH with the proposed development in place. This demonstrates that the structure of the existing building, rather than the

proposed development, is the principal factor in the relative loss of sunlight in terms of APSH.

206. Without balconies, therefore, there would be no sunlight amenity impact to any of the surrounding residential rooms which are greater than negligible in nature.

Daylight and Sunlight Conclusions

207. Despite the dense urban location of the Site, the vast majority of alterations to the daylight and sunlight amenity of the surrounding residential properties are either in full compliance with BRE guidance or are considered to be no greater than minor adverse in nature.
208. The BRE guidelines, state that they are “...*purely advisory and the numerical target values within it may be varied to meet the needs of the development and its location... Though it gives numerical guidelines, these should be interpreted flexibly because natural lighting is only one of many factors in site layout design. In special circumstances, the developer or the planning authority may wish to use different target values. For example, in a historic city centre, or in an area with modern high rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings.*”
209. In respect of the few residential rooms that do experience effects which depart from BRE guidance, these are predominantly located under large balconies serving rooms to the floors above them.
210. BRE guidance states that existing windows with balconies above them typically receive less daylight and sunlight because the balcony reduces visibility of the top part of the sky. As such, even a modest obstruction opposite these windows may result in a large relative impact upon on the VSC, APSH and NSL. The BRE suggests that, in order to demonstrate that it is the presence of the balcony rather than the size of the new obstruction that is the main factor in the relative loss of daylight and/or sunlight, additional daylight and sunlight calculations should be carried out for both the existing and proposed situations without the balconies in place.
211. These assessments were carried out and, as indicated by the BRE, they demonstrated that it is the presence of the balconies, rather than the size of the proposed development that is the main factor in the relative loss of daylight and/or sunlight.
212. By virtue of the limited impact of the proposed development on the daylight and sunlight received by the neighbouring residential occupiers, as indicated by the BRE assessments, it is considered that the proposals are in compliance with policies DM10.7 and DM21.3 of the Local Plan and policies 7.6 and 7.7 of the London Plan.

Light Pollution

213. The building design takes into account residents’ concerns both passively, through the facade composition, materials and density, and actively, through modern lighting controls, fittings and management.

214. The proposed building frontage to Moor Lane would be reduced in height in comparison to the extant scheme and is proposed to be used as a 'Wellness' centre for the office occupiers and has been designed to predominantly face onto the square at podium level rather than Moor Lane. As such, the west building facade to Moor Lane would have significantly less glazing than the previous proposals. There would be no facade lighting on the Moor Lane with external lighting restricted to the lift entrance and stairs connecting to the Highwalk, as well as local low-level lighting to landscape planters and the Highwalk bridge. Except for the lift entrance, all lighting levels on the western façade of the west building would be lower than the existing levels of street lighting along Moor Lane.
215. The east building of the Proposed Development is largely of a similar height compared to the Consented Scheme and set back behind the west building.
216. The east building is 47m from the window line of Willoughby House. At this distance the potential for light pollution from proposed uses on the site would be low i.e. the intensity of light emitted would have to be strong for light pollution nuisance to occur. There would be no facade lighting on the western face of the east building facing Moor Lane, and internal lighting levels within offices would be controlled through design to minimise potential for light spillage.
217. Vertical fins on the outside of the western facades would also reduce visible light from within the offices when viewed obliquely along the street. These would have a black finish to help absorb light and the glazing would have a translucent (semi-opaque) finish to further reduce light spillage.
218. the internal lighting systems within the office buildings will be of a modern design, incorporating controls to minimise visible light, and reduce energy consumption. Movement sensors, light sensors and timer controls (as part of the Lighting Control System) in association with zoning will be used to ensure lighting is minimised and only switched on as required.
219. The external materials and details would be controlled by conditions as they are part of the external design and a condition is included on the schedule. The internal measures fall outside planning control but many of the measures are required to satisfy Building Regulations in terms of energy use and have been agreed by the applicant.

Terraces

220. As part of the considerations of the extant scheme it was proposed to have two terraces on the west building, one at level 6 (approximately 30m away from Willoughby House) and one on level 7 (approximately 35m from Willoughby House)
221. To mitigate concerns raised by Barbican residents in respect of potential noise and overlooking from use of the roof terraces facing Moor Lane conditions were imposed limiting hours of use and

prohibiting music and the use of public address systems on the terraces.

- 222. The current proposals omit any terraces on the west building and provide terraces at levels 9, 10, 12 and 13 on the western elevation of the east building and at level 11 on the eastern elevation. A small terrace would also be provided at level 14 on the south elevation. These would be used by office occupiers and it is likely that they would be used more during the working day than in the evenings. They are not to be used for public restaurants, clubs or venues. Such uses would require specific planning permission.
- 223. At their nearest points the west facing terraces would be approximately 51.2m, 55.4m, 64.8m and 85.3m from the window line of Willoughby House, which are very considerable distances.
- 224. In terms of overlooking, the terraces do not provide any greater possibility than office windows. Planting, landscaping and balustrading is proposed on the terraces to provide screening and to help reduce overlooking.
- 225. Although there is a greatly increased level of separation between the terraces and the nearest noise sensitive receptors in the Barbican, it is proposed to impose similar restrictions on the hours of use and restrict amplified music and the use of public address systems on the terraces through condition. The west facing terraces at levels 9, 10, 12 and 13 would be limited to no use after 9pm with the smaller terraces on the east and south elevations available until 10pm.

Wind Microclimate

- 226. The likely effect of the development on wind microclimate in the immediately surrounding area has been assessed using the Lawson Pedestrian Comfort Criteria.
- 227. At ground and walkway levels during the windiest season the wind conditions around the proposed building would be within the 'Sitting' and 'Standing/entrance' levels which is good and appropriate for the proposed use.
- 228. The terraces, which are not public, would have slightly windier conditions than desired in the summer season which is for the occupier to address through an appropriate landscaping scheme.
- 229. In that it would not cause harm to the amenity of the surrounding area in terms of wind microclimate, it is considered that the development complies with policy DM10.1 of the Local Plan and policies 5.3 and 7.9 of the London Plan.

Noise and Vibration

- 230. Moor Lane is a vehicular access route between Fore Street to the south and Silk Street, Ropemaker Street and Chiswell Street to the north. It provides access/egress to New Union Street (a private service road) and the Barbican carpark ramp beneath Willoughby House.

There is a timed restriction for through traffic between the hours of 11pm and 7am Monday to Friday.

231. It is proposed to service the new development from a service area on Moor Lane. As detailed above (paragraphs 157-164) it is anticipated that there would be a total of 85 service vehicles across the proposed operational period of 7am to 9pm (14 hours). Of these, five would be HGVs. A comprehensive booking system is proposed to ensure an even spread of deliveries during the operational period (6 vehicles per hour) with any out of hours deliveries (limited to two) and all cycle and courier deliveries via a secondary on-street facility on Fore Street Avenue.
232. The applicants have provided details of a noise assessment that sets out the noise levels that would be experienced at Willoughby House in a worst-case scenario i.e. with 10 vehicles per hour including two HGVs.
233. During the period 7am to 9pm the hourly average (L_{Aeq} , 1 hour) background noise level when measured over a full seven day period on Moor Lane varies between 55dB and 64dB. Taking account of vehicle arrivals and departures only, the noise level from 10 servicing vehicles averaged over a one hour period would be 40dB, substantially below the measured hourly ambient noise level.
234. To mitigate against break-out noise from the loading area, acoustic absorption materials will be applied to the soffit of the loading area. This will form part of a Noise Management Plan (NMP) that will include details of all the mitigation measures to be implemented to manage break-out noise from the loading area.
235. When account is taken of break-out noise levels from the loading area, (noise from use of the compactors, gate and blockers) the overall predicted hourly noise level increases from 40dB to 43dB (L_{Aeq} , 1 hour) which would remain substantially below the prevailing ambient noise level.
236. Although the predicted average noise levels would be below the existing ambient noise levels, this does not take account of short duration "event" noise levels, particularly those associated with the arrival and departure of HGVs. To address this, the worst-case scenario derives the predicted event noise level ($dB L_{Aeq,T}$) which is the predicted noise level while a vehicle arrives/leaves rather than an average over a one hour period and the maximum noise level (L_{Amax}) generated from two HGV events occurring concurrently. The predicted maximum increase in noise level during such an event would be 4dB above the prevailing ambient noise levels ($dB L_{Aeq,T}$). The predicted results fall within the range of existing L_{Amax} events measured on Moor Lane during the proposed hours of operation of the servicing area. The City's Markets & Consumer Protection, Pollution Team advise that *"It is commonly accepted that for the average person a change of 1 dB is just perceptible under controlled conditions. A change of 3 dB is noticeable, 6 dB obvious and a change of 10 dB is significant"*. It is

noted that these events would be infrequent (once per hour in a worst-case scenario) and, that they would be perceptible and more discernible during the early morning and evening periods when ambient noise levels are lower.

- 237. The number of service vehicles resulting from this development would, in a worst-case scenario, during the “event” have a minor adverse impact on prevailing noise levels in Moor Lane and experienced by the residents of Willoughby House. However, the low number of proposed HGVs (approximately one every 2hrs 45mins) suggests that the worst-case scenario of two concurrent HGV events would be unlikely to occur and that event noise levels (dB LAEQT) would generally be lower than reported, particularly with non-HGV service vehicles.
- 238. The number and timing of service deliveries would be controlled through the proposed delivery and servicing arrangements, and restricted by condition in respect of hours of operation, in order to ensure that the use of Moor Lane for the provision of servicing does not cause unacceptable harm to residential occupiers and to the surrounding area.
- 239. Noise and vibration during construction would be subject to compliance with details to be approved under conditions which would deal with the management of all freight vehicle movements to and from the site and include a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects attributable to the development.
- 240. Noise levels from mechanical plant in the completed development would be required to comply with the City of London’s standard requirement that there would be no increase in background noise levels and approved under planning conditions to ensure there would not be an adverse effect on the surrounding area.
- 241. The impacts on noise and vibration would be managed through conditions and provisions in the S106 agreement to control any adverse effects.

Air Quality

- 242. 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 the relevant national, regional and local guidance including the NPPF Planning Practice Guidance 2014, policy 7.14 of the London Plan and policy CS15 of the Local Plan.
- 243. During construction dust emissions would increase and would require to be controlled through the implementation of good practice mitigation measures in the Construction Method Statements to be approved for each phase of the development under conditions attached to this planning permission.
- 244. The air quality assessment states that estimated construction traffic, 80 to 90 two-way vehicle movements per day during the peak construction

phase (Quarter 4 of 2020), would lead to a small increase in the number of vehicles on the local highway network. Emissions would be relatively small compared to existing road traffic emissions on London Wall (16,859 daily vehicles including 1,077 (6.39%) HGVs) and Moorgate (14,279 daily vehicles including 2,108 (14.76%) HGVs). The overall impact would not be considered sufficient to cause a significant adverse effect at any of the nearby local air quality receptors.

245. All construction plant must now comply with the London Low Emission Standards set out for Non-Road Mobile Machinery (NRMM). Therefore, it is considered that there would be no significant effect on air quality from the construction plant.
246. The impact of service vehicles on air quality has not been assessed as the number of vehicles falls below the level that would require an air quality assessment under the Institute of Air Quality Management (IAQM) guidelines. It should be noted that the City will be completely within the Mayor of London's ultra-low emission zone (ULEZ) from April 2019. Subject to daily charges for non-compliant vehicles (detailed below), this will restrict access to all but the cleanest diesel/petrol vehicles (Euro 6/Euro 4). When the proposed building is operational in 2023, it is expected that all delivery and service vehicles visiting the site will meet the low emission standards. This, together with the distance to the nearest residential units (30m), indicates that the air quality impact of the operation of the servicing bay on local residential units is likely to be negligible.
 - Petrol vehicles that do not meet Euro 4 standards and diesel vehicles that do not meet Euro 6 standards will have to pay a ULEZ daily fee (£12.50 for cars, vans and motorbikes; £100 for buses, coaches and HGVs) to drive in the zone, 24 hours a day, 365 days a year. The ULEZ will apply to all vehicle types, except black taxis. It is estimated that introducing ULEZ in central London will result in nearly a 50 per cent reduction in road transport NOx emissions by 2020.
247. For the completed scheme the assessment predicts that the effect on air quality due to the increase in air pollutants from road traffic and plant emissions would be negligible.
248. Deutsche Bank are exploring the potential for using electric vehicles which would further reduce emissions.
249. The air quality neutral assessment submitted demonstrates that the development will be air quality neutral, as described in the Mayor of London's SPG on Sustainable Design and Construction.

Moor Lane Enhancement Scheme

250. An enhancement scheme for Moor Lane was approved by the Streets and Walkways Sub-Committee in July 2011. The proposals included a widened footway on the western side of Moor Lane and the creation of a linear garden incorporating sustainable urban drainage. The works

would result in a narrowing of the carriageway by 4m providing a two-way carriageway of 6m.

- 251. Vehicle access to and from the proposed service area would not be compromised by the carriageway alterations and, as a result, the proposal to provide a servicing area accessed from Moor Lane would not prejudice the enhancement scheme.
- 252. The applicants have stated that, in addition, all delivery and servicing associated with the 21 Moorfields development would be managed by a Banksman to oversee vehicle manoeuvres and provide additional visibility assistance to drivers turning into the service area, in particular in relation to pedestrians, cyclists and other vulnerable road users.

Archaeology

- 253. An archaeological assessment has been submitted which concludes that the potential for surviving archaeological remains is low across the site, due to extensive disturbance by construction of the station and railway lines, which are in a cutting.
- 254. The proposed scheme will require new foundations which may have an archaeological impact on the southern perimeter of the site. An archaeological watching brief to record the proposed foundation positions was approved on 5th May 2016 (application no. 16/00313/MDC). The archaeological recording has commenced but is not complete. Conditions are recommended to cover the archaeological recording and foundation design. The site is outside the City wall in the area of the Moorfields marsh and Upper Walbrook valley. This would allow a record to be made of any archaeological remains revealed in accordance with Policy 12.4 of the Local Plan and current standards and guidance. A record would be made of any archaeological remains revealed in accordance with Policy DM12.4 of the Local Plan and current standards and guidance.

Planning Obligations and Community Infrastructure Levy

- 255. 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.
- 256. The applicants have applied for an abatement against their CIL contributions in respect of the previous existing buildings on the site which has been accepted. The abatement applies to CIL only and does not affect S106 contributions.
- 257. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
- 258. 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	£2,852,700	£2,738,592	£114,108
Mayoral planning obligation net liability*	£7,582,320	£7,582,320	£3500
Total liability in accordance with the Mayor of London's policies	£10,435,020	£10,320,912	£117,608

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	£4,279,050	£4,065,098	£213,953
City Planning Obligation Affordable Housing	£1,492,260	£1,477,337	£14,923
City Planning Obligation Local, Training, Skills and Job Brokerage	£223,839	£221,601	£2,238
City Planning Obligation Monitoring Charge	£4,000		£4,000
Total liability in accordance with the City of London's policies	£5,999,149	£5,764,036	£235,113

City's Planning Obligations

259. 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 Highways obligations

- S278 agreement
- Delivery and Servicing Management Plan and monitoring
- Noise Management Plan
- Travel Plan
- Local Training, Skills and Job Brokerage Strategy (Construction)
- Local Procurement
- Carbon Offsetting
- Utility Connections
- Publicly Accessible Area
- City Walkway Bridges and maintenance
- TfL Cycle Hire Scheme Contributions (£60,000)
- TfL Bus Capacity Mitigation (£180,000)
- Light Pollution mitigation
- Development Programme
- Public Lift and Escalator
- Alternative route during construction
- Regular liaison meetings with the local community during the construction and operational phases of the development

Public Realm Access and City Walkway

260. The proposal includes new City walkways and publicly accessible space. Public access rights, operation and maintenance of the proposed public lifts, escalators and City Walkways (including maintenance for planting) will be secured through the section 106 covenants subject to a detailed regime for public access to be only prevented or temporarily restricted or limited to enable cleansing, maintenance and security. The details of this regime are yet to be finalised and negotiations with the developer are in progress.

Delivery and Servicing Management Plan

261. The developer would be required to submit for approval a Delivery and Servicing Management Plan prior to occupation, and to adhere to the plan as approved. The plan would be required to include details of the freight consolidation operation and centre and the delivery and servicing booking and management systems that are necessary to achieve compliance with the maximum vehicle numbers required by the planning obligation. In the event of a breach of the Management Plan, the developer would be required to resubmit a revised document. Should the developer default on this requirement, the City would be given the ability to provide a replacement plan. The operation of the

Delivery and Servicing Management Plan would be subject to an annual review.

262. To ensure that the potential adverse impacts of servicing vehicles are removed, and that the four proposed servicing bays (two for HGVs and two for van deliveries) are appropriate, the following should be secured either through condition or obligations within the S106 agreement as appropriate:

- No goods shall be accepted from or dispatched onto or into any motor vehicle (except a motorcycle on Fore Street Avenue) other than one waiting for that purpose wholly within the servicing area within the building; other than within the permitted hours 5.00am and 7.00am and 9pm and 11pm, when goods may be accepted from or dispatched onto or into motor vehicles waiting for that purpose on Fore Street Avenue (limited to two).
- All motorcycle and bicycle deliveries shall use the post room facilities
- The servicing area within the building shall only be in use and available to be accessed between the hours of 7.00am and 9.00pm from Monday to Friday and 9.00am to 6.00pm on Saturdays.
- No more than 83 motor vehicles (not including motorcycles) shall be permitted access to the servicing area within the building during the 14 hours per day (from 7.00am to 9.00pm from Monday to Friday) that the servicing area is in use, and no more than 85 motor vehicles in total (not including motorcycles) shall service the building over a 24 hour period including any on-street servicing from Fore Street Avenue.
- When the development is operational, no more than 40 motor vehicles shall be permitted access to the servicing area within the building during the 7 hours period (from 9.00am to 6.00pm on Saturday) that the servicing area is in use.
- An online delivery booking system shall be operated to ensure that all deliveries, both those coming from the off-site consolidation centre and all other deliveries, are appropriately scheduled so that the number and size of vehicles needing access to the servicing area within the building does not at any time exceed the capacity of the four loading bays within that servicing area. This delivery booking system shall be available for the City of London to inspect at all times.
- All vehicles entering and exiting the servicing area within the building from or to Moor Lane shall do so in the forward direction and in a forward gear.
- A Noise Management Plan (NMP) that includes details of the mitigation measures to be implemented to manage acoustic noise levels from the loading bay and servicing area on Moor Lane (as detailed within the Regulation 25 Statement dated 4th January 2018).

- A delivery and servicing plan (DSP) shall set out in detail how the building will be serviced, including deliveries, collection of wastes, management of facilities management vehicles and use of the disabled parking bay, in full conformity with all of the requirements set out above. It shall be submitted to the City for its review, comment and approval and shall be kept under review and amended as may be appropriate from time to time, particularly as may be needed to continue to exemplify sustainable logistics best practice.

Monitoring and Administrative Costs

263. 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.
264. 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

265. 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.
266. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations as necessary.

Phasing of Development and CIL Payments

267. In line with the previous agreements the CIL payment will be linked to 2 phases of the development. Phasing of CIL payments is specifically provided for under the CIL regulations. Any payments made against the extant permission will be credited.

Conclusions

Economic Activity

268. The proposed development would result in an additional 41,662sq.m of Class B1 office floorspace over the previously existing buildings on the site and could accommodate an additional 5,667 office workers. This would further consolidate the nationally significant cluster of economic activity in the City and contribute to its attractiveness as a world leading international financial and business centre. It would deliver approximately 3.62% of the additional office floorspace sought in Local Plan policy CS1.
269. Deutsche Bank is a global banking and financial services company and has more than 100,000 employees in over 70 countries. It is the 16th Largest Bank in the World (by total assets) and employs 7,000 people in London and its contribution to the City is significant.

270. Foreign-based banks account for 53.7% (approximately 9.88bn) of all employment taxes generated by banks and make up almost 3% of the UK's total tax receipts.

The impact of the proposals on neighbouring residential occupiers and the local area

271. Concerns have been raised by Barbican residents, particularly in relation to traffic noise and air quality impacts attributable to the location of the servicing area on Moor lane. Additional issues raised include noise from the office terraces, light emission, loss of daylight & sunlight and loss of views. These impacts have been mitigated through negotiations and agreement with the applicant as far as possible while still facilitating the potential tenant's requirements for the site.
272. The use of the Servicing area on Moor Lane will be restricted to protect residents from potential noise disturbance neighbours during the quieter hours.
273. The anticipated number of vehicles using the service area would be 85. Of these only five would be HGVs with 74 (88%) cars and light vans.
274. Assessment of the service vehicle traffic noise indicates that average noise levels would be below the existing ambient noise levels but that in a worst case scenario there would be a minor adverse impact on peak noise levels (4dB above background level) in Moor Lane and experienced by the residents of Willoughby House.
275. The low number of proposed HGVs indicates that the worst-case scenario (two concurrent HGV events) would be unlikely to occur and that peak noise levels would generally be lower than reported.
276. The City will be completely within the Mayor of London's ultra-low emission zone (ULEZ) from April 2019. When the proposed building is operational (2023), it is expected that all delivery and service vehicles visiting the site will meet the low emission standards. This, together with the distance to the nearest residential units indicates that the air quality impact from the use of the servicing area on local residential units is likely to be negligible.
277. At their nearest points the west facing terraces would be approximately 51.2m, 55.4m, 64.8m and 85.3m from the window line of Willoughby House. Conditions will be imposed limiting hours of operation and prohibiting music or the use of public address systems.
278. There would be reductions in sunlight and daylight to some residential premises. Assessments were carried out and, as indicated by the BRE guidance, they demonstrated that it is the presence of the existing balconies, rather than the size of the proposed development that is the main factor in the loss of daylight and/or sunlight. The applicants have demonstrated how they intend to minimise light emission at night and restrictions are proposed on the use of the office terraces at night.
279. There is no right to, or protection of, private views.

- 280. The new City Highwalk and changes to City Walkway bridges over Moor Lane and Fore Street Avenue would provide appropriate replacements for the previous arrangements.
- 281. There would be a significant reduction in the quantity of publicly accessible space when compared to the extant scheme to meet the trading floor floorspace requirements of the proposed tenant, Deutsche Bank. The economic case for retaining Deutsche Bank in the City is laid out within the body of this report. Nevertheless, the landscaping of the proposed publicly accessible square would be of high quality and would provide for a quiet green space for the benefit of office workers and members of the public.
- 282. Rescission and changes to the City Walkway are subject to existing legal agreements. Declaration and maintenance will be subject to separate agreements to be placed before your Committee at the appropriate times.

The impact of the proposals on heritage assets

- 283. The proposed development has been assessed in terms of its potential impact on nearby heritage assets. Utilising the relevant guidance, the assessment indicates that any impact would not be detrimental to the setting and significance of listed buildings, conservation areas and historic parks and gardens in the vicinity.

Compliance with Policy and Guidance

- 284. In relation to sustainable economic growth, creating jobs, prosperity and maintaining the City of London as a strategically important, globally-oriented financial and business services centre, the proposals accord with the National Planning Policy Framework, the London Plan and the Local plan.
- 285. In that it would not have a significant detrimental impact on the local area or residents in terms of noise, air quality, daylight and sunlight and light pollution, the proposal is in substantial compliance with the development plan policies that relate to it. In particular policies DM10.1, DM10.7 and DM21.3 of the Local Plan and policies 7.6 and 7.7 of the London Plan.
- 286. In that it would not have a detrimental impact the setting or significance of heritage assets in the vicinity the proposal is in compliance with the development plan policies that relate to it. In particular policies DM12.1, DM12.3 and DM12.5 of the Local Plan and policies 7.8 and 7.11 of the London Plan.

Conclusion

- 287. This scheme amends previous approvals on the site to meet the needs of a major City occupier.
- 288. The economic benefits of the development in terms of employment, maintaining local supply chains and retaining a significant foreign bank within the City are key considerations that must be weighed against any potential negative impacts on residential neighbours. There would

be some impacts on neighbouring residential occupiers but, as has been demonstrated through the relevant assessments of noise, air quality and daylight and sunlight, any impacts would not be significant. The proposal is in substantial compliance with the guidance of the NPPF and policies of the London Plan and the Local Plan.

289. This is a significant development for the City, which facilitates occupation by a major City occupier who has expressed a willingness to work with, and to minimise the impact on, residents.
290. The scheme is recommended to you for planning permission subject to conditions and a Section 106 agreement being entered into to cover the matters set out in the report.

Background Papers

Internal

Email 09.11.2017 Open Spaces Department

Email 22.11.2017 Barbican Centre and Guildhall School of Music & Drama

External

Representations:

Name	Address	Date
David McArthur	15 Finsbury Circus House	12/01/2018
Madeleine Pugh	Moor House 120 London Wall	13/12/2017
Michael Swash	106 Willoughby House	06/12/2017 29/11/2017
Residents Committee of the Heron	C/o Apartment 1407, 5 Moor Lane	02/01/2018 06/12/2017
Margaret Berer	114 Speed House	26/11/2017 12/11/2017
Beatriz Phipp	83 Speed House	29/11/2017
Peter Prynn	124 Willoughby House	29/11/2017
Eileen Hall	509 Willoughby House	30/11/2017
F Hogan	525 Willoughby House	29/11/2017 29/11/2017
E Hirst	724 Willoughby House	28/11/2017
John Ponting	532 Willoughby House	29/11/2017
Karen Goodison	718 Willoughby House	01/12/2017
Nazar Sayigh	301 Willoughby House	30/11/2017
Kathryn Gray	508 Willoughby House	30/11/2017
Ian Williams	111 Willoughby House	29/11/2017
Renu Gupta	534 Willoughby House	29/11/2017
Nina Strangeway	301 Willoughby House	29/11/2017
Edward McEneaney	110 Willoughby House	29/11/2017
Natalie Robinson	7 Andrewes House	29/11/2017
Simon Ebbins	501 Willoughby House	29/11/2017
Caroline Swash	106 Willoughby House	29/11/2017

Sarah Guy	109 Willoughby House	29/11/2017
Amanda Davenport	710 Willoughby House	29/11/2017
R Starrett	105 Willoughby House	28/11/2017
Lindy Hemming	105 Willoughby House	28/11/2017
Richard Haynes	705 Willoughby House	28/11/2017
Stephanie Gamble	328 Willoughby House	28/11/2017
Hilary Sunman	124 Willoughby House	28/11/2017
The Barbican Association	C/o 403 Willoughby House	27/11/2017
Katherine Jarrett	504 Willoughby House	27/11/2017
Nicholas Redman	113 Willoughby House	27/11/2017
Jorge Rodrigues	401 Willoughby House	16/01/2018
Tim O'Hara	708 Willoughby House	27/11/2017
Maria Granowska	51 Willoughby House	27/11/2017
Lila Rawlings	719 Willoughby House	27/11/2017
David Archer	721 Willoughby House	26/11/2017
Trevor Kavanagh	55 Speed House	26/11/2017
Martin Gilday	519 Willoughby House	26/11/2017
Tim Bishop & Ian Loudon	84 Speed House	26/11/2017
Ian Dixon	407 Gilbert House	25/11/2017
Nicola Holmes	523 Willoughby House	21/11/2017
Dr Steve Nicholson	540 Willoughby House	22/11/2017
Peter Smart	715 Willoughby House	22/11/2017
Graham Webb	318 Willoughby House	20/11/2017
Nick Astbury	522 Willoughby House	20/11/2017
John Hodges	336 Willoughby House	19/11/2017
Lucy Hall	336 Willoughby House	19/11/2017
Christopher Allen & Sandra Hickey	516 Willoughby House	17/11/2017
Geraint Lewis	713 Willoughby House	15/11/2017
Katherine Green	711 Willoughby House	14/11/2017
K Bradshaw	303 Willoughby House	14/11/2017
Aleksei Gornoi	307 Willoughby House	13/11/2017
Richard Gaskell	402 Mountjoy House	12/11/2017

Statutory Consultees

Letter 13.11.2017 Historic England
Letter 15.11.2017 Westminster City Council
Email 20.11.2017 Thames Water
Email 21.11.2017 Natural England
Email 21.11.2017 Environment Agency
Email 22.11.2017 St. Paul's Cathedral
Letter 08.12.2017 Greater London Authority
Letter 12.12.2017 LB Lambeth

Application Documents:

Planning Statement by GVA rec'd 27.10.2017
Environmental Statement Volume 1: Main Text by Waterman Group rec'd 27.10.2017
Environmental Statement Volume 2: Townscape, Heritage and Visual Impact Assessment by Richard Coleman Citydesigner rec'd 27.10.2017
Environmental Statement Volume 3: Appendices by Waterman Group rec'd 27.10.2017
Environmental Statement Volume 4: Figures by Waterman Group rec'd 27.10.2017
Environmental Statement Volume 5: Non-Technical Summary by Waterman Group rec'd 27.10.2017
Design & Access Statement by Wilkinson Eyre rec'd 27.10.2017
Transportation Assessment by Momentum Transport Planning rec'd 27.10.2017
Flood Risk Assessment by Waterman Group rec'd 27.10.2017
Light Pollution Advice Note by Waterman Group rec'd 27.10.2017
Landscape Statement by Andy Sturgeon Design rec'd 27.10.2017
Sustainability Statement by Cundall rec'd 27.10.2017
Energy Statement by Cundall rec'd 27.10.2017
Statement of Community Involvement by Hulme Brophy rec'd 27.10.2017
Regulation 25 Extra Information Note by Waterman Group Energy Statement by Cundall rec'd 04.01.2018
Letter of Clarification by Deutsche Bank rec'd 11.01.2018
Drainage Strategy by Cundall rec'd 01.02.2018
Design Note – 21 Moorfields Blocker by Robert Bird rec'd 01.02.2018
Drawing nos. 00873-WEA-XX-XX-P-0002, 0049, 0050, 0051, 0052, 0053,

0054, 0055, 0056, 0057; 540_P_00_111 Rev. P04, 540_P_01_111 Rev. P06,
540_P_RF_111 Rev. P05.

APPENDIX A

REASONED CONCLUSIONS ON SIGNIFICANT EFFECTS

Reasoned Conclusions

Following examination of the environmental information a reasoned conclusion on the significant effects of the proposed development on the environment has been reached and is set out in the report as summarised in the Conclusions section of the report

Monitoring Measures

If planning permission were granted, it is considered that monitoring measures should be imposed to secure compliance with the cap on servicing trips and other elements of the Delivery and Servicing Management Plan.

Appendix B

London Plan Policies

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

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

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

Policy 2.12 Identify, protect and enhance predominantly residential neighbourhoods within CAZ and develop sensitive mixed use policies to ensure that housing does not compromise CAZ strategic functions elsewhere in the zone.

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

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

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

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

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

Policy 4.5 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 4.6 Support the continued success of London's diverse range of arts, cultural, professional sporting and entertainment enterprises and the cultural, social and economic benefits that they offer to its residents, workers and visitors.

Policy 4.7 Support a strong, partnership approach to assessing need and bringing forward capacity for retail, commercial, culture and leisure development in town centres.

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

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

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

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

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

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

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

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

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

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

Policy 5.18 Encourage development waste management facilities and removal by water or rail transport.

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 7.1 Development should be designed so that the layout, tenure, mix of uses interface with surrounding land will improve people's access to social and community infrastructure (including green spaces), the Blue Ribbon Network, local shops, employment opportunities, commercial services and public transport.

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

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

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

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

Policy 7.6 Buildings and structures should:

- a. Be of the highest architectural quality
- b. Be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm
- c. Comprise details and materials that complement, not necessarily replicate, the local architectural character
- d. Not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings

- e. Incorporate best practice in resource management and climate change mitigation and adaptation
- f. Provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces
- g. Be adaptable to different activities and land uses, particularly at ground level
- h. Meet the principles of inclusive design
- i. Optimise the potential of sites.

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

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

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

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

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

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

Policy 7.18 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

CS5 Meet challenges facing North of 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.

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.

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.

DM3.3 Crowded places

On all major developments, applicants will be required to satisfy principles and standards that address the issues of crowded places and counter-terrorism, by:

- a) conducting a full risk assessment;
- b) keeping access points to the development to a minimum;
- c) ensuring that public realm and pedestrian permeability associated with a building or site is not adversely impacted, and that design considers the application of Hostile Vehicle Mitigation measures at an early stage;
- d) ensuring early consultation with the City of London Police on risk mitigation measures;
- e) providing necessary measures that relate to the appropriate level of crowding in a site, place or wider area.

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.

DM10.4 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.

DM10.8 Access and inclusive design

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

- a) inclusive and safe for all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;

- b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
- c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

DM12.1 Change affecting heritage assets

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

DM12.4 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.

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.

DM15.5 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.

DM15.7 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.

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.

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.

DM19.1 Additional open space

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.
2. New open space should:
 - a) be publicly accessible where feasible; this may be achieved through a legal agreement;
 - b) provide a high quality environment;
 - c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
 - d) have regard to biodiversity and the creation of green corridors;
 - e) have regard to acoustic design to minimise noise and create tranquil spaces.
3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

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.

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.

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: 17/01095/FULEIA

21 Moorfields, Land Bounded By Moorfields, Fore Street Avenue, Moor Lane & New Union Street London

Construction of a mixed use development above and around the new Crossrail station entrance to provide office (Class B1) space[63,008sq.m GEA], retail (Use Class A1/A3/A4) space [182sq.m GEA], a replacement City Walkway, a new urban square, cycle parking, servicing, storage, plant, landscaping [12,587sq.m GEA] and associated works. [Total 75,777sq.m GEA]

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 In the event that further site contamination is found when carrying out the approved development which has not previously been reported in writing to the Local Planning Authority, it must be reported in writing to the Local Planning Authority within five working days and an investigation and risk assessment must be undertaken 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 following policy the Core Strategy: DM15.8

- 3 None of the development hereby permitted shall be commenced (except those works expressly agreed by Crossrail in correspondence with GVA dated 4th August 2015*) until detailed design and construction method statements for all of the ground floor structures, foundations and basements and for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the Local Planning Authority which:-
- (i) Accommodate the proposed location of the Crossrail structures including tunnels, shafts and temporary works,
 - (ii) Accommodate ground movement arising from the construction thereof,
 - (iii) Mitigate the effects of noise and vibration arising from the operation of the Crossrail railway within the tunnels and other structures.
 - (iv) Mitigate the effects on Crossrail, of ground movement arising from development.

The development shall be carried out in all respects in accordance with the approved design and method statements. All structures and works comprised within the development hereby permitted which are required parts (i), (ii), (iii) and (iv) of this condition shall be completed in their entirety before any part of the buildings hereby permitted are occupied.

*The works agreed by Crossrail are set out in Informative number 21.

REASON: To ensure that the development does not prejudice construction of Crossrail and to protect the amenity of occupiers of the proposed building in accordance with the following policies of the Local Plan: CS5, DM16.1.

- 4 None of the development hereby permitted shall be commenced (except those works expressly agreed by Crossrail in correspondence with GVA dated 4th August 2015*) until a method statement has been submitted to, and approved in writing, by the Local Planning Authority to include arrangements to secure that, during any period when concurrent construction is taking place of both the permitted development and of the Crossrail structures and tunnels in or adjacent to the site of the approved development, the construction of the Crossrail structures and tunnels is not impeded.

* The works agreed by Crossrail are set out in Informative number 21.

REASON: To ensure that the development does not prejudice construction of Crossrail and to protect the amenity of occupiers of the proposed building in accordance with the following policies of the Local Plan: CS5, DM16.1.

- 5 No works below ground level comprised within the permitted development shall be carried out at any time when sprayed concrete lined tunnels or compensation grouting works are being undertaken in close proximity.

REASON: To ensure that the development does not prejudice construction of Crossrail and to protect the amenity of occupiers of the proposed building in accordance with the following policies of the Local Plan: CS5, DM16.1.

- 6 Before any Phase 2 construction works hereby approved are begun details must be submitted to and approved in writing by the local planning authority indicating the proposed finished floor levels at ground floor level in relation to the existing highway levels. The development shall be carried out in accordance with the approved site survey unless otherwise agreed in writing by the local planning authority.
REASON: To ensure 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.
- 7 Before any Phase 2 construction works hereby permitted are begun the following details and information shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) details of provision within the building facades for the inclusion of street lighting;
(b) details of all alterations to the City Walkway bridge over Moor Lane.
REASON: In the interests of public safety and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS3, DM10.1, DM16.2.
- 8 Provision must be made within the development for City Walkways to be constructed in accordance with specifications to be submitted to and approved in writing by the Local Planning Authority before any works thereby affected are begun, such specifications to include the positions, widths, levels and finishes of the City Walkway.
REASON: To ensure that facilities are provided for the City Walkway in accordance with the following policy of the Local Plan: DM16.2.
- 9 Works shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the development process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out

other than in accordance with the approved scheme (including payment of any agreed monitoring contribution)

REASON: To protect the amenities of nearby residents and commercial occupiers in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to any work commencing in order that the impact on amenities is minimised from the time that development starts.

- 10 Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.
REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following 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.
- 11 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 including but not limited to: attenuation systems, flow control including the hydraulic brakes and pumps, rainwater harvesting system, design for system exceedance, water quality, integration with the public realm, construction plan, cost etc. The surface water discharge rates for each storm event should be no greater than agreed and the actual attenuation volume provided within each of the catchments should be no smaller than agreed; changes will need to be justified and agreed by the Lead Local Flood Authority;
 - (b) Full details of measures to be taken to prevent flooding (of the site or by the site) during the course of the construction works.REASON: To improve sustainability, reduce flood risk and reduce water run off rates in accordance with the following policies of the Local Plan: DM15.5 and DM18.1
- 12 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, its 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 policies of the Local Plan: DM15.5 and DM18.1

- 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 No impact piling shall take place until a piling method statement (detailing the type of piling to be undertaken and methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water or sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the Local Planning Authority in consultation with the relevant water or sewerage undertaker. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

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

- 15 Before any Phase 1 construction work is begun, impact studies of the existing water supply infrastructure must be submitted to, and approved in writing, by the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new

additional capacity required in the system and a suitable connection point.

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

- 16 No piling 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.

REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.

- 17 The development shall incorporate such measures as are necessary within the site to resist structural damage arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any Phase 2 construction works hereby permitted are begun.

REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2.

- 18 Before any construction works at Phase 2 hereby permitted are begun details of rainwater collection, harvesting and grey water recycling systems shall be submitted to and approved in writing by the local planning authority.

REASON: To improve sustainability and reduce flood risk by reducing potable water demands and water run-off rates in accordance with the following policies of the Local Plan: DM15.5 and DM18.1.

- 19 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 to include the vertical fins, glazing, specialist coating and fritting and details of their contribution to light spillage reduction to the Moor Lane and west facing elevations, external ground and upper level surfaces;
- (b) details of the proposed new facades including typical details of the fenestration and entrances;
- (c) details of typical bays of the development;
- (d) typical details of stonework;
- (e) details of ground floor and podium level (Highwalk) elevations;
- (f) details of junctions with adjoining premises;
- (g) details of soffits, hand rails and balustrades;
- (h) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level

- (i) details of all ground level surfaces including materials to be used;
- (j) details of external surfaces within the site boundary including hard and soft landscaping;
- (h) 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.

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: DM10.1, DM10.4, DM10.5, DM21.3.

- 20 Before any works thereby affected are begun, details shall be submitted to and approved in writing by the Local Planning Authority of the proposed Highwalk lighting artwork. This shall include details of all light fittings and associated works, and shall be accompanied by an lighting impact assessment.
REASON: to ensure a satisfactory external appearance and protect the amenity of all users of the Highwalk and neighbouring residential and commercial occupiers in accordance with the following policies of the Local Plan: DM10.1, DM10.8, DM11.2 and DM21.3.
- 21 Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the arrangements for the servicing area accessed from Moor Lane so as to control and minimise noise to neighbouring residential properties. The scheme shall include details of any acoustic absorbent materials as well as details of the operation of the "Blocker" and security gates. The details approved must be implemented prior to occupation.
REASON: To protect the amenities of neighbouring residential and commercial occupiers in accordance with the following policies of the Local Plan: DM21.3, DM21.5.
- 22 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.
- 23 The development shall be designed to connect into the CityGen district heating network.
REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.
- 24 Before any Phase 2 construction works hereby permitted are begun a detailed assessment of measures to improve carbon dioxide emissions

savings and the BREEAM rating shall be submitted to and approved in writing by the local planning authority.

REASON: To minimise carbon emissions and provide a sustainable development in accordance with the following policy of the Local Plan: DM15.1.

- 25 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.
- 26 A landscaping scheme for the publicly accessible square, Highwalk, street bridges, roof terraces and facades, to include details of all planting and plant species, must be submitted to and approved in writing by the Local Planning Authority before any works affected thereby are begun. 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.
- 27 The green roof(s) indicated on the drawings hereby approved shall be designed to achieve at least the number of BREEAM credits indicated in the pre-assessment in relation to flood risk/water run-off and enhancing ecological value of the site. 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: DM15.1, DM18.2, DM19.2.
- 28 (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.

- 29 Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the Class A1, A3 or A4 uses. The details approved must be implemented before the individual Class A1, A3 or A4 uses are implemented.
REASON: In order to protect commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7.
- 30 No cooking shall take place within any Class A1, A3 or A4 units 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. 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.
- 31 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.
- 32 Prior to installation and use of the boilers, full details of the systems together with the potential for emissions, including any mitigation measures to be applied, shall be submitted and approved by the Local Planning Authority. The emissions shall be modelled in accordance with a methodology agreed with the City of London.

REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 33 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.
- 34 Prior to installation and use of the generators, full details of the location and specification of the plant and flues, the maintenance procedure and other technical details to minimise impact shall be submitted and 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.
- 35 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.
- 36 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 applicable at time of installation) 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.
- 37 The 'Life Safety Generators' shall be used solely on brief intermittent and exceptional occasions when required in response to a life threatening emergency 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 their noise impacts and emissions of air pollutants and a log of use shall be maintained and be available for inspection by the Local Planning Authority.

REASON: To ensure that the generator, which does not meet City of London noise standards, and would have a negative impact on local air quality, is used only in response to a life threatening emergency situation in accordance with the following policies of the Local Plan and the London Plan: DM15.6, DM15.7, DM21.3; 7.14B (a) and (c).

- 38 The party wall elements between the proposed offices and retail premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the office premises due to noise from the neighbouring retail premises and shall be permanently maintained thereafter.
A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall submitted to and approved in writing by the Local Planning Authority.
REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.
- 39 The Class A1 or A3 or Class A4 use hereby permitted shall not be open to customers between the hours of 23:00 on one day and 07:00 on the following day.
REASON: To safeguard the amenity of the nearby residents, adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 40 A clear unobstructed minimum headroom of 5m must be maintained for the life of the building in the refuse skip loading area as shown on the approved drawings.
REASON: To ensure satisfactory servicing facilities in accordance with the following policy of the Local Plan: DM16.5.
- 41 Facilities (other than by street level turntable) must be provided and maintained for the life of the development so that vehicles may enter and leave the building by driving in a forward direction.
REASON: To ensure satisfactory servicing facilities and in the interests of public safety in accordance with the following policy of the Local Plan: DM16.5.
- 42 No goods, including fuel, shall be accepted from or dispatched onto or into any motor vehicle (except a motor cycle) other than one waiting for that purpose wholly within the servicing area within the building, except for between 5.00am and 7.00am and 9pm and 11pm when goods may be accepted from or dispatched onto or into motor vehicles waiting for that purpose on Fore Street Avenue (limited to two such vehicles).
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: DM16.1, DM16.5, DM21.3.

- 43 No servicing of the premises shall be carried out from the Moor Lane servicing area other than between the hours of 7.00am and 9.00pm from Monday to Friday and from 9.00am to 6.00pm on Saturdays and not at all on Sundays and Bank Holidays. Servicing includes the loading and unloading of goods from motor vehicles and putting rubbish outside the building.
REASON: To protect the amenities of neighbouring residential and commercial occupiers in accordance with the following policies of the Local Plan: DM21.3, DM21.5.
- 44 All vehicles entering and exiting the servicing area within the building from or to Moor Lane shall do so in the forward direction and in a forward gear.
REASON: To ensure satisfactory servicing facilities and in the interests of public safety and protect the amenity of neighbouring residents in accordance with the following policy of the Local Plan: DM16.5, DM21.2.
- 45 The loading and unloading areas must remain ancillary to the use of the building and shall be available at all times for that purpose for the occupiers thereof and visitors thereto.
REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Local Plan: DM16.5.
- 46 The threshold of all vehicular access points shall be at the same level as the rear of the adjoining footway or such alternative as may be approved in writing with the Local Planning Authority.
REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.
- 47 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.
- 48 No doors, gates or windows at ground floor level shall open over the public highway.
REASON: In the interests of public safety
- 49 Provision must be made within the development for the lighting and drainage of City Walkways together with a lockable service cupboard and cleansing facilities in accordance with specifications to be

submitted to and approved in writing by the Local Planning Authority prior to any works thereby affected being begun.

REASON: To ensure that City Walkways may be used in safety at all times and in all weathers in accordance with the following policy of the Local Plan: DM16.2.

- 50 All City Walkways within the development shall be constructed in accordance with specifications to be submitted to and approved in writing by the Local Planning Authority prior to any works thereby affected being begun, which shall include details of surface finishes, handrails, balustrades, parapets and signage.
REASON: In the interests of public safety and to ensure uniformity of design treatment of all City Walkways in accordance with the following policy of the Local Plan: DM16.2.
- 51 Provision must be made within the development for continuing structural support for the City Walkway(s) in pursuance of Section 10 of the City of London (Various Powers) Act 1967.
REASON: To ensure the integrity of the City Walkway in accordance with the following policy of the Local Plan: DM16.2.
- 52 After the City Walkway(s) incorporated in the planning permission have been constructed, certified and declared by the City of London Corporation to be City Walkways in pursuance of Sections 5 and 6 of the City of London (Various Powers) Act 1967, any person may have access thereto on foot and may pass and re-pass thereon on foot as of right, but subject nevertheless to any restrictions which may legitimately from time be imposed in relation thereto.
REASON: To ensure the public has access over the City Walkway on this site in accordance with the following policy of the Local Plan: DM16.2.
- 53 There must be no building, roof structures or plant above the top storeys except as may be approved in writing by the Local Planning Authority.
REASON: To ensure protection of the view of St Paul's Cathedral and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS14, DM10.1 DM12.1.
- 54 At all times when not being used for cleaning or maintenance the window cleaning gantries, cradles and other similar equipment shall be garaged within the enclosure(s) shown on the approved drawings.
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
- 55 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.

- 56 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 830 Long Stay 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.
- 57 Provision shall be made for disabled people to obtain access to the offices and to the retail unit via their respective principal entrances without the need to negotiate steps and shall be maintained for the life of the building.
REASON: To ensure that disabled people are able to use the building in accordance with the following policy of the Local Plan: DM10.8.
- 58 No public address system (PA), amplified live or amplified recorded music shall be played within any part of the site so loud that it can be heard outside the site or within any other premises in the buildings on the site.
REASON: To safeguard the amenity of the nearby residents, adjoining premises and the area in general in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 59 No public address system (PA), amplified live or amplified recorded music shall be played on the roof terraces at any time.
REASON: To safeguard the amenity of the nearby residents, adjoining premises and the area in general in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 60 Unless otherwise agreed in writing, there shall be no private or public events or associated activities within the new publicly accessible square.
REASON: To safeguard the amenity of the nearby residents, adjoining premises and the area in general in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 61 No part of the roof areas except those shown as roof terraces 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.

- 62 Other than public street lighting where required, there shall be no external feature lighting on the Moor Lane facade of the building.
REASON: In order to protect residential/commercial amenities in the area and safeguard the settings of designated and non-designated heritage assets in accordance with the following policies of the Local Plan: DM12.1, DM15.6, DM21.3.
- 63 The roof terraces at levels 9, 10 and 12 hereby permitted shall only be used for non-maintenance purposes between the hours of 08:00 and 21:00 Monday to Friday and the roof terraces at levels 11, 13 and 14 and 08:00 to 22:00 Monday to Saturday and not at all on Sundays or Bank Holidays.
REASON: To safeguard the amenity of the nearby residents, adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 64 The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission:
Drawings numbered:
00873-WEA-XX-XX-P-0001, 0071, 0072, 0099, 0100, 0100M, 0101, 0102, 0103, 0104, 0105, 0106, 0107, 01080109, 0110, 0111, 0112, 0113, 0114, 0115, 0115M, 0116, 0201, 0202, 0203, 0204, 0205, 0206, 0301, 0302, 0501, 0502, 0503, 0504, 0505, 0801.
REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

INFORMATIVES

- 1 In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:

detailed advice in the form of statutory policies in the Core Strategy/ Unitary Development Plan, Supplementary Planning documents, and other written guidance has been made available;

a full pre application advice service has been offered;

where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.

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

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

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

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

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

- 3 You are advised that the planting and plant species indicated on the approved drawings are NOT approved and details of the final planting scheme will be required by condition of this planning permission.
- 4 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.
- 5 Access for people with disabilities is a material consideration in the determination of planning applications. The City of London Corporation has published design standards giving advice on access for people with disabilities and setting out the minimum standards it expects to see adopted in the City buildings. These can be obtained from the City's Access Adviser, Chief Planning Officer and District Surveyor. Further advice on improving access for people with disabilities can be obtained from the City's Access Adviser. Your attention is drawn to the Disability Discrimination provisions of the Equality Act 2010 to ensure that disabled people are not significantly disadvantaged.

Service providers, etc., should make "reasonable adjustments" to facilitate access to their premises and the City asks all applicants for

planning permission to ensure that physical barriers to access premises are minimised in any works carried out.

- 6 The correct street number or number and name must be displayed prominently on the premises in accordance with regulations made under Section 12 of the London Building Acts (Amendment) Act 1939. Names and numbers must be agreed with the Department of the Built Environment prior to their use including use for marketing.
- 7 The Department of the Built Environment (Transportation & Public Realm Division) must be consulted on the following matters which require specific approval:
 - (a) Hoardings, scaffolding and their respective licences, temporary road closures and any other activity on the public highway in connection with the proposed building works. In this regard the City of London Corporation operates the Considerate Contractors Scheme.
 - (b) The incorporation of street lighting and/or walkway lighting into the new development. Section 53 of the City of London (Various Powers) Act 1900 allows the City to affix to the exterior of any building fronting any street within the City brackets, wires, pipes and apparatus as may be necessary or convenient for the public lighting of streets within the City. Early discussion with the Department of the Built Environment Transportation and Public Realm Division is recommended to ensure the design of the building provides for the inclusion of street lighting.
 - (c) The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window sill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath, over or into any public way (including any cleaning equipment overhanging any public footway or carriageway).

You are advised that highway projection licences do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the land owner. Please contact the Corporate Property Officer, City Surveyor's Department.
 - (d) Bridges over highways
 - (e) Permanent Highway Stopping-Up Orders and dedication of land for highway purposes.
 - (f) Declaration, alteration and discontinuance of City and Riverside Walkways.

- (g) The provision of City Walkway drainage facilities and maintenance arrangements thereof.
 - (h) Connections to the local sewerage and surface water system.
 - (i) Carriageway crossovers.
 - (j) Servicing arrangements, which must be in accordance with the City of London Corporation's guide specifying "Standard Highway and Servicing Requirements for Development in the City of London".
- 8 The enabling of archaeological work to meet the requirements of condition 12 is the responsibility of the developer and should be regarded as an integral part of the development programme in accordance with the NPPF and the policies of the Local Plan. This would include on site facilities, funding, fieldwork, post excavation analysis and reporting and publication of the work in accordance with recognised guidelines and codes of practice. This is to ensure adequate "preservation by record" of the archaeological resource affected by the proposed development.
- 9 The Markets and Consumer Protection Department (Environmental Health Team) must be consulted on the following matters:
- (a) Approval for the installation of furnaces to buildings and the height of any chimneys. If the requirements under the legislation require any structures in excess of those shown on drawings for which planning permission has already been granted, further planning approval will also be required.
 - (b) Installation of engine generators using fuel oil.
 - (c) The control of noise and other potential nuisances arising from the demolition and construction works on this site and compliance with the Construction (Design and Management) Regulations 2007; the Environmental Health Team should be informed of the name and address of the project manager and/or main contractor as soon as they are appointed.
 - (d) Alterations to the drainage and sanitary arrangements.
 - (e) The requirements of the Health and Safety at Work etc Act 1974 and the other relevant statutory enactments (including the Offices, Shops and Railway Premises Act 1963); in particular:
 - the identification, encapsulation and removal of asbestos in accordance with a planned programme;
 - provision for window cleaning (internal and external) to be carried out safely.

(f) The use of premises for the storage, handling, preparation or sale of food.

(g) Use of the premises for public entertainment.

(h) Limitations which may be imposed on hours of work, noise and other environmental disturbance.

(i) The control of noise from plant and equipment;

(j) Methods of odour control.

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

Noise and Dust

(a) The construction/project management company concerned with the development must contact the Department of Markets and Consumer Protection and provide a working document detailing steps they propose to take to minimise noise and air pollution for the duration of the works at least 28 days prior to commencement of the work. Restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

(b) Demolition and construction work shall be carried out in accordance with the City of London Code of Practice for Deconstruction and Construction. The code details good site practice so as to minimise disturbance to nearby residents and commercial occupiers from noise, dust etc. The code can be accessed through the City of London internet site, www.cityoflondon.gov.uk, via the a-z index under Pollution Control-City in the section referring to noise, and is also available from the Markets and Consumer Protection Department.

(c) Failure to notify the Markets and Consumer Protection Department of the start of the works or to provide the working documents will result in the service of a notice under section 60 of the Control of Pollution Act 1974 (which will dictate the permitted hours of work including noisy operations) and under Section 80 of the Environmental Protection Act 1990 relating to the control of dust and other air borne particles. The restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

(d) Construction work shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise from the site has been submitted to and approved by the Markets and Consumer Protection Department.

Air Quality

(e) 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

(f) 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.

Boilers and CHP plant

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

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

(i) 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.

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

Standby Generators

(k) 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.

(l) 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.

Cooling Towers

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

Ventilation of Sewer Gases

(n) The sewers in the City historically vent at low level in the road. The area containing the site of the development has suffered smell problems from sewer smells entering buildings. A number of these ventilation grills have been blocked up by Thames Water Utilities. These have now reached a point where no further blocking up can be carried out. It is therefore paramount that no low level ventilation intakes or entrances are adjacent to these vents. The Director of Markets and Consumer Protection strongly recommends that a sewer vent pipe be installed in the building terminating at a safe outlet at roof level atmosphere. This would benefit the development and the surrounding areas by providing any venting of the sewers at high level away from air intakes and building entrances, thus allowing possible closing off of low level ventilation grills in any problem areas.

Food Hygiene and Safety

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

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

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

The flue should terminate at roof level in a location which will not give rise to nuisance to other occupiers of the building or adjacent buildings.

It cannot be assumed that ductwork will be permitted on the exterior of the building;

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

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

- 11 The Directorate of the Built Environment should be consulted on:
- (a) Servicing arrangements, which must be in accordance with the City of London Corporation's guide specifying "Standard Highway and Servicing Requirements for Development in the City of London".
 - (b) The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window cill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath, over or into any public way (including any cleaning equipment overhanging any public footway or carriageway). You are advised that highway projection licenses do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the land owner. In such cases please also contact the Corporate Property Officer, City Surveyor's Department.
 - (c) Bridges over highways.
 - (d) Permanent Highway Stopping-Up Orders, dedication of land for highway purposes, declaration, diversion and stopping up of City and Riverside Walkways.
 - (e) The display of any advertisement material on the premises which may be subject to the City of London Corporation's Byelaws.
- 12 The Crime Prevention Design Advisor for the City of London Police should be consulted with regard to guidance on all aspects of security, means of crime prevention in new development and on current crime trends.
- 13 The grant of approval under the Town and Country Planning Acts does not overcome the need to also obtain any licences and consents which

may be required by other legislation. The following list is not exhaustive:

(a) Fire precautions and certification:

London Fire Brigade, Fire Prevention Branch
5-6 City Forum
City Road
London EC1N 2NY

(b) Works affecting Transport for London operational land and structures:

Borough Integration and Partnerships
Transport for London
Windsor House
42-50 Victoria Street
London, SW1H 0TL

(c) Works in proximity to the line of the CrossRail project:

Cross London Rail Links Limited
Portland House
Bressenden Place
London, SW1E 5BH

(d) Works affecting railway operational land and structures:

Planning Surveyor
Railtrack
355 Euston Road
London NW1 3AG

(e) Works affecting water supplies, land drainage and flood defences:

Environment Agency,
North London Planning Liaison Team
9th floor, Eastbury House
30-34 Albert Embankment
London, SE1 7TL

- 14 Transport for London has indicated its preparedness to provide guidelines in relation to the proposed location of the CrossRail structures and tunnels, ground movement arising from the construction of the running tunnels, and noise and vibration arising from the use of the running tunnels. Applicants are encouraged to discuss the guidelines with the CrossRail Engineer in the course of preparing detailed design and method statements.
- 15 The existing walkway stair on the north west corner of New Union Street will become redundant following removal of the bridge and should be removed and the area made good. This must be agreed with the owners of City Point.

16 Thames Water advises:

(1) The developer is advised to contact Thames Water Development Services (0845 850 2777) to discuss the details of the piling method statement required by a condition of this planning permission.

(2) Where a developer proposes to discharge groundwater into a public sewer, a groundwater discharge permit will be required. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing, and site remediation. Groundwater permit enquiries should be directed to Thames Water, Risk Management Team by telephoning 020 8507 4890 or by emailing wwriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality. Any discharge made without a permit is deemed illegal and may result in prosecution under the provision of the Water Industry Act 1991.

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

(4) Thames Water recommends the installation of a properly maintained fat trap on all catering establishments. We further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses. Further information on the above is available in a leaflet 'Best Management Practices for Catering Establishments' which can be requested by telephoning 01923 898 188.

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

(6) Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Water's pipes. The developer

should take account of this minimum pressure in the design of the proposed development.

(7) A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc, may be required before the Company can give its consent. Applications should be made to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.

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

(9) The development covers a large area, currently served by combined sewers. Impact will depend upon proposed points of connection. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.

(10) There are important water assets adjacent to the proposed development. Thames Water will not allow any building within 5 metres of them and will require 24 hours access for maintenance purposes. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.

- 17 The Director of Markets and Consumer Protection states that any building proposal that will include catering facilities will be required to be constructed with adequate grease traps to the satisfaction of the Sewerage Undertaker, Thames Water Utilities Ltd, or their contractors.
- 18 The Environment Agency advises:
 - (a) Developers should ensure that any proposed piling methods do not pose a pollution risk to controlled waters. Piling to facilitate building foundations or the installation of ground source heat pumps has the potential to create a pathway between contaminated shallow soils and deeper geological formations and aquifers. Deep piling can also result in physical disturbance of aquifers.
 - (b) If piling is proposed, a Piling Risk Assessment will be required to demonstrate that the chosen piling method does not increase the risk of near-surface pollutants migrating into deeper geological formations and aquifers. A Hydrogeological Risk Assessment of physical

disturbance to the aquifer should also be undertaken and if unacceptable risks are identified, appropriate mitigation measures must be provided.

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

- 19 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.
- 20 The Director of Markets and Consumer Protection states that any building proposal that will include catering facilities will be required to be constructed with adequate grease traps to the satisfaction of the Sewerage Undertaker, Thames Water Utilities Ltd, or their contractors.
- 21 The works agreed by Crossrail in correspondence with GVA dated 4th August 2015 referred to in conditions 3 and 4 are:
Above deck:
Soft strip and asbestos removal to existing 21 MF structures including roof enclosures, City Boot pub and Moorgate Buttery. [completed]
Fit out of City Boot pub for site welfare. [completed]
Erection of perimeter hoardings on New Union Street, Moor Lane, Fore Street Avenue and Moorfields. [completed]
Erection of encapsulation scaffold round existing buildings.
Erection of Tower Crane 1 and Tower Crane 2 on retained deck.
Installation of temporary impact protection and temporary waterproofing.
Drainage surveys and leak testing.
Installation of temporary protection to LUL vents.
Remedial repairs to retained deck expansion joints.
Removal of New Union Street and Fore Street Avenue Link Bridges and temporary propping to Moor Lane Link Bridge.
Site Investigation works to retained deck including coring works.
Installation of accommodation gantry and cabins on Moorfields by Holland and Barrett.
Reduction in size of Fore Street Avenue substation and disconnection/demolition of New Union Street substation.
Structural demolition of existing buildings (including podium slab) down to retained deck level. This includes New Union Street substation and Phases 1 and 2 of demolition.
Formation of penetrations in retained deck in pile locations to allow for the installation of trimming steels and also piles themselves.
Installation of piling grillage on retained deck.

Below Deck

- ' Asbestos removal in LUL demise and developer's area.
- ' Setting out and surveys to LUL demise and developer's area.
- ' Site Investigations including beam and column intrusive works, boreholes and UXO surveys.
- ' Mini piling in developer's area East ' 300mm diameter piles to depth of 30m + installation of pile caps.
- ' Installation of trimming steels.
- ' Installation of pile protection shields in developer's area at pile positions 3, 5, 7 & 9.
- ' Drainage diversions including Crossrail manhole at Pile 003.
- ' Fit out of developer's area for LUL welfare.
- ' MEP diversions.
- ' Installation of platform 6 lighting and ceiling.
- ' Installation of hoardings in LUL demise.
- ' Installation of link bridges across tracks 5 & 6.
- ' Remedial works to columns/beams and concrete planks within station.

- ' Installation of LUL vent infill slabs.
- ' Removal of lifts and lift shafts.
- ' Temporary propping to retained deck.

- 22 The investigation and risk assessment referred to in condition 2 must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme must be submitted to and approved in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report must be submitted to and approved in writing by the Local Planning Authority. The report of the findings must include:
- (i) a survey of the extent, scale and nature of contamination;
 - (ii) an assessment of the potential risks to:
 - 1. human health,
 - 2. property (existing or proposed) including buildings, open spaces, service lines and pipes,
 - 3. adjoining land,
 - 4. groundwaters and surface waters,
 - 5. ecological systems,
 - 6. archaeological sites and ancient monuments;
 - (iii) an appraisal of remedial options, and proposal of the preferred option(s).
- This investigation and risk assessment must be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11.

Committee:	Date:
Planning and Transportation	20 February 2018
Subject: 1 & 2 Garden Court & 3 Garden Court (Blackstone House) Middle Temple London EC4Y 9BL Change of use of 1 x residential unit (C3) to office use (B1) at fourth floor level and external alterations including the formation of new openings in the rear of 2 Garden Court at second, third and fourth floor levels (located in the City of London) in association with a proposed three storey extension (located in the City of Westminster) linking 2 Garden Court with Blackstone House.	Public
Ward: Farringdon Without	For Decision
Registered No: 17/00937/FULL	Registered on: 12 September 2017
Conservation Area: Temples	Listed Building: Grade II

Summary

The proposal relates to 1 & 2 Garden Court, a pair of red brick chamber buildings comprising four storeys plus basement. 1 & 2 Garden Court are grade II listed buildings within the Temple Conservation Area.

The site includes 3 Garden Court (Blackstone House) and the land between the rear of Blackstone House and 1& 2 Garden Court which falls within the adjoining administrative area of Westminster City Council and are located within the Strand Conservation Area.

Planning permission is sought for alterations to the Grade II listed 1 and 2 Garden Court. The works to 1 and 2 Garden Court include; change of use of one residential unit (Class C3) to office (Class B1), removal of structural and non-structural partitions, creation of openings at second, third and fourth floor level at the rear of 1 & 2 Garden Court, refurbishment and repair works, installation of two new glazed lifts in the existing locations.

An identical application has been submitted to Westminster City Council. The works within the administrative boundary of Westminster include the erection of a glazed infill extension between Blackstone House and 1 and 2 Garden Court to create a new atrium connecting the two buildings at second, third and fourth floor levels and associated alterations including new rooftop plant equipment.

A total of 10 representations have been received. The representations are summarised in the body of the report. The issues raised include the impact of the proposed link extension on daylight and sunlight, privacy, overlooking and an increased sense of enclosure to nearby residential properties, harm to the Strand and Temples Conservation Area, noise and disturbance during construction and devaluation of nearby residential properties.

The proposals would result in less than substantial harm to the significance of the Temples Conservation Area and would result in less than substantial harm to the setting and significance of the Grade II listed 1 & 2 Garden Court as a designated heritage asset. The harm is outweighed by the benefits of the proposal which comprises larger and high quality office space for the Chambers and improved access between the two buildings, enabling the Chambers to remain within the Middle Temple Estate.

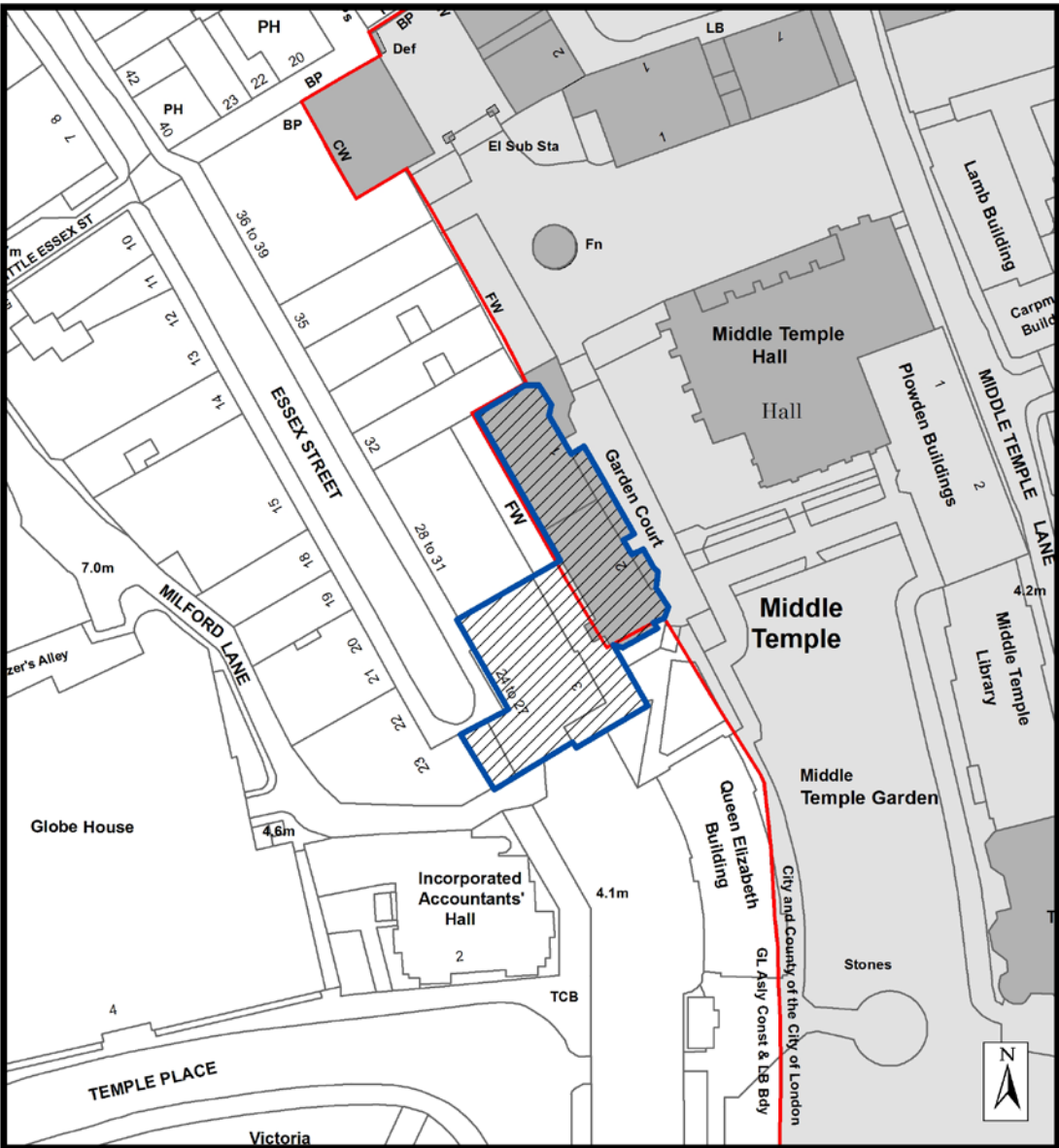
It is considered that the development complies with the NPPF and the Development Plan as a whole and is appropriate subject to conditions.

Recommendation

Recommendation

(1) That planning permission be granted for the above proposal in accordance with the details set out in the attached schedule.

Site Location Plan



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ADDRESS:
1-2 Garden Court

CASE No.
17/00937/FULL

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



DEPARTMENT OF THE BUILT ENVIRONMENT



Main Report

Site

1. 1 & 2 Garden Court are a pair of red brick chamber buildings dating to 1885 with stone dressings and prominent 'Elizabethan' features.
2. 1 & 2 Garden Court are grade II listed buildings comprising four storeys plus basement within the Temple Conservation Area. They are in use as barristers' chambers (Class B1) with residential uses (Class C3) at upper levels.
3. The Grade II registered Middle Temple park and garden extends to the edge of the site to the east and south, with the section immediately south of the site in long-standing use as a carpark. Middle Temple Hall (grade I listed) is to the east of 2 Garden Court.
4. The site includes 3 Garden Court (Blackstone House) and the land between the rear of Blackstone House and 1& 2 Garden Court which are within the adjoining administrative area of Westminster City Council and within the Strand Conservation Area.
5. 1 & 2 Garden Court and Blackstone House are currently linked by a glazed part one, part two storey extension between 2 Garden Court Blackstone House.

Relevant Planning History

6. In July 2007 planning permission and listed building consent were granted for the erection of a part one, part two storey glazed link extension between Blackstone House and 2 Garden Court to provide additional office space (Class B1). Associated alterations to Blackstone House included the formation of new openings in the rear elevation, installation of additional mechanical plant at roof level and associated alterations. Alterations to 1&2 Garden Court included the formation of a new opening in the rear elevation and associated alterations.

Proposals

7. Planning permission is sought for alterations to the grade II listed 1 and 2 Garden Court. The works to 1 & 2 Garden Court include:
 - Change of use of one residential unit (Class C3) on the fourth-floor level to office use (Class B1) (62sqm)
 - Refurbishment and repair works to 1 and 2 Garden Court including replacement of all services, full façade clean and repairs to the roof
 - Creation of new openings at the rear of 2 Garden Court at second, third and fourth floor levels (in association with a glazed structure linking 1 and 2 Garden Court and Blackstone House).

8. An identical application has been submitted to Westminster City Council. The works within the administrative boundary of Westminster include:
 - A glazed infill extension between Blackstone House and 1 and 2 Garden Court to create a new atrium connecting the buildings at second, third and fourth floor levels and associated alterations, including installation of rooftop plant at Blackstone House.

Cross boundary Application

9. As the application site is within two boroughs the applicant has submitted two identical applications. One has been submitted to Westminster ("the Westminster Application") and one to the City ("the City Application"). Unless one authority delegates its LPA functions to the other, each authority should separately determine the Application which has been made to it. In determining the City Application, the City is obliged to have regard to the development plan so far as material, and to make the determination in accordance with the development plan unless material considerations indicate otherwise. The considerations are set out in paragraph 20.
10. This report deals with the application for planning permission (17/00937/FULL).

Consultations

11. The views of other City of London departments have been taken into account in the preparation of this report and some detailed matters remain to be dealt with under conditions.
12. The application has been advertised in the press and a site notice was put up around the site, and statutory and non-statutory bodies were consulted.
13. Historic England does not wish to comment on the proposal and has deferred to the view of the local planning authority.
14. Westminster City Council has concerns with the visual impact of the proposed infill extension with regards to its scale, design, materiality, and its relationship with neighbouring buildings and its surroundings. They consider that the proposal would harm the character and appearance of Blackstone House and the Strand Conservation Area; and would harm the setting of the Temple Conservation Area, the neighbouring Grade II registered Middle Temple Garden and the Grade II listed 1 & 2 Garden Court. Concern is raised that the infill extension may have an un-neighbourly impact on residents at the rear in Aldwych Chambers (29 Essex Street) with regards to loss of light and an increased sense of enclosure. The application was prepared for the Planning Applications Sub Committee in early January, but the application was deferred in order to allow the applicant to enter into further technical discussions with officers and residents, and for members to visit the site. (The comments sent to the City by Westminster and the deferred report to Westminster's Planning

Application's Sub Committee are available for Members in the Consultation Response bundle).

15. City of London Conservation Area Advisory Committee raised no objections.
16. Affected residential properties have been consulted. A total of 9 objections have been received from residential occupiers at Aldwych Chambers (29 Essex Street) within the area of Westminster City Council. They are summarised below:
 - The proposed link structure is out keeping with the historic buildings that make up the area known as Middle Temple and would cause substantial harm to the Strand and Temple Conservation Area with no public benefit to the proposal.
 - The proposed link structure would have a significant impact on the loss of daylight, sunlight, privacy, overshadowing and an increased sense of enclosure to the residential properties at Aldwych Chambers (29 Essex Street).
 - Concerns about the disturbance during construction
 - Proposed link structure would impact on the character of the property
 - Devaluation of their property
 - The applicant should investigate the removal of the adjoining external fire escape stair.

Policy Context

17. The development plan consists of the London Plan and the City of London Local Plan. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix A to this report.
18. Although Westminster's identification and analysis of its policies relevant to the Westminster Application do not form part of the development plan, for the purposes of determining the City Application, they are a material consideration and should be taken into account.
19. Government Guidance is contained in the National Planning Policy Framework (NPPF).

Considerations

20. 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, to local finance considerations 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 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)

- 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 setting of listed buildings;
21. In determining the City Application, the City is obliged to have regard to the London Plan and the development plan documents adopted for the City.
 22. Considerable importance and weight should be given to the desirability of preserving a listed building and/or its setting, and to the desirability of preserving or enhancing the character or appearance of a conservation area, when carrying out any balancing exercise in which harm to the setting of listed buildings or conservation areas is to be weighed against public benefits. A finding that harm would be caused to a listed building or its setting or to a conservation area gives rise to a strong presumption against planning permission being granted.
 23. In considering the planning application before you, account has to be taken of the statutory and policy framework, the documentation accompanying the application, and the views of both statutory and non-statutory consultees.
 24. It is necessary to assess all of the policies and proposals in the Development Plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.
 25. The principal issues in considering this application are:
 - The extent to which the proposals comply with the Development Plan and policy advice (including the NPPF) and the desirability of preserving the setting of listed buildings and preserving or enhancing the character and appearance of the conservation area;
 - The extent to which the proposals impact on the amenity of neighbouring residential occupiers.

HERITAGE

Identification of Heritage Assets and their significance

26. Paragraph 129 of the NPPF states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including the setting of any

asset). The assessment of significance should be taken into account when considering the impact of a proposal.

27. The designated heritage assets of relevance in the consideration of this case are:
 - 1 & 2 Garden Court – Grade II listed
 - Temples Conservation Area (City of London)
 - Strand Conservation Area (Westminster)
28. As well as the setting of:
 - Essex Watergate, Essex Street – Grade II listed (Westminster)
 - Middle Temple Garden - Grade II registered park or garden (City of London and Westminster)
29. There are no non-designated heritage assets in the City of London of relevance to this application. Westminster have identified Blackstone House as an unlisted building of merit.
30. 1 & 2 Garden Court have aesthetic and historical significance as a high quality example of a Victorian chambers building with long-standing associations with the site and Temples area.
31. The Temples Conservation Area, its individual buildings and landscape have a shared historical and communal value for their early association with the Knights Templar and long-established legal use over five centuries. The area and many of its buildings are rare or unique in London and some possess national and international significance.
32. The Strand Conservation Area has historical and aesthetic significance for its contrasting building scales and characters, including notable London landmarks and key views from the Thames.
33. Essex Watergate has historical and aesthetic significance as a former gateway from the Thames dating to c.1676.
34. Middle Temple Garden is one of the City's largest and most historic open spaces, with associations ranging from the Knights Templar to the construction of the Victoria Embankment.

Heritage Policies

35. Policy 7.8 of the London Plan states that "Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail." Paragraph 7.31A of the supporting text states "Substantial harm to or loss of a designated heritage asset should be exceptional, with substantial harm to or loss of those assets designated of the highest significance being wholly exceptional. Where a development proposal will lead to less than substantial harm to the significance of a designated asset, this harm should be weighed against the public benefits of the proposal, including securing its optimal viable use. Enabling development that would otherwise not comply with planning policies, but which would secure the future conservation of a

heritage asset should be assessed to see if the benefits of departing from those policies outweigh the disbenefits.”

36. Policy CS12 of the Local Plan seeks to conserve or enhance the significance of the City’s heritage assets and their settings by: safeguarding the City’s listed buildings and their settings, while allowing appropriate adaptation and new uses, and preserving and enhancing the distinctive character and appearance of the City’s conservation areas, while allowing sympathetic development within them.
37. Policy DM12.1 of the Local Plan relates to managing change affecting all heritage assets and ensuring that the proposals sustain and enhance heritage assets, their settings and significance. Policy DM12.2 relates to development within conservation areas. It seeks to ensure that development in conservation areas is only permitted where it preserves and enhances the character or appearance of the conservation area. Policy DM12.3 relates to listed buildings and seeks to ensure that listed building consent is granted for the alteration of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting. Furthermore that “Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings”. (12.1.4)
38. Paragraph 134 of the NPPF states that “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including securing its optimum viable use”.
39. Paragraph 138 of the NPPF states that the “Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 133 or less than substantial harm under paragraph 134, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage site as a whole.

Extent to which the proposed development complies with the heritage policies of Development Plan

40. The proposal has been assessed in relation to the relevant heritage policies of the London Plan and Local Plan. The proposed new openings in the rear elevation and the external repairs and maintenance works would not have a detrimental impact on the special interest of the listed building, the character and appearance of the Temples Conservation Area or the setting of Middle Temple Garden. The proposed internal alterations would be sympathetic to the special architectural and historic interest of the listed building and would ensure its continued use in the purpose for which it was designed.
41. The proposed openings in the rear elevation would be formed in connection with a proposed link extension which is under consideration

in an associated listed building consent application. These works would fall within the administrative area of Westminster City Council. A condition would be added to the planning permission and listed building consent to ensure that the openings at the rear of 1 & 2 Garden Court shall not be implemented until the associated glazed link extension (within Westminster City Council) is approved and implemented.

42. It is acknowledged that the proposed link extension would result in some harm to the setting and significance of 1& 2 Garden Court as a designated heritage asset due to the visual prominence of the structure. It is considered that this harm would be less than substantial, and would be outweighed by the benefits of the proposal which include larger and higher quality office space, likely to be used for the Chambers and improved access between the two buildings.
43. Concerns about the visual assertiveness of the link are further mitigated by refinements that have been incorporated into the design, which include the proposed set-down below the cornice of the listed building, and the set-back of the link from the southern elevation, the provision of low reflectivity glazing with a metallic interlayer, and a sensitively designed internal lighting scheme.

Impact on the setting and significance of the listed buildings

44. The exterior brick and stonework of 1 & 2 Garden Court would be cleaned and repaired where required.
45. Four existing window openings in the west elevation of 2 Garden Court would be enlarged to provide connections to the proposed new link structure. The openings affected would comprise one at second floor, one at third floor and two at fourth floor level.
46. The existing modern atrium structure at ground and first floor levels would be removed and the brick elevation of 2 Garden Court exposed and made good. Modern service ducts and antennae would be removed and brickwork repaired.
47. The carrying out of the cleaning and repairs would be secured by condition, and details and a method statement would be required by condition to agree the extent and nature of the repair and alterations of works.
48. The external works to the listed building would not result in any harm to its significance. The external alterations would be confined to its rear elevation where there is less sensitivity to change, and where alterations have already occurred. The alterations throughout would be accompanied by an extensive package of repair works that would enhance the significance of the listed building.
49. Historic maps and photographs illustrate that prior to WWII there were structures occupying the site of Blackstone House, abutting the rear of 1 and 2 Garden Court. The existing gap between the buildings is a relatively recent development in the site's history and the proposed link would reinstate this earlier condition.

50. The proposed development would not have a significant impact on the setting of the Essex Watergate due to its set back behind Blackstone House.
51. Westminster City Council have assessed the harm to 1 and 2 Garden Court to be less than substantial, and do not consider that the benefits of the scheme outweigh this harm. Westminster City Council have not assessed the impact of the proposed development on the Essex Watergate.

Impact on the significance of the Conservation Areas

52. The impact of the works on the significance of the Temples Conservation Area has been assessed with reference to The Temples Conservation Area Character Summary and Historic England Advice Note 1 'Conservation Area Designation, Appraisal and Management' which provides guidance on assessing positive contributors at paragraph 16.
53. The Temples Conservation Area Character Summary identifies The Temples as a subtle combination of buildings and spaces with a character and environmental quality that is reminiscent of the collegiate atmosphere of Oxford and Cambridge. It emphasises that the area's character is influenced by the activities of the legal profession which has evolved and continues to carry on.
54. 1 and 2 Garden Court make a positive contribution to the character and appearance of the Temples Conservation Area due to their architectural quality, historical associations and relationship with adjacent buildings in terms of age, materials and style.
55. Aside from general repair and maintenance, the works would be confined to the western rear elevation of 1 and 2 Garden Court. The proposed openings in the rear elevation would not have a significant impact on the appearance of the building or its contribution to the Temples Conservation area.
56. The proposed link structure would be outside the boundary of the Temples Conservation Area. It would result in less than substantial harm to the significance of the conservation area due to the introduction of a modern glazed structure immediately adjacent to its boundary. It is considered that this harm would be outweighed by the benefits of the scheme.
57. The proposed link would be within the boundary of the Strand Conservation Area. It is considered that the proposed development would result in a degree of less than substantial harm to the significance of the designated heritage asset, but that this harm would be outweighed by the benefits of the proposals, which are discussed below.
58. Westminster City Council have assessed the harm to the Temples Conservation Area and Strand Conservation Area to be less than substantial, and do not consider that the benefits of the scheme outweigh this harm.

Impact on the setting and significance of the Middle Temple Garden

59. 1 and 2 Garden Court are located immediately outside the western boundary of the designated Middle Temple Garden. The boundary of the garden extends to the south of the buildings where there is a section in long-established use as a car park.
60. The proposed external works to 1 and 2 Garden Court, including the new openings in the rear elevation of the building would not have any detrimental impact on the significance or setting of the garden. The alterations to the rear would only be glimpsed from the south where they would be obscured by the proposed link extension.
61. The proposed link extension would be visible from the southern car park section of the Garden. From this location the development would have a visual impact on the landscape and would appear as a simple contemporary glazed structure set between traditional masonry buildings. The link would be glimpsed in views from the Garden to the east of Garden Court and Queen Elizabeth Building but would appear as a slim, subservient modern element between two substantial masonry buildings.
62. The proposed link extension is not considered to be harmful to the setting and significance of Middle Temple Garden.
63. Westminster City Council have assessed the harm to the setting of Middle Temple Garden to be less than substantial, and that this harm is not outweighed by the benefits of the proposal.

DESIGN

Design policies

64. Policy 7.4 of the London Plan states that “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.”
65. Policy CS12 of the Local Plan sets out the City’s design policies: “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...”
66. And seeks to ensure that “...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.” Whilst “Encouraging design solutions that make effective use of limited land resources. Ensuring that development has an appropriate street level presence and roofscape and a positive relationship to neighbouring buildings and spaces.”
67. 3.10.8 “In assessing development schemes detailed consideration will be given to the bulk and massing and special characteristics of their locality. All development proposals are expected to have a high standard of design and detailing”.

68. 3.10.13 “The design and execution of extensions and alterations to buildings, such as entrances and windows, are of considerable importance since they have a cumulative effect on the overall character and appearance of the City. Extensions or alterations should be considered in relation to the architectural character of the building, designed to minimise their impact and integrated with the design of the building. Alterations and extensions should achieve a successful design relationship with their surroundings, taking full account of the local context and the setting of the building”.
69. Chapter 14 of the NPPF sets out the key policy considerations in relation to design. Paragraph 60 states “Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.”
70. NPPF paragraphs 63 and 64 state that “In determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area.” and “Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.”

Extent to which the proposed development complies with the design policies of the Development Plan and NPPF Guidance

71. The proposal has been assessed in relation to the relevant design policies of the London Plan and Local Plan and guidance in the NPPF. It is considered that the design of the proposed development would be high quality and would make an appropriate addition to the area.
72. The proposed alterations to 1 and 2 Garden Court would be minor in nature, and would not result in any substantial change to the appearance of the listed buildings.
73. The proposed link extension to the rear would partially replace and extend an existing ground and first floor glazed link that was constructed in 2008. The new link would comprise a series of bridged walkways at second, third and fourth floor levels at the southern part of the site. These would be in addition to the existing first floor bridge. At the northern part of the space meeting rooms would be created at ground, first and second floor levels, with a double-height break-out space above. The new linking structures would be enclosed with a glazed curtain wall and roof.
74. The scale and massing of the link structure has been designed to relate sympathetically to the adjoining buildings and provide a subservient addition to the listed building. It would be set back from the south elevation of 2 Garden Court and by four bays from the south elevation of Blackstone House. At its highest point the link would be below the eaves and cornice line of 2 Garden Court.

75. Historic maps and photographs illustrate that prior to WWII there were structures occupying the site of Blackstone House, abutting the rear of 1 and 2 Garden Court. The existing gap between the buildings is a relatively recent development in the site's history and the proposed link would echo this condition.
76. The curtain wall enclosing the link at the southern end would incorporate a mesh interlayer and low-reflectivity glazing in order to minimise its visual impact. To further subdue its appearance after dark, a discreet lighting scheme has been designed inside the southern section of the link, with inset light fittings in the link bridges only.
77. The link would be lightweight and contemporary in design to allow the architectural character of each brick elevation to remain fully exposed when viewed from within the structure, and perceptible when viewed from external vantage points. The design and appearance of the link would be a departure from the prevailing character of the local area, which is formed of predominantly traditional masonry buildings.
78. The proposed link extension has been assessed in local views from the south and east. From Middle Temple Garden there would be glimpsed views of the south-western corner of the link, with the new structure entirely obscured by Garden Court in the northern part of the garden, and by Queen Elizabeth Building in the southern part. In views immediately south of Garden Court and Blackstone House the link would be fully visible, but would be set back from the building elevations and below the cornice line to avoid obscuring the Garden Court roofline. In these views the link would obscure the existing unsightly fire escape that would remain to the north between the two buildings. From Victoria Embankment the link would be glimpsed in a direct view from the south, although it would be obscured by mature trees and would appear as a distinct and subservient element in relation to surrounding buildings.
79. The City of Westminster have assessed the application against relevant design and conservation policies in the Westminster City Plan (November 2016) and consider that the proposed link building would result in less than substantial harm to the significance of the Strand Conservation Area and Temples Conservation Area, and the setting of 1 & 2 Garden Court. They consider that this harm is not outweighed by any perceived benefits and that there should be a presumption to refuse the application. City of London are in agreement that there is less than substantial harm to the designated heritage assets but consider that this is outweighed by the benefits of the overall scheme.

Benefits of the Proposal

80. The Temples Conservation Area character summary emphasises that the area's character is influenced by the use to which the activities of the legal profession has evolved and continues to carry on.
81. The Honourable Society of the Middle Temple (the applicant) makes the case that they are committed to ensuring that the Estate is able to provide accommodation to retain and attract barristers' chambers. The

applicants have undertaken a comprehensive evaluation of its Estate and have identified a number of historic buildings which are not fit for modern offices and are in need of modernisation. 1 & 2 Garden Court were identified as the first set of buildings in need of significant modernisation. The applicants state they are very dependent on retaining larger sets of chambers as they provide a significant proportion of their financial income. Without this financial income, the Middle Temple would not be able to provide the collegiate and unique environment.

82. Blackstone Chambers (located across both Blackstone House and 1 & 2 Garden Court) has been established for over 70 years and has been based in the Middle Temple since its inception. The nature of the practice has evolved and it has become multi-jurisdictional offering its services both in the UK and internationally. The Chambers have grown to more than 100 practitioners, 4 pupils and 30 staff. The applicants have made a case that the proposals for the expansion and linking of Blackstone House and 1 & 2 Garden Court is an integral part of the future growth and success of the Chambers and to enable them to remain within the Middle Temple Estate.
83. The existing building's limitations have been identified by the Chambers'. They have expressed concerns that staff are currently spread out over three buildings and the separation of staff creates a fragmented, inefficient workplace and there is a real need for the Chambers to be located in one building. Furthermore, they identify the need for improved vertical connectivity between the two buildings.
84. The applicants state that there are no other buildings within the Middle Temple Estate that are large enough to accommodate the Chambers. If the proposals to link 1 & 2 Garden Court and Blackstone House are not able to be delivered, then the Chambers would be forced to vacate the Middle Temple Estate due to the lack of suitable chambers of the required size.
85. Additional benefits of the scheme would comprise the restoration works to the external elevations of the Grade II listed 1 & 2 Garden Court, including stone repairs, cleaning and removal of redundant services, supporting the long-term conservation of the listed buildings. The occupation of the development is not restricted to barrister's chambers by planning controls. However, the Inn states that the provision of accommodation for the bar is stipulated under the Letters Patent granted to it in 1608 by James I.

Assessment of the Benefits

86. The proposals have been assessed in relation to the relevant heritage and design policies of the London Plan and Local Plan. Whilst it is acknowledged that the proposed link structure would be within Westminster, in assessing the full application, the proposed link structure would result in less than substantial harm to the designated heritage asset but consider that this is outweighed by the overall benefits of the proposal which include larger and high quality office

space for the Chambers and improved access between the two buildings, enabling the Chambers to remain within the Middle Temple Estate. Your officers accept the case that if the Chambers move out of the Middle Temple Estate, it would impact on the character of the Temples Conservation Area.

Change of Use

87. The proposal would result in the loss of one residential unit located on the fourth-floor level at 2 Garden Court. Local Plan Policy DM21.4 permits adjustments between professional and residential accommodation where it is important to the functioning of the Temples to enable the continuing use. The residential unit at fourth floor level is an isolated unit and the change of use to office use would omit any residential use at fourth floor level, providing only office space at fourth floor level which would allow for improved privacy for the Chambers.

Daylight, Sunlight and Overlooking

88. There are residential units within 1 and 2 Garden Court, Aldwych Chambers (29 Essex Street) and New Court Chambers. The flats in Aldwych Chambers have windows which face into the gap between Blackstone House and 1 & 2 Garden Court.
89. A number of representations have been received from residents at Aldwych Chambers located within Westminster Council area, raising concerns that the proposed infill extension would substantially reduce the daylight and sunlight to their homes, create an increased sense of enclosure and loss of privacy.
90. 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. Local Plan Policy DM12.3 seeks to protect residential amenity and requires that all developments should be designed to avoid overlooking and seeks to protect privacy, day lighting and sun lighting levels to adjacent residential accommodation.
91. The proposed link extension would result in three additional stories to the boundary with Aldwych Chambers and the link would visually fill the gap between the Garden Court and Essex Street properties. There is an existing fire escape which already encloses these properties and the amount of daylight received in the existing situation is already compromised as a result.
92. A daylight and sunlight report has been submitted in support of the application assessing the impact of the proposed infill extension on the daylight and sunlight received by the residential properties at Aldwych

Chambers (29 Essex Street) and New Court Chambers in accordance with the assessments suggested in the BRE guide to good practice 'Site Layout Planning for Daylight and Sunlight'. In response to the concerns raised by the residents, Malcolm Hollis prepared an addendum to the Daylight and Sunlight Report dated 9 August 2017.

Daylight

93. Of the 67 windows tested, 63 would continue to meet BRE target values. The report identifies that the properties at New Court Chambers would not be affected in terms of daylighting.
94. The report identifies four windows in Aldwych Chambers which would experience a loss of daylight which would exceed BRE guidelines. These windows (at basement, lower ground, upper ground and first floor levels) are adjacent to the proposed infill extension and directly behind the existing fire escape stair. Three of the affected windows serve bedrooms (basement, upper ground and first floor) and the BRE guidelines state that bedrooms have a lower requirement for daylight than principal living areas. The remaining window (at lower ground floor) serves a living room, but this room is also served by two further windows that would remain unaffected. The BRE guidelines state where a room benefits from more than one window, where the other windows are BRE compliant, the occupiers of that room cannot reasonably be said to suffer a detrimental loss of light.

Sunlight

95. BRE guidance states that sun light levels to residential properties may be affected if a new development is situated within 90 degrees due south of a main window. None of the windows of the residential properties at Aldwych Chambers face 90 degrees of due south and would not be impacted upon in terms of loss of sunlight.
96. Eight windows located on the south elevation of New Court Chambers were assessed for any impact on sun lighting levels. All the windows would continue to meet the target values set out in the BRE guidelines.
97. It is considered that the proposed link extension would have a minor adverse impact on the daylight currently enjoyed by the residential properties at Aldwych Chambers (29 Essex Street). However, it is noted that the existing daylight levels are compromised by the fire escape stair.
98. Local Plan Policy DM10.7 states ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations. Overall, the daylight and sunlight implications for neighbouring properties are considered to be acceptable and in accordance with the requirements of Local Plan Policy DM10.7 and DM21.3.

Overlooking and Loss of Privacy and Enclosure

99. Representations have been received from residents in Westminster raising concerns that the proposed glazed link extension would result in

overlooking of the gardens of the properties at Aldwych Chambers (29 Essex Street).

100. Local Plan Policy DM21.3 requires developments to be designed to avoid overlooking and seek to protect the privacy of neighbouring occupiers.
101. The glazing of the link extension would include a metal mesh which would help to reduce the transparency of the glazing. A condition is recommended to provide further details of the glazing to ensure that it is of sufficient density to prevent overlooking from the glazed structure. The Local Plan states due to the density of development in the City avoidance of overlooking may not always be possible.
102. In relation to residential amenity, the impacts would arise to residents in Westminster and this would primarily be for Westminster City Council to determine as the extension falls within their area. Westminster City Council consider the proposed development would unacceptably increase the sense of enclosure experienced by residents at Aldwych Chambers and consider that the proposed development would not meet the requirements of Policy S29 of Westminster's City Plan (November 2016). Westminster City Council's assessment that the proposal would not be acceptable due to the sense of enclosure has been considered as a material consideration.
103. However, if considered against the City of London Local Plan policies, it is considered that the residential units already experience a sense of enclosure due to the existing fire escape stair and that the proposed glazed link extension would not increase the sense of enclosure to an unacceptable degree over the existing situation.

Access

104. The proposed development would provide improved accessibility and circulation between Blackstone House and 1 & 2 Garden Court. A new lift would be installed within Blackstone and the existing lifts within 1 & 2 Garden Court would be replaced with new glazed lifts, which would be extended to serve the lower level of the building. The new lifts would eliminate the need to use multiple lifts to access offices between the two buildings.

Archaeology

105. The site is in an area of high archaeological potential where remains from all periods may be expected to survive. This area is outside the Roman and medieval walled city and south of the Roman route, now Fleet Street. There has been gradual encroachment into the river and there is potential for prehistoric, Roman, Saxon and later medieval foreshore remains as well as structures, garden features and associated remains from later periods. An Historic Environment assessment has been submitted with the application.

106. The proposed alterations including extensions to existing lift pits, localised excavation within the sub-basement would have an archaeological impact.
107. Conditions are recommended to cover a programme of archaeological work to record remains that would be disturbed by the proposed works of the internal lift pits and new basement slab groundworks.

Construction Impact

108. Representations have been received raising concerns about the effect of the construction works. The amenity of nearby residents and commercial occupiers would be protected by a condition which would require the applicants to submit for approval a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental factors during demolition and construction prior to any works commencing.

Refuse Collection

109. 95. Details of waste storage and collection have not been provided. A condition is proposed to provide further details of refuse storage and collection facilities.

Rooftop Plant (3 Garden Court within Westminster CC)

110. Plant equipment is proposed at roof level on Blackstone House. The existing plant room would be extended and six new external air conditioning units would be installed. A noise survey has been submitted in support of the application. A condition is proposed to manage the noise levels from the new plant equipment.

Other Matters

111. Concerns have been raised by residents in Westminster that the proposals would impact on the value of their properties. This would not be a material planning consideration. Residents have suggested that the existing external fire escape stair is removed. The escape stair is not within the red line of the application site or within the ownership of the applicants. The escape stair would be required as a secondary means of escape for the upper level of Blackstone House and a neighbouring building.

Conclusions

112. The proposal has been assessed in accordance with the relevant statutory duties, having regard to the development plan and other relevant policies, and relevant advice including the NPPF.
113. The proposal has been assessed in accordance with the London Plan, City of London Local Plan policies and Westminster City Council's assessment has been taken into account as a material consideration in the determination of this application.

114. The proposal would result in less than substantial harm to the significance of the Temples Conservation Area and Strand Conservation Area. The proposal would result in less than substantial harm to the setting and significance of 1 & 2 Garden Court as a designated heritage asset. It is considered that this harm would be outweighed by the benefits of the proposal which includes larger and high quality Chambers and improved access between the two buildings, enabling the Chambers to remain within the Middle Temple Estate.
115. The proposal accords with the development plan when considered as a whole, meeting the requirements of Policy 7.8 of the London Plan and policies CS10, DM10.7, CS 12, DM12.1, DM12.2, DM12.3 and CS 21, DM21.3, DM21.4 of the local plan.

Background Papers

Internal

Nil

External

Representation 12.10.2017 Clark Property Developments Limited
Representation 22.11.2017 Mr Brian Reinker
Representation 22.11.2017 Mrs Faye Milburn
Representation 23.11.2017 Mr Ronald Chua
Representation 23.11.2017 Mr Sean Coxall
Representation 27.11.2017 Mr Jules Antoine Marie Michel Becci-Morin
de la Riviere
Representation 28.11.2017 Ms Sarah Allen
Representation 03.12.2017 Mr Russell French
Representation 03.12.2017 Ms Natasha D'Souza
Letter Indigo Planning dated 08 September 2017
Letter Indigo Planning dated 31.10.2017
Letter Indigo (to Westminster City Council) dated 01 December 2017
Letter City of Westminster Observation dated 8 November 2017
Letter Conservation Area Advisory Committee dated 05 October 2017
Energy and Sustainability Statement dated 05 September 2017
Planning Statement dated September 2017
Daylight and Sunlight Report prepared by Malcolm Hollis dated 09 August 2017
Daylight and Sunlight Addendum Letter, prepared by Malcolm Hollis dated 24 October 2017
Design and Access Statement dated 25 August 2017
Additional Information Document, prepared by Morey Smith
Photograph of Middle Temple Library and OS Map
Historic Building Report December 2017
Historic Environment Assessment dated August 2017
Environmental Noise Survey dated 8 September 2017
Geotechnical and Geo-Environmental Interpretative Report (prepared by Fairhurst) dated September 2017
Statement on Damp Proof Injection dated 05 December 2017
Garden Court Drainage Drawings
Letter Blackstone Chambers dated 23 November 2017
Letter The Honourable Society of the Middle Temple dated 22 November 2017
Committee Report City of Westminster dated 09 January 2018

Appendix A

London Plan Policies

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

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

Relevant Local Plan Policies

Relevant Local Plan Policies

CS10 Promote high quality environment

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

CS12 Conserve or enhance heritage assets

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

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.

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).

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.

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.

DM10.7 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 of all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;

- b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
- c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

DM12.1 Change affecting heritage assets

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

DM12.2 Development in conservation areas

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

DM12.3 Listed buildings

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

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.

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.

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.

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.

DM21.4 The Temples

Within the Temples adjustments between professional and residential accommodation will be permitted where:

- a) the overall balance of residential and professional chambers is maintained;
- b) it is important to the functioning or character of the Temples, or to the continuing use of their buildings.

SCHEDULE

APPLICATION: 17/00937/FULL

1 & 2 Garden Court & 3 Garden Court (Blackstone House) Middle Temple London

Change of use of 1 x residential unit (C3) to office use (B1) at fourth floor level and external alterations including the formation of new openings in the rear of 2 Garden Court at second, third and fourth floor levels (located in the City of London) in association with a proposed three storey extension (located in the City of Westminster) linking 2 Garden Court with Blackstone House.

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 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 soffits, hand rails and balustrades;
 - c) details of the integration of plant, flues, fire escapes and other excrescences at roof level;
 - d) details of plant and ductwork to serve the premises;
 - e) details of alterations to the west elevation of 1 and 2 Garden Court, including new openings, and details of all junctions with the link structure;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: DM10.1, DM12.2, DM12.3.
- 3 The openings at the rear of 1 and 2 Garden Court in association with the proposed glazed link extension shall not be implemented until the associated glazed link extension is approved and implemented.
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: DM10.1, DM12.2, DM12.3.

- 4 Works shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the development process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution)
REASON: To protect the amenities of nearby residents and commercial occupiers in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to any work commencing in order that the impact on amenities is minimised from the time that development starts.
- 5 Works shall not begin until a scheme and methodology for cleaning and repair of brickwork has been submitted and approved by the Local Planning Authority and the development shall not be carried out other than in accordance with the approved scheme.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, DM12.2, DM12.3.
- 6 Before any works thereby affected are begun, no works 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.
- 7 No works except demolition to basement slab level shall take place before details of the lift pits, basement slab groundworks and any foundations, 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.

- 8 Refuse storage and collection facilities shall:
(a) be provided within the curtilage of the site to serve each part of the development in accordance with details which must be submitted to and approved in writing by the Local Planning Authority prior to work commencing; and
(b) thereafter be maintained as approved throughout the life of the building.
REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1. 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 (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.
- 10 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: MS01, MS180, MS181, MS182, MS183, MS184, MS200 Rev D, MS201 Rev C, MS202 Rev A, MS203 Rev A, MS204 Rev A, MS205, MS206 Rev A, MS20R, MS220, MS221, MS222, MS223, MS224, MS225, MS320, MS321, MS330, MS331, MS332, MS333, MS334, MS340, MS341, MS342, MS600, MS610, MS611, MS700, MS701, MS702, MS703, MS704, MS705
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.

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Committee:	Date:
Planning and Transportation	20 February 2018
Subject: 1 & 2 Garden Court & 3 Garden Court (Blackstone House) Middle Temple London EC4Y 9BL Internal and external alterations including the formation of new openings in the rear of 2 Garden Court at second, third and fourth floor levels (located in the City of London) in association with a proposed three storey extension (located in the City of Westminster) linking 2 Garden Court with Black Stone House.	Public
Ward: Farringdon Without	For Decision
Registered No: 17/00938/LBC	Registered on: 11 September 2017
Conservation Area: Temples	Listed Building: Grade II

Summary

The proposals relate to 1 & 2 Garden Court, a pair of red brick chamber buildings comprising four storeys plus basement. 1 & 2 Garden Court are grade II listed buildings within the Temple Conservation Area.

Listed building consent is sought for internal and external alterations to the grade II listed 1 and 2 Garden Court. The works to 1 and 2 Garden Court include; the formation of new openings in the rear of 2 Garden Court at second, third and fourth floor levels, repair and works and cleaning to the external elevations of 1 & 2 Garden Court, damp proofing, new flooring, removal of structural and non-structural partition walls, replacement of the existing lifts, installation of secondary glazing and installation of an air conditioning system above a suspended raft.

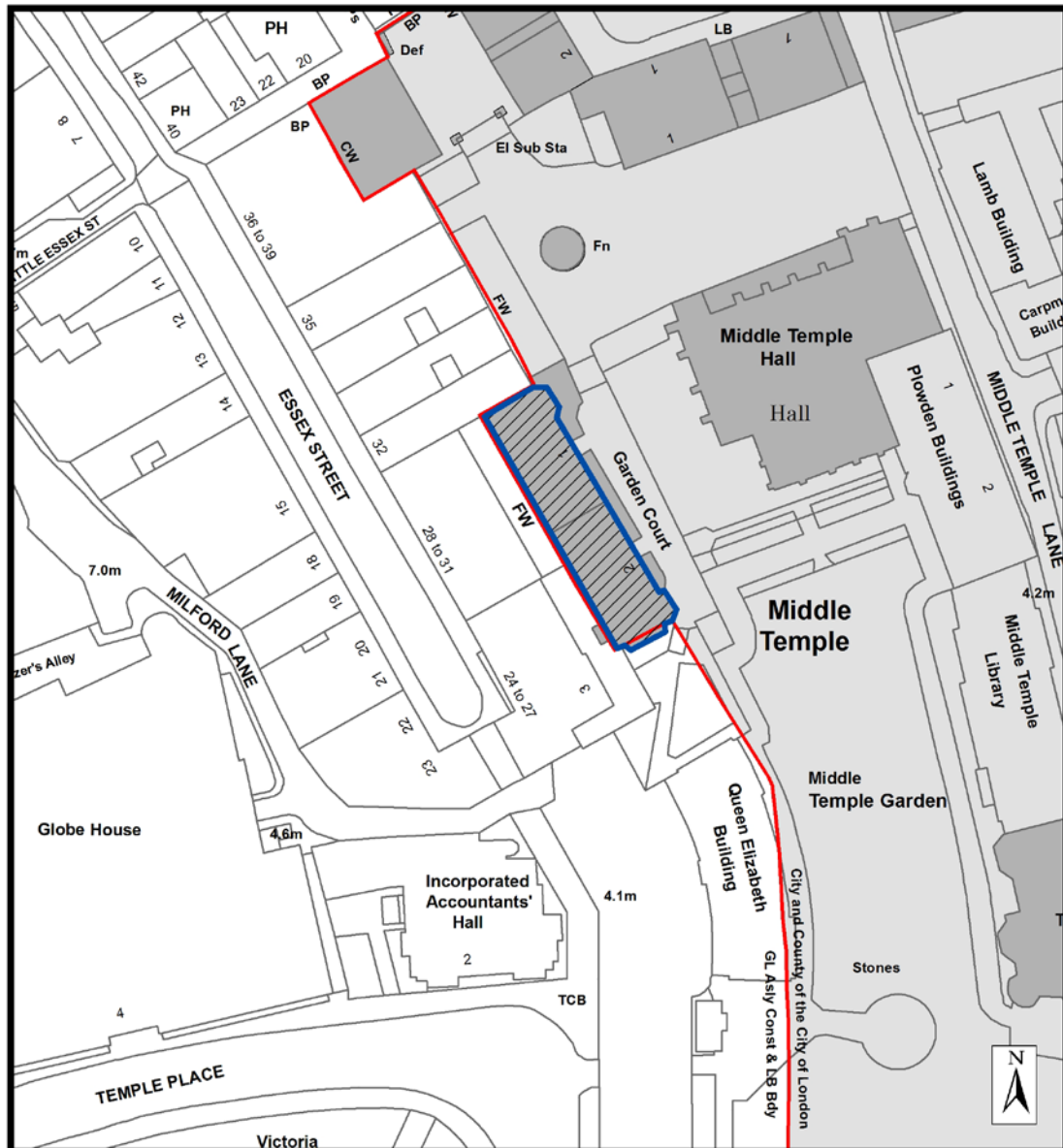
The proposed internal and external alterations would not result in any harm to its significance. The external alterations would be confined to its rear elevation where there is less sensitivity to change, and where alterations have already occurred. The internal works would be minor in relation to the scale and significance of the building, and would not result in the loss of any significant fabric or features. The alterations throughout would be accompanied by an extensive package of repair works that would enhance the significance of the listed building.

It is considered that the development complies with the NPPF and the Development Plan as a whole and is appropriate subject to conditions.

Recommendation

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

Site Location Plan



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ADDRESS:

1-2 Garden Court

CASE No.

17/00938/LBC

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



DEPARTMENT OF THE BUILT ENVIRONMENT



Main Report

Site

1. 1 & 2 Garden Court are a pair of red brick chambers buildings dating to 1885 with stone dressings and prominent 'Elizabethan' features.
2. 1 & 2 Garden Court are grade II listed buildings comprising four storeys plus basement within the Temple Conservation Area. They are in use as barristers' chambers (Class B1) with residential uses (Class C3) at upper levels.
3. The Grade II registered Middle Temple park and garden extends to the edge of the site to the east and south, with the section immediately south of the site in long-standing use as a carpark. Middle Temple Hall (grade I listed) is to the east of 2 Garden Court.
4. 1 & 2 Garden Court and Blackstone House are currently linked by a glazed part one, part two storey extension between 2 Garden Court Blackstone House.

Relevant Planning History

5. In July 2007 planning permission and listed building consent were granted by the City of London and Westminster City Council for the erection of a part one, part two storey glazed link extension between Blackstone House and 2 Garden Court to provide additional office space (Class B1). Associated alterations to Blackstone House included the formation of new openings in the rear elevation, installation of additional mechanical plant at roof level and associated alterations. Alterations to 2 Garden Court included the formation of a new opening in the rear elevation and associated alterations.

Proposals

6. Listed building consent is sought for internal and external alterations to the grade II listed 1 and 2 Garden Court. The works to 1 and 2 Garden Court include:
 - Creation of new openings at the rear of 2 Garden Court at second, third and fourth floor levels (in association with a glazed structure linking 1 and 2 Garden Court and Blackstone House)
 - Refurbishment and repair works to 1&2 Garden Court including replacement of all services, full façade clean and repairs to the roof
 - Replacement of existing internal secondary glazing and the introduction of additional units
 - Installation of two new glazed lifts in the existing locations
 - Removal of structural and non-structural partitions to create new openings and modify the layout of rooms.
 - Installation of an air conditioning system above suspended ceiling rafts.

Consultations

7. The views of other City of London departments have been taken into account in the preparation of this report and some detailed matters remain to be dealt with under conditions.
8. The application has been advertised in the press and a site notice was put up around the site, and statutory and non-statutory bodies were consulted.
9. Historic England does not wish to comment on the proposal and has deferred to the view of the local planning authority.

Policy Context

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

Considerations

12. The Corporation, in determining the listed building application has the following main statutory duties to perform:-
 - To have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations. (Section 70 Town & Country Planning Act 1990);
 - To determine the application in accordance with the development plan unless other material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).
 - In considering whether to grant listed building consent for the works the Corporation shall 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 regard to the desirability of preserving the special architectural or historic interest of the listed buildings;
13. Considerable importance and weight should be given to the desirability of preserving a listed building and/or its setting, when carrying out any balancing exercise in which harm to the setting of listed buildings or conservation areas is to be weighed against public benefits. A finding that harm would be caused to a listed building or its setting or to a conservation area gives rise to a strong presumption against planning permission being granted.

14. In considering the listed building consent before you, account has to be taken of the statutory and policy framework, the documentation accompanying the application, and the views of both statutory and non-statutory consultees.
15. The principal issues in considering this application are:
 - The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan having regard to the impact of the proposal on the character and significance of designated heritage assets; specifically - whether the proposed alterations, both external and internal, would be sympathetic to the character and appearance of the listed building and would preserve its special significance.

HERITAGE

Identification of Heritage Assets and their significance

16. Paragraph 129 of the NPPF states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including the setting of any asset). The assessment of significance should be taken into account when considering the impact of a proposal.
17. The designated heritage assets of relevance in the consideration of this case are:
 - 1 & 2 Garden Court – Grade II listed
18. 1 and 2 Garden Court have aesthetic and historical significance as a high quality example of a Victorian chambers building with long-standing associations with the site and Temples area. The grade II listed buildings have group value in relation to adjacent heritage assets including Middle Temple Hall (Grade I listed).

Heritage Policies

19. Policy 7.8 of the London Plan states that “Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.” Paragraph 7.31A of the supporting text states “Substantial harm to or loss of a designated heritage asset should be exceptional, with substantial harm to or loss of those assets designated of the highest significance being wholly exceptional. Where a development proposal will lead to less than substantial harm to the significance of a designated asset, this harm should be weighed against the public benefits of the proposal, including securing its optimal viable use. Enabling development that would otherwise not comply with planning policies, but which would secure the future conservation of a heritage asset should be assessed to see if the benefits of departing from those policies outweigh the disbenefits.”
20. Policy CS12 of the Local Plan seeks to conserve or enhance the significance of the City’s heritage assets and their settings by:

safeguarding the City's listed buildings and their settings, while allowing appropriate adaptation and new uses, and preserving and enhancing the distinctive character and appearance of the City's conservation areas, while allowing sympathetic development within them.

21. Policy DM12.1 of the Local Plan relates to managing change affecting all heritage assets and ensuring that the proposals sustain and enhance heritage assets, their settings and significance. Policy DM12.3 relates to listed buildings and seeks to ensure that listed building consent is granted for the alteration of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting. Furthermore that "Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings". (12.1.4)
22. Paragraph 134 of the NPPF states that "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including securing its optimum viable use".

Extent to which the proposed development complies with the heritage policies of Development Plan

23. The proposal has been assessed in relation to the relevant heritage policies of the London Plan and Local Plan. The proposed new openings in the rear elevation and the external repairs and maintenance works would not have a detrimental impact on the special interest of the listed building. The proposed internal alterations would be sympathetic to the special architectural and historic interest of the listed building and would ensure its continued use for the purpose for which it was designed.
24. The proposed openings in the rear elevation would be formed in connection with a proposed link extension which is under consideration in an associated planning application. These works would fall within the City of Westminster.

Impact on the significance of the listed building

External works

25. The exterior brick and stonework of the building would be cleaned and repaired where required. The carrying out of the cleaning and repairs would be secured by condition, and details and a method statement would be required by condition to agree the extent and nature of the repair and alterations of works.
26. Existing window openings in the rear, west elevation of 2 Garden Court would be enlarged to provide connections to the proposed new link structure. The openings affected would comprise one at second floor, one at third floor and two at fourth floor level.

27. The existing modern atrium structure at ground and first floor levels would be removed and the brick elevation of 2 Garden Court exposed and made good. Modern service ducts and antennae would be removed and brickwork repaired.
28. A series of ventilation ducts would be installed to the rear elevation in connection with the proposed internal air-conditioning system.
29. Details and a method statement would be required by condition to agree the extent and nature of the repair and alterations of works to the rear elevation.

Internal works

30. Additional damp proofing measures would be installed at the north end of 1 Garden Court which has a chronic penetrating damp issue caused by the change in levels at this part of the site. A membrane would be installed to the interior of the north elevation at basement and ground floor level, with the internal finishes made good to match. The existing injected damp proof course would be supplemented to further improve the building's resilience against damp at the northern end.
31. The basement timber floors have largely been replaced with concrete in previous decades. Small areas of timber flooring remain but these are degraded and considered beyond repair. It is proposed to insert concrete floors in these areas.
32. At basement level at the northern end of the building a series of partition walls would be removed in order to create two larger meetings rooms which would largely revert the area of the building to its original layout. At the southern end on the same floor two original walls would be partially removed, leaving nibs, down-stands and cornices to maintain historic features and an impression of the historic plan form.
33. Outdated lifts run through the centre of the two main staircases. These would be replaced with modern glazed lift cars in the same locations, requiring no further alteration to the staircases. The painted glazed bricks in the stairwells would be restored to their original green ceramic finish.
34. The cast iron radiators, which are not of historic interest, would be removed and replaced with fancoil units in new cabinets.
35. An air-conditioning system would be installed throughout the office areas of the building. This would be run along corridors and into offices above a suspended raft. The raft would comprise a contemporary insertion set in from each side of the corridors so that the cornice could be viewed above. A series of penetrations in the rear elevation would be made as part of the system. The installation of the raft through the corridors would alter the volume and character of the space, but the works would be reversible and could be taken out in future leaving historic features intact.
36. Secondary glazing would be installed throughout, with the existing rear window units replaced and new units installed to the front of the building. The secondary glazing units would be white slimline aluminium frames

supplied by 'Selectaglaze' which would have a minimal visual impact when viewed from the exterior of the building.

Conclusions

37. The external and internal works to the listed building would not result in any harm to its significance. The external alterations would be confined to its rear elevation where there is less sensitivity to change, and where alterations have already occurred. The internal works would be minor in relation to the scale and significance of the building, and would not result in the loss of any significant fabric or features. The alterations would be accompanied by an extensive package of repair works that would safeguard the buildings and enhance their significance.

Background Papers

Internal

Nil

External

Letter Indigo Planning dated 08 September 2017

Letter Indigo Planning dated 31.10.2017

Letter Indigo (to Westminster City Council) dated 01 December 2017

Letter Historic England dated 9 October 2017

Planning Statement dated September 2017

Design and Access Statement dated 25 August 2017

Additional Information Document, prepared by Morey Smith

Photograph of Middle Temple Library and OS Map

Historic Building Report December 2017

Historic Environment Assessment dated August 2017

Geotechnical and Geo-Environmental Interpretative Report (prepared by Fairhurst) dated September 2017

Statement on Damp Proof Injection dated 05 December 2017

Garden Court Drainage Drawings

Appendix A

London Plan Policies

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

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

Relevant Local Plan Policies

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.

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.

DM12.3 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.

DM12.1 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.

SCHEDULE

APPLICATION: 17/00938/LBC

1 & 2 Garden Court & 3 Garden Court (Blackstone House) Middle Temple London

Internal and external alterations including the formation of new openings in the rear of 2 Garden Court at second, third and fourth floor levels (located in the City of London) in association with a proposed three storey extension (located in the City of Westminster) linking 2 Garden Court with Black Stone House.

CONDITIONS

- 1 The works hereby permitted must be begun before the expiration of three years from the date of this consent.
REASON: To ensure compliance with the terms of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 2 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all works pursuant to this consent shall be carried out in accordance with the approved details:
 - a) particulars and samples of the materials to be used on all external faces of the building including external ground and upper level surfaces;
 - b) details of soffits, hand rails and balustrades;
 - c) details of the integration of plant, flues, fire escapes and other excrescences at roof level;
 - d) details of plant and ductwork to serve the premises;
 - e) details of alterations to the west elevation of 1 and 2 Garden Court, including new openings and junctions with the link structure;
 - f) details and a method statement for masonry cleaning and repairs.REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
- 3 Works shall not begin until a scheme and methodology for cleaning and repair of brickwork has been submitted and approved by the Local Planning Authority and the development shall not be carried out other than in accordance with the approved scheme .
REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.

- 4 Before any works thereby affected are begun, no works 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.
- 5 No works except demolition to basement slab level shall take place before details of the lift pits, basement slab groundworks and any foundations, 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.
- 6 The works hereby permitted shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this consent: MS00, MS180, MS181, MS182, MS183, MS184, MS200 Rev D, MS201 Rev C, MS202 Rev A, MS203 Rev A, MS204 Rev A, MS205, MS206 Rev A, MS20R, MS220, MS221, MS222, MS223, MS224, MS225, MS320, MS321, MS330, MS331, MS332, MS333, MS334, MS340, MS341, MS342, MS600, MS610, MS611, MS700, MS701, MS702, MS703, MS704, MS705
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.

Committee(s) Planning and Transportation – For Decision	Dated: 20/02/2018
Subject: Freight and Servicing Supplementary Planning Document – Updates and Adoption	Public
Report of: Carolyn Dwyer, Director of the Built Environment	For Decision
Summary <p>This report presents further revisions to the Freight and Servicing Supplementary Planning Document (SPD) following member comments at the Planning and Transportation Committee on 9 January 2018.</p> Recommendations <p>Members are asked to:</p> <ul style="list-style-type: none"> • approve the amendments to the SPD • approve the document for adoption. 	

Main Report

Background

1. Following public consultation on the draft Freight and Servicing SPD in late summer 2017, the document was updated and presented to the Planning and Transportation Committee on 9 January 2018.
2. Members made additional comments on the revised document, which has now been updated.

Updated Document and Ready Reckoner

3. The SPD has been updated to take account of Member comments at committee on 9 January. In particular the references to river servicing and out of hours loading have been strengthened. A summary of the changes to the document is attached as Appendix 1. The updated SPD is attached as Appendix 2.
4. In addition to changes to the SPD, a spreadsheet based Loading Bay ‘ready reckoner’ has been produced. This will allow prospective developers to estimate the likely requirement for internal loading and servicing bays. The spreadsheet is advisory, and aims to inform discussions with the City Corporation on what will ultimately be required.
5. The spreadsheet also encourages developers to take steps to manage deliveries and servicing by demonstrating the possible impact of management measures on loading bay requirements. The spreadsheet is attached as Appendix 3, and will be uploaded to the Design Guidance section of the City Corporation website.

Proposals

6. It is proposed that, subject to comments received from the Planning and Transportation Committee, the revised Freight and Servicing SPD is adopted and published.

Corporate & Strategic Implications

7. The SPD provides further guidance on the implementation of policies in the City of London Local Plan. It supports other policies and SPDs adopted by the City Corporation, but as neither the Local Plan nor the London Plan set out policies of mandatory freight consolidation, the SPD cannot introduce a requirement to use consolidation.
8. The SPD aligns with the Mayor of London's policies on the management of freight, as set out in the draft Mayor's Transport Strategy. It also supports Key Policy Priority 3 of the Corporate Plan; "Engaging with London and national government on key issues of concern to our communities such as transport, housing and public health".

Health Implications

9. The SPD will contribute to improved air quality and reduced road danger in the City, providing potential health benefits for the City population.

Conclusion

10. The Freight and Servicing SPD provides additional guidance on Local Plan policies on delivering to, and servicing of new development in the City. The document aims to reduce the negative impact on the City of freight and servicing traffic, while allowing the City to flourish.
11. Subject to approval from the Planning and Transportation Committee, the SPD and Ready Reckoner will be adopted, made available on the City Corporation website and promoted to developers and planning consultants.

Appendices

- Appendix 1 – Summary of Changes
- Appendix 2 – Updated SPD
- Appendix 3 – Loading Bay Ready Reckoner

Background Papers

- Report to Planning and Transportation Committee - Freight and Servicing Supplementary Planning Document – Draft for Consultation – 24/7/17
- Report to Planning and Transportation Committee - Freight and Servicing Supplementary Planning Document – Consultation and Adoption – 9/1/18

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Appendix 1 – Summary of Changes

Minor amendments to Freight and Servicing SPD following comments from Planning & Transportation Committee on 9th January 2018.

Paragraph	Change	Note
34	The Ultra Low Emission Zone (ULEZ) will come into force in <u>April 2019</u> and will replace the Emissions Surcharge.	Corrected typo.
66	Use of low emission river transport for goods and waste is <u>strongly encouraged, and should be considered in particular for development within the Thames and Riverside Key City Place.</u>	Strengthened language encouraging river servicing throughout the City, and added specific reference to Thames and Riverside Key City Place where it will be most practical.
70	All deliveries <u>to any part of the City</u> requiring activity outside working hours, either at the site in the City or elsewhere in the delivery chain, should be subject to a quiet delivery agreement (examples are set out in the DSP Guidance – see Appendix B) or commitment to minimise noise and pollution impacts at all stages of the delivery process, including along the delivery route and at any intermediary points such as a consolidation centre	Strengthened language to ensure overnight deliveries in all parts of the City are subject to quiet delivery agreements to minimise impact on residential amenity.
71	Where daytime deliveries and servicing are essential or out of hours deliveries are not permitted or feasible, these should occur off-peak (i.e. avoiding 7am – 10am <u>and</u> 4pm – 7pm).	Corrected typo.
75	The physical space in which goods are loaded and unloaded should be designed in accordance with the City of London Highways and Servicing Guidance (see Appendix C), <u>and appropriate provision of off-street loading bays should be provided. A ready reckoner that may be used to indicate the likely off-street loading bay requirement for the most common use classes is provided on the City Corporation website.</u>	Added reference to requirement for appropriate loading bay provision, and signpost to a simple spreadsheet-based ready reckoner to be hosted on the City Corporation website that can be used to calculate the number of loading bays likely to be required for common use classes.
Glossary	Peak times 6.30am – 9.30am <u>7am – 10am</u> and 4pm – 7pm on weekdays.	Corrected error.

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Freight and Servicing Supplementary Planning Document

DATE XXXX



Contents

Freight and Servicing Supplementary Planning Document	1
1. Introduction	3
Background	3
What is Freight and Servicing?	3
The Future of Freight	5
2. The Policy Context	7
National Policy	7
London-wide policy	7
City of London Policy	10
3. Vision and Aims.....	15
Vision	15
Aims	15
4. Guidelines	16
Introduction	16
Measures to Minimise Freight and Servicing Trips	16
Measures to match demand to network capacity	18
Measures to mitigate the impact of freight trips	18
Monitoring	19
5. Types of Development	20
Introduction	20
Office Developments.....	20
Multi-tenanted buildings	21
General Retail	21
Food and Drink Retail/Pubs & Restaurants	21
Hotels and Hospitality	22
Residential and student accommodation	22
6. Construction Logistics Plans	24
7. Enforcement.....	25
Glossary	26
Abbreviations	27
Appendices	28
Appendix A - Details of other City of London Corporation Policies	29
APPENDIX B - City of London Delivery and Servicing Plan Guidance	35
APPENDIX C - Details of City of London and External Guidance and Best Practice	36

1. Introduction

Background

1. The efficient movement of goods and services are fundamental requirements for a successful city. While electronic services and communication have revolutionised working practices and removed the demand for the movement of some goods and services, other new areas of demand have grown.
2. Despite the small footprint of the City of London, the large working population generates significant demand for physical goods and services. Employment in the City is forecast to grow from 487,000 in 2015 to 569,000 in 2036¹, so the need to manage the increasing demand for space on the transport network continues to grow.
3. This Supplementary Planning Document (SPD) sets out the City Corporation's requirements for new development in relation to the management of freight and servicing. The document should be read in conjunction with the Standard Highway and Servicing Requirements for Developments in the City of London, the Code of Practice for Deconstruction and Construction Sites (published by the City Corporation), and the Construction Logistics Plan Guidance (published by Transport for London). References to these documents are provided in Appendix C.

What is Freight and Servicing?

4. All movement of goods and services by road, river or rail can be included under the umbrella term 'freight'. In the City context, freight movements are generally supporting the offices and retail that make up a majority of the employment in the Square Mile, or serving construction and demolition sites in the City. Most of these freight movements take place on the road network. Even where goods are mainly moved by river or rail, the final journey stage within the City will probably take place by road, most often by car, van or other goods vehicle. "Servicing" is a component of freight that does not involve the physical delivery of goods, and would include maintenance visits to buildings, waste collections, window-cleaning and so on.
5. Figure 1 shows that throughout a typical weekday, around 22% of traffic in the City of London is goods vehicles, with the majority of these being Light Goods Vehicles (LGV) under 3.5 tonnes. This data does not show freight moved by car, motorcycle and pedal cycle – it is therefore reasonable to expect that freight demand makes up a slightly higher percentage of traffic than shown here.

¹ Long Term Labour Market Projections, GLA, 2016 Projections

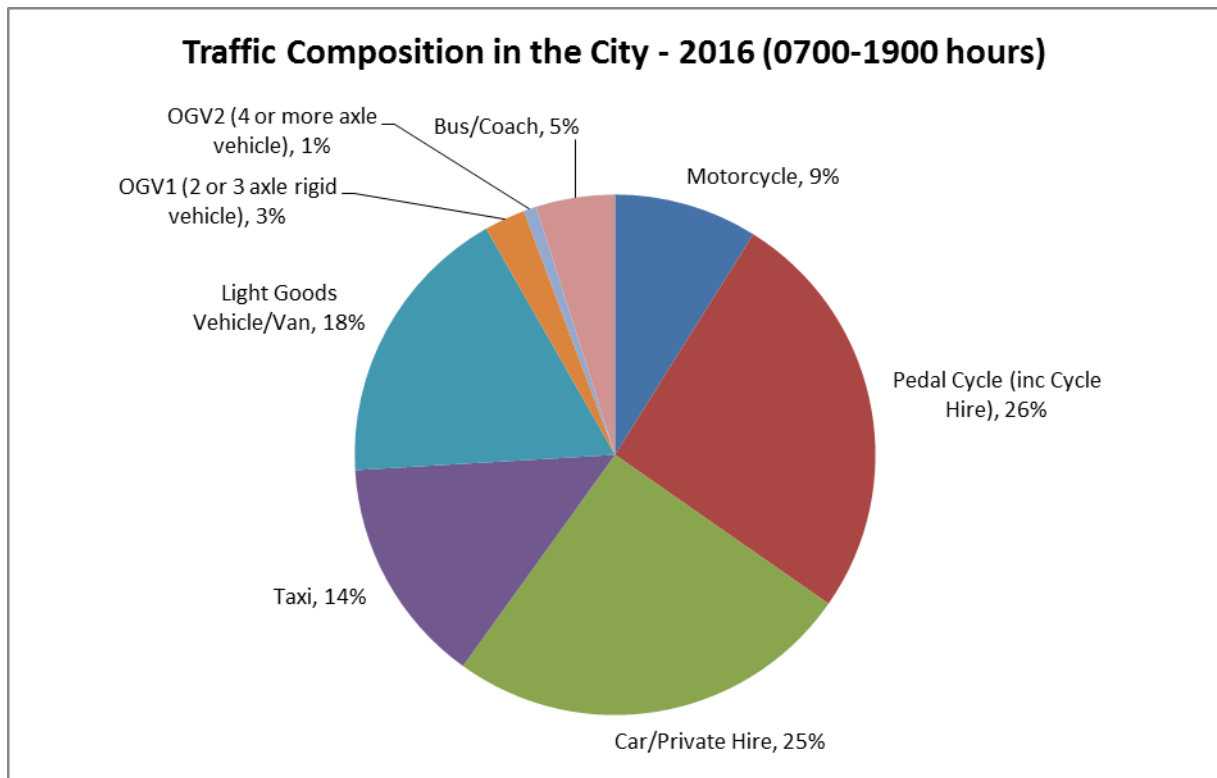


Figure 1 Traffic Composition in the City of London, Mouchel survey for the City Corporation, 2016

6. The need to manage freight demand is driven by several factors;

Traffic

7. While the total number of motor vehicles in the City has been in steady decline over recent years, the proportion of goods vehicles, particularly Light Goods Vehicles (LGV) and vans, has increased. Policies from the City Corporation, neighbouring boroughs and Transport for London to create 'Healthy Streets', and promote active travel, have led to a reallocation of road space away from motor traffic. This reallocation has led to an increase in journey time delay in places. With the City continuing to flourish, the demand for goods and services transported by road will continue to increase.

Road Danger Reduction

8. The City Corporation has a duty to promote road safety, and it is known that goods vehicles are disproportionately involved in collisions where vulnerable road users are injured. Reducing the number of goods vehicles serving new and existing premises in the City could therefore have a positive impact through reduced road danger both within the City and in neighbouring boroughs.

Air Quality and Carbon Emissions

9. The City of London was designated an Air Quality Management Area (AQMA) for two pollutants – Nitrogen Dioxide (NO₂) and small particles (PM₁₀) in 2001. Exposure to these pollutants is considered to be a significant cause of ill health and premature death in London.

Research by King's College London² estimated that air pollution was responsible for up to 141,000 life years lost or the equivalent of up to 9,400 deaths in London in 2010, as well as over 3,400 hospital admissions. The total economic cost associated with this was estimated at £3.7 billion. Poor air quality in the City is now considered to be a corporate risk.

10. Around 24% of PM₁₀ and 33% of NO_x (Oxides of Nitrogen, including NO₂) emissions associated with traffic in the City is from the movement of freight³. At present there are relatively few Ultra Low Emission goods vehicles on the market, so the reduction in freight vehicle movements is a priority for addressing air quality within the City and beyond.
11. Around 5% of carbon emissions in the City are associated with transport, rising to 22% across London as a whole⁴.
12. Reducing vehicle miles and increasing the use of electric vehicles for remaining journeys in the City will result in a reduction in all harmful emissions but this must not be at the expense of increased emissions elsewhere in London.

The Future of Freight

13. The employee population of the City of London is forecast to continue to grow over the next two decades, and demand for freight is expected to grow with it. In Greater London, Transport for London (TfL) forecasts that trips made by vans will increase by 26 per cent by 2031, representing 77 per cent of the total forecast growth in vehicle trips⁵.
14. New and emerging technologies such as autonomous vehicles and drones may play an increasingly important part in the movement of freight over the next few decades. The impact of these technologies, particularly in a densely populated city environment is unclear at this stage. In the short to medium term the movement of freight within cities is likely to continue to rely on drivers using the road network.
15. In the near future, increased use of smart technologies may impact on the possibilities for managing freight movements in urban environments. The efficient co-ordination of deliveries through technology and data is becoming increasingly important in the freight sector, and may present new opportunities for managing the impacts of delivery and servicing.

² Understanding the Health Impacts of Air Pollution in London, Walton et al, King's College London, 2015

³ City of London Air Quality Strategy 2015 - 2020

⁴ Carbon Dioxide Emissions by borough, GLA Datastore

⁵ Written evidence on Urban Congestion submitted by Transport for London to House of Commons Transport Committee, 24 April 2017

2. The Policy Context

16. This Freight and Servicing SPD forms part of a suite of national, regional and local policy documents. Figure 2 shows how an SPD fits into the wider planning context.

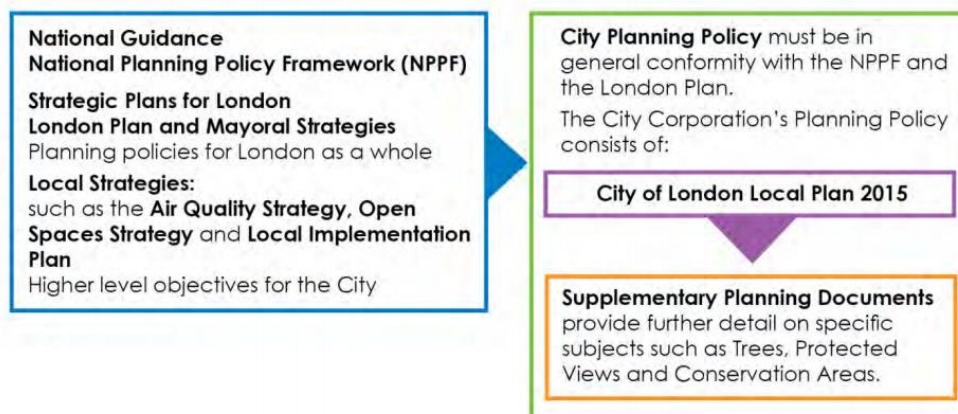


Figure 2 - Overview of Planning Policies and how they interact

17. The National Planning Policy Framework (NPPF) sets out national policy for England. Within Greater London, the London Plan sets out planning policies for the city as a whole. This document is supported by additional Mayoral strategies, in particular the Mayor's Transport Strategy (MTS). The City of London Local Plan and SPDs must be in general conformity with the London Plan.

National Policy

18. The National Planning Policy Framework (NPPF) states that;
Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (NPPF, para 30)
Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to... ..accommodate the efficient delivery of goods and supplies (NPPF, para 35)

London-wide policy

London Plan

19. The London Plan is the strategic planning document for the 32 London boroughs and the City of London. It sets out the framework for development in London, and the policy context for local planning policies. At the time of writing the London Plan is under review by the

new Mayor of London, but until this review is complete the most recent version from March 2016 remains in place.

20. Policies in the London Plan pertinent to this SPD are;
- Policy 2.17 – Strategic Industrial Locations
 - Policy 6.1 – Strategic Approach to Transport
 - Policy 6.4 – Enhancing London's Transport Connectivity
 - Policy 6.11 – Smoothing Traffic Flow and Tackling Congestion
 - Policy 6.14 - Freight
 - Policy 6.15 – Strategic Rail Freight Interchanges
 - Policy 7.14 – Improving Air Quality
 - Policy 7.15 Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and promoting appropriate soundscapes
 - Policy 7.24 – Blue Ribbon Network
 - Policy 7.26 – Increasing the use of the Blue Ribbon Network for Freight Transport

Other London-wide policies and strategies

- 21. The Safeguarding Wharves Final Recommendation report (2013) recommended that Walbrook Wharf – the only active wharf in the City – is retained as a waste facility, and increased use for other activities should be encouraged.
- 22. The Mayor's Transport Strategy (MTS) sets out the Mayor's transport policy. As with the London Plan, the current strategy dates from a previous Mayoral administration. Although a new MTS is currently in draft format, the previous strategy remains in place until the new document is formally adopted.
- 23. The existing MTS sets out policies to promote the use of river and rail for freight movements through safeguarding existing wharves and promoting rail freight infrastructure.
- 24. The MTS also addresses the safety implications of freight movements, promoting schemes such as the Fleet Operator Recognition Scheme (FORS) and improvements to vehicle and driver safety. The document also supports efficiencies through consolidation and out of hours delivery and servicing where possible, supported by quiet delivery schemes and Delivery and Servicing Plans.
- 25. The new Mayor's Transport Strategy draft for consultation was published in June 2017. Although this is a draft document and subject to change, the document gives a strong indication of the Mayor's transport priorities for his term of office. The draft strategy proposes a ten per cent reduction in central London lorry and van use by 2026. In particular there is a focus on the use of consolidation centres for construction and other sectors. Proposal 15 of the draft strategy sets out plans for a tailored approach for individual sectors, and plans to

work with business on re-timing, and reducing deliveries through procurement. Policy 2 of the strategy adopts a Vision Zero approach to road danger in London, with the aim for all deaths and serious injuries to be eliminated from London's streets by 2041. Policy 6 of the strategy aims to make London's transport network zero emission by 2050.

26. A new London Environment Strategy was published in draft format in summer 2017. This strategy brings together the Mayor of London's polices covering air quality, water, waste, green spaces and biodiversity, noise and climate change adaptation and mitigation.
27. A City for All Londoners was published in November 2016 and sets out the strategic direction of travel for the new Mayor of London. The document does not include specific policies, but gives an indication of the priorities of the new Mayor.
28. The movement of freight is specifically mentioned by the Mayor, in the context of an expected rise in van use associated with the changing needs and expectations of businesses and customers. The Mayor cites potential solutions such as riverside lorry consolidation centres, more deliveries being made by bike, and changing the way streets are used at different times of day.
29. The overarching Healthy Streets Approach to managing the street network is a key part of the Mayor's vision. In central London this means a shift towards reducing motorised traffic partly by having fewer deliveries to create a more attractive environment for walking, cycling and using public transport.

Existing and Forthcoming Schemes Affecting Freight & Servicing

30. Low Emission Zone – Covering most of Greater London, the Low Emission Zone requires larger vehicles and older small commercial vehicles to pay a charge if they do not achieve certain emissions standards. At present, only vehicles registered before 2006 are required to pay the charge, and compliance is very high.
31. London Lorry Control Scheme (LLCS) – administered by London Councils, the LLCS restricts the routes of large goods vehicles over 18 tonnes at night and at weekends. The aim of the scheme is to reduce noise pollution in residential areas. The scheme restricts large vehicles to a core network of main roads for as much of their journey as possible, with penalties issued for use of inappropriate routes. Vehicles wishing to use roads off the core network during the restricted hours must apply for a free permit to do so.
32. Congestion Charge – The Congestion Charge is a daily charge applying to all vehicles entering central London between 7am and 6pm Monday to Friday. The charge does not vary with the type of vehicle, so a large HGV would pay the same as a small van to enter

the zone. Some discounts and exemptions do apply for Ultra Low Emission Vehicles, but in general most internal combustion engine vehicles will pay the charge.

33. Emissions Surcharge (T-Charge) – The Emissions Surcharge, which uses the same boundaries and time restrictions as the Congestion charge, requires older vehicles not meeting certain emissions criteria to pay a daily charge to enter the area. The Emissions Surcharge was introduced from 23rd October 2017 as an interim scheme, pending the introduction of the Ultra Low Emission Zone.
34. Ultra Low Emission Zone – The Ultra Low Emission Zone (ULEZ) will come into force in April 2019 and will replace the Emissions Surcharge. The ULEZ will require all vehicles within the Congestion Charge area to meet strict emissions standards, or pay a daily charge in addition to the Congestion Charge.

City of London Policy

Local Plan

35. The City of London Local Plan (Appendix A) is the statutory planning document for the City. The following policies are pertinent to this SPD, and the policies in this document are in general accord with the policies in the Local Plan. The Local Plan is being reviewed, with an updated document expected to be adopted in 2019.

Policy DM 3.4 Traffic management

Core Strategic Policy CS9: Thames and the Riverside

Policy DM 15.6 Air quality

Core Strategic Policy CS16: Public Transport Streets and Walkways

Policy DM 16.1 Transport impacts of development

Policy DM 16.5 Parking and servicing standards

Policy DM 16.8 River transport

Core Strategic Policy CS17: Waste

Policy DM 17.1 Provision for waste in development schemes

Policy DM 17.2 Designing out construction waste

More details on these policies can be found in Appendix A

Standard Highway and Servicing Requirements for Developments in the City of London

36. The Standard Highway and Servicing Requirements for Developments in the City of London document sets out the guidelines for physical infrastructure associated with development-related highway and servicing arrangements. This document should be the point of reference for all matters relating to development impact on the public highway. A reference to the document is provided in Appendix C.

City of London Delivery and Servicing Guidance

37. The City of London Delivery and Servicing Guidance (Appendix B) provides practical information on how to manage freight associated with an existing site or new development through a Delivery and Servicing Plan. The guidance closely supports this Supplementary Planning Document, providing details of best practice and sample quiet delivery codes of conduct. The guidance is shown in Appendix B.

Air Quality Strategy and SPD

38. The City of London Air Quality Strategy 2015 - 2020 and Air Quality SPD set out the City's aims and responsibilities on managing Air Quality. The strategy aims to fulfil statutory obligations relating to air quality management, encourage measures to reduce harmful emissions in the City, and raise public awareness of air quality issues.
39. The Air Quality SPD sets out the City Corporation's requirements for reducing air pollution from new and refurbished developments within the Square Mile.
40. This SPD is in general accordance with the Air Quality Strategy Policies and Actions, particularly;
 - Policy 2: Political influence and commitment
 - Policy 3: Working with the Mayor of London
 - Policy 5: Reducing emissions from transport
 - Action 29: Reducing Air Quality Impact of Freight
 - Policy 6: Reducing emissions from new developmentsMore details on these policies can be found in Appendix A. References to the documents can be found in Appendix C.

Low Emission Neighbourhood

41. The City of London Low Emission Neighbourhood (LEN) is being introduced in the Barbican and Golden Lane areas, and is expected to be fully implemented by 2019. This project, which is part-funded by the Mayor of London, aims to trial several high-impact activities that will address local air quality issues and act as a pilot area for the rest of the City. Proposals include working with businesses to tackle emissions from delivery and servicing trips, looking at the potential for local freight consolidation, and zero emission last mile deliveries.

Noise Strategy

42. The City of London Noise Strategy 2016 – 2026 sets out the City Corporation's strategy for managing noise levels from all sources. Unwanted noise can be a nuisance to both residents and businesses, and while some noise in a working environment is inevitable, the City Corporation has a statutory responsibility to manage and minimise

exposure to excessive or unnecessary noise, while ensuring that the city can function and flourish.

43. In relation to new development, policies in the Noise Strategy relevant to this SPD are as follows;
- Policy Developments 1 - New noise making and noise sensitive development
 - Policy Transport 12 - Night Time Servicing
 - Policy Transport 13 – General
 - Policy Transport 14 – General

Road Danger Reduction Plan

44. The City of London Road Danger Reduction Plan 2013 sets out measures to reduce road danger at source. The plan recognises the disproportionate danger posed by goods vehicles, and proposes a combination of engineering measures and Education, Training and Publicity schemes to tackle road danger. The plan is due to be updated in 2018.

Waste Strategy

45. The City of London Waste Strategy 2013 – 2020 sets out the City Corporation's vision "To increase reuse and recycling and reduce waste arisings and carbon impacts associated with waste management from householders, businesses and visitors within the City, to include City of London buildings and staff".
46. Objective 7 of the strategy establishes the aim to reduce our negative impact on climate change and improve air quality in the City. This includes continuing to transport waste out of the City by river from the facility at Walbrook Wharf, removing an estimated 3744 HGV journeys from City streets each year.

Thames Strategy

47. The Thames Strategy SPD sets out the City Corporation's overarching strategy for use of the river. The strategy supports the Local Plan policy CS9 Thames and the Riverside with regard to promoting the use of the river for freight as well as passenger transport. The SPD supports the safeguarding of the waste transfer site at Walbrook Wharf, and the reinstatement of the pier at Swan Lane for passenger or freight use.

Public Realm

48. The City of London Public Realm SPD sets out 10 aims to maintain and enhance the City's built environment and provide a safe, high quality and inclusive place in which to work, live and enjoy.

- Particularly relevant to the management of freight and servicing, the SPD aims to;
- Encourage simpler, more spacious and less cluttered streets and spaces (Aim 3)
- Provide more sustainable streets and spaces (Aim 6)
- Support and encourage wellbeing and healthy lifestyles (Aim 7)
- Provide better connected and more inclusive streets and spaces (Aim 9)

49. The SPD supports the management of out of hours deliveries, and timed closures of streets where appropriate.

Traffic Restrictions

50. The City operates an area-wide ban on vehicles over 7.5 tonnes, covering most of the City. Vehicles over this weight are not permitted to enter the restricted area unless they are accessing premises within the area. The restricted area is shown in figure 3.

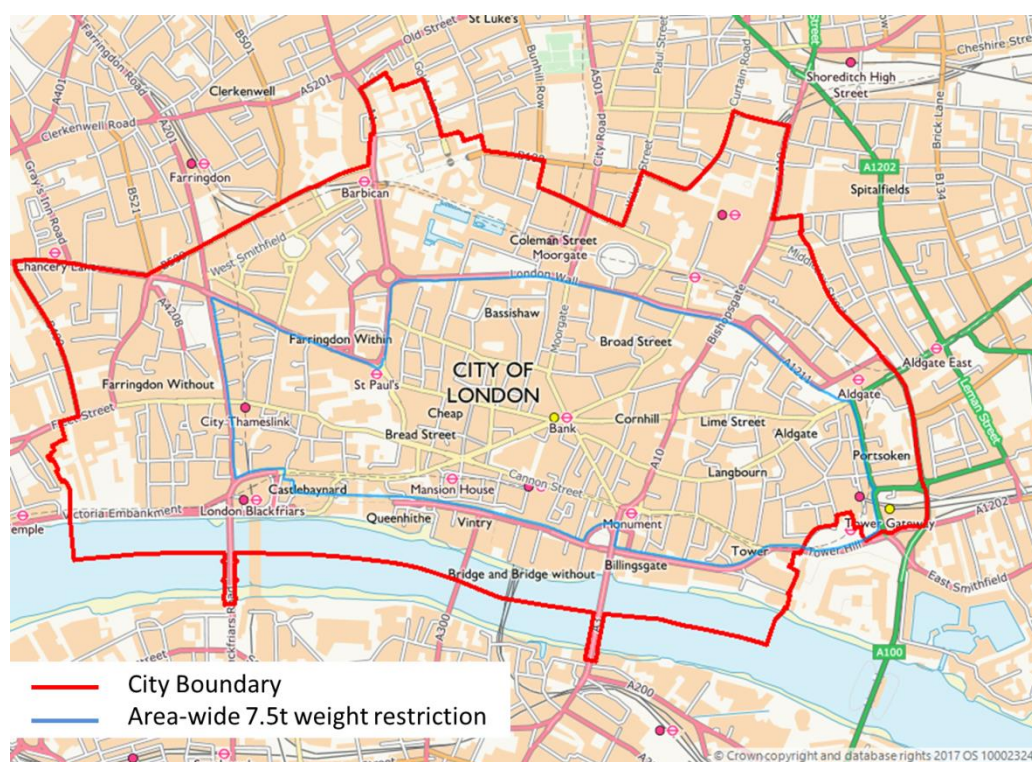


Figure 3 - Weight restriction in the City of London

51. In May 2017, the Bank on Safety trial scheme was introduced, restricting the movement of all vehicles, except buses and cycles, through Bank Junction between 7am and 7pm. The trial will last up to 18 months.
52. Details of traffic restrictions are shown on the City Corporation website.

3. Vision and Aims

Vision

- 53. The vision for the management of freight and servicing in the City of London is to;
- 54. **“reduce the number of freight and servicing vehicles and their environmental impact on the City, particularly at peak times, whilst still allowing the City to flourish and avoiding negative impacts beyond the City’s boundaries.”**
- 55. This SPD will help achieve this vision by setting out guidance for new major development that will limit the impact of new and additional freight demand on the City and beyond the City boundary.

Aims

- 56. The vision will be achieved via three principal aims, which are aligned with the Mayor of London’s emerging Transport Strategy;
- 57. **Minimise Freight and Servicing Trips** - Reduce the number of delivery and servicing trips generated by premises in the City – including personal deliveries and waste collections.
- 58. **Match demand to network capacity** - Maximise the proportion of essential delivery and servicing trips taking place outside peak times and where possible promote quiet evening or night-time deliveries. All essential delivery and servicing trips should be routed appropriately, using streets that are suitable for the vehicle being used, and minimising noise, emissions and road danger along the length of the route in and outside the City.
- 59. **Mitigate the impact of freight trips** - Where goods and services must be transported by road, including for last mile, use the safest and quietest zero emission means possible. This may mean moving goods or service personnel on foot or by cycle, to reduce the environmental impact on the City. The use of low emission river or rail transport for the transfer of goods and waste is encouraged, but the impact of additional noise and pollution at all stages of the journey should be considered. Loading and unloading of goods should not adversely impact on highway capacity, pedestrian, cycle or vehicle movement, road or site safety or unwanted noise levels either in the City itself, or on any stage of the journey.

4. Guidelines

Introduction

60. The single most effective way of proactively managing delivery and servicing arrangements is through a Delivery and Servicing Plan (DSP). For applications over 1000sqm or where the development is likely to have a significant impact on the transport network, the Local Plan requires a DSP as a planning condition. Where it is not required, the development of a DSP can lower delivery costs and impacts and is strongly encouraged to effectively manage delivery and servicing movements associated with the site.
61. The following guidelines set out prospective actions to effectively manage the freight and servicing impact of a development. The freight and servicing requirements of different types of development will vary and some measures may not be applicable to all sites. Section 5 of this document outlines the mix of measures that different types of development are expected to consider. Early engagement with the City Corporation's Planning team on management of delivery and servicing is encouraged.

Measures to Minimise Freight and Servicing Trips

62. A DSP should include measures that use appropriate smart or joint procurement to reduce the numbers of deliveries and servicing trips required to the premises – effectively consolidating deliveries or waste collection within the existing supply chain. Joint procurement may be organised on an ad-hoc basis or through participation in a business network such as the Cheapside Business Alliance.
63. Requiring suppliers to use consolidation centres in suitable locations within Greater London to minimise the number of trips required to service the premises is strongly encouraged. In line with London Plan Policy 2.17 and Land for Industry and Transport Supplementary Planning Guidance Implementation Point SPG5, where use of an out of central London consolidation centre is proposed, a facility in a designated Preferred Industrial Location may be most suitable. DSPs for larger developments should address the use of freight consolidation to minimise trips to the premises.
64. A requirement to use freight consolidation should be supported by a system to ensure that the consolidation works effectively to reduce the number of vehicle movements to and from the site and results in an overall reduction in total road miles compared with traditional servicing arrangements. A system of 'micro-consolidation' within the City which enables the use of last mile deliveries by foot, cycle or zero emission van could be considered. Where any sort of consolidation

centre is to be used, a commitment to use of zero or low emission vehicles, and appropriate routeing should be included in the DSP. A robust system of monitoring should be established to measure the impacts of using consolidation, with outcomes reported to the City Corporation as required by the DSP.

65. Personal deliveries to staff are considered part of the delivery and servicing of the premises, and should be managed in the same way. Agreements to prohibit personal deliveries to workplaces, especially those associated with online shopping, are strongly encouraged. Providing staff with membership of a 'click and collect' parcel drop-off service, or promoting these services can provide a good alternative, and demonstrate a commitment to minimising personal deliveries to workplaces.
66. Use of low emission river transport for goods and waste is strongly encouraged, and should be considered in particular for development within the Thames and Riverside Key City Place. The safeguarded waste transfer site at Walbrook Wharf provides a means of removing domestic and commercial waste from the City with minimal use of the road network. Agreements with waste management and other logistics companies to make use of this facility are strongly encouraged. Where the river can be used, agreements with waste management and logistics companies should specify the use of low emission and Direct Vision vehicles, where feasible, for collection within the City. Liaison with the Environment Agency and Port of London Authority to minimise the impact of boat movement on biodiversity and flood defences is encouraged.
67. The provision of adequate on-site storage space for goods is strongly encouraged to reduce the need for frequent deliveries of non-perishable items. Smaller sites where storage space is very limited are encouraged to investigate arrangements to share storage space with neighbouring properties to facilitate bulk deliveries. Where possible, vehicles making deliveries to a site should be loaded with waste or returns to maximise trip efficiency.
68. In line with Local Plan policy DM17.1, on-site waste management of all possible materials, including food waste, should be strongly encouraged, and the minimum possible frequency of waste and recycling collection should be specified. Where possible, occupiers of multiple-occupancy buildings should seek to co-ordinate waste contractor procurement to minimise waste collection trips. The City of London Time Banding Scheme restricts the times at which bagged waste can be left on the public highway for collection.
69. In line with Local Plan policy DM17.2, waste generated through construction and deconstruction should be minimised through the re-use of existing structures wherever possible, and the on-site recycling of deconstruction waste where feasible.

Measures to match demand to network capacity

70. Unless there are restrictions regarding noise or other considerations at the premises, evening, night time or weekend delivery and servicing should be the default outside residential areas. All deliveries to any part of the City requiring activity outside working hours, either at the site in the City or elsewhere in the delivery chain, should be subject to a quiet delivery agreement (examples are set out in the DSP Guidance – see Appendix B) or commitment to minimise noise and pollution impacts at all stages of the delivery process, including along the delivery route and at any intermediary points such as a consolidation centre. A commitment to minimise noise impacts at all stages of the delivery process and along the route should be included in the DSP. Overnight deliveries using vehicles over 18 tonnes may be subject to routeing restrictions set out in the London Lorry Control Scheme which aims to minimise lorry noise in residential areas.
71. Where daytime deliveries and servicing are essential or out of hours deliveries are not permitted or feasible, these should occur off-peak (i.e. avoiding 7am – 10am and 4pm – 7pm). In some areas where lunchtime footfall is particularly high, deliveries at this time should be avoided. A booking system should be used and enforced to ensure that delivery and servicing visits are restricted to these times, with deliveries arriving outside of these hours turned away.
72. Where a City business operates a fleet of vehicles, steps should be taken to ensure that appropriate routes – using the Strategic Road Network where possible - are used by drivers both within the City and at all stages of their journey. Where possible, routes should be chosen to avoid areas of high pedestrian or cycle use both within and beyond the City. Intelligent route planning should avoid residential areas along the length of the route where possible, especially when movements take place outside weekday working hours. The London Lorry Control Scheme controls the movement of larger goods vehicles taking place at night and at weekends. A similar approach may be suitable for route planning of smaller goods vehicles to reduce the noise impact on residential amenity.

Measures to mitigate the impact of freight trips

73. Consideration should be given to the mode of transport and type of vehicle used to carry out deliveries or collections, including waste collections. Responsible procurement policies that prioritise suppliers that use river, public transport or zero or low emission vehicles are encouraged. Vehicles that meet the forthcoming Ultra Low Emission Zone standards should be a minimum requirement in any delivery or servicing contract where vehicles can be specified. Where a business

operates a fleet of vehicles, consideration should be given to the use of cargo bikes, and zero or low emission vehicles. In line with Local Plan Policy 16.6, infrastructure to support the use of commercial electric vehicles should be provided in off-street loading or parking areas.

74. Particularly where large vehicles are required, the procurement process should require high standards of vehicle and driver competency from suppliers. A requirement for suppliers to be accredited by FORS or an equivalent scheme, which promotes good working practices and vehicle management, as well as routeing and scheduling that minimises noise and environmental impact, is encouraged. A requirement for the use of Direct Vision vehicles which provide the driver with an improved field of vision is encouraged. Subject to consultation from the Mayor of London, the lowest rated HGVs would be restricted or banned within Greater London from 2020. For fleets serving construction sites, adherence to the Construction Logistics and Community Safety (CLOCS) standard which aims to reduce Work Related Road Risk is strongly encouraged.
75. The physical space in which goods are loaded and unloaded should be designed in accordance with the City of London Highways and Servicing Guidance (see Appendix C), and appropriate provision of off-street loading bays should be provided. A ready reckoner that may be used to indicate the likely off-street loading bay requirement for the most common use classes is provided on the City Corporation website. Where on-street loading is permitted, measures should be put in place to ensure that the movement and safety of pedestrians, cyclists and other road users is not adversely affected – in line with the City's guidance on obstruction of the public highway - and there is no adverse impact on the amenity of nearby residents. The City Corporation promotes and enforces a 'no idling' policy. Local enforcement of this policy is strongly encouraged.

Monitoring

76. The impact of all measures taken to minimise, match and mitigate the impact of freight movement both within the City and beyond should be tracked with a robust system of monitoring through the DSP. Monitoring is likely to cover air quality, noise, road safety and traffic impacts of the operation, but other areas may also be specified for particular observation to ensure positive outcomes for the City and other areas. This monitoring will usually take place through the DSP, and outcomes should be reported to the City Corporation as required by the DSP. Wider monitoring of footways and streets will continue to be undertaken by the City Corporation.

5. Types of Development

Introduction

77. The types of measures taken to manage deliveries and servicing will depend largely on the activities taking place at the premises. This section outlines typical measures that developers dealing with different land uses would be expected to consider in the management of freight and servicing. Where the site has mixed uses (for example retail on the ground floor, with office and hotel space above), a combination of measures should be considered in a DSP.

Office Developments

78. Small and medium sized office developments may not generate the volume of delivery and servicing trips of larger towers, but due to the number of small offices in the City their collective impact is significant. Joint procurement agreements with neighbouring buildings can prove beneficial for small offices. Producing a joint DSP with adjacent properties and occupiers may allow efficiencies in procurement of common goods and services, including waste collection, and shared use of loading bays or servicing areas. Procurement should specify, where possible, the use of the safest, quietest and cleanest method of transport possible to transport goods and services.
79. The prohibition of personal deliveries to offices, combined with an offer of click and collect services to employees is one way of reducing the number of vehicles serving the office, and can significantly reduce the impact on the road network.
80. The re-timing of some deliveries should be possible within a small office development. If a development is not to be staffed overnight or at weekends, on-site secure storage, or arrangements with nearby businesses to accommodate out of hours deliveries may be feasible in order to reduce daytime impact on the network. The potential noise impact of moving to out of hours deliveries should be assessed along any affected access routes and loading points as well as the site itself to ensure that the arrangements are acceptable.
81. In addition, medium-sized office developments (broadly defined as accommodating fewer than 250 people) should strongly consider a voluntary code, mandating the consolidation of inbound goods to reduce the impact of the development and demonstrate a commitment to minimising freight movements.
82. In addition to the measures for small and medium sized office developments, larger office developments are likely to have a requirement to consolidate deliveries of goods inward. This consolidation regime should be enforced through a robust booking

and monitoring system that can demonstrate the number of vehicle trips avoided as a result of the consolidation. If it is not required as a planning condition, a voluntary cap on the number of delivery vehicles each day is encouraged.

Multi-tenanted buildings

83. Buildings with several occupants will naturally generate more delivery and servicing trips than those occupied by a single company. In addition to the items mentioned above, buildings with multiple tenants should consider the development of an occupier forum to co-ordinate joint procurement, waste collection and collaborative working. Providing a single point of delivery for all occupants of a multi-tenanted building can reduce the need for delivery personnel to spend time finding the correct recipient within the building, improving efficiency.

General Retail

84. The delivery and servicing needs of retailers are focussed around ensuring that goods are received into the store at appropriate times.
85. Management of freight movements in retail developments should focus on the consolidation of goods into the store and waste/returns from the store, ensuring that as few movements as possible are required in order to allow the business to operate. Developments with sufficient storage space can reduce the requirement for regular deliveries. Ensuring that vehicles used for deliveries are also loaded with returns or waste, where appropriate, maximises efficiency and reduces empty vehicle mileage, minimising the development's impact on the network.
86. Retail can benefit significantly from out-of-hours deliveries where on-street loading restrictions may not apply, or be less stringent. Quiet delivery codes of conduct to minimise the noise impact are particularly important for retail deliveries which often involve the use of metal cages for moving goods.

Food and Drink Retail/Pubs and Restaurants

87. Many of the measures appropriate for general retail are applicable to the food and drink sector, including pubs and restaurants. The needs of a large chain organisation are likely to be quite different to a small individual shop or café. An organisation with several City locations may be able to demonstrate that deliveries to the City are already efficient, and make good use of consolidation to minimise freight movements. In these instances, the focus of a DSP should be on ensuring that quiet deliveries occur outside peak hours, and with

the safest, quietest and cleanest vehicles available. Particular care should be taken with regard to more noisy deliveries/servicing e.g. waste bottle collections, to avoid disturbance to nearby residents. DSPs should employ quiet delivery agreements to reduce noise and disturbance on-street. Engines should be turned off unless absolutely necessary for deliveries to reduce noise and air pollution.

88. Smaller or independent food and drink retailers not benefitting from a large procurement network may use many suppliers for different items. In these instances, joint procurement techniques to maximise co-operation between neighbouring businesses may offer the best way of reducing the number of freight movements without impacting on business operations.
89. Any delivery services associated with the food or drink retailers, whether managed by the occupier or not, should be considered and managed by a DSP. Where delivery services are made available, measures to encourage the use of foot or cycle deliveries are encouraged.

Hotels and Hospitality

90. Many of the measures appropriate to reduce the impact of delivery and servicing of hotels, meeting venues and Livery Halls will be similar to those for food and drink outlets. Hotels may be particularly well placed to take advantage of quiet overnight or off-peak deliveries due to round the clock staff availability, subject to the impact on nearby residential properties and hotel guests.
91. Joint procurement of common services, such as linen delivery or dry cleaning is particularly encouraged for hotels and hostels.

Residential and student accommodation

92. Residential and student accommodation sites will have significantly different patterns of deliveries to most commercial properties, with the majority of deliveries being personal. The promotion and use of a central delivery point where all residents have the option to collect goods, rather than have a missed delivery to home is encouraged.
93. Where servicing of a building is carried out by a management agent, a commitment to carry out quiet routine servicing out of hours which does not cause disturbance is encouraged, and consolidation of any required deliveries is encouraged.
94. Student accommodation providers should address servicing and deliveries within published building management plans. These plans should also address the impact of arrivals and departures at the beginning and end of terms, staggering activity using a booking system to avoid undue impact on the highway network and

disturbance to adjacent occupiers. Building managers should liaise with the City Corporation Highways department and City Police prior to busy periods of movement to ensure disruption caused by loading and unloading is minimised.

6. Construction Logistics Plans

95. A Construction Logistics Plan (CLP) is required for all major developments, where a development will have a significant impact on the transport network during construction.
96. The City Corporation's Code of Practice for Deconstruction and Construction Sites (CPDCS) provides guidance on environmental best practice for construction sites, and this should be considered in the development of a CLP.
97. Membership of the City of London Considerate Contractor Scheme (CCS) which promotes good practice on and about construction sites is encouraged.
98. CLPs submitted in support of an application will be assessed in line with CPDCS and the London-wide Construction Logistics Plan Guidance issued by Transport for London, see Appendix C.

7. Enforcement

99. The need for effective enforcement of the measures set out in this SPD is recognised. As part of the restructure of City Transportation, resources are being made available to review and enforce the contents of DSPs. Ongoing enforcement will ensure that agreed DSP conditions are adhered to, and the benefits to the City set out in this SPD are achieved. The City Corporation's Enforcement Plan (see Appendix C) sets out the City's approach to planning enforcement.

Glossary

Air Quality Management Area an area where air quality objectives are unlikely to be achieved, requiring the local authority to produce a plan to improve air quality.

Construction Logistics Plan A plan setting out how all aspects of the freight logistics of a construction site will be managed. An approved plan will be required before construction commences.

Direct Vision Standard The Direct Vision Standard for heavy goods vehicles (HGVs) assesses and rates how much a HGV driver can see directly from their cab in relation to other road users.

Delivery and Servicing Plan A plan setting out how all delivery and servicing to a completed site will be managed, including measures to minimise freight trips, match demand to network capacity, and mitigate the impact of essential freight trips.

Fleet Operators Recognition Scheme (FORS) a voluntary accreditation scheme that promotes best practice for commercial vehicle operators.

Light Goods Vehicles typically commercial vehicles up to 3.5 tonnes maximum gross weight. Includes most vans.

National Planning Policy Framework the planning framework drawn up by central government, providing guidance for local planning authorities in drawing up local plans and making planning decisions.

Peak times 7am – 10am and 4pm – 7pm on weekdays.

Residential Areas Defined in the City of London Local Plan, figure X.

Ultra Low Emission Vehicle (ULEV) the collective term for Battery electric vehicles (BEVs) Plug-in hybrid electric vehicles (PHEVs), Range-extended electric vehicles (RE-EVs), Hydrogen fuel cell electric vehicles (FCEVs)

Abbreviations

AQMA Air Quality Management Area
CCS Considerate Contractor Scheme
CLOCS Construction Logistics and Community Safety
CLP Construction Logistics Plan
CPDCS City Corporation Code of Practice for Deconstruction and Construction Sites
DSP Delivery and Servicing Plan
FORS Fleet Operators Recognition Scheme
HGV Heavy Goods Vehicle
LEN Low Emission Neighbourhood
LGV Light Goods Vehicles
LLCS London Lorry Control Scheme
MTS Mayor's Transport Strategy
NPPF National Planning Policy Framework
SPD Supplementary Planning Document
TfL Transport for London
ULEZ Ultra Low Emission Zone
ULEV Ultra Low Emission Vehicle

Appendices

- A. Details of other City of London Corporation Policies
- B. City of London Delivery and Servicing Plan Guidance
- C. Details of External Guidance and Best Practice

Appendix A - Details of other City of London Corporation Policies

Local Plan

Policy DM 3.4 Traffic management

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and highways security measures, including addressing the management of service vehicles, by:

- consulting the City Corporation on all matters relating to servicing;
- restricting motor vehicle access, where required;
- implementing public realm enhancement and pedestrianisation schemes, where appropriate;
- Using traffic calming, where feasible, to limit the opportunity for hostile vehicle approach.

Core Strategic Policy CS9: Thames and the Riverside

4. Promoting the functional uses of the River Thames and its environs for transport, navigation and recreation, particularly through:

- (i) retaining Walbrook Wharf for waterborne freight traffic;
- (ii) encouraging the use of the River Thames for the transport of construction and deconstruction materials and waste;
- (iii) retaining Blackfriars Pier, and access to Tower Pier, and encouraging the reinstatement of Swan Lane Pier and the use of these facilities for river transport. Applications to remove these facilities will be refused unless suitable replacement facilities of an equivalent or higher standard are provided;
- (iv) maintaining London Bridge, Tower Bridge, Blackfriars Bridge, Southwark Bridge and the Millennium Bridge;
- (v) refusing development on or over the River, except for structures which specifically require a waterside location for river-related uses;
- (vi) resisting the permanent mooring of vessels; if moored vessels are exceptionally permitted they must be of national importance, have a special connection with the City and the River Thames, be used for a river-related purpose and not have a detrimental impact on navigation, river regime or environment;
- (vii) maintaining access points to the River Thames foreshore, from both land and water, for public or private use as appropriate, subject to health and safety and environmental safeguards.

Policy DM 15.6 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.

Core Strategic Policy CS16: Public Transport Streets and Walkways

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, by:

4. Minimising congestion and reducing vehicle emissions:

(i) directing through motor traffic within the City onto appropriate streets in accordance with the Highway Hierarchy. Bus routes will continue to serve customer needs throughout the City and will not be subject to the Highway Hierarchy;

(ii) continuing to facilitate intermediate modes (coaches, car clubs, taxis and private hire vehicles) and to provide for essential motor vehicle traffic, including addressing the servicing of City buildings and the needs of disabled people, whilst minimising the environmental impact of these modes;

(iii) encouraging the provision of infrastructure for alternative-fuel vehicles, such as off-street electric vehicle recharging points;

(iv) using traffic management measures and street works permits to improve journey time reliability on the City's roads;

(v) requiring developers to demonstrate, through transport assessments, construction logistics plans, travel plans and delivery/servicing plans, how the environmental impacts and road danger of travel and servicing will be minimised, including through the use of river transport.

Policy DM 16.1 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:

- road dangers;
- pedestrian environment and movement;
- cycling infrastructure provision;
- public transport;
- the street network.

2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

3.16.10 Delivery and Servicing Plans will be required for all major development and any other development that will cause significant transport impacts on the local or wider area, through operational deliveries and servicing.

3.16.11 Construction Logistics Plans will be required for all major development and for any development that will cause significant transport impacts during its construction phase.

3.16.12 Where practicable, Transport Assessments, Travel Plans and other statements should be combined into a single document. Applicants should discuss the scope of the transport documentation required early in the pre-application phase to ensure that it provides an assessment relevant to the City's specific circumstances.

3.16.13 Mitigation for adverse impacts should be detailed in assessments and plans. Where flexible permissions are granted which allow a range of uses, interim assessments and plans should be prepared at application stage and updated when occupants and uses are finalised.

Policy DM 16.5 Parking and servicing standards

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.

3.16.19 The low numbers of private motor vehicles mean that delivery and service vehicles have a relatively greater impact on traffic congestion and air quality. Efficient off-street servicing and delivery arrangements are vital to keep the City's traffic moving. In order to reduce vehicle impact on air quality, electric vehicle fast-charging infrastructure needs to be available in convenient locations. Guidance is contained in the City Corporation's 'Standard Highway and Servicing Requirements for Developments in the City of London'.

Policy DM 16.8 River transport

1. River piers, steps and stairs to the foreshore, the Walbrook Wharf safeguarded site, and other river-based transport infrastructure will be safeguarded and improvements will be supported. 143

2. Development adjacent to or over the River Thames must be supported by a Transport Assessment and a Construction Logistics Plan addressing the potential for the use of the river for the movement of construction materials and waste.

3.16.22 New river piers must be publicly accessible. The City Corporation will expect construction and waste materials from developments on or near the river to be transported by river barge.

Core Strategic Policy CS17: 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) by:

1. Enabling waste minimisation and adherence to the waste hierarchy:
(i) requiring the provision of facilities for waste segregation, handling and management within new developments;

(ii) increasing the proportion of municipal solid waste recycled to at least 45% by 2015 in line with the City of London Waste Strategy;

(iii) promoting improved waste management choices for businesses and residents.

2. Enabling waste to be managed at the nearest available suitable location:

(i) identifying waste management capacity in the City, or elsewhere in London, to meet the City's London Plan waste apportionment target, including through partnership working with the London Borough of Bexley;

(ii) safeguarding Walbrook Wharf as a waste handling site and investigating the potential for waste management, alongside its waste transfer function;

(iii) co-operating with other waste planning authorities to ensure appropriate waste management facilities are available to manage waste generated in the City.

3. Enabling the sustainable transport of materials including waste and recyclables by river:

(i) safeguarding Walbrook Wharf as a wharf suitable for river transport of materials including waste;

(ii) exploring the potential for further use of waterways for the transport of waste and construction materials subject, where appropriate, to the potential impact on Natura 2000 sites.

Policy DM 17.1 Provision for waste in development schemes

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.

Policy DM 17.2 Designing out construction waste

New development should be designed to minimise the impact of deconstruction and construction waste on the environment through:

- reuse of existing structures;
- building design which minimises wastage and makes use of recycled materials;
- recycling of deconstruction waste for reuse on site where feasible;
- transport of waste and construction materials by rail or river wherever practicable;
- application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management.

Noise Strategy

2.4.1 New noise making and noise sensitive development

POLICY DEVELOPMENTS 1: The City Corporation will seek to manage noise impacts as a result of new development through the introduction and application of appropriate and effective planning procedures, policies, conditions and agreements, and in particular:

c) Continue to limit and contain noise and vibration from construction and deconstruction activities through the Planning Consent process, based on the

latest edition of the City of London Code of Practice for Deconstruction and Construction and other relevant standards. This includes requiring through planning conditions the approval and implementation of Environmental Management and Construction Logistics Plans where appropriate.

e) Prevent the introduction of noise sensitive uses into areas close to commercial developments with high noise levels where the achievement of acceptable standards for quiet living conditions are not technically practicable.

f) Place limits on the hours of operation of servicing and noise generating activities at developments where noise sensitive premises are likely to be adversely affected. Existing limits for hours of servicing (permitted between 7am-11pm, Monday – Saturday, except Bank Holidays) to be applied; where this is not practicable a plan to minimise noise from servicing will be required to be approved and implemented.

POLICY TRANSPORT 12: The City Corporation will continue to support restrictions on night time and weekend commercial vehicle movements through the City and to limit operational hours of noisy servicing activities in noise sensitive locations wherever necessary. However the City Corporation will consider a more flexible approach where our normal time restrictions are proving problematical provided that other acceptable noise management measures are implemented such as use of loading bays and consolidation centres. Where appropriate, we will promote TfL's Code of Practice for Quieter Deliveries within the City. Where there is no likelihood of disturbance 24 hour servicing is actively encouraged. We will review the implementation of this policy on an ongoing basis and will revise our approach as required.

POLICY TRANSPORT 13: The City Corporation will seek to identify and exploit opportunities and synergies between this Noise Strategy and other City of London Corporation policies (e.g. the City Corporation's Air Quality Strategy and Local Transportation Implementation Plan) to reduce noise and vibration and to better manage the impact of noise from road transportation, servicing and street works.

POLICY TRANSPORT 14: The City Corporation will where possible, support and contribute to the development of low noise methods, schemes, management techniques and technologies which could reduce noise or better manage noise impacts from road traffic, street works and servicing.

Air Quality Strategy

Policy 2: Political influence and commitment

The City Corporation will seek opportunities to influence air quality policy across London to secure lower levels of air pollution in the Square Mile.

Policy 5: Reducing emissions from transport

The City Corporation will seek opportunities for a significant reduction in emissions associated with road traffic in the Square Mile.

Action 29: The City Corporation will look for opportunities to significantly reduce the impact of freight distribution on air quality across central London and specifically work with businesses and the construction and demolition

industry to identify opportunities for a reduction in vehicle movements, freight consolidation, zero-emission and low emission last mile deliveries.

Policy 6: Reducing emissions from new developments The City Corporation will ensure that new developments have a minimal impact on local air quality both during the development phase and when occupied.

Air Quality SPD

Requirements

Section 2: Sustainable Development and Building Design

Reduce Emissions:

- Provide for sustainable travel

Section 4: Reducing Air Quality impacts during construction / deconstruction

Scheme of Protective Works detailing:

- Details of continuous monitoring and trigger levels
- No engine idling policy
- CLP in line with TfL best practice

Section 5 Air Quality Impact Assessments

Air Quality Neutral Assessment (or Air Quality Positive as policy emerges) required when the floor space is 1,000m² or more or 10 or more residential dwellings:

- Building emissions
- Transport emissions

APPENDIX B - City of London Delivery and Servicing Plan Guidance

Available online at the Planning Design Guidance page of the City website

APPENDIX C - Details of City of London and External Guidance and Best Practice

These documents will be updated as required.

Document	Description	Author
Local Plan	The City of London's planning strategy document	City Corporation
Air Quality Strategy	The City of London's policy and strategy on managing Air Quality	City Corporation
Air Quality SPD	The City's guidance on minimising emissions and exposure to air pollution	City Corporation
Noise Strategy	Document setting the strategic direction for noise policy in the Square Mile	City Corporation
Public Realm SPD	The principles and guidelines for controlling and informing street enhancement schemes (July 2016)	City Corporation
Road Danger Reduction Plan	The City's plan for the reduction of road casualties	City Corporation
Code of Practice for Deconstruction and Construction Sites	A guide to best practice on construction/deconstruction projects	City Corporation
Standard Highway and Servicing Requirements for Developments in the City of London	Guidance for the physical aspects of highway and servicing requirements	City Corporation
Supplementary Planning Documents Directory	Section of the City Corporation website listing active SPDs	City Corporation
Design Guidance Directory	Section of the City Corporation website listing active design guidance	City Corporation
City Enforcement Plan	Sets out the City's approach to planning enforcement	City Corporation
Safeguarding Wharves Final Recommendation report	Summary of the Safeguarded Wharves Implementation Report – outlining the role of wharves on the Thames.	GLA

Document	Description	Author
London Plan	The spatial planning document for London	GLA
Land for Industry and Transport Supplementary Planning Guidance	SPG adding guidance to the London Plan on land for transport and industry	GLA
Mayor's Transport Strategy 2010	The Strategic Transport Plan for London, produced by the previous Mayoral administration.	GLA
Mayor's Transport Strategy 2017 Draft	The new draft Strategic Transport Plan for London.	GLA
London Environment Strategy	The draft strategic plan for London's environment and green space	GLA
Construction Logistics Plan Guidance	Guidance on how to produce an effective Construction Logistics Plan.	TfL
Direct Vision Standard for HGVs	Web portal outlining information on Direct Vision standard lorries	TfL
FORS Guidance	Guidance on the Fleet Operator Recognition Scheme – promoting best practice amongst fleet operators.	FORS

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Appendix 3 – City of London Loading Bay Ready Reckoner (snapshot of interactive spreadsheet tool, including example data)

City of London Loading Bay Ready Reckoner		
Notes	<p>Use this calculation to estimate the required number of loading bays for the most common development use classes within the City of London. Outputs are an indication of potential loading bay requirements only. The eventual requirement will be subject to agreement with the City Corporation, taking into account local considerations.</p> <p>Notes on each stage of the calculation are shown below. As set out in the Freight and Servicing SPD, users are encouraged to demonstrate how delivery and servicing trips can be minimised, timed out of peak hours, and shifted to cleaner, safer, lower impact modes of transport.</p>	
	Instructions	
	Input Gross External Area (GEA) for each use class in green cells	
	Enter expected proportion of Heavy Goods Vehicles (HGV)	
	Fixed parameters are shown in grey cells	
	Outputs are shown in orange cells	

City of London Loading Bay Ready Reckoner						
Use Class	Enter GEA of each use class	Daily Trips		Use Class	Land Use Factor	These factors are based on historic trip rates at other developments in and around the City. Different factors may be appropriate for local circumstances, so developers may be able to justify alternative factors.
A1	590	0		A1	1.35	
A2		0		A2	1.35	
A3		7.965		A3	1.35	
A4		0		A4	1.35	
A5		0		A5	1.35	
B1	8235	16.47		B1	0.2	
	Daily Trips	24.435				
	% of daily peak hour trips	20%	This is a standard assumption based on historic trip patterns. Developers may be able to demonstrate that a lower peak hour delivery percentage is appropriate (e.g. by enforcing a booking system) which may alter the ultimate loading bay requirement.			
	Daily peak hour trips (20% of trips)	4.887				
	Assumed HGV Dwell Time (minutes)	30	These are standard assumptions. Different factors may be appropriate if the developer can demonstrate that dwell times for these vehicles are appropriate in these circumstances.			
	Assumed LGV Dwell Time (minutes)	20				
	Enter expected % of HGVs	10%				
	Expected Peak Hour HGVs	0.489				
	Expected Peak Hour LGVs	4.398				
	Loading Bay Requirement	2				

Committee(s)	Dated:
Planning and Transportation	20/02/2018
Subject: Renaming of Pedestrian Route: Barker Bridge	Public
Report of: Policy and Performance Director	For Decision
Report author: Hannah Brooks, Department of the Built Environment	

Summary

This report advises Members that an application has been made to rename a section of St Alphage Highwalk as the 'BARKER BRIDGE'. This would commemorate John Alfred Barker OBE, the former Chief Commoner and Member for Cripplegate Ward who died in May 2017. The naming of streets or structures/buildings after living or recently deceased persons is contrary to the City Corporation's published Advice Note. Therefore this report is brought before the Committee to consider whether an exception is merited on this occasion.

Recommendations

Members are recommended to:

1. Agree the name 'BARKER BRIDGE' for the new footbridge, and approve a statutory consultation on the proposed name.
2. Agree that if the statutory consultation results in no objections, then the Director of the Built Environment be delegated to approve the name 'BARKER BRIDGE', and require that a statutory order be issued.

Main Report

Background

1. The City Corporation is responsible for the authorisation of all building names, street numbers and street names within the City in accordance with the London Building Acts (Amendment) Act 1939. The normal procedure is for such applications to be dealt with by officers under delegated authority but there is provision for high profile or unusual cases to be reported for decision by Planning & Transportation Committee.
2. The footbridge referenced in this report has recently been under construction, and it will link existing 'City Walkways' The Postern/Alban Highwalk with the new London Wall Place development (see map in Appendix 1). It was formally named as part of St Alphage Highwalk on 26th April 2016 (Street Naming and Numbering Notification ref: 2016LONWAL0121). Appendix 1 shows the site, with the new footbridge indicated in short dashes on the plan (ref **SXALHW1000**).

The Site and Proposal

3. In October 2017 a suggestion was received from Marianne Fredericks (Member, Tower Ward) to name the new footbridge to commemorate John Alfred Barker OBE, the recently deceased former Chief Commoner and Member. This has been treated as a formal application to re-name the footbridge.
- 4.
5. This bridge was formally named as part of the re-instated St Alphage Highwalk, and so any change would involve a formal re-naming, including a public consultation with relevant parties. However, as the site is a footbridge link with no related building addresses, there are no residential or commercial occupiers who would be directly affected by the re-naming as 'Barker Bridge'.
6. The prefix 'Barker' references Mr Barker in a consistent format to 'Gilbert Bridge', a similar footbridge within the Barbican complex named after the explorer Sir Humphrey Gilbert. The suffix 'Bridge' clearly describes the walkway and its character as a footbridge.

Considerations

7. The City's Street Naming and Numbering Advice Note (p11) states that:
"In applications to name streets after deceased persons, permission must be obtained from the person's family or estate administrators. In order to be considered the individual in question should:
 - Have been dead for 20 years or have passed the centenary of their birth;
 - Have a significant and demonstrable connection to the site in question"

Permission from the Family

8. Representatives for Mr Barker's family have been consulted about the proposed naming of the footbridge as Barker Bridge. They are supportive of the proposal.

Connection with the Area

9. Mr Barker lived in the Barbican area and had a strong association with the City of London. He had been a local government councillor for over 60 years, representing parts of Holborn, Camden and the City. He served as a Member for Cripplegate Ward (1981-2017) and as Chief Commoner (2008), as well as undertaking a variety of other public service and charitable roles. In 2005 he received an OBE for services to the Corporation and City of London. Mr Barker made frequent use of the Barbican highwalks to access Guildhall to carry out his many duties and so had a significant connection with the site.

Naming after a Deceased Person

10. Regarding naming proposals relating to a deceased person, the City Corporation's Advice Note follows the English Heritage guideline that 20 years should have elapsed before the case is considered to give time for the merit of

the individual to be properly established. Mr Barker died in May 2017, aged 87, and so consideration of the naming application today is not consistent with the Advice Note.

11. Members are invited to consider this naming proposal as an exceptional case. Mr Barker does have a clear connection to the Barbican area and a long and distinguished history of public service. It is not considered that agreeing to this proposal today would set a precedent that would undermine the effectiveness of the Advice Note as a way of managing inappropriate personal naming proposals.

Consultation

12. This pedestrian route is City Walkway and was formally named as part of St Alphage Highwalk on 26th April 2016 (SNN ref: 2016LONWAL0121). Therefore should Members approve the proposed name, a full Consultation will be undertaken. This will invite the views of Statutory Consultees (internal and external), Ward Members for Bassishaw and Cripplegate and the developers of the adjacent London Wall Place site. Informal contact suggests that the developers of London Wall Place are supportive of the proposal. Public notices will be posted on site.

Conclusion

13. This pedestrian route is City Walkway and was formally named as part of St Alphage. This report recommends that Members approve in principle the proposed re-naming of the footbridge as the Barker Bridge. This is considered to be an exceptional case justified by Mr Barker's clear connection to the Barbican area and his long and distinguished history of public service.

Contact: Paul Beckett

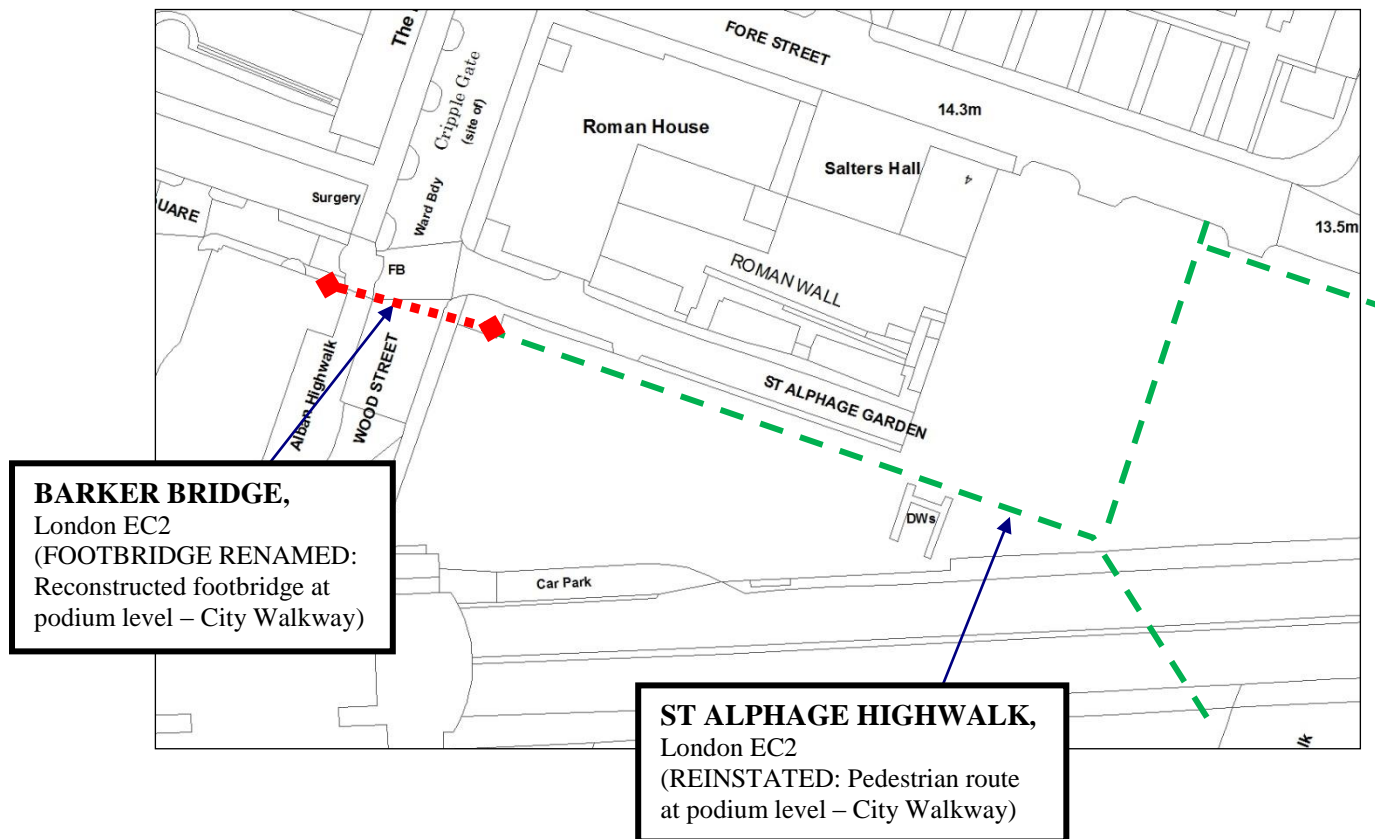
Policy and Performance Director

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Appendix 1: Drawing Reference **SXALHW1000**

Podium level site plan with new alignment of City Walkway



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Map Reference: TQ – 532387, 181623

If you require further details on this development, reference can be made on the City of London's internet site to Planning Application 10/00832/FULEIA (varied by 14/00259/FULL and 13/00464/LBC).

<http://www.planning2.cityoflondon.gov.uk/online-applications/>

The development description: Demolition of existing buildings and structures and erection of two buildings comprising an 18 storey west building and 14 storey east building providing 66,839sq.m of office (Class B1) floorspace and 2,075 sq.m of retail floorspace (Classes A1/A2/A3). Alterations to City Highwalk at Willoughby Highwalk, removal, realignment and reinstatement of Bassishaw Highwalk across London Wall, alterations to Moorfields Highwalk over Fore Street Avenue, removal, realignment and reinstatement of Alban Highwalk between Wallside/The Postern and Alban Gate and removal of Alban Gate Rotunda at London Wall and Alban Gate. Removal of stair from St Alphage podium level to St Alphage Garden and Salters Garden. Hard and soft landscaping and necessary enabling works, including alterations to and within the public highway.

Committee(s)	Dated:
Planning & Transportation	20/02/2018
Subject: City Corporation's response to consultation on the Draft London Plan, December 2017	Public
Report of: Director of the Built Environment	For Decision
Report author: Peter Shadbolt. Department of the Built Environment	

Summary

The Mayor of London has published his draft London Plan for consultation. The draft Plan seeks to implement the Mayor's election manifesto commitments and sets out detailed policies for the future development of London in the period 2019-2041. Following the consultation, the Mayor will submit the draft Plan for public examination in front of an independent Panel of inspectors. Subject to the Panel's recommendations, the Mayor intends to formally adopt (publish) the Plan in early 2019. On adoption, the draft Plan will become part of the statutory Development Plan for London alongside borough and City Corporation local plans.

The draft London Plan is intended to be very different from previous London Plans, providing a much more ambitious, detailed and prescriptive Plan that can be implemented as soon as it is adopted, rather than waiting for boroughs and the City to prepare and update local plans. There is much in the draft Plan that can be supported, including the Mayor's emphasis on Good Growth, placing improvements to the health and quality of life for Londoners at the heart of planning for the growth that London needs to continue to thrive. The draft Plan sets out strong policy support for office development within the City of London, and indicates that office and other Central Activities Zone (CAZ) strategic priorities, including cultural activities, should be given greater weight than residential development. There is also support for further development of cultural and entertainment uses, including within the Barbican/Smithfield/Farringdon area (Culture Mile), an emphasis on green and sustainable development and infrastructure, including actions to deliver improvements in air quality and the delivery of the Mayor's Healthy Streets agenda, reducing the impact of freight and servicing trips and support for consolidation of freight.

However, there are several key elements of the draft Plan that would have adverse impacts on the City of London and to which objection should be raised. In particular, the draft Plan requires external design review of development proposals over 30m in height, which would add greater complexity, cost and uncertainty to development in the City and ignores the significant experience on design matters within the City Corporation. The draft Plan also sets a target for new housing development which appears to conflict with the priority afforded to office development within the City of London elsewhere in the draft London Plan. A reduced target for new housing should

be adopted which meets the City Corporation's own local assessment of need whilst ensuring that necessary office and other commercial development can continue. The City Corporation will continue to support the delivery of new housing through its own housing estates and financial contributions towards affordable housing from commercial development within the City.

Recommendation(s)

Members are recommended to:

- Agree the key points set out in paragraphs 5 to 30 and the detailed comments on individual policies in Appendix 1, as the City Corporation's response to the draft London Plan.

Main Report

Background

1. The Mayor of London is required to prepare a range of statutory strategies, including a spatial development strategy (the London Plan) and strategies for transport, housing, environment, economic development, health and culture. In October 2016, the Mayor published for consultation a statement of ambition for the future of London and Londoners, 'A City for all Londoners'. The City Corporation's response was agreed by the Planning & Transportation Committee on 13 December 2016. Responses to the consultation have informed the subsequent development of the Mayor's strategies and the draft London Plan.

Current Position

2. In December 2017, the Mayor published his Draft London Plan for consultation. The draft Plan is available on the Mayor's website at:
<https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan>.
The draft Plan is intended to replace the existing 2016 London Plan rather than amend that Plan. It sets out the Mayor's proposed land use planning policies for the whole of London in the period up to 2041 and will form part of the Development Plan for London, alongside borough and City Corporation local plans. The draft Plan is intended to be very different from previous London Plans, providing a much more ambitious, detailed and prescriptive Plan that can be implemented as soon as it is adopted, rather than waiting for boroughs and the City to prepare and update local plans. The Plan runs to 503 pages, includes 114 policies and will be supplemented by a range of other detailed supplementary planning guidance prepared by the Mayor.
3. Following consultation on the draft Plan, the Mayor will submit the London Plan for Examination in Public in front of an independent Panel of planning inspectors appointed by the Planning Inspectorate. This Examination is expected to take place during the autumn of 2018 (possibly alongside the Examination into the Mayor's proposals for a revised Mayoral Community Infrastructure Levy). After the Examination is completed, the Panel will prepare a report to the Mayor recommending changes. The Mayor will then consider whether or not to make

these changes and then send the final Plan to the Secretary of State for consideration. Assuming the Secretary of State does not make any direction to amend the Plan, it will be laid before the London Assembly for final consideration before being published (adopted). Publication is currently anticipated early in 2019.

Proposals

4. The following paragraphs set out comments on key elements of the draft London Plan and suggested responses in italics. Appendix 1 contains more detailed comments on individual policies within the draft Plan and it is recommended that this Appendix, together with the comments below be forwarded to the Mayor as the City Corporation's formal response to the draft London Plan.

Key Points and Suggested Response

Delivering Good Growth

5. The draft Plan is intended to be different to previous London Plans, with a new overarching focus on Good Growth, defined as growth that is socially and economically inclusive and environmentally sustainable. This is expressed in 6 new Good Growth policies which provide the strategic context for the Plan and cover the creation of strong and inclusive communities, making the best use of land, creating a healthy city, delivering the homes Londoners need, growing a good economy and increasing efficiency and resilience.
6. *The Mayor's approach to, and emphasis on delivering, Good Growth should be supported. It places improvements to the health and quality of life for Londoners at the heart of planning for the growth that London needs to continue to thrive. The recognition of the importance of the Plan to the health and well-being of Londoners reflects the direction of the emerging City Corporation Corporate Plan for 2018-23 which has at its heart the role of the City Corporation in contributing to the health and well-being of City residents, workers and visitors.*

Level of Detail and Direction

7. The draft Plan is a much more detailed and prescriptive document than the current or previous London Plans. This approach reflects the Mayor's concern that past London Plans have had to rely on borough local plans for implementation, resulting in delay in implementing the Mayor's manifesto. The intention is that the new London Plan, as part of the statutory Development Plan for London, will be implemented and will influence detailed development decisions taken by boroughs from the day of adoption, rather than being reliant on the later delivery of specific guidance in borough and City local plans. Local plans are not expected to repeat the detailed guidance in the London Plan and are seen by the Mayor as being shorter, primarily local implementation documents.
8. There are a number of examples within the draft Plan of policies which include a level of detail not seen in previous strategic level plans, including:

- Policy D4: Housing quality and standards, which retains current London Plan guidance on overall space standards, but also now includes detailed standards on the sizes of bedrooms, minimum floor to ceiling heights and minimum standards for private outdoor space.
 - Policy D8: Tall buildings, which sets out very detailed design guidance, running over 3 pages.
 - Policy E9: Retail, markets and hot food takeaways, which restricts the development of hot food takeaways within 400m of a school and requires prescriptive conditions to control the quality of food on sale within permitted A5 units.
9. *Whilst there is much in the draft Plan that can be supported, in places the level of detail and prescription within policy goes beyond what would normally be expected of a strategic level plan. There is a need for the London Plan to provide a strategic framework for local policy, but it should not attempt to impose detailed requirements which do not allow for flexibility to respond to specific local circumstances or locally adopted policy. For example, it is difficult to see how a London-wide policy restricting the location of A5 hot food takeaways can be delivered in the City of London with a focus on meeting the needs of a global business centre within a small area. The overall approach in the draft Plan should be to provide strategic direction in line with the Mayor's manifesto commitments, whilst allowing for necessary and justified local variation.*

Support for the City of London's commercial role

10. Policies SD4 and SD5 provide guidance on the role and function of London's Central Activities Zone (CAZ) and appropriate development within this Zone. The City of London lies wholly within the CAZ. Policy SD4 seeks to support the internationally significant office cluster within the CAZ, as well as other CAZ strategic functions, including cultural attractions, highlighting the need for further public realm enhancement, infrastructure improvement (including the need for consolidation of freight and servicing), digital connectivity and the promotion of safety, security and resilience. Air quality is identified as a particular issue.
11. Policy SD5 identifies the City of London as an office centre of national and international significance and states that 'residential development is not appropriate in the commercial core of the City of London'. Outside of the commercial core (which is to be defined in the City of London Local Plan), draft policy indicates that other CAZ strategic functions, such as culture and entertainment, should be afforded greater weight relative to residential development. The draft Plan supports the introduction of Article 4 Directions to permanently remove permitted development rights for the change of use from offices to residential.
12. *The draft London Plan goes further than the current London Plan in supporting the national and international commercial role of the City of London and this should be strongly welcomed. This approach will provide an effective framework for the City Corporation to develop and apply local policies which ensure the continuation of the City's commercial focus. Support for measures to address freight and servicing concerns, poor air quality and resilience are also welcomed. There is, however, a concern that the strong statement of commercial priority*

within the City conflicts with other policies in the draft London Plan, specifically Policy H1 which sets a challenging housing target for the City. The requirement for an increased level of housing development could compromise the City's ability to deliver the scale of commercial, principally office, development necessary to ensure that the City of London can fulfil the strategic priority set out in Policies SD4 and SD5. The Mayor should reduce the housing target for the City to a level commensurate with the City's own estimate of housing need to ensure that the strategic priority for commercial development within the City of London can be met. The City Corporation will continue to make provision for increased housing provision London-wide, including affordable housing, through development on its own housing estates, funded in part through s106 contributions from commercial development within the City and through development on Corporation owned land elsewhere in London.

Design Review

13. The draft Plan promotes good design and provides detailed guidance for boroughs and the City on the evaluation of buildings, including promoting the use of comprehensive design tools such as 3D modelling. The draft Plan requires that boroughs and the City Corporation use independent design review panels to assess and inform design options early in the planning process. Development proposals referable to the Mayor must have undergone at least one design review before a planning application is made on tall buildings, defined at being those above 30m or any locally adopted definition.
14. *A number of elements of the Mayor's design approach can be welcomed. The draft Plan recognises the value that 3D and other modelling techniques have in contributing to the assessment of development proposals and specifically in liaising with the public. The City Corporation has for several years been a leading proponent of the potential of 3D modelling to aid the design and development process and looks forward to working closely with the Mayor and his planning team to refine this modelling and promote its wider use across the capital.*
15. *The City Corporation fundamentally objects to the blanket requirement in Policy D2 that external design review is used to assess and inform design options. This requirement would have a significant impact on development in the City of London, where most new development exceeds the 30m threshold. The requirement for design review assessment, additional to the City's in-house consideration, will add cost, complexity and uncertainty to the development process. The City Corporation has an established reputation for delivering buildings of the highest quality of design and layout, producing buildings that have been critically acclaimed and recognised through international design awards. The City Corporation has good working relationships with the numerous international architecture practices often engaged by developers to work in the City. The City Corporation's internal design input is delivered by a strong team of experienced and highly regarded officers, with experience in design, historic buildings and archaeology as well as development management. Regular liaison with the City's developers has revealed no external perception that there is a design quality issue arising from the City's advice that needs to be addressed through the proposed external process.*

16. *There are already numerous bodies consulted on design aspects of new development in the City, including the City's Conservation Area Advisory Committee, CABE/Design Council, the GLA, the Victorian Society and 20th Century Society and Historic England. There is no need to add further complexity through the introduction of an additional, and separate, design review panel.*
17. *The City Corporation fully supports the need to deliver high quality design and layout to ensure that development makes a positive contribution to London's built environment. However, the requirement for external design review to be applied across London irrespective of existing local circumstances is excessive. The City Corporation accepts that not all boroughs have the level of design resource or experience that is available within the City Corporation and that design review panels can play an important role, but London Plan policy should provide flexibility for boroughs to determine the need for design review, whilst delivering a high standard of design. Similarly the requirement that schemes referable to the Mayor must have been through external design review is excessive, unnecessary and should be deleted.*

Housing

18. *There is a strong emphasis in the new Plan on the delivery of housing, with the overall London-wide annual target for housing increasing from 42,000 to 65,000. Much of the growth is expected in outer London, in identified Opportunity Areas (all outside the City, but including the City Fringe) and through an intensification of development in and around town centres and transport nodes. The City's housing target rises from 141 per year to 146 per year. Amongst neighbouring boroughs, only Camden and Lambeth are expected to increase provision; all others see a reduction in the rate of new housing (although all remain significantly greater than the City). The Mayor has proposed the application of London-wide affordable housing targets, effectively requiring 35% provision on all eligible sites, with detailed requirements for how these are assessed and requirements for referral to, and consultation with, the Mayor.*
19. *The City Corporation supports the Mayor's ambition to see a step change in the level of new housing and affordable housing across the capital. The lack of suitable and affordable housing has been identified by many businesses and business groups as a key constraint to further economic development and investment. However, the City Corporation considers that the policy target of an additional 146 dwellings per year in the City is too high and could have a detrimental effect on the ability of the City of London to deliver economic and employment growth as required by draft London Plan policies SD4 and SD5.*
20. *The City Corporation is reviewing its own local plan and has undertaken a Strategic Housing Market Assessment (SHMA) to identify the level of housing need in the City over the period 2014-2036. This assessment indicates a need to deliver an additional 126 dwellings per year. In September 2017, the Government published a consultation paper 'Planning for the Right Homes in the Right Places', which set out an indicative housing need target for each local planning authority in the country, based on a proposed new national*

methodology. The new methodology suggested that the level of housing need in the City between 2016 and 2026 was 120 dwellings per annum.

21. *In light of the policy priority in the draft London Plan for office and commercial development in the City of London in place of residential, the lower assessments of housing need for the City established through the national methodology and the City's own SHMA, the City Corporation considers that the housing target in Policy H1 for the City of London should be reduced to a level of 126 dwellings per year. The City Corporation will continue to support the delivery of new housing and affordable housing on its own housing estates and other land holdings across London, seeking an appropriate level of contribution to affordable housing from new commercial development within the City.*

Culture

22. The draft London Plan promotes and supports cultural areas and cultural development, encouraging creative activity, pop-up events, the growth of the night time economy and the protection of pubs. Cultural activity is seen as a strategic function of the CAZ. Illustrative diagrams identify the Culture Mile area and recognise the strategic importance of cultural activity in the Barbican, Smithfield, Farringdon area.
23. *Although not specifically referring to Culture Mile, the Plan gives clear support to the City's Culture Mile ambitions and the importance of culture in creating an internationally attractive City. These elements of the Plan can be supported.*

Green and Sustainable Infrastructure

24. In line with the aim of delivering good growth, the draft Plan seeks to enhance the greening of London, requiring new development to comply with a London-wide greening assessment – the Urban Greening Factor. There is a greater focus on improved air quality in London, requiring development to be air quality neutral, and air quality positive in specific areas (including Upper and Lower Thames Street).
25. The draft Plan seeks to minimise carbon emissions, and work towards achieving the Mayor's aim of a zero carbon city by 2050. New commercial development will be required to be zero carbon in both construction and operation from 2019.
26. *The emphasis on greening, sustainable development, air quality improvements and reducing carbon emissions can be supported in principle. They accord with the direction of the City Corporation's Future City agenda, corporate measures to improve air quality across the City and policy direction in the emerging City of London Local Plan, which will be brought to this Committee for approval later in 2018. Additional greening and zero carbon requirements will have an impact on development costs and the Mayor will need to carefully consider whether the cumulative impact of these additional costs, alongside other policy requirements in the draft Plan and the proposed Mayoral Community Infrastructure Levy 2, will have an adverse impact on development viability. Sufficient flexibility needs to be built into draft policies to recognise the potential impact on viability at the individual building level.*

Transport

27. The draft Plan's transport policies seek to implement the Mayor's Transport Strategy which was the subject of public consultation during 2017. Policies promote the concept of Healthy Streets and seek improvements to strategic transport infrastructure, including Crossrail 2, and improvements to the Tube. There is greater emphasis than in previous plans on cycling and walking, with higher cycle parking standards (1 space per 75 sqm of office space, compared with the current 1 per 90 sqm). There is support for out of hours servicing and for consolidation of servicing, with policies encouraging the use of Strategic Industrial Land across London for consolidation. The Plan repeats the Mayor's opposition to expansion at Heathrow unless it can be shown not to have additional air quality or noise effects.
28. *The City Corporation should support the Mayor's approach to transport, which seeks to rebalance the transport system towards walking, cycling and public transport, and to implement the Mayor's Transport Strategy. The identification and safeguarding of new sites and route alignments for priority transport investment can also be supported. The Mayor should, however, consider whether there is a need to extend this safeguarding to ensure that opportunities for development, can be realised in appropriate locations alongside routes and transport nodes, to support the business case underpinning major new transport investment proposals, such as Crossrail 2.*
29. *The Mayor's ambition to increase cycling and walking across London is also supported, including the provision of suitable levels of cycle parking within new development for both long stay and short stay visitors. However, there should be flexibility in the way that cycle parking standards are applied to reflect locally specific or building specific constraints and where a robust and evidenced case for variation in standards has been made. The higher cycle parking standard of 1 space per 75 sqm for office floorspace could be challenging in the City given site constraints and the amount of floorspace created, particularly within office towers in the east of the City.*
30. *The Mayor's support for changes to freight and servicing and for off-site consolidation should particularly supported. As set out elsewhere in the draft Plan, consolidation of freight and servicing in the CAZ, in particular, will be essential to deliver the growth necessary to maintain London's world city role.*

Corporate & Strategic Implications

31. The London Plan forms part of the Development Plan for the City of London, alongside the City Corporation's Local Plan. The City Local Plan is required to be in general conformity with the London Plan. The Mayor's proposed approach accords with the Local Plan's emphasis on maintaining the City as an office centre of national and international importance, and with wider City Corporation ambitions to deliver Culture Mile, reduce the impact of freight and servicing vehicles, deliver urban greening and air quality improvements, as set out in the draft Corporate Plan 2018-23 and the Department of the Built Environment's Business Plan.

Implications

32. There are no financial or legal implications arising out of the consultation on the draft London Plan. There may be implications, for example through the creation and management of design review panels, if the Plan were adopted as currently drafted. Through setting out the City Corporation's concerns on the draft Plan and continued liaison with the Mayor and his officers as the Plan develops, these potential implications can be mitigated.

Health Implications

33. There are no health implications arising from this report.

Conclusion

34. The Mayor of London has published his draft London Plan for consultation. The draft Plan sets out the Mayor's proposed land use planning policies for the whole of London in the period up to 2041 and will form part of the Development Plan for London, alongside borough and City Corporation local plans. The draft Plan is intended to be very different from previous London Plans, providing a much more ambitious, detailed and prescriptive Plan.
35. There is much in the draft Plan that can be supported:
- The emphasis on Good Growth and placing improvements to the health and quality of life for Londoners at the heart of planning for the growth that London needs to continue to thrive.
 - Strong policy support for office development within the City of London, as part of the CAZ, and an indication that office and other CAZ strategic priorities, including cultural activities, should be given greater weight than residential development.
 - Support for further development of cultural and entertainment uses, including within the Barbican/Smithfield/Farringdon area (Culture Mile).
 - An emphasis on green and sustainable development and infrastructure, including actions to deliver improvements in air quality.
 - The delivery of the Mayor's Healthy Streets agenda, reducing the impact of freight and servicing trips and support for consolidation of freight.
36. However, elements of the draft Plan would have adverse impacts on the City of London and concern or objection should be expressed, including:
- Concern that a number of policies in the draft Plan contain an inappropriate level of detail for a strategic plan.
 - The requirement for external design review of development proposals over 30m in height, which would add greater complexity, cost and uncertainty to development in the City and ignores the significant experience on design matters within the City Corporation.
 - A level of housing growth above the level of locally assessed housing need, which would appear to conflict with the draft Plan's strong emphasis on the role of the City of London as an office centre of national and international importance.

Appendices

- Appendix 1 – City of London Corporation comments on the draft London Plan.

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CONSULTATION ON DRAFT LONDON PLAN, DECEMBER 2017 – CITY CORPORATION RESPONSE	
	CITY CORPORATION KEY COMMENTS
	<p>The City Corporation welcomes the opportunity to comment on the Draft London Plan. The Corporation considers that there is much in the draft Plan that can be supported:</p> <ul style="list-style-type: none"> • The emphasis on Good Growth and placing improvements to the health and quality of life for Londoners at the heart of planning for the growth that London needs to continue to thrive. • Strong policy support for office development within the City of London, as part of the CAZ, and an indication that office and other CAZ strategic priorities, including cultural activities, should be given greater weight than residential development. • Support for further development of cultural and entertainment uses, including within the Barbican/Smithfield/Farringdon area (Culture Mile). • An emphasis on green and sustainable development and infrastructure, including actions to deliver improvements in air quality. • The delivery of the Mayor's Healthy Streets agenda, reducing the impact of freight and servicing trips and support for consolidation of freight. <p>However, elements of the draft Plan would have adverse impacts on the City of London and the City Corporation highlights the following areas of particular concern:</p> <ul style="list-style-type: none"> • A number of policies in the draft Plan contain an inappropriate level of detail for a strategic plan. • The requirement for external design review of development proposals over 30m in height, would add greater complexity, cost and uncertainty to development in the City and ignores the significant experience on design matters within the City Corporation. • The level of housing growth proposed for the City is above the level of locally assessed housing need, and would appear to conflict with the draft Plan's strong emphasis on the role of the City of London as an office centre of national and international importance.
CHAPTER 1: PLANNING LONDON'S FUTURE (GOOD GROWTH POLICIES)	
LONDON PLAN POLICY	CITY CORPORATION COMMENT
Chapter 1 – General Comments	<p>The City Corporation welcomes and supports the Mayor's emphasis on Good Growth within the London Plan. This places measure to improve the health and quality of life for Londoners at the heart of the plan, allowing it to address cross-cutting issues, rather than a more traditional approach which identifies policies for particular land uses to the detriment of quality of life issues. The strategic approach to these policies is an appropriate response within a London-wide plan, leaving greater scope for boroughs and the City to address locally specific issues at the Local Plan level.</p>

GG1: Building strong and inclusive communities	The City Corporation welcomes the enhanced emphasis on inclusivity. There could be more emphasis on ensuring economic inclusivity, recognising the importance of arts and culture in creating strong and inclusive communities, for example ensuring that all members of society regardless of means feel welcome and can access services, entertainment, culture and heritage, allowing all the public to benefit from London's amenities.
GG2: Making the best use of land	<p>The City Corporation supports the overall approach, but considers that specific reference could also be included to making the best use of land within the CAZ to support the wider CAZ strategic functions, including office development.</p> <p>Recognition of the importance of land used for small scale commercial enterprises and light industrial uses would be beneficial within this policy. Businesses, employers and cultural institutions in the City, such as the Barbican, are reliant on the services of a wide range of small commercial enterprises and suppliers based in the capital, with this kind of industrial space increasingly under threat.</p> <p>Paragraph D, suggest changing "promote the creation of" to "deliver" "new green infrastructure and urban greening". The Plan should ensure that all development delivers on urban greening, whether it be major development, a new building or a roof terrace. The policy should also include reference to the need to provide additional high quality public space and more space for pedestrians and cyclists to support the growing population.</p>
GG3: Creating a healthy city	The City Corporation welcomes the consideration of creating a healthy city and the underlying Policy. The Corporation suggests that this approach is co-ordinated with an emphasis on treating public health funding on a par with other clinical funding within London NHS budgets. The Policy should also be extended to include visitors and workers within London as these constituents are not mentioned within the policy and are critical to London's economic, social and physical wellbeing.
GG5: Growing a good economy	<p>The City Corporation supports this policy, but considers that it should also include specific provision recognising the strategic importance of the CAZ to London's economy.</p> <p>Paragraph F, welcome the explicit connection between heritage and cultural assets and good economic growth. This could be strengthened to state that development should ensure and strengthen the contribution of London's rich heritage and cultural assets to the global brand and economic growth. The justification should recognise that heritage and culture is good for business, bring visitors, leisure opportunities, enhanced wellbeing. It should state that new development should deliver inclusive public access to London's heritage and cultural assets so that all feel part of London's growth.</p>

	Paragraph F, as well as promoting and supporting London's cultural assets, should also reference plans to expand and develop these assets.
CHAPTER 2: SPATIAL DEVELOPMENT PATTERNS	
LONDON PLAN POLICY	CITY CORPORATION COMMENT
SD1: Opportunity Areas	There are no Opportunity Areas within the City, but the City Fringe/Tech City OA adjoins the City's eastern boundary. The City Corporation supports the emphasis within the policy on accommodating suitable employment and housing growth within the OAs, subject to the provision of necessary infrastructure to support that growth.
SD2: Collaboration in the Wider South East	The City Corporation strongly supports the Mayor's commitment to continued and wider collaboration on key issues and shared challenges between London authorities and those in the Wider South East, recognising that London is part of an extensive and complex network of centres.
SD4: The Central Activities Zone (CAZ)	<p>The City Corporation welcomes and strongly supports the Mayor's approach to planning in the Central Activities Zone, and the City of London. The City Corporation welcomes the acknowledgement and strong policy support for the internationally significant office cluster in the CAZ and the need to plan for sufficient office space to meet demand. The recognition of the need for public realm enhancement, infrastructure improvements (including the need for consolidation for freight and servicing), digital connectivity and the need to promote safety, security and resilience are all supported. Greater emphasis could be given to ensuring the CAZ contributes to broader inclusivity, so that its offer and amenities ensure all sections of society benefit.</p> <p>The Policy recognises that practical measures should be taken to improve air quality in the CAZ, including an air quality positive approach, where possible. This recognition is welcomed and the City Corporation looks forward to working closely with the Mayor and TfL to develop and implement practical and innovative measures to address air quality issues within the City of London and the wider CAZ, building for example on the City's Low Emission Neighbourhood designation.</p> <p>The City Corporation also supports recognition of the wider role and function of the CAZ and the increasingly important role that other strategic functions play in ensuring that London remains a leading world city, including recognition of the role of culture, arts and entertainment, and the specific mention in the explanatory memorandum of the arts, culture and creative cluster at Barbican/Smithfield/Farringdon. The City Corporation is working closely with arts and cultural organisations to further enhance this cluster through the Culture Mile initiative, including the provision of a new location for the Museum of London and a Centre for Music. Given the London-wide (and wider) importance of these institutions, along with the Barbican, it would be helpful if the London Plan could specifically identify the Culture Mile ambition alongside the illustrative depiction of Culture Mile in Figure 2.16.</p>

	<p>The Plan should also consider the interaction between the various clusters within the CAZ rather than viewing them in isolation e.g. current and potential relationships between arts/cultural and tech and/or research clusters which are often in neighbouring areas e.g. proximity of Barbican and Tech City. The Plan could also recognise how cultural clusters often support and sustain retail clusters by attracting audiences/visitors.</p> <p>The City Corporation welcomes the statement in paragraph M that sufficient capacity for industry and logistics should be identified and protected, including last mile distribution, freight consolidation and other related service functions, within or close to the CAZ, to support the needs of businesses and activities located within it. Many businesses in the City rely on ‘just in time’ servicing and logistical arrangements, and their operational efficiency would be compromised if the further loss of industrial land within inner London led to longer journey times for essential services such as office supplies, repair and maintenance, waste management and recycling.</p> <p>Paragraph (C) could be strengthened to state that the often unique heritage and cultural assets of the CAZ are to be sustained and enhanced, with improved access and interpretation of them for all Londoner’s to enjoy. This is considered central to the objective of Good Growth.</p> <p>Paragraph (F) should go further and encourage retail as part of mixed-used development throughout the CAZ.</p>
SD5: Offices, other strategic functions and residential development in the CAZ	<p>The City Corporation strongly supports the emphasis on the role of the City of London as an office centre of national and international importance. The statement that ‘residential development is not appropriate in the commercial core of the City of London’ is welcomed, together with the indication that outside of this core, other CAZ strategic functions (such as culture and entertainment) should be given greater weight relative to residential development. The policy provides a strong foundation and support for the long-standing approach in the City of London Local Plan which gives priority to office and commercial development within the City of London. The City Corporation also welcomes the continued support within the Plan for off-site contributions, land use swaps and credits in lieu of mixed-use development in the CAZ in order to sustain the strategically important cluster of commercial activity in the City.</p> <p>The City Corporation welcomes the Mayor’s support for the introduction of Article 4 Directions within the CAZ to permanently remove office to residential permitted development rights. The City Corporation is introducing a non-immediate Article 4 Direction to come into effect on 31 May 2019.</p> <p>There is, however, a concern that the strong statement of commercial priority within the City conflicts with other policies in the draft London Plan, specifically Policy H1 which sets a challenging housing target for the City. The City</p>

	Corporation is concerned that the requirement for a higher level of housing development could compromise the City's ability to deliver the scale of commercial, principally office, development necessary to ensure that the City of London can fulfil the strategic priority set out in Policies SD4 and SD5. The Mayor should reduce the housing target for the City to a level commensurate with the City's own estimate of housing need to ensure that the strategic priority for commercial development within the City of London can be met. The City Corporation will continue to make provision for increased housing provision London-wide, including affordable housing, through development on its own housing estates and through development on Corporation owned land elsewhere in London.
SD6: Town centres	The Mayor should clarify that redevelopment and intensification of town centres to deliver additional housing should not apply in the CAZ Retail Clusters within the City of London, where the priority (in line with policies SD4 and SD5) should be on the delivery of commercial development to sustain the strategically important role of the CAZ.
SD7: Town centre network	The City Corporation welcomes the continued identification of the City of London's Principal Shopping Centres as CAZ Retail Clusters. Policy SD7 indicates that the classification of town centres at the upper end of the London hierarchy can only be changed through the London Plan, whereas changes to District, Local and Neighbourhood centres can be brought forward through Local Plans where supported by local evidence. There is no mention, however, of changes to the CAZ Retail Clusters. The City Corporation is currently examining the need for amendments to the network of PSCs in the City through the Local Plan Review and the London Plan should recognise the potential for alterations where justified by local circumstances.
SD8: Town centres: development principles and Development Plan Documents	The policy outlines a sequential approach to retail development across London, which accords with national guidance as set out in the NPPF. It sets detailed guidance on what is expected in borough Local Plans in relation to retail, including definition of town centres on policy maps. The City Corporation has no objection to the overall approach to retail development, but it does seem to relate principally to larger, more traditional town centres, and is less applicable to the CAZ retail clusters in the City of London which are narrower in extent and focussed on retail frontages. London Plan policy should be sufficiently flexible to respond to changes in the extent and designation of centres through Local Plans.
CHAPTER 3: DESIGN	
LONDON PLAN POLICY	CITY CORPORATION COMMENT
D1: London's form and characteristics	<p>Paragraph B (4), there could be reference to improving public access to heritage assets.</p> <p>The City Corporation welcomes the importance placed on comfortable pedestrian environment (sunlight, shade, wind, air pollution, noise and shelter) in para 3.1.2. These factors should be key in informing new development design, in the main part of the policy.</p>

	<p>Welcome maximizing urban greening but more emphasis should be placed on the need to integrate urban greening in the key early stages of design development of schemes as opposed to retrofitting late on.</p>
D2: Delivering good design	<p>The City Corporation supports the emphasis on incorporating good design principles into development plans and strategies and in assessing development proposals.</p> <p>It is suggested that Paragraph A (4) should include pedestrian flows and stress areas and Paragraph A (5) should include wind patterns and intensity and sunlight levels to ground.</p> <p>The reference in paragraph C to the use of modelling assessments, including 3D and visual assessments, is welcomed. The City Corporation has for several years been a leading proponent of the potential of 3D modelling to aid the design and development process and looks forward to working closely with the Mayor and his planning team to refine this modelling and promote its wider use across the capital.</p> <p>The City Corporation supports the requirement for development proposals to include design and access statements to demonstrate how a proposal meets the requirements of the development plan.</p> <p>The City Corporation objects to the requirement in Policy D2 for boroughs to make use of external design review processes to assess and inform design options early in the planning process. This requirement would have a significant impact on development in the City of London, with most new development exceeding the 30m threshold and having to undergo additional assessment to the City's own consideration, adding additional cost, complexity and uncertainty to the development process. The City Corporation has an established reputation for delivering buildings of a high quality of design and layout, producing buildings that have been critically acclaimed and recognised through international design awards, and has good working relationships with the numerous international architecture practices often engaged by developers to work in the City. The City Corporation's design input is delivered by a strong team of experienced and highly regarded officers, with experience in design, historic buildings, archaeology as well as development management. Regular liaison with the City's developers has revealed no external perception that there is a design quality issue arising from the City's advice that needs to be addressed through the proposed external process.</p> <p>There are already numerous design review bodies and statutory consultees who provide advice on aspects of design in the City, including the City's Conservation Area Advisory Committee, CABD/Design Council, the GLA, the Victorian Society and 20th Century Society and Historic England. There is no need to add further complexity through the introduction of an additional, and separate, design review panel.</p>

	<p>The City Corporation fully supports the need to deliver high quality design and layout to ensure that development makes a positive contribution to London's built environment. However, the requirement for external design review to be applied across London irrespective of existing local circumstances is excessive. The City Corporation accepts that not all boroughs have the level of design resource available within the City Corporation and that design review panels can play an important role, but London Plan policy should provide flexibility for boroughs to determine the need for design review, whilst delivering a high standard of design. Policy D2 (F & G) should be amended to encourage the use of external design where a local authority considers it will make a positive contribution, but it should not be a requirement on all local planning authorities. Similarly the requirement that schemes referable to the Mayor should have been through external design review is excessive, unnecessary and should be deleted.</p> <p>Explanatory Memorandum paragraph 3.2.10: "Securing the design team's ongoing involvement" is very welcomed. The issue of original architects being dismissed post consent is becoming commonplace in London and is of increasing concern to London planning Departments. There is the question about how this could be secured in practice.</p>
D3: Inclusive design	<p>The City Corporation strongly supports the requirement for inclusive design across all development in London. However, the concept of "Inclusive City" also covers economic and social inclusivity. This policy ought to ensure that the design of developments is economically inclusive as possible (e.g. social housing entrance at the rear adjoining the bin store whereas the market housing entrance is on the principal façade; parity of access to the roof level free public viewing gallery when compared with a high-end restaurant at roof level; ensuring that the design is inclusive to all members of the community including children, families and the elderly). These key issues and the wider definition contained in paragraph 3.3.1 should be included in the main Policy text not just in the explanatory text.</p> <p>The requirement for at least 1 fire evacuation lift suitable for use by those requiring level access from the building goes beyond the responsibilities and powers of the local planning authority and is a matter that will be dealt with through building control (either local authority or approved inspectors). The local planning authority can encourage the provision of such facilities, and can encourage the submission of information demonstrating how fire safety issues will be addressed within a development, but cannot determine an application on the basis of whether a proposal meets or does not meet building regulations, or enforce the provision of equipment/designs required by building regulations. Policy D3 should continue to encourage the provision of information to demonstrate how the development will provide level access via fire evacuation lifts and encourage liaison</p>

	between local planning authorities and building regulations, but it cannot require.
D4: Housing quality and standards	<p>The City Corporation supports the provision of strategic guidance in the London Plan on the need for high quality housing development. However, Policy D4 includes very detailed standards for private internal space and outside space which will apply to new residential development. Previous London Plans included guidance on minimum space standards but did not provide the same level of detailed policy guidance as in the current draft Plan. This level of detail precludes local interpretations and application, for example the potential to deliver required standards within designated heritage assets or the ability to deliver private outdoor space within densely developed areas of central London such as the City of London. Policy D4 should provide strategic direction on housing quality and standards with suggested space standards set out in supplementary documents rather than being included within policy.</p> <p>Guidance on the need to consider standards for noise in residential development and signposting to relevant detailed guidance, or cross reference to Policy D13, would be helpful.</p>
D7: Public realm	<p>The City Corporation welcomes the strong emphasis on delivering a public realm which can accommodate for a myriad of functions: sustainable transport movement (walking and cycling), vibrant use, urban greening and public art and open events. However, in particular in the CAZ, it should recognise that accommodating servicing is essential to allowing a place to function and is an increasing conflict with this agenda. It is suggested that the policy tackles servicing requiring:</p> <ul style="list-style-type: none"> • Requirement for off-street servicing where practicable; • Single access off-street servicing where possible as part of the re-development of larger sites; • Need for servicing agreements to ensure conflict with the public realm is minimised; and • A requirement to minimise servicing entrance and for them to be designed in a manner which is attractive. <p>The City Corporation's pedestrian modelling suggests the City of London's essentially Medieval and Victorian street network and public realm is under significant stress, both at present and in the future with projected significant employment and population growth. It is suggested that the policy should recognise as essential that new development delivers new public realm and an improvement in the quality of the public realm to absorb the additional numbers whilst creating a public realm which is vital, comfortable and safe, allowing for active frontage, space for rest and relaxation and urban greening. Measures such as the reallocation of space from vehicles to pedestrians and cyclists should be considered.</p> <p>Welcome, at paragraph 3.7.1, that the definition of the public realm is extended to "some internal or elevated spaces, such as shopping malls, sky gardens, viewing platforms, museums or station concourses. The recognition</p>

	<p>that such forms of public realm are particularly important in areas of higher density is also welcomed.</p> <p>In this context, the City Corporation considers that the main body of the text should include a more radical policy requiring the creation of both ground and elevated public realm to accommodate a sufficient public realm, making explicitly reference to upper floor galleries, viewing platforms, sky gardens from which wider views and a greater appreciation of London can be made, making people feel part of the City, creating a more inclusive environment.</p> <p>In Paragraph A, it is suggested that this could make reference to the public realm containing historic interpretation should allow people to engage with deep layers of London history.</p> <p>Policies D7 and SI1 (Improving Air Quality) advise that design solutions can improve air quality in open spaces and the public realm, however there appears to be no further text in the Plan which indicates how this could be achieved. Further emphasis and guidance on this issue would be useful as many spaces are designed to minimise maintenance costs and/or look attractive but do not include design measures to reduce exposure to air (and noise) pollution.</p>
D8: Tall buildings	<p>The requirement for a plan-led approach to the location of tall buildings is supported, as is the Mayor's intention to provide guidance on the design, construction, use and servicing of tall buildings and requirements for assessing the environmental impacts. However, the level of detail and guidance within the policy is excessive for a strategic document and should be left to local determination through detailed policies in local plans, which can better reflect local circumstances.</p> <p>Paragraph D which requires the inclusion of publicly accessible areas within tall buildings is welcomed, although it should be amended to clarify that such areas should be free to enter and should normally be located at the top of the building to afford wider views across London. High level viewing platforms and uses are a much more meaningful in allowing the wider public to appreciate the elevated views which is a major public benefit given the substantial impact of tall buildings on the skyline. This would place London at the forefront of World Cities in delivering truly inclusive tall buildings which benefits the wider public.</p> <p>Welcome paragraph 3.8.4 which states that publicly accessible upper floors in tall buildings should be freely accessible and considered as public realm.</p>
D10: Safety, security and resilience to emergency	<p>Guidance on safety, security and resilience is welcomed, as is the specific reference to the need to liaise with the City of London Police. Paragraph B requires that security measures be integrated into the development and the wider area. The City Corporation considers that the emphasis should be on delivering building-related security measures within the building itself, but that developers should also contribute to the design and delivery of area-</p>

	wide security measures and on-street hostile vehicle mitigation, where appropriate and identified within Local Plans.
D11: Fire safety	<p>The City Corporation understands the rationale for the inclusion of a policy on fire safety and the need to ensure that new buildings, particularly tall buildings, are designed to achieve the highest standards of fire safety. However, ensuring fire safety is not deliverable through the planning system. Fire safety provisions in new buildings are set out in Building Regulations and administered and delivered through the Building Control service (either local authority building control or approved inspectors). Building control professionals have expertise and information that makes them better placed to assess fire safety than planners. At planning permission stage there is rarely enough information in the application and submitted plans to make informed decisions on planning conditions regarding fire safety. Over many years, Government has repeatedly emphasised that consenting regimes (such as planning and building control), should avoid overlap wherever possible.</p> <p>Policy D11 should concentrate on those matters which fall directly within the remit of the local planning authority, such as ensuring that access to a building meets the requirements of the emergency services. Although the planning system can encourage designs which deliver the highest standards of fire safety and the submission of information demonstrating how fire safety issues will be addressed within a development (through a Fire Safety Statement), it cannot determine an application on the basis of whether a proposal has provided an appropriate Fire Safety Statement, meets or does not meet building regulations, or enforce the provision of equipment/designs required by building regulations.</p>
D12: Agent of change	This is a new policy which places the responsibility for mitigating the impacts from noise generating activities or uses on the proposed noise-generating development. It also seeks to ensure that established noise generating venues remain viable and do not have unreasonable restrictions placed on them as a result of new noise sensitive development nearby. The overall approach is supported.
D13: Noise	The City Corporation welcomes the inclusion of the specific mention of soundscapes within the policy. Soundscape should be identified as a design principle to be considered at the initial design stage of development proposals to enhance the wider environment of London.
CHAPTER 4: HOUSING	
LONDON PLAN POLICY	CITY CORPORATION COMMENT
H1: Increasing housing supply	The City Corporation supports the Mayor's ambition to see a step change in the level of new housing and affordable housing across the capital. The lack of suitable and affordable housing has been identified by many businesses and business groups as a key constraint to further economic development and investment. However, the City Corporation considers that the policy target of an additional 146 dwellings per year in the City is excessive and could have a detrimental effect on the ability of the City of London to deliver economic and employment

	<p>growth as required by other policies in the draft London Plan.</p> <p>Draft London Plan policies SD4 and SD5 indicate that ‘residential development is not appropriate in the commercial core of the City of London’ and ‘offices and other CAZ strategic functions are to be given greater weight relative to new residential development in other core commercial areas of the CAZ, including other parts of the City of London’. These policies give a clear indication of the important commercial role of the City and the priority that should be given to delivering commercial, particularly office, development in the City in preference to residential. In this context, the housing delivery target in policy H1 is excessive, could undermine the Mayor’s policies for the CAZ and cause harm to the beneficial agglomeration of world leading businesses in the City.</p> <p>The City Corporation is reviewing its own local plan and has undertaken a Strategic Housing Market Assessment to identify the level of housing need in the City over the period 2014-2036. This assessment indicates a need to deliver an additional 126 dwellings per year. In September 2017, Government published a consultation paper ‘Planning for the Right Homes in the Right Places’, which set out an indicative housing need target for each local planning authority in the country, based on a proposed new national methodology. The new methodology suggested that the level of housing need in the City between 2016 and 2026 was 120 dwellings per annum.</p> <p>In light of the policy priority in the draft London Plan for office and commercial development in the City of London in place of residential, the significantly lower assessments of housing need for the City established through the national methodology and the City’s own SHMA, the City Corporation considers that the housing target in Policy H1 for the City of London is too high and should be reduced to a level of 126 dwellings per annum. This reduction is not considered to be strategically significant in terms of total housing delivery across London, but it would help the City of London perform its strategically significant commercial role. The City Corporation will continue to support the delivery of new housing and affordable housing on its own housing estates and other land holdings across London, seeking an appropriate level of contribution to affordable housing from new commercial development within the City.</p>
H2: Small sites	<p>Policy H2 sets out borough level targets for housing development on small sites (under 0.25ha and under 25 homes). For the City of London a target of 74 dwellings per annum on small sites is given. The Mayor’s Strategic Housing Land Availability Assessment sets out the methodology used to identify small site targets and considers 3 approaches – one based on 8 year trends, one based on 12 year trends and a modelled approach which reflects the intensification of development to deliver increased housing across London. The SHLAA (para 6.7) indicates that this modelled approach has been adopted in setting borough level small site targets in the Plan. For the City, however, it appears that the target has been set in relation to the 8 year trend of 74 units pa rather than the</p>

	<p>modelled figure of 71pa or the longer term trend of 63pa. Given the policy emphasis in the Plan that residential development is inappropriate or not a policy priority in the City, it seems perverse to identify a small site target for the City which is greater than that suggested by the modelling which has been used to determine the small site target for the majority of London boroughs.</p> <p>In addition, policy H2 establishes a presumption in favour of small site development in a number of circumstances and requires that boroughs prepare area-wide design codes to positively encourage and promote housing development. A number of exemptions are identified to the presumption in favour of small housing developments, but these do not include the draft London Plan policy priority given to office and other CAZ strategic functions in the City. The policy should be amended to exempt the City of London from the presumption in light of the requirements elsewhere in policies SD4 and SD5.</p>
H3: Monitoring housing targets	The City Corporation welcomes the recognition that non-self contained accommodation for students should count, in part, towards meeting housing targets. H3 indicates a similar approach for shared living schemes. Shared living addresses a different and often less transient sector of the market and the contribution to housing target should be on a one to one basis.
H5: Delivering affordable housing	The emphasis in Policy H5 on the delivery of on-site affordable housing reflects national guidance. Although there is reference to off-site provision or cash in lieu in exceptional circumstances, the City Corporation considers that there should be a greater flexibility over the use of off-site contributions where the London Plan has set other strategic land use priorities, particularly within much of the City of London where draft London Plan policy indicates that residential development is inappropriate.
H6: Threshold approach to applications	Policy H6 provides policy backing for the threshold approach to affordable housing and viability set out in the Mayor's SPG published in 2017. The principle of the policy, setting an affordable housing target and indicating that applications which meet and exceed this threshold will not require viability appraisal, is supported. However, the policy sets a viability appraisal threshold of 35%, which becomes an effective minimum affordable housing requirement for new housing development across London. No account is taken of existing local plan requirements or local evidence of need within individual boroughs. Whilst the City Corporation supports the thrust to increase the level of affordable housing and the inclusion of a strategic target, the London Plan should not set targets for individual boroughs; these should be determined locally in light of local assessments of housing need.
H7: Affordable housing tenure	Policy sets out a London-wide tenure split that should apply to all affordable housing across London. Although the split is informed by the London-wide SHMA, it does not reflect local housing needs and affordable housing tenure requirements at a local, borough level. For example, the City of London SHMA indicates a need within the City for an affordable housing tenure split of 88% social rented and 12 intermediate. The London Plan should enable tenure requirements to be set locally in light of local evidence of need.

H9: Vacant building credit	The policy sets out a London-wide justification for limited application of the vacant building credit in relation to housing, which accords with the approach taken in the City of London. It would be helpful, however, if the policy clarified that the approach to the vacant building credit is also applicable to commercial development.
H10: Redevelopment of existing housing and estate regeneration	The policy approach to estate regeneration is supported, but in concentrating only on tenant rent levels the policy ignores other costs incurred by residents, particularly service charges. Policy H10 should be amended to require that housing replaced through estate regeneration is provided to existing tenants at an equivalent total cost to that currently being incurred, including rent and service charges, in order that it can remain affordable to existing tenants.
H12: Housing size mix	Policy provides detailed guidance on housing size mix, based on the results of the London 2017 SHMA. Although it acknowledges that decision makers should have regard to local evidence, where relevant, the guidance reflects London-wide requirements and offers little flexibility to reflect local evidence of need. The policy needs to give greater weight to the determination of housing size mix in light of local evidence of need.
H15: Specialist older persons housing	Policy requires provision of specialist older persons housing and the plans sets out indicative benchmarks for this provision by borough, with a requirement in the City for 10 units per annum. The City Corporation welcomes the inclusion of separate policy guidance on older persons housing, but the determination of the level of need and setting of targets should be a borough/City responsibility, based on local rather than strategic evidence. For example, the strategically assessed need for older persons housing in the City is 10 dwellings per year, whilst the City Corporation's SHMA indicated a need for 3 dwellings per year.
H18: Large-scale purpose-built shared living	The City Corporation welcomes the policy guidance on shared housing, but the requirement for affordable housing should be determined locally in light of local evidence, rather than having to comply with the London-wide 35% requirement.
CHAPTER 5: SOCIAL INFRASTRUCTURE	
LONDON PLAN POLICY	CITY CORPORATION COMMENT
S1: Developing London's social infrastructure	Sky gardens and upper floor viewing galleries should be recognised as an essential piece of social infrastructure for the City as a whole and also for the resident, working and visitor community which define the City.
S4: Play and informal recreation	<p>The City Corporation supports the emphasis on the provision of play and informal recreation and the requirement to consider this through local plans, but it should be a matter for local determination whether there is a need for a separate strategy on play and information recreation facilities.</p> <p>Not all sites or developments will be able to provide on-site facilities for play and informal recreation of the scale sought in the policy. Provision should be made for these facilities to be provided on alternative sites in the locality or through payments in lieu to the local planning authority to fund provision of facilities within a reasonable distance of the principal development.</p>

S6: Public toilets	The City Corporation welcomes the approach to the provision of publicly accessible toilets within large scale development and the encouragement for the provision of 'Changing Places' toilets. As the Plan indicates, public toilets are a vital facility and are particularly important for many groups. As well as encouraging the provision of facilities in new development, the Policy could usefully provide encouragement to the extension of the community toilet scheme across London, which provides public access to otherwise private facilities.
S7: Burial space	The policy or supporting text should recognise the significance of historic burial grounds and churchyards, their cultural interest and biodiversity role and potential.
CHAPTER 6: ECONOMY	
LONDON PLAN POLICY	CITY CORPORATION COMMENT
E1: Offices	The City Corporation welcomes Policy E1 which supports and promotes office growth across London and specifically recognises that unique agglomeration and dynamic clusters of world class business in the CAZ. Reference to the need to progress Article 4 Directions to remove office to residential permitted development rights is also supported, and is being progressed by the City Corporation in the form of a non-immediate Article 4 Direction to come into effect at the end of May 2019.
E2: Low-cost business space	The City Corporation supports the aim to deliver low cost business space suitable for SMEs, start-ups and other small and growing companies. The analysis underpinning this approach reflects evidence prepared by the City Corporation in March 2016 (Clusters and Connectivity: The City as a Place for SMEs). In taking this policy forward, rather than seeking suitable low cost and flexible space on larger office developments over 2,500 sq m, the policy should instead require that all new office development be designed to be flexible and adaptable to meet the needs of a wide range of businesses and occupiers, including the needs of start-ups and SMEs.
E3: Affordable workspace	<p>The City Corporation supports the aim of ensuring the provision of affordable workspace and the requirement that this be considered and delivered at the local level through Local Plans. Affordable workspace requirements will vary considerably across the capital, and it is not appropriate for the strategic London Plan to impose a definition of affordable workspace applicable to all boroughs.</p> <p>The inclusion of artist studios and designer-maker spaces as specific sectors that have cultural value is welcomed. The Plan could provide clarity that the definition of 'artists studios' could also include rehearsal space for the performing arts and workspaces for wider creative industries, as a positive step that helps ensure a wider range of cultural and creative industries benefit from the provision of affordable workspace.</p>
E4: Land for industry, logistics and services to support London's economic function	The City Corporation welcomes the policy requirement for a sufficient supply of land which can support logistics consolidation and micro-consolidation where the last mile delivery can be by low/zero emission vehicle. Given the growing importance of consolidation to meet London's servicing needs and the requirements in draft policy T7 (A and E), the Mayor should consider whether policy E4 should also require the safeguarding of suitable sites to

	support consolidation.
E5: Strategic Industrial Locations (SIL)	The City Corporation welcomes the specific requirement that provision should be made for storage and logistics/distribution close to central London, consolidation centres and collection points. The provision of off-site consolidation is essential to ensure that significant office development in the City and the wider CAZ can proceed without having a significant adverse impact on transport networks and air quality. The lack of suitable sites within the City and the CAZ means that such provision needs to be considered on a more strategic level.
E8: Sector growth opportunities and clusters	<p>The City Corporation supports the requirement for proactive policies to ensure the availability of suitable workspaces to support London's economic function, specifically meeting the needs of the financial and business services, tech and digital, culture and creative sectors and particularly the need to provide suitable workspaces for culture and creative sectors.</p> <p>In Paragraph D, references to R&D and collaboration between businesses, higher education institutions and other relevant research and innovation organisations should be extended to include cultural institutions.</p> <p>Explanatory text, paragraph 6.8.3 could be amended to refer to the potential for interaction between the sectors identified as well as listing sectors.</p>
E9: Retail, markets and hot food takeaways	<p>The City Corporation welcomes the Mayor's continued support for appropriate retail development and London's markets, including specialist markets. However, the City Corporation does not support the restriction on A5 hot food takeaways within 400m of a primary and secondary school in the City. The City Corporation is fully supportive of the wider health agenda underlying this policy and the need to tackle problems of ill health and growing obesity amongst school children, but does not consider that a blanket restriction would be workable within the City, as it would indicate that no further A5 uses should be permitted within the Square Mile, where the primary focus is on meeting the needs of the business community. Furthermore, the City Corporation does not consider that it is appropriate to use planning conditions to restrict the food provided by hot food takeaways to ensure compliance with the Healthy Catering Commitment. The use of conditions to achieve this would be contrary to the 6 tests for planning conditions set out in national Planning Practice Guidance, particularly the requirement that conditions be enforceable, precise and reasonable.</p> <p>The policy should allow for greater local determination of appropriate measures which reflect local circumstances and allow boroughs and the City of London to explore alternative, non-planning measures to address the important aims and objectives of this policy.</p>
E10: Visitor infrastructure	The City Corporation supports the promotion of appropriate visitor infrastructure as set out in this policy and the commitment to conserving, enhancing and promoting London's cultural infrastructure and the recognition of its

	<p>role in attracting visitors to the capital. The Corporation welcomes the statement that serviced accommodation to serve the visitor community in central London should primarily be located within CAZ Opportunity Areas or the City Fringe and that only small scale serviced accommodation should be permitted within the CAZ commercial core in order to maintain the London Plan policy priority for office development within this area.</p> <p>The policy should give an appreciation the kinds of uses deemed essential visitor infrastructure, for example, theatres, public houses and sky gardens/viewing galleries which offer a unique tourist experience. The City of London is at the forefront of delivering an internationally unique cluster of high level viewing galleries which will be accessible and welcoming to all. Examples include 22 Bisphosphate, 6-8 Bishopsgate, 1 Leadenhall Street, 120 Fenchurch Street and 20 Fenchurch Street.</p>
E11: Skills and opportunities for all	The City Corporation supports the strategic approach to the provision of training and skills initiatives and the use of s106 obligations to deliver such initiatives. The City of London Local Plan already provides a framework for using s106 obligations for this purpose.
CHAPTER 7: HERITAGE AND CULTURE	
LONDON PLAN POLICY	CITY CORPORATION COMMENT
HC1: Heritage conservation and growth	<p>The City Corporation welcomes the explicit recognition of the links between heritage and economic growth and vitality, between heritage and social well being and the delivery of culture and the night-time economy. The Corporation also welcomes the requirement for boroughs to develop an evidence base on the historic environment in order to ensure that the historic environment informs development management and other individual proposals.</p> <p>Paragraph A, suggest rewording to emphasise seeking access to and interpretation of heritage assets: ‘..... improving access to and interpretation of heritage assets, landscapes and archaeology within their area.’</p> <p>Explanatory text, paragraph 7.1.11 (last sentence) Add ‘publication’ after dissemination.</p>
HC3: Strategic and Local Views	This policy carries forward existing London Plan policy on strategic and local views and provides the policy framework for the Mayor’s London Views Management Framework SPG. The City Corporation supports this policy, but considers that it could be improved by outlining the importance of collaborative working between boroughs in assessing the implications of development proposals on strategic and local views, particularly collaboration between the development host borough and the borough within which the protected landmark is located.
HC4: London View Management Framework	This policy replicates existing London Plan policy with the exception of an additional requirement to consider the impact of the external illumination of structures in the background of a view. This additional requirement is supported.

	<p>Paragraph B, could be worded more proactively and positively, changing “should not be overly intrusive, unsightly or prominent to the detriment of the view” to “should be of the highest design quality, responding positively to the composition of the view and its constituent landmarks”.</p>
HC5: Supporting London’s culture and creative industries	<p>The City Corporation welcomes and supports this policy which seeks to protect existing cultural clusters and gives explicit policy support for the identification and promotion of new cultural clusters. The policy also supports the use of vacant buildings and public spaces for cultural pop-ups. The approach taken in the policy is supportive of the City Corporation’s joint working with key cultural partners in the north west of the City to develop Culture Mile.</p> <p>The policy also provides the framework for the designation of Creative Enterprise Zones and provides detailed planning guidance for such areas. These CEZs are intended to include existing or emerging areas of creative industries. Where such designations are made, there needs to be sufficient flexibility within the policy to allow for local distinctiveness and for creative industries to respond to local context. The Plan should explore how existing clusters of cultural attraction could house, support, work alongside or be in close proximity to creative enterprise zone clusters and new spaces for the creative industries. This would reflect the interdependency of culture and the wider creative industries, would encourage cross-sector collaboration and create dynamic neighbourhoods.</p> <p>Explanatory text, paragraph 7.5.11 – the Barbican and Culture Mile in the City of London should be added to the list of strategic clusters of cultural attractions.</p>
HC6: Supporting the night-time economy	<p>This policy supports and promotes a 24-hour City, with a focus on the CAZ and key town centres across London, requiring that boroughs develop local strategies for the night time economy. It is noted that the Barbican is identified as a night time area of ‘international or national significance’ (NT1). This is supported and accords with the City Corporation’s vision for the Culture Mile. Cheapside and Liverpool Street PSCs within the City of London are identified as night time areas of ‘more than local significance’ (NT3). In contrast to Policy SD7 and Annex 1, which are very clear about the role of different town centres within the overall London hierarchy, there is a lack of clarity in Policy HC6 and Annex 1 about the policy implications of the three different night-time economy designations. This should be addressed in the final version of the London Plan.</p> <p>The City Corporation suggests that a specific link to the Mayor’s Vision for London as a 24 Hour City should be included and also that the work of the Night Time Commission is both mentioned and commitment is made to build upon its inaugural work.</p> <p>Whilst supportive of the Mayor’s aim to support London’s night time economy to deliver an attractive and</p>

	successful city, the City Corporation considers that reference should also be made to the needs of residents, workers and visitors for periods of quiet and relaxation, particularly between the hours of 11pm and 7am. There should be a policy requirement for boroughs to take account of local context and local sensitivities, particularly in residential areas, when developing and implementing strategies for the night-time economy.
HC7: Protecting public houses	<p>The City Corporation welcomes the protection of public houses. The City of London has a strong heritage of public houses which provide valued facilities for the diverse range of the City community, including residents, workers and visitors.</p> <p>Paragraph C is also welcome in recognising that the re-development of ancillary accommodation can threaten the continued viability and vitality of a public house, for example, by reducing the potential to accommodate live music or sport. The policy should support the better use of ancillary space for complementary use, for example, for dining, for music/performance space or even affordable office accommodation or tourist accommodation, which would support the viability of the host pub.</p> <p>In protecting public houses, the policy should clarify that evidence that a pub has been poorly managed (intentionally or otherwise), should not be taken into consideration when assessing the viability of a pub.</p>
CHAPTER 8: GREEN INFRASTRUCTURE AND NATURAL ENVIRONMENT	
LONDON PLAN POLICY	CITY CORPORATION COMMENT
G1: Green Infrastructure	Paragraph A should make specific reference to green walls, in addition to green roofs, as these are becoming essential pieces of green infrastructure with a multitude of benefits
G4: Local green and open space	The protection of existing local green and open spaces and the requirement to assess needs and plan for additional space where needed, is supported. The explanatory memorandum should address the potential for green roofs, rooftop amenity spaces or skygardens to contribute towards the provision of amenity space particularly within central London areas such as the City where opportunities for additional local green and open space at ground level are limited.
G5: Urban greening	The City Corporation supports the Mayor's ambition to deliver greater greening of London's buildings and the introduction of the Urban Greening Factor as a mechanism for measuring the delivery of urban greening. The City Corporation is considering the feasibility and viability of adopting higher UGFs for developments within the City as part of the review of the City of London Local Plan. More information on amenity and soil volumes would be welcome as Table 8.2 lacks soil depth guidance.
G6: Biodiversity and access to nature	The City supports the protection of Sites of Importance for Nature Conservation (SINCs) and requirements for the identification of the recognition of further SINCs and areas with deficiency in nature.
G7: Trees and woodland	The approach to trees and woodlands is supported. Further information on tree soil depths and the benefits of

	uncompacted soil and soil support systems would be welcome.
CHAPTER 9: SUSTAINABLE INFRASTRUCTURE	
LONDON PLAN POLICY	CITY CORPORATION COMMENT
SI1: Improving air quality	<p>The new air quality policy is stronger than the previous and gives a greater emphasis on exposure reduction which is welcomed and vital to achieving the reductions in pollution needed to improve health across the city.</p> <p>Further clarification or amendment would be helpful in several parts of the policy:</p> <ul style="list-style-type: none"> • Paragraph A (1)(d), clarification is needed on what is classed a 'high levels of exposure' and 'unacceptable risk'. This could be an opportunity to be more specific in preventing further exposure, for example, of children by including a point stating that new schools should not be within x metres of a main road. • Paragraph A (2), reference to Air Quality Focus Areas should instead be Air Quality Management Areas, or boroughs' own Focus Areas. For example in the City of London, the designated Focus Areas are not the main areas of concern for the authority. The GLA's Focus Areas in the City are along main TFL roads which have very little residential exposure. The City is determining our own Focus Areas which will be centred around the areas of residential development. • Paragraph A (3), agree that Air Quality Neutral Assessment needs to be taken further, but further guidance would be required to explain exactly what 'Air Quality Positive' would be and how it would be assessed and also the definition of 'large scale' development to which the policy would apply. Could the 'Air Quality Positive' approach be used to reduce emissions associated from deliveries? Large scale office developments that are car free often escape the AQNA as they are technically car free however they have a large number of vehicle trips associated with them through servicing and deliveries. We would also welcome consideration of how having an extra assessment to complete could put extra burden on both applicants and Local Authorities reviewing applications. An alternative (or extra) approach could be to improve the existing Air Quality Neutral Assessment by reducing the benchmarks as it is evidenced through numerous applications both here and in neighbouring boroughs, that it is possible to meet lower emissions requirements. • Paragraph A (4), inclusion of the NRMM policy in the main body of the policy is welcomed. However it would be better if this could be legislated and we would encourage and support the GLA's endeavours to do this. • Paragraph A (5), agree that AQA's should be submitted with all Major Developments however including the exception of developments that can demonstrate that their emissions are less than the previous use may exclude developments that have low emissions but are adding additional exposure to an area of existing poor air quality. This exception should be removed. <p>In addition, the City Corporation has several comments on the supporting text to this policy:</p>

	<p>9.1.4 The requirement for developments to carry out an initial Air Quality Assessment prior to starting the design process to determine suitable land uses for the site is very useful in reducing exposure, for example for preventing applications for new schools on the sides of very busy polluted roads.</p> <p>9.1.6 The instruction to include the impacts from generator emissions in AQA's is welcomed as the City Corporation has high levels of developments including large generators.</p>
SI2: Minimising greenhouse gas emissions	<p>The first sentence of this policy states that "Major development should be net zero carbon" however it is not clear how embodied carbon should be taken into account in the assessment of net zero carbon. The policy goes on to say that". This means reducing carbon dioxide emissions from construction and operation...". Previous definitions of zero carbon apply to regulated carbon emissions during the operational phase of the building whereas this wording implies that reductions in emissions during the construction phase could be included in the zero carbon assessment. The supporting text paragraph 9.2.10 (k) requires that "proposals to minimise embodied carbon" should be included in the energy strategy, which further confuses the intention of this policy.</p> <p>The accompanying London Plan viability study deals with the impact of the zero carbon target on development across London as a whole. Whilst the study looks at the implications of zero carbon in operation, it does not appear to address the implications of zero carbon construction on development viability. Further information is needed within the Plan to demonstrate that the zero carbon in construction requirement is both feasible and viable.</p> <p>The issue of embodied carbon is important and the City Corporation welcomes its inclusion, however embodied carbon should be addressed via a separate policy or at least a separate part of policy SI2. Further guidance as to the methodology for assessing embodied carbon should be published alongside the London Plan.</p> <p>There is very little mention of the conflict between energy policies and air quality impacts. Commercial gas accounted for 30% of NOx emissions in the City in 2013 (LAEI 2013) and this proportion is set to increase as traffic emissions reduce. Care must be taken to ensure the Zero Carbon policy does not undermine the air quality policy and that the resulting energy efficiency measures are mutually beneficial to both carbon emissions and local air pollution emissions.</p>
SI3: Energy infrastructure	<p>Smart meters, smart grids and local micro grids are referred to in the supporting text for policy SI2 but are not included in policy SI3. Smart energy infrastructure will become increasingly important as a means of demand management in future and this should be reflected in policy SI3 (B). The initial focus of energy masterplans should</p>

	<p>be on demand management therefore policy SI 3 (B) should be amended to include the identification of “Opportunities for demand management through smart energy infrastructure”.</p> <p>SI3 D includes the heating hierarchy for communal heating systems in major developments which gives a clear instruction that non-polluting heating systems should be considered before selecting CHP, but only in areas of ‘Heat Network Priority’. This policy should apply to all AQMA’s too.</p> <p>Paragraph D (2), stating that CHP/Boiler systems should be designed to ensure that there is no significant impact on local air quality, is welcomed.</p> <p>In the City Corporation’s response to the above proposal in the Draft Environment Strategy we stated – ‘We welcome proposals for a hierarchy of energy systems that contribute towards improving air quality. We also welcome additional action to minimise emissions from gas fired combined heat and power plant, which can lead to very high local levels of nitrogen dioxide. We would like to see a detailed assessment of options for future gas fired combined heat and power plant to inform policy in the London Plan. This should ensure that both local air quality is protected, and opportunities are not lost for carbon gains from combined heat and power plant in appropriate locations. This assessment should look in detail at existing options for abatement, how effective they are and how abatement may be developed in the future.’ This response is reiterated and remains the case for this consultation.</p> <p>Generators are not mentioned in the policy. Air quality impacts from generators should be considered and guidance could be given on less polluting alternatives and against using backup diesel generators for Short Term Operating Response and other demand side response in areas of high pollution, as per the draft LES proposal 4.2.3d. Guidance on testing and maintenance of generators to reduce emissions and less polluting alternatives should be included in the Energy Planning Guidance document.</p>
SI5: Water infrastructure	<p>The City Corporation welcomes the emphasis in this policy on water conservation measures. BREEAM Excellent standard only requires one mandatory credit in the water section. To achieve high standards of water conservation for commercial development SI5 C (2) could be strengthened by requiring the maximum feasible BREEAM credits for the water section. Similarly, SI5 C (3) could be strengthened by “requiring” water saving technologies rather than just “encouraging” them.</p>
SI6: Digital connectivity infrastructure	<p>The inclusion of a specific policy on digital connectivity is welcomed, but the policy should be strengthened to provide a clear direction of travel and requirements for the delivery of digital connectivity within buildings and outside buildings. In particular, the policy should support the use of the standardised wayleave toolkit produced by</p>

	the City Corporation.
SI7: Reducing waste and supporting the circular economy	<p>The City Corporation welcomes the emphasis on the circular economy in the draft London Plan. A key component of successful circular economies is the emphasis on sharing and providing goods as a service. This can be encouraged through design of buildings and the public realm. For example the inclusion of shared kitchens in commercial developments reduces reliance on take away facilities which generate more waste; the provision of cycle hire space encourages more efficient sharing of bikes. The principle of designs which encourage sharing should be included in this policy.</p> <p>Although the policy addresses all forms of waste and promotes circular economy principles, the explanatory memorandum could usefully include guidance on measures to reduce the use of plastics and reduce plastic waste in London, reflecting the recently announced UK Government ambition to eliminate avoidable plastic waste by 2042.</p>
SI8: Waste capacity and net waste self-sufficiency	<p>The City Corporation welcomes the adjustment in the City of London's waste apportionment target from the current 2016 London Plan. Paragraphs 9.8.6 and 9.8.7 encourage boroughs to pool apportionment requirements where insufficient capacity exists within a borough to meet the Mayor's target. The Mayor should provide further guidance and support to boroughs on how such pooling can be achieved to ensure that the overall target of net waste self-sufficiency across London is met.</p> <p>Policy SI8 B(3) (a) indicates that suitable locations should be identified to manage borough waste apportionments include waste transfer facilities. It is not clear what evidence would be required to allow boroughs to identify waste transfer sites as suitable sites to contribute to their waste apportionments. Additional guidance on this could be included in paragraph 9.8.4.</p>
SI12: Flood risk management	Paragraph 9.12.4 should be amended to make it clear that Lead Local Flood Authorities have a duty to prepare Local Flood Risk Management Strategies which in most cases will encompass any requirement to address flood risk management in the vicinity of the River Thames thereby negating the need for separate flood related Riverside Strategies.
SI15: Water transport	<p>SI15 C this proposal should be considered as 'increase in the amount of freight transported by river, where it reduces road borne transport'. The City Corporation's Freight and Servicing SPD includes a statement to this effect 'use of low emission river transport for goods and waste is strongly encouraged', where it reduces road borne transport</p> <p>SI15 D/F/G – should have regard to where in some locations riverside use by pedestrians and cyclists may also be a high priority, and therefore aim to balance access demand, or at least have regard to potential demand in decision</p>

	<p>making; it may be possible to design use of the wharf front so that cycle access is also possible, with only some timed limited restrictions.</p> <p>There needs to be reference to the London Port Health Service as one of the critical agencies along with the PLA in positively encouraging and effecting change/improvement on and around the tidal River.</p>
SI16: Waterways – use and enjoyment	The City Corporation supports the policy to link towpaths to existing transport network, specifically for better cycle and walking links.
CHAPTER 10: TRANSPORT	
LONDON PLAN POLICY	CITY CORPORATION COMMENT
Chapter 10 – general comments	The City Corporation supports the Mayor’s approach which seeks to rebalance the transport system towards walking, cycling and public transport and policies which support the Mayor’s Transport Strategy.
T1: Strategic approach to transport	The City Corporation supports the approach which seeks to rebalance the transport system towards walking, cycling and public transport, implement the Mayor’s Transport Strategy (which the City Corporation has already commented on and supported) and deliver an improvement in Air Quality across London.
T2: Healthy Streets	The City Corporation supports the Healthy Streets approach as set out in the Mayor’s Transport Strategy and, in particular paragraph D which seeks to reduce the dominance of vehicles on London Streets. The incorporation of air quality indicators into transport plans through the Health Streets indicators, as with the MTS, is welcomed.
T3: Transport capacity, connectivity and safeguarding	<p>The City Corporation welcomes the approach to safeguarding of existing land and buildings used for transport, particularly paragraph B (3) which safeguards land for the Walk London network, and access to and along the Thames.</p> <p>The Corporation also supports paragraph B (2) which seeks to identify and safeguard new sites and route alignments for priority transport investment. The Mayor should, however, consider whether there is a need to extend this safeguarding to ensure that opportunities for development, particularly housing development, can be realised in appropriate locations along routes and transport nodes, to support the business case underpinning major new transport investment proposals, such as Crossrail 2.</p>
T5: Cycling	The City Corporation supports the Mayor’s approach to encourage an increase in cycling across London, including the provision of suitable levels of cycle parking within new development for both long stay and short stay visitors. However, the Corporation considers that there should be flexibility for boroughs and the City Corporation in the application of these parking standards, in light of locally specific or building specific constraints and where a robust and evidenced case for variation in standards has been made, such as the application of the B1 standard of 1 space per 75 sqm within office towers in the City’s Eastern Cluster.
T6: Car parking	The City Corporation welcomes the Mayor’s confirmation that new development in areas of high public transport

	accessibility should be car free and the requirement to provide infrastructure for Electric and Low Emission vehicles, in line with Mayor's proposal to implement ULEZ in 2019.
T6.4: Hotel and leisure uses parking	The City Corporation notes the approach to hotel parking in the CAZ (paragraph A) which limits parking to operational needs, disabled parking, taxis/coaches and necessary servicing vehicles. The Corporation requests that these standards be applied flexibly recognising, for example, that within the City of London, the adopted Local Plan does not permit on-site coach parking for hotels.
T6.5: Non-residential disabled persons parking	The City Corporation welcomes the provisions and guidance for non-residential disabled persons parking
T7: Freight and servicing	<p>The City Corporation welcomes provisions within the policy which seek to reduce freight trips and reduce emissions from freight, whilst recognising the need to allow business to continue to operate efficiently. This approach is in line with the City of London's Freight and Servicing SPD.</p> <p>The City Corporation particularly welcomes and supports the encouragement of consolidation and micro-consolidation particularly where onward distribution is by sustainable mode, such as cycle or small electric vehicle. Such consolidation will be essential to enable further office and commercial development within the CAZ whilst minimising the need for additional servicing and deliveries. Consolidation centres are also sensible for air quality/congestion management reasons but again need to be considered (and therefore referenced) for noise/acoustic design (D12/13).</p> <p>Construction logistics plans need to be considered as part of the whole environmental impact for developments and should be specifically mentioned in the (good) design policies especially D12 and D13 at least.</p>
T8: Aviation	The City Corporation welcomes the Mayor's acknowledgement of the need for additional aviation capacity in the south east of England and the support for the role of London's airports in enhancing London's spatial growth. The City Corporation has, for a number of years, supported an increase in airport capacity in the South East of England to assist in maintaining the City of London's pre-eminent position as a leading financial centre. Growth in airport capacity is also essential for the creation of jobs and growth across wider London and the rest of the UK.
T9: Funding transport infrastructure through planning	The City Corporation notes the Mayor's intention to use MCIL to secure funding towards strategic transport infrastructure, such as Crossrail. The City Corporation has responded to the Mayor's consultation on the MCIL2 Draft Charging Schedule and seeks a commitment from the Mayor to engage with boroughs and the City Corporation on MCIL spending priorities.
CHAPTER 11: FUNDING THE LONDON PLAN & CHAPTER 12: MONITORING	
LONDON PLAN POLICY	CITY CORPORATION COMMENT
DF1: Delivery of the Plan and	The City Corporation supports the emphasis in this policy on the need for developers to take full account of

Planning Obligations	planning policy requirements when purchasing land or buildings. The Corporation suggests that the policy could usefully be improved by clarifying the expectation that site specific viability appraisals will be placed into the public arena as part of the planning application process to enable wider scrutiny of developer proposals.
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Committee:	Date:
Planning & Transportation Committee	20 February 2018
Subject:	Public
Terms of Reference and Frequency of meetings	
Report of:	For Decision
Town Clerk	
Report author:	
Amanda Thompson, Town Clerk's Department	

Summary

As part of the post-implementation review of the changes made to the governance arrangements in 2011 it was agreed that all Committees should review their terms of reference annually. This will enable any proposed changes to be considered in time for the reappointment of Committees by the Court of Common Council.

It is proposed that the approval of any further changes to the Committee's terms of reference be delegated to the Town Clerk in consultation with the Chairman and Deputy Chairman.

The Committee is also required to review the frequency of its Committee meetings.

Recommendations

That:

- a) Subject to any comments, the terms of reference of the Committee be approved for submission to the Court, as set out at Appendix 1, and that any further changes required in the lead up to the Court's appointment of Committees be delegated to the Town Clerk in consultation with the Chairman and Deputy Chairman; and
- b) Members consider whether any change is required to the frequency of the Committee's meetings.

Contact:

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PLANNING & TRANSPORTATION COMMITTEE

1. Constitution
A Ward Committee consisting of,
 - four Aldermen nominated by the Court of Aldermen
 - up to 31 Commoners representing each Ward (two representatives for the Wards with six or more Members regardless of whether the Ward has sides) or Side of Ward.
2. Quorum
The quorum consists of any nine Members.
3. Terms of Reference
To be responsible for:-
 - (a) All functions of the City as local planning authority [relating to town and country planning and development control] pursuant to the Town and Country Planning Act 1990, the Planning (Listed Building and Conservation Areas) Act 1990 and Compulsory Purchases Act 2004, the Planning Act 2008 and all secondary legislation pursuant to the same and all enabling legislation (including legislation amending or replacing the same).
 - (b) Making recommendations to Common Council relating to the acquisition, appropriation and disposal of land held for planning purposes and to exercise all other functions of the local planning authority relating to land held for planning (or highways) purposes, and making determinations as to whether land held for planning or highways purposes is no longer required for those purposes, other than in respect of powers expressly delegated to another committee.
 - (c) All functions of the Common Council as local highway, traffic, walkway and parking authority (other than in respect of powers expressly delegated to another committee) and the improvement of other open land under S.4 of the City of London (Various Powers) Act 1952.
 - (d) All functions under part II of the City of London (Various Powers) Act 1967 including declaration, alteration and discontinuance of City Walkway.
 - (e) All functions relating to the construction, maintenance and repair of sewers in the City, including public sewers (on behalf of Thames Water under an agency arrangement).
 - (f) All functions relating to the Stopping Up of highway (including as local planning authority and highway authority).
 - (g) All functions relating to street naming and numbering under the London Building Acts (Amendment) Act 1939.
 - (h) All functions relating to the control, maintenance and repair of the five City river bridges (insofar as matters not within the delegated authority of another Committee).
 - (i) All functions relating to building control under the Building Act 1984, Building Regulations 2000-10 and London Building Acts 1930-82.
 - (j) The setting of building control charges under the Building (Local Authority Charges) Regulations 2010.
 - (k) Response to and resolution of dangerous structures under the London Building Acts (Amendment) Act 1939.
 - (l) All functions relating to the City of London Corporation's commemorative blue plaques.
 - (m) All functions relating to the Local Land Charges Act 1975.
 - (n) The appointment of the Chief Planning Officer.
 - (o) The appointment of the Director of the Built Environment (in consultation with the Port Health and Environmental Services Committee).
 - (p) The appointment of such Sub-Committees as is considered necessary for the better performance of its duties including a Streets & Walkways Sub-Committee.

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Committee	Dated:
Planning & Transportation	20/02/2018
Subject: International Comparative Study – Final Report	Public
Report of: Carolyn Dwyer, Director of the Built Environment	For Information
<p>Summary</p> <p>At 30th November 2016 Committee, Members agreed the commissioning of a study to examine international best practice in traffic management as part of a programme of congestion related work. The study, which benchmarks the City of London Corporation's approach against 11 other cities, considered policies and programmes to:</p> <ul style="list-style-type: none"> • Reduce congestion and the impact of traffic • Improve the efficiency of freight and servicing activities • Accommodate employment and residential growth • Improve the experience of walking, cycling and spending time on streets <p>This report was originally taken to 29th January 2018 Committee to summarise the findings of the study. Members requested it was re-submitted with the consultant's report attached (Appendix 3).</p> <p>The study found that the City Corporation and Transport for London's approaches to traffic management and reduction are in line with international best practice. In some aspects, such as improving the experience of walking and cycling, congestion charging and public transport provision, the City and London are seen as global leaders. In others, such as reducing the impact of freight and logistics, comparison cities are ahead in terms of policy and delivery.</p> <p>The consultants (WSP) make a series of recommendations for future transport policies, projects and programmes. These will inform the development of the City of London Transport Strategy and Local Implementation Plan.</p> <p style="text-align: center;">Recommendation</p> <p>Members are asked to:</p> <ul style="list-style-type: none"> • Note the report. 	

Main Report

Background

1. The City of London, and London as a whole, currently faces a number of transport challenges. Traffic congestion, limited street space, road danger and poor air quality are all issues that need to be addressed to ensure the Square Mile continues to be an attractive place to work, live, visit and invest. Employment and population growth will put further pressure on streets and transport services.
2. These challenges are common to most cities. Understanding how other cities around the world are addressing them will help ensure the City of London Corporation is doing all it can to reduce the impacts of traffic and improve the experience of walking, cycling and spending time on the City's streets.
3. In November 2016, the commissioning of an International Comparative Study of Traffic Management was agreed by Members as part of a programme of congestion related work. In the spring of 2017, WSP were commissioned to undertake a study to identify global best practice in managing traffic and benchmark this against the approaches being taken by the City Corporation, Transport for London and the Greater London Authority.
4. The study has now been completed and the findings are summarised below. As requested, the full consultant's report is now contained in Appendix 3.

Best Practice Review

5. Eleven cities – Amsterdam, Barcelona, Brussels, Copenhagen, Gothenburg, Madrid, New York, Paris, Singapore, Stockholm and Sydney – were identified as being both global leaders in their approach to traffic management and sharing some characteristics with the City of London. Their approaches to traffic management were reviewed and compared with those of the City Corporation. Greater London was also included for comparative purposes, allowing the review to incorporate Transport for London and Mayoral policies and programmes that impact the City.
6. Three of the cities – New York, Paris and Stockholm – were selected for study visits on the basis of particular comparability with the City of London. The visits included meetings with senior city officials and provided further valuable insights into how these cities are tackling transport challenges. Itineraries and key lessons are provided in Appendix 1.
7. The best practice review identified approaches to traffic management that were common to some or all of the cities:
 - **Integration of people, place and activity:** adopting hierarchical design principles priorities walking and cycling, adopting a human-led design ethos for residents and visitors alike 24 hours a day

- **Low-impact logistics:** adopting logistics solutions that allow businesses to thrive but minimise impact upon the street network, including consolidation, micro-consolidation, cargo bikes / e-bikes
- **Reallocating road space to pedestrians:** repurposing carriageway for public use, widening pavements, creating plazas and squares
- **Reducing congestion:** through the use of policy measures and innovative infrastructure design to rebalance supply and demand
- **Focusing on walking and cycling:** putting walking at the top of the travel agenda supported by cycling (and associated infrastructure), to reduce environmental impact, improve safety, health and well-being
- **Improving air quality and decarbonising transport:** rapidly moving away from diesel and petrol to improve air quality at point of use for public / shared transport and logistics
- **Sharing of assets and services:** encouraging access to rather than ownership of cars and providing bike share
- **Enabling modal shift:** encouraging modal shift through innovation away from traditional car / van / truck, including the use of river transport
- **Embracing technology:** considering the role and use of data, connected and autonomous vehicles and electronic payments to streamline access to and use of transportation assets and services
- **Vision Zero:** adopting an approach where no loss of life is acceptable as a result of the design and management of the transport system and street network

8. Appendix 2 provides an overview of the extent to which the City of London and comparison cities are delivering these approaches. It considers progress on policy and strategy, implementation and outcomes.

Recommendations

9. The best practice review found that that the City of London and Greater London's policy approach, ongoing initiatives and recent successes are broadly in line with the other cities examined.
10. In some instances the City Corporation and London are leading the world. The Congestion Charge, an expanding and improving public transport network, and ambitious investment in cycling infrastructure are seen by other cities as global best practice. However, there are also areas where other cities are advancing more quickly, such as improving last mile deliveries while reducing their impact.
11. WSP has made a series of recommendations based on the best practice review. These will inform the development of the City of London Transport Strategy and Local Implementation Plan. Recommendations include:
 - Support walking as the preferred mode within the City and develop a mobility hierarchy for the City of London that prioritises walking, cycling, public transport and freight and servicing
 - Encourage developers to incorporate micro-consolidation within new developments to provide sustainable last mile delivery / pick up within the City

- Encourage the use of cargo bike / e-cargo bike solutions within the City by enabling bespoke drop off facilities at major developments
- Review the street network to identify opportunities to reallocate carriageway (full or part-time) to other uses including walking, cycling or for use as public space
- Undertake low-impact trials of road space re-allocation to test processes and effectiveness and deliver quick results
- Close 'rat runs' within the City to focus traffic onto primary corridors
- Work with TfL to examine options for more punitive restrictions on diesel / petrol vehicles within the more sensitive areas of the City.
- Examine the effectiveness of current Congestion Charging regime within the City with a view to developing City specific interventions if needs be
- Transition the City of London fleet to non-fossil fuels over the next cycle of renewals where possible
- Work with TfL to prioritise emission free public transport on routes within the City of London
- Examine the role of connected and autonomous technologies to improve mobility within the City but ensure that they are not at the detriment of walking and cycling, nor contributing to congestion.
- Adopt Vision Zero

Conclusion

12. Benchmarking the City Corporation's approach to traffic management against global best practice shows that current policies and programmes are broadly in line with best practice. There are however lessons to be learnt from other cities and these will be applied in the development of the Transport Strategy and Local Implementation Plan.

13. A number of the consultant's recommendations will require us to work with partner organisations such as Transport for London, the Greater London Authority and transport operators, developers and other private companies. Stakeholder engagement to inform the development of the Transport Strategy provides an opportunity to build on established relationships and explore opportunities for joint working.

Appendices

- Appendix 1: Study Visits – Key Lessons and Itineraries
- Appendix 2: Best Practice Review – Summary Table
- Appendix 3: 'International Comparative Study: Traffic Management' WSP consultant's report

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Appendix 1: Study Visits – Key Lessons and Itineraries

Key Lessons

New York

- New York local government transport agencies look to London as a leader of best practice on transport issues (in particular the congestion charge scheme and the ability to administer traffic management schemes through cameras and automatic number plate recognition (ANPR) technology).
- Freight management is not solely an issue at the kerbside or last mile, strategic freight planning for the whole logistics chain is necessary to re-mode road freight and requires long term planning.
- Opportunities to implement temporary traffic reduction or public realm schemes (such as New York's Pop-up Plaza Program) should be maximised; it allows for projects to be trialled quickly with minimal infrastructure changes, and are reversible if necessary. Permanent designs can then be drawn up and modified based on the impact of the temporary scheme.

Paris

- Land for sustainable freight activities should be incorporated into land use planning and mixed-use developments at a range of scales. In the central city, this could be a requirement for small scale logistic spaces in new developments or under used car park. In the outer city there can be significant freight infrastructure alongside other land uses such as housing and offices (as seen at Chapelle International development).
- While the City of Paris does not have specific targets relating to traffic volume reduction, it is delivering ambitious schemes that re-allocate road space to pedestrians, cyclists and public realm improvements (for example proposals to transform seven Parisian squares that will see 50 per cent of road space reallocated to pedestrians).
- The City of Paris has an ambitious target to phase out diesel cars by 2024, and petrol cars by 2030 in the city. This is a standalone initiative that is in addition to the current Low Emission Zone that covers the greater Paris area.

Stockholm

- While Stockholm's solutions and end point for traffic management is radical, the city's approach seems careful, including experimentation and close working between the public and private sectors and a step-by-step transition.
- Developing sustainable logistic solutions that are commercially successful is challenging but possible (as achieved through their Urban Consolidation Centre), as long as there is stakeholder collaboration.
- Stockholm's long-term transport strategy and vision (Urban Mobility Plan for Vision 2030) is supported by short term delivery plans (such as the 2014-2017 Freight Plan)

Itineraries

New York

Organisation	Description
Urban Land Institute	Attendance at Infrastructure Council Meeting. Presentation and discussion of the transportation/land use framework of the Great East Midtown Rezoning
New York City Department of Transportation (NYCDOT)	Working lunch with Commissioner Polly Trottenberg and senior officials from across the Department. Covering the topics of policy issues and initiatives, congestion, freight, clean fleets, alternative modes and safety
New York City Department of Transportation; Traffic Management Centre	A tour of the Traffic Management Centre and a presentation on New York City's Connected Vehicle Pilot
SL Green and Metropolitan Transport Authority (MTA)	Presentation and discussion on the development of the One Vanderbilt building, and how to facilitate public transport and public realm improvements with new developments
New York City Fleet	Meeting with Commissioner and Chief Fleet Officer Keith Kerman. Presentation and discussion on green fleets, vehicle sharing and safety
New York City Department of City Planning	Meeting with Director of Strategic Planning Howard Slatkin. Presentation and discussion on private owned public spaces and 'Shaping the Sidewalks' plans
Economic Development Corporation; Ports and Transportation Group	Meeting with Senior Vice President David Hopkins and Assistant Vice President Ryan White. Topics included transportation policy initiatives and re-moding of freight
New York and New Jersey Port Authority (NYNJPA); Planning Department	Meeting with General Manager Lou Venech and Regional Transport Planning Manager Todd Goldman. Presentation and discussion on their Goods Movement Action Plan and World Trade Centre Vehicular Security Centre

Site Visits

Location
Grand Central Station and One Vanderbilt Development
Temporary and Permanent Plazas; Times Square, Herald Square and Broadway
World Trade Centre and Campus, connection to Transportation Hub

Paris

Organisation	Description
Deputy Mayor for Transport	Meeting with Transportation Advisor to Deputy Mayor Herve Levifve. Presentation and discussion of Paris's transport challenges and initiatives
APUR (Urban Planning Agency)	Meeting with Urban Freight Manager Michele-Angelique Nicol and People Mobility Manager Florence Hanappe. Presentation and discussion on freight initiatives
Sogaris (mixed ownership urban logistics society)	Meeting with the director of the Chapelle International mixed land use development (including rail freight terminal and depot). Presentation and guided tour.

Site Visits

Location
Place de la Republique (Public Square)
Rue De Rivoli (Key traffic route with segregated cycle route under construction)
Le Marais (Paris's Old Town, plans to remove all non-essential traffic)
Group Casino, Franprix and Monoprix River Freight Operation
Chronopost, Beaugrenelle Urban Logistic Space
Sogaris Hotel Logistic (Chapelle International)

Stockholm

Organisation	Description
CLOSER (National Collaboration Forum)	Meeting with Magnus Blinge, Senior Project Manager. A presentation and discussion on the forum set-up and freight management and congestion projects
Stockholm Traffic Administration	Meeting with the Transport Director, Freight Manager and Environment Manager. Presentations on Stockholm's Vision for 2040, Stockholm's Freight Plan and traffic and street environment.
Royal Sea Port Development	Meeting with Project Manager of sustainable urban development. Presentation and guided tour

Site Visits

Location
Alskade Stad Urban Consolidation Centre
Cargobike Depot
Royal Sea Port Construction Consolidation Centre

Appendix 2: Best Practice Review – Summary Table

Theme	Integration People, Place and Activity	Low Impact Logistics	Re-allocating Road Space to Pedestrians	Reducing Congestion	Focusing on Walking and Cycling	Improving Air Quality and De- carbonising Transport	Sharing of Assets and Services	Enabling Modal Shift	Embracing Technology	Vision Zero Focus
World city										
City of London	P - M I - M O - H	P - H I - M O - L	P - M I - M O - H	P - H I - H O - M	P - M I - M O - H	P - H I - M O - M	P - M I - M O - H	P - H I - H O - H	P - H I - H O - M	P - M I - M O - M
Greater London	P - H I - M O - H	P - H I - M O - M	P - H I - M O - H	P - H I - H O - M	P - H I - H O - M	P - H I - H O - M	P - H I - H O - H	P - H I - H O - H	P - H I - H O - M	P - H I - M O - M
Amsterdam	P - H I - H O - M	P - H I - H O - M	P - H I - H O - H	P - H I - H O - M	P - H I - H O - H	P - H I - M O - M	P - M I - H O - L	P - H I - H O - H	P - H I - M O - M	P - H I - H O - M
Barcelona	P - H I - H O - H	P - H I - H O - H	P - H I - H O - H	P - H I - H O - M	P - H I - H O - H	P - H I - M O - M	P - M I - H O - H	P - H I - H O - H	P - H I - M O - M	P - M I - M O - M
Brussels	P - H I - M O - M	P - H I - M O - M	P - H I - H O - M	P - H I - M O - M	P - H I - M O - M	P - H I - M O - M	P - M I - M O - M	P - M I - M O - M	P - H I - H O - M	P - M I - M O - M
Copenhagen	P - H I - H O - H	P - H I - H O - M	P - H I - H O - H	P - H I - H O - H	P - H I - H O - H	P - H I - M O - M	P - H I - H O - H	P - H I - H O - H	P - H I - M O - M	P - H I - H O - H
Gothenburg	P - H I - M O - M	P - H I - M O - M	P - H I - M O - M	P - H I - H O - H	P - H I - M O - M	P - H I - H O - M	P - M I - H O - M	P - H I - H O - M	P - H I - M O - M	P - H I - H O - H
Madrid	P - H I - M O - M	P - M I - M O - M	P - M I - M O - M	P - M I - M O - M	P - M I - M O - M	P - M I - M O - M	P - M I - M O - L	P - H I - M O - M	P - M I - M O - M	P - M I - M O - M
New York	P - M I - M O - M	P - M I - M O - M	P - H I - H O - H	P - M I - M O - L	P - M I - M O - M	P - M I - M O - M	P - H I - H O - M	P - M I - M O - M	P - M I - M O - M	P - H I - H O - H
Paris	P - L I - M O - H	P - M I - H O - H	P - H I - H O - H	P - M I - M O - L	P - H I - M O - M	P - H I - M O - L	P - H I - H O - M	P - H I - M O - M	P - H I - M O - M	P - M I - M O - M
Singapore	P - L I - M O - M	P - M I - M O - M	P - L I - M O - M	P - H I - H O - M	P - M I - M O - M	P - L I - M O - M	P - M I - M O - M	P - M I - M O - M	P - H I - H O - H	P - M I - M O - M
Stockholm	P - L I - M O - H	P - M I - M O - M	P - H I - M O - M	P - H I - H O - H	P - H I - M O - M	P - H I - H O - H	P - H I - M O - M	P - H I - H O - H	P - H I - H O - M	P - H I - H O - H
Sydney	P - H I - H O - M	P - M I - M O - M	P - M I - M O - M	P - M I - M O - M	P - H I - H O - M	P - M I - M O - M	P - H I - M O - M	P - H I - H O - M	P - H I - M O - M	P - M I - M O - M

Progress on **Policy & Strategy (P)**, success in **Implementation (I)** and **Achieving Outcomes (O)** assessed by;

- Low (L)
- Medium (M)
- High (H)

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INTERNATIONAL COMPARATIVE STUDY

TRAFFIC MANAGEMENT



Contents

Introduction	1
The City of london's challenges	1
Best Practice Review	3
City analysis summary	5
Integration of people, place and activity	7
Low-impact logistics	10
Re-allocating road space to pedestrians	12
Focusing on walking and cycling	14
Reducing congestion	15
Improving air quality and decarbonising transport	16
Sharing of assets and services	18
Enabling modal shift	20
Embracing technology	22
Vision zero focus	24
Recommendations	25
Integrating people, place and activity	25
Low impact logistics	26
Re-allocation of road space to pedestrians	26
Focusing on walking and cycling	26
Reducing congestion	27
Improving air quality and de-carbonising transport	27
Sharing of assets and services	27
Enabling modal shift	28
Embracing technology	28
Vision zero focus	28

INTRODUCTION

The City of London, and London as a whole, currently faces a number of transport challenges. Traffic congestion, limited street space, road danger and poor air quality are all issues that need to be addressed to ensure the Square Mile continues to be an attractive place to work, live, visit and invest. Employment and population growth will put further pressure on streets and transport services.

These challenges are common to most cities. Understanding how other cities around the world are addressing them will help ensure the City of London Corporation is doing all it can to reduce the impacts of traffic and improve the experience of walking, cycling and spending time on the City's streets.

In the spring of 2017, WSP was commissioned by the City of London Corporation to undertake an international study of best practice in managing traffic in order to improve mobility and enhance the public realm. The study included visits to three cities – New York, Paris and Stockholm – and a desktop review of a further eight cities.

This short report summarises the study findings. It compares the approach being taken by the City of London Corporation and Transport for London with international best practice and makes a series of recommendations to inform policy development. More detailed analysis is provided in the accompanying technical report.

THE CITY OF LONDON'S CHALLENGES

The City of London is the financial district and historic centre of London, with over 450,000 people employed in an area of just over a square mile. Economic growth is driving significant investment across the City, including several major office developments planned or under construction in the Eastern City Cluster. This intensification of employment will put further pressures on the City's streets and the transport networks serving the Square Mile.

Particular transport challenges include:

1. Pavements that are uncomfortably overcrowded at peak times (and further intensified locations with the arrival of the Elizabeth Line) leading to safety issues
2. The need to safely accommodate the growing number of people who are choosing to cycle to and within the city
3. The need to maintain access for essential vehicles while potentially restricting general access for motor vehicles
4. The need to improve the safety, security, health and well-being of all who access the City
5. The need to improve air quality within the Square Mile and across London for the benefit of all residents and visitors
6. Managing freight / servicing and delivery traffic to address congestion, safety and parking issues
7. Ensuring that deliveries and servicing can be carried out as efficiently as possible to enhance the environment for businesses
8. The need to maintain a high quality public realm and provide new and improved public spaces
9. Competing demands for space on the City's streets and differing expectations of businesses, employees and residents
10. A lack of clarity on the challenges and opportunities of new transport technologies and the speed at which emerging technologies will be adopted
11. The high numbers of employees accommodated within tall buildings – both old and new – and associated pressures in terms of peak access / egress and deliveries, both corporate and personal.
12. The mismatch between the large heavy goods vehicles currently used to transport goods and packages to the City and the need for smaller, low or zero emission vehicles to make deliveries in the City

Addressing these challenges is essential if the City of London is to maintain and enhance its position as a global centre for commerce and an international destination for culture.



BEST PRACTICE REVIEW

Eleven cities – Amsterdam, Barcelona, Brussels, Copenhagen, Gothenburg, Madrid, New York, Paris, Singapore, Stockholm and Sydney – were identified as being both global leaders in traffic management and sharing some characteristics with the City of London. Their approaches to traffic management were reviewed and compared with those of the City Corporation. Greater London was also included for comparative purposes, allowing the review to incorporate Transport for London and Mayoral policies and programmes that impact the City.

Three cities were selected for study visits on the basis of particular comparability with the City of London:

- **New York** – a global centre for finance with significant congestion and delivery issues coupled with recent growth in cycling as well as an active programme to reclaim public spaces
- **Paris** – a dense global centre with an historic core with significant air quality issues and challenges around access, mobility and servicing
- **Stockholm** – a Scandinavian capital with an historic core and the rapid deployment of innovative mobility solutions for public transport and last mile deliveries, particularly a move away from fossil fuels

The study visits included meetings with city officials, leading developers and visits to best practice projects. They provided further valuable insights into how these cities are tackling transport challenges and lessons for the City of London.

The best practice review identified approaches to traffic management that were common to some or all of the exemplar cities:

- **Integration of people, place and activity** – adopting hierarchical design principles that integrate people with their surroundings and activities, adopting a human-led design ethos for residents and visitors alike 24 hours a day

- **Low-impact logistics** – adopting logistics solutions that allow businesses to thrive but minimise impact upon the highway network and developments including consolidation, micro-consolidation, cargo bikes / e-bikes
- **Re-allocating road space to pedestrians** – re-purposing highway assets for public use, widening pavements, creating plazas and squares
- **Focusing on walking and cycling** – putting walking at the top of the travel agenda supported by cycling (and associated infrastructure), to reduce environmental impact, improve safety, health and well-being
- **Reducing congestion** – through the use of policy measures and innovative infrastructure design to rebalance supply and demand
- **Improving air quality and decarbonising transport** – rapidly moving away from diesel and petrol to improve air quality at point of use for public / shared transport and logistics – electric, hydrogen, recycled cooking oil etc.
- **Sharing of assets and services** – encouraging access to cars rather than ownership through car share, providing bike share infrastructure
- **Enabling modal shift** – encouraging modal shift through innovation away from traditional car / van / truck including the use of river transport
- **Embracing technology** – considering the role and use of data, connected and autonomous vehicles and electronic payment solutions to streamline access to and use of transportation assets and services
- **Vision Zero** – adopting an approach where no loss of life is acceptable as a result of the transportation / highway system

The table overleaf summarises the performance of the cities examined for each of the approaches. It outlines progress on policy and strategy, the success in implementing those policies and the extent to which outcomes are being delivered. This is followed by a more detailed consideration of each of the approaches.

Theme					
		low			
		medium			
		high			
		Integration people, place & activity	Low impact logistics	Re-allocating road space to pedestrians	Focusing on walking & cycling
City of London	Policy & Strategy	medium	high	medium	medium
	Implementation	medium	medium	medium	medium
	Achieving Outcomes	high	low	high	high
Greater London	Policy & Strategy	high	high	high	high
	Implementation	medium	medium	medium	high
	Achieving Outcomes	high	medium	high	medium
Amsterdam	Policy & Strategy	high	high	high	high
	Implementation	high	high	high	high
	Achieving Outcomes	medium	medium	high	high
Barcelona	Policy & Strategy	high	high	high	high
	Implementation	high	high	high	high
	Achieving Outcomes	high	high	high	high
Brussels	Policy & Strategy	high	high	high	high
	Implementation	medium	medium	high	medium
	Achieving Outcomes	medium	medium	medium	medium
Copenhagen	Policy & Strategy	high	high	high	high
	Implementation	high	high	high	high
	Achieving Outcomes	high	medium	high	high
Gothenberg	Policy & Strategy	high	high	high	high
	Implementation	medium	medium	medium	medium
	Achieving Outcomes	medium	medium	medium	medium
Madrid	Policy & Strategy	high	medium	medium	medium
	Implementation	medium	medium	medium	medium
	Achieving Outcomes	medium	medium	medium	medium
New York	Policy & Strategy	medium	medium	high	medium
	Implementation	medium	medium	high	medium
	Achieving Outcomes	medium	medium	high	medium
Paris	Policy & Strategy	low	medium	high	high
	Implementation	medium	high	high	medium
	Achieving Outcomes	high	high	high	medium
Singapore	Policy & Strategy	medium	medium	low	medium
	Implementation	medium	medium	medium	medium
	Achieving Outcomes	medium	medium	medium	medium
Stockholm	Policy & Strategy	high	medium	high	high
	Implementation	high	medium	medium	medium
	Achieving Outcomes	high	medium	medium	medium
Sydney	Policy & Strategy	high	medium	medium	high
	Implementation	high	medium	medium	high
	Achieving Outcomes	medium	medium	medium	medium

	Reducing congestion	Improving air quality & de-carbonising transport	Sharing of assets & services	Enabling modal shift	Embracing technology	Vision Zero focus
	high	high	medium	high	high	medium
	high	medium	medium	high	high	medium
	medium	medium	high	high	medium	medium
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	high	medium	high	high	high	high
	medium	medium	low	high	medium	medium
	high	high	medium	high	high	medium
	high	medium	high	low	medium	medium
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	medium	medium	low	medium	medium	medium
	medium	high	high	medium	high	high
	medium	medium	high	medium	medium	high
	low	medium	medium	medium	medium	high
	medium	high	high	high	high	medium
	medium	medium	high	medium	medium	medium
	low	low	medium	medium	medium	medium
	high	low	medium	medium	high	medium
	high	medium	medium	medium	high	medium
	medium	medium	medium	medium	high	medium
	high	high	high	high	high	high
	high	high	medium	high	high	high
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	medium	medium	high	high	high	medium
	medium	medium	medium	high	medium	medium
	medium	medium	medium	medium	medium	medium

INTEGRATION OF PEOPLE, PLACE AND ACTIVITY

Numerous cities are adopting hierarchical, design principles that integrate people with their surroundings, mobility and activities. Such an approach embeds a human-led design ethos for residents and visitors alike, improving the city experience 24 hours a day.

CITY OF LONDON'S POSITION

The development of the City of London's Transport Strategy provides an opportunity to establish a street user hierarchy and make clear the City Corporation's commitment to prioritising the movement of people and goods over private vehicles.

BEST PRACTICE CASE STUDIES

Stockholm's *Urban Mobility Strategy*, which complements their City Plan and their Vision for 2030, prioritises walking and cycling first, then public transport, followed by commercial traffic, then taxis and finally the private car. The City Plan also includes the walkable city concept, a method of building a city where access – the ability to reach different destinations – does not build solely on mobility but also on accessibility. The Urban Mobility Strategy recognises that the city's roads and streets are more than a machine for transporting people and goods. It acknowledges that they are a vital part of the public realm and play a key role in how Stockholm is perceived as a place to live in, work and visit. The strategy states that streets should encourage interaction and provide a public meeting place.

Sustainable Sydney 2030, first adopted in 2008, aims to create a green, global and connected city through investment in walking, cycling and high-quality public transport as well as trees, parks, gardens and linked open spaces. The city's four year Community Strategic Plan (2017 – 2021) sets out aspirations for the city and recognises the changes that have occurred over recent years with regards to how and when people use the city's streets and public spaces. Projects that respond to this 'transformative move' include developing a pedestrianised spine (with light rail) through the heart of city connecting three squares designed to provide a focus for public life in the city centre.

Barcelona's *2013-2018 Urban Mobility Plan* promotes a healthy, low carbon mobility model that prioritises the quality of urban life and collective well-being, as well as the creation of comfortable urban spaces that promote coexistence among citizens. It too has a distinct hierarchy putting pedestrian first, then cycle users, then public transport, then the movement of goods and finally private transport. It adopts the 'superblock' principle to redefine how city areas function. This allows only certain types of vehicles at low speeds (10 kilometres per hour) to access an area bounded by larger streets. Restricting through traffic within the superblock allows shared spaces to be created that support public, social and retail activities.

In **Copenhagen** the *2015 Municipal Plan* presented a vision for the city recognising that more Copenhageners were staying in the city right through their lives. The plan encourages, amongst many things, spaces that allow people to socially interact within a transport network that positively encourages walking and cycling. Recent statistics published in Copenhagen's 2011-2015 Bicycle Strategy states that 150,000 people cycle each day to work or educational institutions in The City of Copenhagen. The Strøget is quoted as the world's longest pedestrianised street at 3.2 kilometres providing a spine of activity through the heart of the city home to shops, restaurants, galleries, theatres and other attractions.



Chronopost Logistics Facility, Paris

Älskade Stad Electric Vehicle, Stockholm



LOW-IMPACT LOGISTICS

Cities are now adopting low impact logistics solutions that allow businesses to thrive but minimise impacts on the street network and neighbourhoods, including a variety of innovative measures adopting the principles of consolidation and sustainable modes.

CITY OF LONDON'S POSITION

The City of London's freight programme provides a good basis for future development of low impact logistics. In London as a whole, Transport for London has been an international leader in working together with industry to address freight issues, particularly best practice for haulage, and safety issues. While there are a number of initiatives, such as the consolidation scheme in Camden and Islington, as well as a number of private sector programmes, low impact logistics are not at an as advanced stage in London as those in Barcelona, Paris and Stockholm.

BEST PRACTICE CASE STUDIES

At **Beaugrenelle** (in the Paris 15th Arrondissement), a 3,000m² logistics facility opened in 2013 following the conversion of part of a former multi-story car parking facility. Operated by Chronopost express, mail deliveries and pick up are made by heavy goods vehicles. Parcels are then sorted for the 'last mile' deliveries and are distributed by ten electric vans and twenty cleaner diesel vans. The operation vastly reduced the numbers of larger vehicles on the roads of central Paris. Elsewhere in Paris, Supermarket Franprix uses a hierarchical approach to logistics consolidation facilitated by river transport delivering food five days a week to eighty of its central Paris stores. Forty two swap-body containers are transported by truck from a warehouse in the suburbs to the inland port of Bonneuil-sur-Marne where they are transferred to a barge. After making the 20 kilometre journey along the

Marne and Seine rivers to the heart of the capital, (avoiding chronic road traffic congestion), they are then off-loaded and make the last few mile deliveries around the city. The service has been made possible by re-development work carried out by inland ports operator, the Ports de Paris, on a stretch of quayside near the Eiffel Tower to accommodate the barge shuttles.

In **Stockholm** the Älskade Stad ('Beloved City') logistics operation uses a purpose built small scale electric, articulated truck to make deliveries within the city core and also picks up dry recycling materials. Operating from a loading dock beneath an office block in the centre of the city, which also houses a waste compactor and cycle garage, this commercial, cooperative venture between Ragn-Sells (waste materials) and Bring (parcels and road distribution) enables sustainable logistics even within Stockholm's pedestrianised core reducing trips and vehicle impacts. Across the city, MoveByBike provides cargo bike and e-cargo bike logistics solutions using Stockholm's extensive network of cycle paths. Using traditional cargo bikes as well as containerised models, riders undertake pick-ups and drop offs within a 30 minute radius and are working with local retailers and internet companies to undertake door to door transport via a shared consolidation centre on the outskirts of the city.

The **Barcelona** 'super-block' approach includes measures to reduce the impacts of deliveries in city centre districts. Deliveries are made from the perimeter of each super-block or from other depots across the city using electric cargo bikes to deliver parcels and handcarts for smaller items.



River Seine Right Bank, Paris

Herald Square, New York



RE-ALLOCATING ROAD SPACE TO PEDESTRIANS

Many cities are re-purposing carriageway for public use including the widening of pavements and creating public plazas and squares for both formal and informal uses.

CITY OF LONDON'S POSITION

The City Corporation has a good track record in this area, including the creation of a new public space in Aldgate and the timed closure of Bank Junction. There is potential to adopt the 'paint and planters' approach pioneered by New York to deliver quick results and trial permanent solutions.

BEST PRACTICE CASE STUDIES

In **New York** the Department of Transport works with various organisations to create neighbourhood plazas throughout the City to transform underused or reallocated streets into vibrant, social public spaces. **The New York City Plaza Program** is a key part of the City's effort to ensure that all New Yorkers live within a ten minute walk of quality open space. Interventions range from the closures of parts of Broadway including the conversion of a large part of Times Square to public open space through to the more tactical closures of left turns on wide boulevards to create small urban spaces for sitting and other functions. In some places, such as Lower Manhattan, streets are closed on a temporary basis using removable street furniture and planters to gauge traffic impacts and public uptake before more permanent public realm solutions are designed and implemented. Given heightened security concerns extra protections have been put in place in many of the larger plazas.

At the Place de la Republique in **Paris** a major road space re-allocation project has recently been completed removing 50 per cent of traffic lanes from this major public

space. Traffic (apart from buses) has been eliminated from one side of the square with lane reduction on the other sides resulting in increased public open space and multi-functional events area. The Place de la Rebulique is one of seven squares designated by the Mayor for major traffic reduction across the City. On the right bank of the River Seine the busy through highway route which ran alongside the river was turned over to public space in April 2017 facilitating walking and cycling, public and public realm improvement including seating, planting and temporary uses (such as the Paris beach). The route has been retained as an emergency through route for emergency vehicles in the event of a major city wide incident. Finally, Paris is starting further pedestrianisation of the Marais historical district to remove vehicles from the narrow and, at times, congested streets.

In **Barcelona** the City has recently announced that the Carrer Cristóbal de Moura is to be transformed with planting and traffic calming measures reversing the amount of space used by vehicles and pedestrians. The project will transform the 1.27 kilometre corridor between the Parc del Centre del Poblenou and Rambla del Prim with 32,000m² of new greenery for the Sant Martí district.

In **Stockholm** as part of the extension of the tramway to the bus and coach station, the main city thoroughfares have had traffic excluded in advance of works to rebuild the corridor. Once complete the tram will share space with dedicated cycle lanes, wider pedestrian pavements and will be supplemented by tree planting and other greenery to offset 1960s architecture which characterises the route.



FOCUSING ON WALKING AND CYCLING

Cities are ensuring walking is at the top of the travel agenda, closely supported by cycling and its associated infrastructure in providing safe, healthy and sustainable travel choices.

CITY OF LONDON'S POSITION

In recent years there has been significant investment in cycling in the City and across London. This needs to continue if cycling is to become a safe and attractive travel choice for more Londoners. The City has delivered significant pedestrians improvements, such as Cheapside. The development of the City of London Transport Strategy provides an opportunity to prioritise improving the experience of walking.

BEST PRACTICE CASE STUDIES

Copenhagen leads the way in terms of cycling being a major part of the transportation mix. *'Good, Better, Best' Copenhagen's Bicycle Strategy 2011- 2015* sets out its aims and aspirations to become the world's best cycling city. Data from 2008-2010 showed a 36 per cent modal split for work and education trips versus 7 per cent for walking, 28 per cent public transport and 29 per cent car. Copenhagen's approach focuses on enabling cycling for all, at all times of the year, and for every type of activity. With investments in segregated infrastructure, the removal of missing links, real time information and integration with the built environment Copenhagen has become the envy of most cities.

Stockholm's City Plan, *'The Walkable City'*, adopted in 2010, puts walking at the heart of the city's development and focuses on the qualities of a human, safe and environmentally friendly city. The strategies for achieving this are to continue strengthening central

Stockholm, to invest in attractive strategic nodes, to connect the different parts of the city and to promote an attractive, vibrant and safe urban environment across the whole of Stockholm. Coupled with its Vision Zero approach (as outlined below) Stockholm has put people back at the centre of the city and its activities.

In **Paris** significant investments are being made in cross-city cycle superhighway type infrastructure with in some cases bus lanes being converted to two way cycle routes through major city thoroughfares. The ultimate 45 kilometre network will provide north-south and east-west routes across the city providing direct access to many central Parisian districts.

New York is investing in cycling infrastructure across the five boroughs, including protected lanes on a number of Avenues, lane and safety improvements and bridge access improvements. Many of these schemes also address pedestrian safety through improved crossings and reducing conflict with cyclists. A number of pedestrian initiatives are proposed to increase sidewalk widths in congested areas (such as 7th Avenue) to improve access to public transit, reduce conflicts and to improve the environment. It should be noted however the New York has recently decided to enforce a ban on e-bikes which are illegal there.

In **Brussels** the Rue du Midi and Rue des Grands Carmes pedestrian zone has been enforced with retractable bollards prohibiting general traffic from the area. Taxis, cyclists and pedestrians are permitted but only at walking speed and deliveries are allowed between 04:00 and 23:00.

REDUCING CONGESTION

A number of cities are reducing congestion through the use of policy measures and innovative infrastructure design to rebalance supply and demand.

CITY OF LONDON'S POSITION

London was one of the first cities to introduce a congestion charge and subsequently the low emission zone. Unlike the systems in Singapore and Stockholm which have variable pricing, London's current system operates on a set of fixed charges. Charging is a significant tool in combating congestion and air quality issues but London's approach needs to evolve.

BEST PRACTICE CASE STUDIES

Stockholm's road pricing scheme was established following an earlier pilot and subsequent referendum in 2007. The electronic, variable charge scheme ranges from free (midnight to 06:39) to 30SEK (approx. £2.60 in the peaks) and applies to most vehicles entering the city and is intended to reduce congestion with funds being used to enhance public transport and fund Metro extensions. Charges apply to most vehicles including buses and commercial vehicles. Gothenburg also has a congestion charging levied on most vehicles Monday to Friday, 06:00 to 18:30 with a range of daily charges.

The **Singapore** Electronic Road Pricing System (ERP) manages road congestion using a pay-as-you-use principle where motorists are charged when they use priced roads during peak hours. Charges are based on usage; those who use the roads less frequently or who travel during non-ERP hours pay less or don't need to pay at all. Charge is made via a dashboard mounted device, which takes a standard bank card and interacts with electronic gantries located on major corridor and routes around the city.

In **Sydney** the Harbour Bridge and Tunnel operate free flow electronic tolling using a Tag based system on the southbound only journey. Charges are continuous over the 24 hour period but vary between different peak, off-peak and night time bands. The tunnel and bridge are used by over 43 million vehicles per year. There are currently proposals to charge users in the northbound direction to raise funds for new road infrastructure.

In **New York** vehicles are charged for using the bridges and tunnels into Manhattan and are charged entering New York. Tolls vary by vehicle type and time of day ranging from \$9.50 for an off-hours motorcycle on an electronic pass to \$126 for a six axle truck paying cash all hours. In February 2017, the Bayonne Bridge began cashless payments only following conversion of the Queens Midtown tunnel in an attempt to reduce standing traffic. Administered by the Port Authority and New York and New Jersey, charges are used to fund various infrastructure and maintenance programmes.

IMPROVING AIR QUALITY AND DECARBONISING TRANSPORT

Air quality is high on a number of cities' agendas; many are looking to rapidly move away from diesel and petrol to improve air quality at point of use for public/shared transport and logistics. The use of electric, hydrogen and recycled oil are all being explored.

CITY OF LONDON'S POSITION

London is now addressing air quality as a high priority. Immediate actions such as the T-Charge, electric, hybrid, and hydrogen powered buses, and the LoCity project will be followed up with electric taxis and the Ultra Low Emission Zone.

BEST PRACTICE CASE STUDIES

Paris has set itself ambitious targets to exclude diesel vehicles from the city by 2024 for the Olympics and to ban all petrol vehicles by 2030. The city is already using compressed natural gas (CNG) and electric vehicles for local logistics and the Autolib electric car share scheme covers all of central Paris and many suburbs. According to Charge Map there are currently 750 charging locations within the Périphérique of Paris however there are a very small number of CNG filling stations in and around the city (less than ten at current estimates). The city implemented its third car free day on 1st October 2017. The initiative which banned the majority of vehicles from an area covering 40 square miles over the city centre was in force between 11:00 and 18:00. The Champs Élysées is among other roads in the capital that are closed on the first Sunday of every month.

Stockholm has a Low Emission Zone covers all of the city centre and immediate environs banning older Euro 4 buses and trucks with this extending to Euro V vehicles in 2020. The city encourages the use of alternative fuels such as biodiesel and reclaimed vegetable oil as long as they meet the Euro standards. The Strategy for a fossil-fuel free Stockholm by 2040 tasks the City Executive Board to present an action plan for a fossil-free road transport sector and

to investigate the feasibility of prohibiting the sale of fossil fuels by 2040, with a sub-target for 2030. The majority of Stockholm's bus services are now fossil-free and the city has a fully electric bus route in operation. Within the city local logistics are being undertaken using electric and HVO trucks as well as e-cargo bikes.

In **Gothenburg** orders have been placed for two high capacity (450kW) fast chargers at Sahlgrenska University Hospital and Eriksberg Square, on line, over which two prototype electric articulated high capacity Volvo buses will operate in 2018. Since 2015 fully electric and electric-hybrid buses have been running on route 55 between Chalmers University of Technology campuses in Johanneberg and Lindholmen as part of the ElectriCity project.

Brussels is introducing a Low Emission Zone from January 2018 to ban older, Euro 1 standard diesel vehicles (cars, vans, buses and caches). Over the coming years the scheme will expand to cover more recent vehicles with all but Euro 5 diesel and Euro 3 petrol vehicles banned by 2025. Exempted vehicles can be permitted to the zone, which covers all nineteen municipalities within the capital region, but only for eight days per year.

New York's City Fleet is rapidly divesting itself from pure fossil-derived fuels. The City now has over 5,000 hybrid vehicles, over 600 plug-in electric vehicles, is adapting vehicles to run on bio-diesel and has three CNG refuelling facilities. The city has recently announced a significant new electric car charging program that will bring 50 fast-charging stations across all five boroughs through an initiative with a utility company. New York currently has over 300 charging points although only sixteen are fast charging stations. Vehicle manufacturer Tesla are reported to be planning their own network of fast charging stations in Manhattan across eight sites.



SHARING OF ASSETS AND SERVICES

Rather than vehicle ownership, sharing of assets and services allows people to access vehicles through car share, bike share and car club schemes. This is being encouraged in numerous cities to improve accessibility, mobility and modal choice.

CITY OF LONDON'S POSITION

The sharing of assets and services is a relatively new concept and whilst bike share has long been established in London this is evolving rapidly. The City Corporation's approach to 'dockless' bike share highlights a willingness to embrace shared services as a means of delivering wider transport objectives.

BEST PRACTICE CASE STUDIES

London's long established cycle hire scheme is expanding and continues to be a best in class example. Recently the dockless alternative 'Ofo' has launched in the city and a number of London boroughs offering an infrastructure free alternative.

Both **New York** (CitiBike) and **Paris'** (Velib) bike hire schemes are extensive and well used but as in London dockless alternatives have started operations in Paris.

In **Sydney** ReadyGo and Obike already have dockless bike schemes across the city and Ofo are reportedly about to start operations. Guidelines for bike hire operators have also been issued in an attempt to mitigate any negative impacts.

In **Amsterdam** the car sharing platform Together has been automatically matching colleagues on the basis of location, working schedule and car ownership. Undertaken as part of the Amsterdam City initiative the project won the The Hague Innovation Award for 2017.

Copenhagen has a long established sharing culture and in the transportation sector the ByCyklen service offers a docked bike hire scheme for subscribers right across the capital. There are numerous car share companies offering a range of membership types and usage models.



'Logistics Hotel', Paris (Image Credit - Sogaris)

River Seine Cross-docking Facility, Paris



ENABLING MODAL SHIFT

Encouraging modal shift through innovation away from private cars and traditional large goods vehicles is a key approach to traffic reduction. The Walking and Cycling recommendations (earlier) include best practice examples, innovations in car and logistics are detailed below.

CITY OF LONDON'S POSITION

London arguably leads the way in achieving modal shift overall through a combination of investments in bus, tube, cycling and, as of next year, Crossrail. This trend is set to continue with the strong focus on reducing private car use in the Mayor's Transport Strategy and recent initiatives by the City of London Corporation to encourage sustainable logistics solutions for major new developments. However, modal shift for freight has been limited by the lack of rail freight terminals in and freight wharves in London, other than for construction traffic.

BEST PRACTICE CASE STUDIES

All of the cities studied are pursuing various initiatives to encourage individuals to use private cars less and public / shared transport, walking or cycling more, some of which have been detailed so far. Overall there are far too many initiatives to summarise here but the following are the more unusual which are pushing boundaries including in the logistics space.

In **Singapore** the Bus Service Enhanced Programme (BSEP) will add a total of 80 new services to serve new developments connecting residents to major transport nodes. Bus service frequency will be increased to 6-8 minutes during peak periods. With limited road space and a growing population, the city recognises the need to optimise public transport to move more people.

In **Göteborg** the city has promoted its GoFast Network which aims to provide journey times of no greater than 30 minutes between any two of the city's primary area irrespective of mode. To facilitate this bus and tram services will be given priority on street to improve journey times. Ferries also provide an essential part of the local transport network. The "Eldrivna Stadsleveranser" electric delivery service has just won the Swedish Quality Innovation Award for 2017. Operating from a consolidation centre in Gullbergsvass the service uses small electric trucks to deliver smaller loads to the historic core of the city on narrow pedestrianised streets.

In **Copenhagen** the Metro circle line (the city ring) is under construction and is expected to open in 2018. About 234,000 passengers are expected on the city ring on weekdays, with 3,000 new journeys in the greater Copenhagen area, and about 3.4 % more journeys by public transport. In the longer term, it is proposed to supplement the Metro system with more lines, including to two large urban development areas. The city also has a long established sharing culture, in the transportation sector the ByCyklen service offers a docked bike hire scheme for subscribers right across the capital and there are numerous car share companies offering a range of membership types and usage models – together providing alternatives to car ownership and use.

In **Paris** the electric car sharing scheme, AutoLib described earlier, provides residents access to shared electric vehicles right across the city providing a viable alternative to private car ownership. In **New York** the City allows employees access to its fleet vehicles out of hours.

In **Paris** the 'Logistics Hotel', which is under construction, will allow the transportation of food and drink for the Parisian restaurant and hotel trade by train from remote distribution depots hundreds of kilometres outside the city. The trains, 450m in length, will serve the facility up to four times a day allowing the transshipment of food and drink from train to wholesale market to sustainable distribution all within a single building just north of the Gare du Nord. The same site has local housing, community start-up facilities, a gym and an urban farm. As detailed earlier use of the River Seine for the transshipment of supermarket deliveries has removed 42 truck round trips from the city's roads per day. Paris also has a number of cross docking and micro-consolidation centres where shipments in large trucks are trans-shipped to smaller greener vehicles for the last mile deliveries within the city core. The City has designated micro-consolidation centres right across Paris as part of future zoning and planning conditions.

EMBRACING TECHNOLOGY

Considering the role and use of data-led, connected, autonomous and electronic payment solutions to streamline access to and use of transportation assets and services can encourage the use of the right mode for the right journey and improve efficiencies.

CITY OF LONDON'S POSITION

The City recognises the role that technology has to play in delivering improved outcomes for those that live and visit the city. The City is actively following the agenda and will look to encourage and deploy solutions which contribute to the aims of its Transport Strategy.

BEST PRACTICE CASE STUDIES

Gothenburg has been chosen by Volvo for the first large scale autonomous vehicle trial in the world using ordinary drivers and families on initially fixed routes around the city's environs. The trial is expected to start shortly and will lead to further deployment including London. Driver assist functions have also been trailed on the ElectriCity bus routes mentioned earlier to assess driver and safety benefits of such technologies.

Stockholm's *Smart and Connected strategy* sets out an aspiration to be "the smartest city in the world" by 2040. The strategy envisages the digitisation of most infrastructure and services within the city with a focus on openness, innovation and connectivity to deliver the best outcomes for citizens and business. UbiGo will relaunch its service which was developed in Gothenburg in 2013 as a small scale trial of offer Mobility as a Service solutions in Stockholm in 2018. The app based service will offer public transport, car-sharing, rental car and taxis on a subscription, pay monthly, book and use as you go basis – eliminating the need to pay for individual modes.

New York is focusing on the connected agenda rather than autonomous, deploying a number of trials to connect vehicles to highway and traffic control infrastructure to examine potential safety, operational and user benefits. The Metropolitan Transport Authority has recently announced that it will be overhauling its ticketing systems to bring in smartcard technology very similar to London's Oystercard.

Smart Mobility 2030 is **Singapore's** Intelligent Transport Systems (ITS) Strategic Plan, which recognises the role that ITS has played an important role in enhancing commuters' travelling experiences in Singapore. Its vision is "Moving towards a more connected and interactive land transport community" which will be delivered by three key strategies; implement innovative and sustainable smart mobility solutions, develop and adopt ITS standards, establish close partnerships and co-creation. There are also four focal areas; Informative, Interactive, Assistive and Green Mobility. The Singapore Autonomous Vehicle Initiative (SAVI) is a partnership to provide a technical platform for industry partners and stakeholders to conduct research and development and test-bedding of autonomous vehicle technology, applications and solutions, it has demarcated routes for autonomous vehicle testing.

Building upon **Amsterdam's** 'smart' aspirations a research collaboration between Massachusetts Institute of Technology and the Amsterdam Institute for Advanced Metropolitan Solutions has begun seeking to design and test the world's first fleet of autonomous boats making use of the city's extensive waterway network to transport people and goods. Numerous other "smart" initiatives are underway from Smart Grid developments and autonomous shuttles to smart traffic management and zero emission logistics.

VISION ZERO FOCUS

The Vision Zero concept involves adopting an approach where no loss of life is acceptable as a result of the transportation / highway system.

CITY OF LONDON'S POSITION

Vision Zero is proposed as part of the Mayor's Transport Strategy and will bring London into line with Sweden and New York. The City Corporation's ambitions in this area are already being demonstrated through the 'Bank on Safety' project and its pioneering focus on road danger reduction. For freight, FORS and CLOCS are key tools to improve standards and reduce injuries and fatalities among vulnerable road users.

BEST PRACTICE CASE STUDIES

Developed in **Sweden** in 1997 and adopted by the Government, Vision Zero aims to achieve a highway network with no fatalities or serious injuries involving road traffic. The Vision zero website states: "The Vision Zero is the Swedish approach to road safety thinking. It can be summarized in one sentence: No loss of life is acceptable. The Vision Zero approach has proven highly successful. It is based on the simple fact that we are human and make mistakes. The road system needs to keep us moving, but it must also be designed to protect us at every turn." Vision Zero principles are embedded in all activities in **Stockholm** and **Göteborg** with a focus on fatalities and serious injuries, integrating the failing human in design, shared responsibility between system and design, the premise that industry can be stimulated and, saving lives is cheap.

With approximately 4,000 New Yorkers seriously injured and more than 250 are killed each year in traffic crashes **New York** is one of nearly 30 cities across the USA that has adopted Vision Zero through a cross-agency initiative. The City of New York no longer regards traffic crashes as mere "accidents," but rather as preventable incidents that can be systematically addressed through design, enforcement and public education. As of the end of October 2017 the city has 151 separate Vision Zero initiatives.

RECOMMENDATIONS

The best practice research illustrates that the City of London and Greater London are broadly in line with the other cities examined in terms of their policy approach, ongoing initiatives and recent successes. In some instances London is leading the world. The Congestion Charge, an expanding and improving public transport network, work with the freight industry, and ambitious investment in cycling infrastructure are seen by other cities as global best practice. However, there are also areas where other cities are advancing more quickly, such as improving last mile deliveries while reducing their impact.

The recommendations that follow are intended to inform the development of the City of London Transport Strategy. They will help position the City of London as a global leader in the delivery of transport projects and programmes that serves the needs of business and residents for decades to come while enhancing quality of life and improving the built and natural environment.

Delivering such a step change will require not only the support of politicians, businesses and users / customers, but also of the City's partner organisations such as TfL, the GLA and transport operators, developers and other private companies.

INTEGRATING PEOPLE, PLACE AND ACTIVITY

- Develop a people focused mobility hierarchy for the City of London
- Review the highway and built environment to examine opportunities to enhance activity and place through road closures / restrictions
- Develop new public (or private) open spaces in all of the City's districts by working with developers or reallocating space
- Encourage diversification of the City of London's retail and hospitality offer by capitalising on public and private open spaces
- Work with partners to design in personal safety, healthy living and well-being into all new infrastructure

LOW IMPACT LOGISTICS

- Investigate the development of consolidation centres or cross docking operations outside of the City for major developments / clusters within
- Encourage developers to incorporate commercial micro-consolidation within new developments to provide sustainable last mile delivery / pick up within the City
- Encourage the use of cargo bike / e-cargo bike solutions within the city by enabling bespoke drop off facilities at major developments
- Work with businesses and encourage businesses to work together to better plan servicing, deliveries and refuse collection

RE-ALLOCATION OF ROAD SPACE TO PEDESTRIANS

- Review the highway network to examine where road space could be reallocated (full or part-time) to other uses including pedestrian / cycling or use as plazas
- Undertake low-impact trials of road / road space re-allocation to test processes and effectiveness to streamline traditional approaches
- Where traffic flows allow encourage the widening of pavements as part of new developments in the City

FOCUSING ON WALKING AND CYCLING

- Develop specific walking and cycling strategies for the City of London and recognise walking's role as the primary mode of transport within the Square Mile
- Encourage the role of cargo bikes and e-cargo bikes to service City commerce, retail and hospitality
- Ensure that the needs of people walking and cycling are the focus of all infrastructure design
- Develop a legible pedestrian and cycle network (including associated infrastructure) for the city linking all major generators and attractors

REDUCING CONGESTION

- Examine further options to reduce congestion in the City through major interventions such as 'Bank on Safety' to prioritise sustainable modes of transport within the City core
- Close rat runs within the City to focus traffic onto primary corridors
- Work with TfL to examine options for more punitive restrictions on diesel / petrol vehicles within the more sensitive areas in the city
- Examine the effectiveness of current Congestion Charging regime within the City with a view to develop City specific interventions if needs be

IMPROVING AIR QUALITY AND DE-CARBONISING TRANSPORT

- Transition the City of London fleet to non-fossil fuels over the next cycle of renewals where possible
- Work with TfL to prioritise emission free public transport on routes within the City of London
- Encourage developers to provide electric vehicle charging in developments for service and other vehicles
- Work with adjacent Boroughs to provide the charging / fuelling infrastructure for the next generation of electric / low emission commercial vehicles

SHARING OF ASSETS AND SERVICES

- Encourage car / van sharing services within the City to move to a normalised model of access vs. ownership to reduce underutilised and parked vehicles
- Work with TfL to anticipate disruption to the hire-bike market and develop appropriate management regimes and policies

ENABLING MODAL SHIFT

- Encourage the creation of local and micro consolidation centres for the distribution of goods and freight by cycling and walking
- Enhance pedestrian and cycling networks to prioritise highway space for sustainable last mile / first mile trips
- Encourage the concept of walking being the most desirable form of access in the City

EMBRACING TECHNOLOGY

- Examine the role of connected and autonomous technologies to improve mobility within the City but ensure that they are not at the detriment of walking and cycling, nor a contribution to congestion
- Examine the role of automation within the logistics sector particularly where new developments could be adopt 'future ready' designs
- Consider how new models of mobility will work with traditional City infrastructure particularly on-demand modes which could potentially exacerbate parking / congestion issues

VISION ZERO FOCUS

- Adopt Vision Zero principles for all City of London activities

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