

# **Planning and Transportation Committee**

Date: TUESDAY, 29 MAY 2018

Time: 10.30 am

Venue: LIVERY HALL - GUILDHALL

**Members:** Christopher Hayward (Chairman)

Deputy Alastair Moss (Deputy

Chairman)

Munsur Ali

Rehana Ameer

Randall Anderson Peter Bennett

Sir Mark Boleat
Mark Bostock

Deputy Keith Bottomley

Henry Colthurst Peter Dunphy Emma Edhem

Stuart Fraser Marianne Fredericks

Prem Goyal OBE JP (Alderman)

Graeme Harrower Christopher Hill

Deputy Jamie Ingham Clark

Alderman Gregory Jones QC

Shravan Joshi Oliver Lodge

Alderman Nicholas Lyons

**Andrew Mayer** 

**Deputy Brian Mooney** 

Sylvia Moys
Barbara Newman
Graham Packham
Susan Pearson
Judith Pleasance
Deputy Henry Pollard
James de Sausmarez

Oliver Sells QC Graeme Smith William Upton

Alderman Sir David Wootton

**Enquiries:** Amanda Thompson

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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 8 May 2018.

For Decision (Pages 1 - 10)

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

Report of the Chief Planning Officer and Development Director.

For Information (Pages 11 - 20)

5. VALID APPLICATIONS LIST FOR COMMITTEE

Report of the Chief Planning Officer and Development Director.

For Information (Pages 21 - 24)

6. EASTERN CITY CLUSTER AREA ENHANCEMENT STRATEGY: PRE-CONSULTATION REPORT

Report of the Director of the Built Environment.

For Decision (Pages 25 - 60)

7. DOCKLESS CYCLE HIRE

Report of the Director of the Built Environment. (To be read in conjunction with the non-public appendix at Item 19).

For Decision (Pages 61 - 80)

8. POSTMAN'S PARK SPD

Report of the Director of the Built Environment.

Please note that Appendix C to this report will be circulated electronically.

For Decision (Pages 81 - 124)

### 9. TRANSPORT STRATEGY – VISION, AIMS AND OUTCOMES

Report of the Director of the Built Environment.

For Decision

(Pages 125 - 136)

### 10. TRANSPORT STRATEGY - PHASE ONE ENGAGEMENT REPORT

Report of the Director of the Built Environment.

For Information

(Pages 137 - 172)

### 11. TUDOR STREET

Report of the Director of the Built Environment. (To be read in conjunction with the non-public appendix at Item 20).

For Decision

(Pages 173 - 186)

# 12. TOWARDS A SUSTAINABLE FUTURE: THE CITY OF LONDON CORPORATION'S RESPONSIBLE BUSINESS STRATEGY - 2018-23

Report of the Chamberlain and the Chief Grants Officer

For Information

(Pages 187 - 206)

### 13. SENIOR OFFICER RECRUITMENT

Report of the Director of the Built Environment.

For Information

(Pages 207 - 208)

### 14. OUTSTANDING REFERENCES

Report of the Town Clerk.

For Information

(Pages 209 - 214)

### 15. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

# 16. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT St Bart's Hospital.

(Pages 215 - 324)

### 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.

# Part 2 - Non-public Agenda

# 18. PLANNING AND REGULATORY SERVICES CASEWORK MANAGEMENT SYSTEM PROJECT

Report of the Director of the Built Environment.

**For Decision** 

(Pages 325 - 340)

19. DOCKLESS PARK: NON-PUBLIC APPENDIX

To be read in conjunction with the report at Item 7.

For Information

(Pages 341 - 342)

20. TUDOR STREET - NON-PUBLIC APPENDIX

To be read in conjunction with the report at Item 11.

**For Decision** 

(Pages 343 - 344)

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

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

### PLANNING AND TRANSPORTATION COMMITTEE

### Tuesday, 8 May 2018

Minutes of the meeting of the Planning and Transportation Committee held at the Guildhall EC2 at 10.30 am

#### **Present**

Members:

Christopher Hayward Deputy Jamie Ingham Clark
Deputy Alastair Moss Alderman Gregory Jones QC

Munsur Ali Shravan Joshi Randall Anderson Oliver Lodge

Peter Bennett Alderman Nicholas Lyons

Sir Mark Boleat Andrew Mayer

Mark Bostock Deputy Brian Mooney

Deputy Keith Bottomley

Henry Colthurst

Peter Dunphy

Emma Edhem

Stuart Fraser

Marianne Fredericks

Sylvia Moys

Barbara Newman

Graham Packham

Susan Pearson

Judith Pleasance

Deputy Henry Pollard

Alderman Prem Goyal

Graeme Harrower

Deputy Henry Pol
Oliver Sells QC
Graeme Smith

Christopher Hill Alderman Sir David Wootton

Officers:

Simon Murrells - Assistant Town Clerk
Amanda Thompson - Town Clerk's Department
Jennifer Ogunleye - Town Clerk's Department

Simon Owen - Department of the Built Environment

Deborah Cluett - Comptrollers & City Solicitor

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
Steve Presland - Transportation & Public Realm Director

### APOLOGIES

Apologies for absence were received from Rehana Ameer and James de Sausmarez.

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

Deputy Alastair Moss declared a personal interest in agenda item 11 - 3-4 Bartholomew Place, London and advised that he would leave the meeting during the deliberations.

Randall Anderson and Alderman Sir David Wootton also declared personal interests in this item as Members of the Worshipful Company of Information Technologists who had objected to the proposal. However they indicated that they would remain in the meeting and vote..

Barbara Newman and Deputy Brian Mooney declared personal interests in agenda item 12 – Broken Wharf House – and advised that they would remain in the meeting and vote.

### 3. ORDER OF THE COURT OF COMMON COUNCIL

The Order of the Court of Common Council, appointing the Committee and approving its Terms of Reference was received.

### 4. ELECTION OF CHAIRMAN

The Committee proceeded to elect a Chairman pursuant to Standing Order No. 29. A list of Members eligible to stand was read and Christopher Hayward declared his willingness to serve.

With Christopher Hayward being the only member indicating his willingness to do so, the Committee;

RESOLVED – That Christopher Hayward be elected Chairman in accordance with Standing Order 29 for the year ensuing.

On being elected, the Chairman thanked the Committee for its support.

The Chairman welcomed new Members Alderman Prem Goyal, Alderman Sir David Wootton, Munsur Ali, Peter Bennett, Stuart Fraser and Shravan Joshi to the Committee, and expressed his thanks and appreciation to Alderman Vincent Keaveny, Alderman Robert Howard, Sophie Fernandes and Jason Pritchard who were standing down.

### 5. **ELECTION OF DEPUTY CHAIRMAN**

The Committee proceeded to elect a Deputy Chairman pursuant to Standing Order No. 30. A list of Members eligible to stand was read and Alastair Moss declared his willingness to serve.

With Alastair Moss being the only member indicating his willingness to do so, the Committee:

RESOLVED – That Alastair Moss be elected Deputy Chairman in accordance with Standing Order 30 for the year ensuing.

On being elected the Deputy Chairman thanked the Committee for their support.

### 6. APPOINTMENT OF SUB-COMMITTEES

The Committee considered a report of the Town Clerk relative to the appointment of Sub Committees for the ensuring year (2018/2019).

### **RESOLVED** – That,

- a) the Streets and Walkways Sub Committee Terms of Reference be approved;
- b) the following memberships be agreed:-

# **Streets and Walkways Sub Committee**

Chairman of the Grand Committee – Chris Hayward
Deputy Chairman of the Grand Committee – Deputy Alistair Moss
Randall Anderson
Keith Bottomley
Marianne Fredericks
Alderman Gregory Jones
Deputy Jamie Ingham Clark
Graham Packham
Oliver Sells

Together with three ex-officio Members representing the Finance, Police and Open Spaces & City Gardens Committees.

# **Local Plans Sub Committee and Local Plan Working Party**

Chairman of the Grand Committee – Chris Hayward
Deputy Chairman of the Grand Committee – Deputy Alistair Moss
Randall Anderson
Mark Bostock
Deputy Keith Bottomley
Marianne Fredericks
Alderman Gregory Jones

Together with an ex-officio Member representing the Policy and Resources Committee.

### **RESOLVED** – That the report be noted

### 7. MINUTES

RESOVED - That the minutes of the meeting held on 8 May 2018 be agreed as a correct record subject to:

In the fourth para of item 13 the addition of the words "70% identified themselves as taxi/private hire drivers".

### **Question from Sir Mark Boleat**

Officers have been instructed to model allowing black cabs greater access through Bank Junction. What is the rationale behind considering giving preference to just one category of vehicle with few passengers? How was the decision taken and what opportunity have Members had to consider or review it?

## **Response from the Chairman**

The instruction to officers to examine the opportunities for introducing some relaxation of the restrictions at Bank, to allow taxis to use the junction, was given by me. Throughout the course of the project, officers and I have met with representatives of the taxi trade on a number of occasions. They have repeatedly asked that the scheme be modified and taxis be allowed to drive through the junction at all times. During the early stages of the experiment, I was being approached by many; including Members of the Court. The request was always to modify the scheme to allow taxis to use the junction during the day.

The experiment was initiated with safety as its key objective and modelling the impact of letting taxis into Bank looked to establish whether there was an alternative option that would greater satisfy acceptance of the experiment and reduce the risk of ending the experiment with no permanent change agreed. This was about managing risk.

Officers have just completed their modelling of the impact of letting taxis use Bank. The information will be shared with members at two briefing sessions that have been lined up for the 15 May and 28 June. The report that will come to this Committee on the 19 June, seeking a recommendation on the future of Bank, will mention the assessment undertaken by officers.

### **Question from Marianne Fredericks**

Ms Fredericks referred to the question asked at the last meeting regarding action taken under urgency in relation to this matter and asked why the Committee had still not seen any record or minute to that effect.

The Transportation & Public Realm Director advised that the decision to utilise central contingency funds was taken following consultation with the Chairman, Deputy Chairman and the Chairman and Deputy Chairman of the Projects Sub Committee, and the delegated decision would be placed before the Project Sub-Committee on the 16 May 2018.

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

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

**RESOLVED** – That the report be noted.

### 9. VALID APPLICATIONS LIST FOR COMMITTEE

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

**RESOLVED** – That the report be noted

### 10. 35 FURNIVAL STREET LONDON

The Chairman reported that this item had been deferred from the last meeting to enable a site visit to take place.

The Chairman advised that the Committee would resume debate on the matter and only Members present at the last meeting were eligible to consider and vote on the application.

The Chairman then read out a list of those Members eligible to do so.

Debate ensured and several Members spoke in support of the application which they felt would not impact on privacy or increase the level of overlooking over and above the existing situation.

The proposal was put to the vote with 15 voting FOR, 3 AGAINST and 2 ABSTENTIONS.

**RESOLVED** - That planning permission be granted for the above proposal in accordance with the details set out in the attached schedule

### 11. 3 - 4 BARTHOLOMEW PLACE LONDON

The Deputy Chairman left the meeting during discussion on this item.

The Chief Planning Officer (CPO) introduced the application concerning the redevelopment of an existing light industrial building to provide a seven-storey building to create nine residential units.

Members asked a number of questions in relation to the green roof, the use of the courtyard, the life span and relevance of the planning policies, and daylight and sunlight issues.

Some Members expressed concern regarding the regarding the height of the building and the lack of sunlight, however other members considered that these concerns were outweighed by the fact that the building was currently vacant and in a poor state of repair.

The proposal was put to the vote with 28 voting FOR, 4 AGAINST and 0 ABSTENTIONS.

### RESOLVED - That

- 1) Planning permission be granted for the above proposal in accordance with the details set out in the attached scheduled; and
- 2) That negotiate and execute obligations in respect of those matters set out in "Planning Obligations".

### 12. BROKEN WHARF HOUSE. 2 BROKEN WHARF

The CPO introduced the application relating to the change of use of Broken Wharf House to create an apart-hotel with ancillary gym, workspace and restaurant.

The Committee noted that local residents had expressed concerns over the servicing arrangements and the impact of the scheme on residential amenity, and that the applicant had now revised the application to address the matters raised.

Members sought clarification of the proposed servicing arrangements, in particular the collection of refuse, and it was suggested that perhaps residents could be written to and asked to ensure that the conditions were met.

A member of the public present interrupted the meeting at this point to advise that he had requested to speak in objection to the application but had received no confirmation to do so, in the circumstances the Chairman advised the objector that he would allow him to address the Committee.

Mr Forlin spoke in objection to the application on the grounds of servicing issues, noise and disturbance, lack of access for the fire brigade, and the fact that there was no need for any more hotel development in the City.

The proposal was put to the vote with 31 voting FOR and 1 ABSTENTION.

RESOLVED - That planning permission be granted for the above proposal in accordance with the details set out in the attached schedule and for the reasons set out in this report.

### 13. DECLARATION OF CITY WALKWAY AT 33 KING WILLIAM STREET

The Committee received a report of the Director of the Built Environment concerning the new public staircase and lift at 33 King William Street between Upper Thames Street and King William Street which had now been constructed and conformed to the City Corporation's standards for new city walkways.

#### RESOLVED - To

- 1) Declare to be a city walkway the new public staircase and lift at 33 King William Street between Upper Thames Street and King William Street on a date to be determined in the terms of the resolution set out at Appendix 1 to this report; and
- 2) 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 make the declaration.

# 14. CITY CORPORATION RESPONSE TO GOVERNMENT CONSULTATION ON THE NATIONAL PLANNING POLICY FRAMEWORK

The Committee received a report of the Director of the Built Environment concerning the City of London's response to the National Planning Policy Framework (NPPF), published by the Ministry of Housing, Communities and Local Government.

Members welcomed the report and the work undertaken by officers, but commented that a greater steer from London Councils was needed in relation to the national drive for affordable housing.

RESOLVED – To agree the comments set out in paragraphs 4 to 20 of this report, and the detailed comments in Appendix 1, as the City Corporation's response to the Government's consultation on the draft National Planning Policy Framework.

# 15. CITY CORPORATION RESPONSE TO GOVERNMENT CONSULTATION ON SUPPORTING HOUSING DELIVERY

The Committee received a report of the Director of the Built Environment concerning the City of London's response to the Government consultation on supporting housing delivery through developer contributions.

The Committee were not content with the suggested use of the CPI inflation index and it was agreed that the suggested response should not advocate a specific inflation index but should refer to the factors that should be taken into account by the Government when recommending an inflation index. These factors were changes in the cost of construction and changes in the value of the development as evident from sales or lettings information relevant to central London including the City of London.

RESOLVED - That in the light of comments made by Members, officers amend the final wording and approval be delegated to the Town Clerk, in consultation with the Chairman and Deputy Chairman.

### 16. ARTICLE 4 DIRECTION

Prior to the introduction of this item the Chairman sought the Committee's agreement to extend the meeting and this was supported.

The Committee received a report of the Director of the Built Environment regarding the confirmation of a non-immediate Article 4 Direction to remove permitted development rights for the change of use of offices (B1(a)) to dwelling houses (C3).

### **RESOLVED - to:**

- Approve the confirmation of the non-immediate Article 4 Direction made on 31 January 2018 and coming into force on 31 May 2019 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 and any land within its curtilage from offices (Use Class B1(a)) to dwellinghouses (Use Class C3).
- 2) Authorise officers to take all necessary steps to give effect to the decision including publicising confirmation of the Article 4 Direction in accordance with statutory requirements.

### 17. FUNDING FOR ENFORCEMENT OFFICER FOR CITY'S BRIDGES

The Committee received a report of the Director of the Built Environment seeking approval to the funding from Bridge House Estate of an additional post managed within the Markets and Consumer Protection Department for a Licensing Officer to be dedicated to carry out enforcement activities on the City's Bridges, particularly those bridges, parts of bridges and adjacent areas which were normally within the jurisdiction of neighbouring Local Authorities.

Members questioned if one officer was sufficient for the task and it was agreed that the Committee should be provided with a progress report in case further resources were needed.

### RESOLVED - to

- 1) Agree to the creation of a full time Licensing Officer post dedicated to enforcing across the City's Bridges; and
- 2) Agree to the funding of this post from the Bridge House Estates Fund.

### 18. BANK ON SAFETY

The Committee received a report of the Director of the Built Environment detailing the consultation results of the Bank on Safety consultations.

Members were advised that of the consultation survey, 45% of respondents supported the experiment as implemented, a further 29% generally supported the scheme but wanted to see changes, and a total 75% of respondents supported or generally supported the experiment.

Members noted that the majority of business and representative group respondents were supportive, including the City Property Association, which represented 150 businesses within the City.

Overall, the most frequent request of a variation in the consultation survey was to allow black cabs through the junction. This was suggested by 12% of the total respondents.

Members asked a number of questions in relation to the effect of the closure on public transport and whether or not the impact of the gas main repair had strengthened the evidence to close

Members commented that the consultation response had been excellent and the data entirely conclusive.

RESOLVED – That the outcomes of the Bank on Safety Consultation exercise be noted.

### 19. HIGHWAY INFRASTRUCTURE CODE OF PRACTICE

The Committee received a report of the Director of the Built Environment concerning the adoption of the Highways Infrastructure Code of Practice.

RESOLVED – That the report be noted.

# 20. DEPARTMENT OF THE BUILT ENVIRONMENT RISK MANAGEMENT - QUARTERLY REPORT

The Committee received the quarterly risk management report for the Department of the Built Environment.

RESOLVED – That the report be noted.

### 21. REFERRAL FROM PORT HEALTH & ENVIRONMENTAL SERVICES.

The Committee received a note of the discussion and issued raised by the Port Health & Environmental Committee in relation to the proposal to substitute Moor Lane as an ultra-low emission street due to the illegal levels of air pollution within Beech Street.

RESOLVED – That the referral be noted.

### 22. OUTSTANDING REFERENCES

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

# 23. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

**Beech Street Tunnel Closure** 

A Member requested some feedback on the impact of the closure of the Beech Street Tunnel due to an event.

# **Committee Away Day**

In response to a question concerning the organisation of a Committee Away Day, the Chairman agreed that this would be good idea and asked the Town Clerk to arrange this.

- 24. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**There were no items of urgent business.
- 25. 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.

### 26. **SECURITY PROGRAMME**

The Committee received a Gateways 3/4 report of the Director of the Built Environment concerning a security programme for the City of London.

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

There were no questions.

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

There were no items of urgent business.

The meeting closed at 1.15 pm	
Chairman	

**Contact Officer: Amanda Thompson** 

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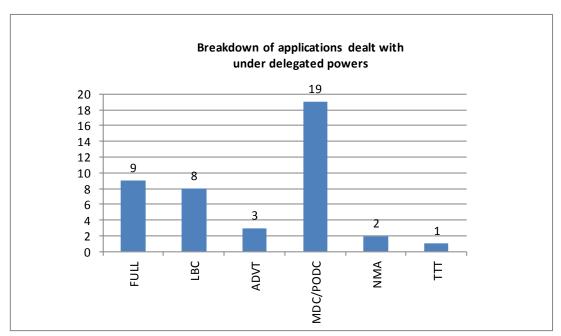
Committee(s)	Dated:
Planning and Transportation	29 <sup>th</sup> May 2018
Subject: Delegated decisions of the Chief Planning Officer and Development Director	Public
Report of: Chief Planning Officer and Development Director	For Information

# **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 forty-two (42)] matters have been dealt with under delegated powers.

Nineteen (19) relate to conditions of previously approved schemes, eight (8) relate to works to listed buildings. Three (3) express consent to display advertisements were decided, also one (1) Thames Tideway Tunnel, two (2) Non-Material amendment applications. Nine (9) applications for development have been approved including two (2) changes of use and 2,172sq.m of created floorspace.



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

**PODC** - Planning Obligations **NMA** - Non-Material Amendments **TTT** - Thames Tideway Tunnel 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
17/00751/MDC Cordwainer	Land bounded by Cannon Street, Queen Street, Queen Victoria Street, Bucklersbury & Walbrook London EC4	Delivery and Servicing Management Plan pursuant to condition 40 of planning permission dated 13th June 2017 (application reference 16/01288/FULL).	Approved 10.05.2018
17/00950/MDC Bishopsgate	100 Liverpool Street London EC2M 2RH	Details of contaminated land pursuant to condition 6 (part) of planning permission dated 8 May 2017 (17/00276/FULL).	Approved 01.05.2018
17/01285/ADVT Langbourn	88 Gracechurch Street London EC3V 0DN	Installation of (i) two wall mounted brass plaques measuring 0.50m high by 0.35m wide and 1.10m above ground level and; (ii) one set of applied vinyl letters measuring 0.14m high by 1.20m wide and 2.60m above ground level.	Approved 10.05.2018
18/00075/MDC Broad Street	15 - 18 Austin Friars London EC2N 2HE	Details of new plinth and balustrades pursuant to condition 2 of planning permission dated 19th December 2017 (planning reference 17/00816/FULL).	Approved 08.05.2018
18/00077/MDC Coleman Street	21 Moorfields, Land bounded by Moorfields, Fore Street Avenue, Moor Lane & New Union Street London EC2P 2HT	Details of the piling configuration, drainage layout and impact on Crossrail infrastructure pursuant to conditions 2, 3, 12 and 13 of planning permission (application no. 16/00883/FULEIA) dated 10th October 2017.	Approved 27.04.2018

10/00000/7070	70 00 5 : :	0.1	Α .
18/00093/PODC Tower	76 - 86 Fenchurch Street, 1 - 7 Northumberland Alley & 1 & 1A Carlisle Avenue London EC3N 2ES	Submission of a Utility Connection Programme pursuant to Schedule 3 Paragraph 11.1 of the Section 106 Agreement dated 11 November 2014 in relation to Planning Permission 08/00824/FULEIA (as varied by 15/00702/FULMAJ).	Approved 24.04.2018
18/00083/LBC 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.	Approved 01.05.2018
18/00106/FULL Farringdon Within	Footway to The Eastern Side of 70 Farringdon Street London EC4	Installation on the carriageway of a cycle hire docking station associated with the London Cycle Hire Scheme, containing a maximum of 26 docking points for scheme bicycles plus a terminal to secure and release bicycles and provide registration and payment facilities and way-finding mapping.	Approved 01.05.2018
18/00110/MDC Coleman Street	55 Moorgate London EC2R 6PA	Details of a scheme for the provision of disabled access to the units offices and retail units, pursuant to condition 26 of planning permission 16/00405/FULMAJ dated 11.10.17.	Approved 24.04.2018
18/00120/MDC Farringdon Within	Fleet Building, 40 Shoe Lane, 70 Farringdon Street, Plumtree Court, 42 Shoe Lane, 12 Plumtree Court And 57 Farringdon Street London, EC4A 3AF	Submission of a scheme for disabled people to gain access to principle entrances pursuant to condition 17 of planning permission dated 28.10.2013 (App No 12/01225/FULEIA)	Approved 24.04.2018

18/00150/PODC	Bernard Morgan	Submission of the Open Space	Approved
Cripplegate	House 43 Golden Lane London EC1Y 0RS	Method Statement pursuant to Schedule 3 Paragraph 11.2.1 of the Section 106 Agreement dated 30 August 2017 in relation to planning permission 16/00590/FULL.	10.05.2018
18/00154/LBC	16 Old Bailey London	Erection of a two storey roof extension (1,417sq.m GEA)	Approved
Farringdon Within	EC4M 7EG	plus plant room for office use (Class B1) with the associated formation of new terrace areas, infilling of an atrium (755sq.m GEA) and external alterations to the Fleet Place façade including the introduction of greening, alterations to the ground floor of the Old Bailey façade including the insertion of new doors and windows, removal of the first floor of the building, internal reconfiguration of the layout and other works incidental to the development.	24.04.2018
18/00149/MDC	1 Poultry London EC2R 8EJ	Details of (i) detailed design, method statements and	Approved
Cordwainer	LOZIVOLJ	assurances (in consultation with London Underground) for fire risk to ensure safety of the railway, passengers and staff and (ii) a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects pursuant to conditions 2 and 3 of planning permission 16/00841/FULL dated 20.06.2017.	24.04.2018
18/00187/PODC	Land bounded by Charterhouse	Submission of the Local Procurement Strategy and the	Approved
Farringdon Within	Street, Lindsey Street, Long Lane and Hayne Street London EC1	Local Training, Skills and Job Brokerage Strategy (Construction) pursuant to Schedule 3 Clause 2.1 and 3.2 of the Section 106 Agreement dated 07 December 2015 in relation to Planning Permission	24.04.2018

18/00159/FULL	2 Finchury	Change of use for a temperary	Approved
Bishopsgate	3 Finsbury Avenue London EC2M 2PA	Change of use, for a temporary period, of (i) part ground floor (north) from office (Class B1) to	Approved 10.05.2018
Bishopsgate	EC2M 2PA	(north) from office (Class B1) to a flexible use for either retail (Class A1) or cafe/restaurant (Class A3) or office (Class B1) (126.31sq.m GIA); and (ii) part ground floor (south) from office (Class B1) to a flexible use for either: retail (Class A1) or cafe/restaurant (Class A3) or non-residential institution use (Class D1) or office (Class B1) (173.80sq.m GIA); external alterations to remove external fins to part of the north, east and southern elevation; addition of external double doors to the northern elevation; and addition of external double doors with ramped entrance to the eastern elevation.	10.05.2018
18/00172/MDC	21 Moorfields,	Details of a scheme for	Approved
	Land bounded by	protecting nearby residents and	
Coleman Street	Moorfields, Fore Street Avenue, Moor Lane & New Union Street London EC2P 2HT	commercial occupiers from noise, dust and other environmental effects during construction (Phase 1) pursuant to condition 8 [in part] of planning permission (application no 16/00883/FULEIA) dated 2nd February 2017.	26.04.2018
18/00196/MDC	80 Cheapside London	Details of materials and the junctions between the new	Approved
Cordwainer	EC2V 6EE	entrance portal and the existing building pursuant to the discharge of condition 2 parts (i) and (ii) of planning permission 17/01027/FULL dated 10th January 2018.	24.04.2018
18/00199/TTT	Tideway Working Area Blackfriars	Partial discharge of schedule 3 requirement relating to	Approved
Castle Baynard	Bridge Foreshore Victoria Embankment London	Construction Logistics Plan pursuant to PW6 of the Thames Water Utilities Limited (Thames Tideway Tunnel) Order 2014 as	01.05.2018
	EC4Y 0DR	amended.	

18/00200/FULL	23 Great	Installation of a new condenser	Approved
Broad Street	Winchester Street London EC2P 2AX	unit and pipework within the existing light well.	24.04.2018
18/00201/LBC	23 Great	Installation of a new condenser	Approved
Broad Street	Winchester Street London EC2P 2AX	unit and pipework within the existing light well and internal alterations.	24.04.2018
18/00202/LBC	New Moon Public	Installation of replacement	Approved
Langbourn	House 88 Gracechurch Street London EC3V 0DN	illuminated and non-illuminated advertisement materials including menu boxes, fascia signs and a high level projecting sign.	10.05.2018
18/00215/MDC	Walsingham House 35	Details of particulars and samples of the materials to be	Approved
Tower	Seething Lane London EC3N 4AH	used on all external faces of the building including external ground and upper level surfaces pursuant to condition 7a (part) of planning permission 14/01226/FULMAJ dated 08.01.16.	01.05.2018
18/00216/FULL	2 King's Bench Walk London	External alterations comprising (i) modification of the existing	Approved
Farringdon Without	EC4Y 7DE	cornice to incorporate a gutter, and (ii) the installation of two new cast iron down pipes and hoppers.	26.04.2018
18/00219/LBC	33 Defoe House Barbican	Removal of non-structural wall between kitchen and living	Approved
Aldersgate	London EC2Y 8DN	room. Replacement of all internal doors with full height doors.	03.05.2018
18/00225/FULL	11 Mitre Street London	Relocation of a pass door at ground floor level.	Approved
Aldgate	EC3A 5BU	ground noor level.	26.04.2018
18/00226/FULL	11 Mitre Street	Installation of a signage totem	Approved
Aldgate	London EC3A 5BU	within the site boundary.	26.04.2018

18/00227/MDC	10 Fleet Place	Submission of details of a	Approved
18/00227/18100	London	scheme for the protection	Approved
Farringdon Within	EC4M 7RB	nearby residents and	26.04.2018
l anniguon main	20	commercial occupiers from	
		noise, dust and other	
		environmental effects pursuant	
		to condition 3 of planning	
		permission dated 24/01/2017	
		(16/01034/FULL).	
18/00229/FULL	77 Gracechurch	Change of use of part ground	Approved
	Street London	floor, part lower ground floor	
Langbourn	EC3V 0AS	and lower ground floor level 2	03.05.2018
		from plant and equipment area	
		to gymnasium (Class D2)	
18/00236/LBC	1/2 Royal	(337sq.m total floorspace). Installation of a waterproof	Approved
10/00230/LDC	Exchange London	membrane to the basement	Approved
Cornhill	EC3V 3LL	vaults of 1/2 Royal Exchange.	26.04.2018
	2001 022	vadite of 1/2 regar Exertainge.	20.01.2010
18/00253/FULL	1-3 Frederick's	Replacement of windows at	Approved
	Place London	basement to fifth floor levels	
Cheap	EC2R 8AE	with new timber and steel crittal	10.05.2018
		double-glazed units.	
10/00051/1000	405 1 11		
18/00254/LBC	1-3 Frederick's	Replacement of windows at	Approved
Chaon	Place London EC2R 8AE	ground to sixth floor levels with new timber and steel crittal	10.05.2018
Cheap	EUZR OAE	double-glazed units.	10.05.2016
		double-glazed utilits.	
18/00260/NMA	1-3, 4, 5, 7 & 8	Non-Material Amendment	Approved
	Fredericks Place	under Section 96A of the Town	
Cheap	& 35 Old Jewry	and Country Planning Act 1990	10.05.2018
·	London	to planning permission	
	EC2R 8AE	(application no.	
		15/01308/FULL) dated 4th	
		October 2016 to reflect minor	
		detail alterations to the internal	
		layout and roof level plant	
		enclosure at nos. 1-3	
18/00271/MDC	A _ 8 Ludgato	Frederick's Place.	Approved
10/002/1/1/1000	4 - 8 Ludgate Circus London	Submission of details of plant noise following installation and	Approved
Castle Baynard	EC4M 7LF	prior to operation pursuant to	01.05.2018
Jacks Dayriaid		condition 2 (b) and details of	01.00.2010
		the mounting of the external	
		plant pursuant to condition 3 of	
		planning permission	
		16/01137/FULL dated	
		20.04.2017	

18/00263/LBC	89-91 Gresham	Refurbishment of the 4th & 5th	Approved
Cheap	Street & 90 Basinghall Street London EC2V 5AY	floor office accommodation and replacement of finishes to the ground floor entrance/reception.	10.05.2018
18/00275/MDC Bishopsgate	100 Liverpool Street & 8 - 12 Broadgate London EC2M 2RH	Details of fume extract arrangements pursuant to condition 11 of planning permission 17/00276/FULL dated 05.06.17.	Approved 10.05.2018
40/00077/14/00			
18/00277/MDC Farringdon Within	Site bounded By 34-38, 39-41, 45-47 & 57B Little Britain & 20, 25, 47, 48-50, 51-53, 59, 60, 61, 61A & 62 Bartholomew Close, London EC1	Details of archaeological evaluation in respect of Phase 3 of the development pursuant to condition 12 of planning permission dated 16.03.17 (application number 16/00165/FULMAJ).	Approved 03.05.2018
18/00280/ADVT Bishopsgate	100 Liverpool Street & 8-12 Broadgate London EC2M 2RH	Installation and display of one non-illuminated hoarding advertisement associated with the 100 Liverpool Street development.	Approved 10.05.2018
18/00295/ADVT Aldgate	Site Boundary 1 Creechurch Place London	Installation and display of one illuminated neon cycle parking sign mounted on black background measuring 2.1m high by 0.3m wide.	Approved 03.05.2018
18/00301/FULL Cheap	89-91 Gresham Street & 90 Basinghall Street London EC2V 5AY	Refurbishment of 5th floor terrace	Approved 10.05.2018
18/00322/NMA Broad Street	15 - 18 Austin Friars London EC2N 2HE	Non-material amendment under Section 96A of the Town and Country Planning Act 1990 (as amended) to planning permission 17/00816/FULL	Approved 08.05.2018

		dated 19th December 2017 to allow the addition of a dormer window to the western elevation at fifth floor level, a drop-down ladder at the southern elevation of the roof, and a smoke extract fan located on the roof.	
18/00317/MDC	6 Bream's Buildings London	Details of archaeological evaluation pursuant to condition	Approved
Farringdon Without	EC4A 1HP	9 of the planning permission dated 10 March 2016 (application number 15/00971/FULL)	10.05.2018
18/00368/MDC	51 Eastcheap London	Details of a Demolition and Construction Logistics Plan	Approved
Billingsgate	EC3M 1JA	(including a Scheme of Protective Works) pursuant to conditions 2 and 3 of planning permission (application no. 17/01221/FULL) dated 15th March 2018.	10.05.2018

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# Agenda Item 5

Committee(s)	Dated:
Planning and Transportation	29 <sup>th</sup> May 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 <a href="mailto:plans@cityoflondon.gov.uk">plans@cityoflondon.gov.uk</a>.

# **Details of Valid Applications**

Application Number & Ward	Address	Proposal	Date of Validation
18/00377/FULLR3 Aldgate	The Willis Building, 51 Lime Street, London, EC3M 7DQ	Temporary installation of a sculpture 'Numen (Shifting Votive Three)' by Thomas J Price for a period of up to one year, to be taken down on or before 01.06.2019.	20/04/2018
18/00374/FULLR3 Aldgate	Heneage Lane, London, EC3A 5DQ,,	Temporary installation of a sculpture 'Sari Garden' by Clare Jarrett for a period of up to one year, to be taken down on or before 01.06.2019.	20/04/2018
18/00375/FULLR3 Aldgate	Fenchurch Place, London, EC3M 4AJ	Application under Section 73 of the Town and Country Planning Act 1990 to vary condition 1 of planning permission 17/00338/FULLR3 dated 06.06.2017 to extend the temporary time period for the installation of the sculpture 'Synapsid' by Karen tang to 01.06.2019.	20/04/2018
18/00379/FULLR3 Aldgate	Willis Building, 51 Lime Street, London, EC3M 7DQ	Temporary installation of a sculpture 'Stack Blues' by Sean Scully for a period of up to one	20/04/2018

		year, to be taken down on or before 01.06.2019.	
18/00395/FULLR3 Aldgate	Mitre Square, London, EC 3A 5DH	Temporary installation of a sculpture 'Climb' by Juliana Cerqueira Leite for a period of up to one year, to be taken down on or before 01.06.2019.	24/04/2018
18/00397/FULLR3 Aldgate	Cunard Place, London, EC3A 5AR	Temporary installation of a sculpture 'UNIVRS' by Michail Pirgelis for a period of up to one year, to be taken down on or before 01.06.2019.	24/04/2018
18/00398/FULLR3 Aldgate	20 Bury Street Passage, London, EC3A 7HL	Temporary installation of a sculpture 'Your Lips Moved Across my Face' by Tracey Emin for a period of up to one year, to be taken down on or before 01.06.2019.	24/04/2018
18/00380/FULL Billingsgate	10 Lower Thames Street, London, EC3R 6EN	Change of use of part lower ground floor (1,315sq.m) from office (Class B1) to a gym (Class D2) and associated works including the installation of a new stair and platform lift to the Lower Thames Street facade and 16 cycle parking stands on service bay access ramp.	23/04/2018
18/00424/FULL Billingsgate	5 - 10 Great Tower Street, London, EC3R 5AA	Installation of fifteen A/C condenser units at roof level.	01/05/2018
18/00400/FULL Bishopsgate	Open Space, Exchange Square, London, EC2A 2EH	Erection of a pop-up bar, storage facilities and a structure incorporating LED screen and associated outdoor seating arrangements for a temporary period between 8th June 2018 and 2nd September 2018.	26/04/2018
18/00382/FULL Bridge and Bridge Without	31-35 Eastcheap, London, EC3M 1DT	Application under Section 73(a) of the Town and Country Planning Act 1990 to vary the wording of Condition 8 of planning permission (application no. 16/00269/FULL) dated 24th May 2016 to enable extended hours of operation.	27/04/2018
18/00359/FULL Candlewick	19 - 23 St Swithin's Lane, London, EC4N 8AD	Alteration to external pier to enable widening of fire escape exit gate.	16/04/2018
18/00281/FULL Coleman Street	Moor House, 120 London Wall,	Alterations to existing shopfront, installation of three Automated	23/03/2018

	London, EC2Y 5ET	Telling Machines (ATMs) and associated works.	
18/00431/FULL Cordwainer	Unit 2A, 1 Poultry, London, EC2R 8EJ	Use of private land beneath the existing colonnade for the siting of 15 tables and 30 chairs in association with the adjacent retail (A1) use.	03/05/2018
18/00369/FULL Farringdon Without	Barnards Inn, 86 Fetter Lane, London, EC4A 1EQ	(i) Alterations to the Fetter Lane and Barnard's Inn Elevation at ground floor level including new cladding treatment and replacement curtain wall glazing and entrances at 86 Fetter Lane; (ii) Reconfigured bin store and new entrance gate to Barnard's Inn; (iii) Replacement plant screening at 7th floor roof level; (iv) Installation of a new plant enclosure at 6th floor roof level; and (v) New hard and soft landscaping to Barnard's Inn.	01/05/2018
18/00429/FULL Farringdon Without	38 Chancery Lane, London, WC2A 1EN	Application under Section 73 of the Town and Country Planning Act 1990 for the variation of condition 12 of planning permission dated 20 June 2014 (ref: 13/01189/FULL) to allow for the installation of plant to the roof area.	02/05/2018
18/00262/FULL Langbourn	150 - 152 Fenchurch Street, London, EC3M 6BB	Change of use of part of the ground floor and part of the lower ground floor from Use Class A1 (Retail) (28 sq.m) and Use Class D1 (Non-residential institution) (290sq.m) to a flexible use for either Class A2 (Financial and professional services), Class A3 (Restaurants and cafes), Class A5 (Hot food takeaways) or Class D2 (Assembly and leisure) (318sq.m).	23/04/2018
18/00378/FULLR3 Lime Street	St Helen's Bishopsgate, Great St Helen's, London, EC3A 6AT	Temporary installation of a sculpture 'Crocodylius Philodendrus' by Nancy Rubins for a period of up to one year, to be taken down on or before 01.06.2019.	20/04/2018
18/00376/FULLR3 Lime Street	The Leadenhall Building Plaza, 122 Leadenhall	Temporary installation of a sculpture composed of two pieces 'Numen (Shifting Votive One)' and' Numen (Shifting Votive Two)' by	20/04/2018

	Street, London, EC3V 4AB	Thomas J Price for a period of up to one year, to be taken down on or before 01.06.2019.	
18/00396/FULLR3 Lime Street	Outside 1 Undershaft, St. Helen's Square, Land Close to St. Mary Axe, London, EC3A 8EE,	Temporary installation of a sculpture 'Opening the Air' by Jyll Bradley for a period of up to one year, to be taken down on or before 01.06.2019.	24/04/2018
18/00361/FULL Portsoken	Aldgate House, 33 Aldgate High Street, London, EC3N 1AH	Application under S73 of the Town and Country Planning Act 1990 (as amended) to allow variation of condition 2 (approved plans) of planning permission dated 27th February 2018 (17/01302/FULL) to allow the installation of a new ventilation system and a full height glazing system.	24/04/2018
18/00192/FULL Walbrook	15 - 16 St Swithin's Lane, London, EC4	Proposed external lighting to front and rear facades of the building.	23/02/2018
18/00391/FULL Walbrook	The Ned Hotel, 27 Poultry, London, EC2R 8AJ	Application under Section 73(a) of the Town and Country Planning Act 1990 to vary the wording of condition 25 of planning permission (App No 13/01036/FULMAJ) dated 3rd June 2014 to enable extended hours of use of the external spaces.	23/04/2018

# Agenda Item 6

Committee(s):	Date(s):	Item no.
Planning and Transportation Committee 29 May 2018		
Subject:	Public	
Eastern City Cluster Area Enhancement Strareport		
Report of:	For Decision	
The Director of the Built Environment		

### **Summary**

This report sets out details of the planned public engagement exercise to aid the development of the Eastern City Cluster Area Enhancement Strategy. The strategy analyses the public realm within the Eastern Cluster, identifying current issues and pressures for change, and sets out a framework for addressing these, including a series of enhancement projects and proposals for activating and transforming the area.

The development of the strategy has been a collaboration between the City, local businesses, owners, and representatives from the City Property Association, the City Architecture Forum and the local Wards. As part of the preparation of the strategy document, stakeholders have been engaged through a series of workshops, meetings and surveys. The feedback gained has been invaluable in establishing the demand from stakeholders for change and the nature of this change. The strategy proposals have been developed in response. A detailed report on the feedback from stakeholders is included in Appendix 2.

Members are asked to agree that the draft Eastern City Cluster Area Enhancement Strategy be made available for public consultation over June and July 2018. This will allow stakeholders, with support from the City, to develop further their vision and their business case for change. Subject to the outcome of this process, the draft strategy will be adapted as required and presented to committees for adoption in winter 2018.

#### Recommendations

- Members agree that public consultation on the draft Eastern City Cluster Area Enhancement Strategy is undertaken over June and July 2018.
- Authority be delegated to the Chief Officer to finalise the details of the relevant consultation material.

### **Main Report**

# **Background**

- 1. The challenges and opportunities facing the City are captured in the recently adopted Corporate Plan (2018-23), which sets out the vision and desired outcomes to ensure the coordinated the delivery of sustainable long-term growth, whilst at the same time improving the environment and quality of life of the City community. In response to the new Corporate Plan, the Strategy will deliver on number of desired outcomes including:
  - People are safe and feel safe.
  - People enjoy good health and wellbeing.
  - Communities are cohesive and have the facilities they need.
  - We are digitally and physically well-connected and responsive
  - We inspire enterprise, excellence, creativity and collaboration
  - · Our spaces are secure, resilient and well-maintained
- 2. In addition to addressing the requirements imposed by future growth projections, it is also vital to establish what the current issues and priorities are within the area.
- To ensure that the scope and focus of the strategy is in line with corporate objectives, the Strategy has been developed by means of a two-stage process. The two stages are as follows:
  - Stage 1 was completed and presented to Members through an update report in July 2017. It included the following elements:
    - An urban design analysis of the area identifying main issues, drivers for change and opportunity areas.
    - Targeted consultation with key stakeholders and City officers.
    - o Definition of the draft vision, aspirations and objectives of the strategy.
  - **Stage 2** which is the purpose of this committee report, includes the following elements:
    - Developing site specific proposals for public realm enhancements
    - o Identifying opportunities for cross-cutting initiatives such as culture and art, smart and digital solutions and other emerging City strategies.
    - Carrying out a comprehensive public consultation exercise on the strategy proposals, to be undertaken in summer 2018.
- 4. An important element in developing the area strategy has been the collaborative approach undertaken with stakeholders and the City Property Association, The City Architecture Forum and the Lime Street Ward. Early engagement with these groups and City Officers was carried out through a series of workshops as follows:
  - Workshop 1 (15<sup>th</sup> February 2018): Attendees included representatives from key stakeholders in the area, including developers, occupiers, landowners, City of London senior officers, and members of the City Property Association and The City Architecture Forum.

- Workshop 2 (26<sup>th</sup> February 2018): This meeting was facilitated by the Lime Street Ward and included attendees from the insurance sector, local occupiers and Ward Members.
- 5. At these two workshops, emerging ideas and design principles were presented, to seek stakeholder's views about a range of options which could potentially be implemented in the area, to help cope with a predicted increase in workforce population and the anticipated development pipeline. The focus of the discussion was centred around pedestrian priority areas, security infrastructure, transport & servicing, cultural offer, social amenities, greening and well-being.
- 6. A summary of the views from the stakeholders' workshops is included below. A detailed report with the key findings from the workshops is attached in **Appendix 2**.

Stakeholders in the Eastern Cluster area want:

- To rebalance the allocation of space in streets to provide an improved pedestrian environment. Introduction of pedestrian priority areas is favoured, to help ensure sustainable growth.
- A high quality and well-designed public realm is of paramount importance, with integrated security measures which do not impede businesses' ability to operate.
- Safe streets, which facilitate social interaction, cultural activities and celebrate the area's unique character.
- Greater greening of the environment as a catalyst for change, and to improve health and well-being.
- The built environment to respond to the changing trends in office occupancy, visitor & workforce profiles and demographics.
- An ambitious curated cultural programme, potentially delivered in partnership.
   Food, art, culture, and greening were strongly supported as themes for this programme.
- To bring people together through public engagement and community involvement, within buildings, but also between buildings.
- Technology to play a role in activating public spaces and communicating cultural activities. The enabling of flexible working patterns and enhanced connectivity are key aspirations.
- To support changing lifestyles and evolving trends amongst businesses coming into the area.
- To see improvements delivered within shorter timeframes, potentially through experimental or trial means if necessary.

7. Members' briefing sessions were also held with Ward Members from Lime Street, Langbourn, Bishopsgate and Aldgate Wards, together with the Chairman and Deputy Chairman of the Planning & Transportation Committee, with the purpose of providing feedback from the stakeholder sessions and an update on the emerging proposals.

### **Current Position**

- The draft Eastern City Cluster Area Enhancement Strategy will provide a framework for the future development and improvement of the public realm of the Eastern Cluster, based on clear evidence of need, pressures for change and stakeholder's aspirations.
- 9. The draft area strategy includes the following elements:
  - Site specific proposals for public realm enhancements in the area.
  - A culture and art strategy which is embedded in the design process and that will reinforce the vision for the area and facilitate ongoing engagement with occupiers.
  - It identifies opportunities for cross-cutting initiatives such as, smart and digital engagement, and temporary interventions and trials to test emerging ideas on potential changes to the streetscape, as well as ensuring that positive change can happen quickly in this dynamic area with its large number of construction sites.

Printed copies are available in the Members' Reading room.

### **Consultation Approach**

- 10. It is proposed that the draft strategy will be the subject of a public consultation exercises for a 6-week period during June and July 2018. Following the end of the consultation period, the strategy will be amended as appropriate and brought back before this Committee for formal adoption, which is anticipated in winter 2018.
- **11.** The consultation will be targeted at different stakeholder groups including workers, local occupiers, developers, residents and visitors.
- 12. A variety of methods are proposed to be utilised during the consultation exercise, including the following:
  - An innovative digital platform will be created to consult the public on the strategy. This approach will potentially reach a larger audience and will enable respondents to better visualise the proposals and will ensure an efficient analysis of feedback.
  - Online and media engagement through City of London partners and The City Centre.
  - Leaflets and printed postcards will be distributed in the area

- 6-8 drop-in sessions will be held in various locations within the Eastern Cluster area, including buildings' receptions, Leadenhall Market and Great St Helen's Church.
- Up to 5 architect-designed temporary benches will be installed across the area as part of the London Festival of Architecture. These benches will help the public to re-imagine some of the spaces in this evolving area and associated plinths will include information about the strategy consultation.
- On-line and on-street surveys will be undertaken
- 13. It is recommended that authority be delegated to the Chief Officer to finalise the details of the relevant consultation material.

# **Implications**

- 14. A summary of the project expenditure to date is included in Appendix 1.
- 15. There are no specific risks, legal, property or HR implications arising from the proposed area strategy consultation process.
- 16. The Strategy will support other City-wide initiatives and projects currently under development, including Servicing and Freight Supplementary Planning Document, the Eastern Cluster Area Security Project, and the emerging Local Plan.
- 17. The Transport Strategy is currently being developed and will also be consulted on during this period. The proposals presented in the Eastern Cluster Strategy provide a flexible design framework to accommodate future recommendations of the Transport Strategy.

#### Conclusion

- 18. To ensure that the proposals meet the needs of the City community and aid the prioritisation of the enhancement projects, public consultation on the draft strategy is to be undertaken this summer. Following the consultation an updated strategy will be reported back to Committees for adoption in winter 2018.
- 19. Key dates are as follows:

Task	Target date	
Approval of pre-consultation report	May 2018	
Finalise consultation plan	June 2018	
Public consultation	June - July 2018	
Analyse results	August 2018	
Finalise Strategy	September - October 2018	
Adopt Strategy	December 2018	

## **Appendices**

- 1. Funding table
- 2. Consultation feedback report table.
- The draft Area Enhancement Strategy is available in the Members' reading room

# **Background Reports**

• July 2017 ECC Area Enhancement Strategy Update Report

### **Author**

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## Appendix 1

Funding table

Eastern City Cluster Strategy - 16800351			
Table 1: Expenditure to date			
Description	Approved Budget (£)	Expenditure (£)	Balance (£)
P&T Staff Costs	160,000	103,213.16	56,786.84
P&T Fees	160,000	124,156.25	35,843.75
Transport Studies *	98,000	-	98,000.00
TOTAL	418,000	227,369	190,631

<sup>\*</sup> The initiation of the Transport Studies has been delayed due utility works in the Eastern Cluster area, which have restricted vehicle movement in along key vehicular routes. The studies will be undertaken over the next 6 months as part of the coordinated approach with the Transport Strategy.



Document produced by City Public Realm Team, Department of the Built Environment, City of London

Issued: March 2108

Project Team:

# LAC UNA growthindustry

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### 1.INTRODUCTION

### Introduction and Background

This report summarises findings from the third Stakeholder Group Workshop held on 15th February 2018. It will be used to inform the content of the Eastern City Cluster Area enhancement strategy. The group of participating stakeholders included representatives from current and future developments in the area, land owners and key local occupiers.

The aim of the workshop was to gather feedback on the strategic vision and objectives, which were developed and published following initial comments provided by this forum in March 2017, and by representatives of the local insurance industry in a separate meeting which also took place in March 2017. During the recent workshop, emerging ideas and design principles were also presented, to seek stakeholder's views about potential changes which could potentially be implemented in the area, to help cope with a predicted increase in workforce population and the anticipated development pipeline. Particular focus was given to pedestrian movement, security infrastructure, transport & servicing, cultural offer, social amenities and greening.

# 2. WORKSHOP STRUCTURE

## 2.1 Structure and Agenda

During the workshop, Growth Industry and Lacuna presented emerging ideas and concepts for potential projects, inviting stakeholders to express their views. A questionnaire was distributed to all attendees, and round-table discussions took place. Copies of the presentation and questionnaire are included in *Appendices A and B*.

The following table sets out the structure of the workshop, as facilitated by the consultants currently supporting the City Public Realm Team in the development of the strategy:

- Jon Akers-Coyle, Director at Growth Industry [ www.growthindustry.co.uk ]
- Stella Ioannou, Director at Lacuna projects [ www.lacunaprojects.com ]

Details: Eastern City Cluster Area Strategy St Date: 15 February 2018 Time: 14:30 – 17:00 Location: SCOR SE, Asia House, 31 -33 Lime S	·
Welcome & introduction	Carolyn Dwyer Director, Department of the Built Environment, City of London
Part 1 – Opportunities Presentation  •Public realm and traffic management •Culture and Art Strategy: aspirations and identity	Jon Akers Coyle – Growth Industry Stella Ioannou – Lacuna Projects
Part 2 – Workshop - round table discussion •Public Realm and traffic management •Security •Culture and Identity	All attendees
Part 3 – Discussion •Feedback from each group •Discussion and Q&A	All attendees
Closing statement – thanks / next steps	Christopher Hayward, Chairman Planning and Transportation Committee

# 2.2 List of Attendees

	City of London Corporat	ion	
	List of Attendees: Easte	rn City Cluster stakeholder workshop – 15th February	y, 14:30-17:00 pm.
	Attendees	Title	Company
1.	Carolyn Dwyer	Director, Department of the Built Environment	
2.	Christopher Hayward	Chairman Planning and Transportation Committee	
3.	Simon Glynn	Assistant Director - City Public Realm	
4.	Adrian Roche	Planning Policy	
5.	Peter Shadbolt	Assistant Director - Policy	
6.	Iain Simmons	Assistant Director - City Transportation	City of Landan
7.	David Horkan	Assistant Director - Planning Development	City of London
8.	Annie Hampson	Development Director	
9.	Edward Jackson	Project Manager – City Transportation	
10.	Melanie Charalambous	Group Manager – City Public Realm	
11.	Maria Herrera	Project Manager – City Public Realm	
12.	Sarah Whitehorn	Project Manager – City Transportation	
13.	Anya Obrez	Project Support Officer – City Public Realm	
14.	Jon Akers Coyle	Director	Growth Industry
15.	Stella Ioannou	Director	Lacuna
16.	Maria Marro-Perera	Project Manager	Lacuna
	STAKEHOLDERS:		
17.	Tom Bradley		Lipton Rogers
18.	Dan Scanlon	Vice President of the CPA Board	CPA/Brookfield
19.	Roy McGowan		Momentum Transport Consultancy
20.	Mark Cannell	Partner	London & Oriental
21.	Loris Tinacci	Associate Partner	London & Oriental
22.	Maria de Simone	Regional Facilities Manager	Tideway Investment Management
23.	Steve Riches	Facilities Manager	Hiscox
24.	Nick Dart	Head of Property Property	The Leathersellers' Company
25.	Adam Goldin	Head of CC Land	CC Land
26.	Ned Salisbury	Generali Saxon Land Development	Generali
27.	Tina Palliet	Head of Generali Real Estate	Generali
28.	Samantha Garwood	CTSA	City of London Police
29.	Harry Badham	Head of Development UK	Axa
30.	Andrew Reynolds	Chairman	City Architecture Forum
31.	Rob Edwards	Lead Sponsor	Transport for London
32.	Simon O'Connell	Lead Sponsor	Transport for London
33.	Geoff Harris	Management of property development	T H Real Estate
34.	Justin Black	Head of Development	CC Land

# 3. EXECUTIVE SUMMARY

There is significant appetite for change in the Eastern Cluster, not only to accommodate the increasing numbers of people in the area, but also to make this part of the City an attractive and distinct destination. Stakeholders expressed their aspirations for an improved pedestrian environment, which is inclusive, safe and able to accommodate a diverse range of activities. The local public realm is perceived as a valuable asset, with the potential to make a strong contribution to the dynamism of this vibrant City quarter.

The introduction of measures to reduce vehicle movements was generally supported, with the aim of increasing the amounts of pedestrianised space to help cope with the predicted increases in pedestrian numbers, and to improve the quality of the environment. An array of design initiatives were considered, and it was recognised that each site would need to be carefully considered to ensure that businesses are not adversely affected. There is a strong appetite to give priority to pedestrians in key routes within the Eastern Cluster, in particular St Mary Axe and Leadenhall Street, which would create a "pedestrian core" around key destination points within the cluster. Bishopsgate was also seen as a critical street which will be subject to increasing pressures, once Crossrail and new planned developments are completed.

The intangible value of Leadenhall Market, as a historic asset and local destination, was considered worthy of inclusion in the Area Strategy. There is an opportunity for the Market, as a key visitor destination and local landmark, to provide a more diverse retail offer.

With regards to servicing and delivery needs, a consolidation strategy is generally supported as a complementary mechanism to help deliver pedestrian priority areas and better air quality. The reliability of the delivery system is fundamental, to ensure businesses continue to operate in a regular manner.

Security is seen as an important consideration. There is a strong preference to develop and implement aesthetically pleasing HVM solutions, integrated into the public realm. An enhanced presence of police and security personnel was also identified as desirable, but stakeholders strongly felt that security measures should not adopt a "gated estate" approach.

There is a strong desire for the City Corporation to drive through rapid and radical change, whilst also continuing to engage with the community. There may be some benefit gained by implementing some proposals incrementally, and/or through trials.

Stakeholders have high expectations and have a strong appetite for a varied programme of cultural activities that are well designed and well targeted. New amenities should be tailored towards the changing trends in workforce demographics and working patterns.

In particular, the following qualities were considered to be key to the delivery of a successful cultural and art offer:

- o Variety
- o Memorable
- Surprise
- o Interactive
- o Inspirational

There was a general desire to re-brand the identity of the area in order to change the perception and respond to the changing trends of office occupancy and global investment. Any new identity or name must be informed by the characteristics of the site, drawing upon the historical and archaeological legacies and be relevant to the rich architecture of the Cluterage 38

# 4. PUBLIC REALM AND GREENERY

## 4.1 Public Realm and Greenery

- There was a general acceptance of the need for radical change, given that some streets are already performing at full capacity. Several comments were put forward around the idea of introducing pedestrian priority measures.
- Comments were made with regards to the provision of higher quality spaces and streets in this area, which integrate greenery and improve well-being. There is a desire for a high quality public realm which matches the high-quality architecture present in the area.
  - The general consensus is that the pace of delivering improvements should be accelerated.

## 4.1.1 Bishopsgate

- Bishopsgate was identified by many as a key street in which pedestrian movement and comfort should be improved. It was felt that footway gains may not be enough, given the projected number of pedestrians coming into the area.
- Traffic movements should be improved by achieving greater efficiency in bus movements, and/or limitingprivate vehicle access. Considerations should also be given to the increasing number of cyclists (north-south routes) and taxi movements.
- A beneficial transformation for Bishopsgate could be to prioritise pedestrians, or the introduction of a "Bank junction model" in order to force a change in behaviour. Bank is a test case that could inform improvement schemes for other areas in the City. Any traffic changes would need to take into consideration the impact upon neighbouring boroughs, and network resilience.
- Comments were raised with regards to the need for new and better crossings along the length of the Bishopsgate, responding to pedestrian desire lines, giving commuters greater choice in where they can cross the street, but also to disperse pedestrians better and 'feed in to' the Cluster.
- Other nearby, "tertiary" streets should also be improved, to disperse people away from this congested route into safer and more pleasant routes. Options for closing some streets off Bishopsgate to better redirect pedestrian flows should be evaluated.

# 4.1.2 Pedestrian priority

- There was a strong appetite for pedestrian prioritisation, or indeed pedestrianisation, in streets such as **St Mary Axe**, **Undershaft**, **Leadenhall Street** and **Lime Street**, in order to provide alternative routes for the increasing number of people coming into the area.
- There is a desire to enhance the pedestrian routes into the Cluster, especially from/to Liverpool Street and Crossrail, in particular, with character and greenery, and to make these routes more active in terms of the mix of ground floor uses, and provision of places to pause. If alternative and attractive pedestrian routes were provided, people would choose to avoid busy routes such as Bishopsgate. This would help to alleviate the pressure on congestion to provide the pressure on congestion to provide the pressure of congestion to provide the provide the pressure of congestion to provide the pressure of the provide the pressure of the provided to provide the provided to provided the provided to provide the provided to provide the provided to provide the provided to provide the provided to provided the prov

- With regards to the delivery of pedestrian priority schemes, experimental closures of streets, on a continuous or timed basis, would be welcomed to test ideas and inform a permanent solution. Each project should be assessed on a case by case basis, as it was recognised that the same solutions may not be appropriate for all areas.
- Timed closures were supported as a mechanism to provide better street environments whilst limiting impacts upon business operations. For example, Lime Street currently excludes vehicles from 8:00 am-6:00 am Monday-Friday.
- Alternative provisions for taxis must be considered, if they were to be excluded from accessing certain zones. For example, peripheral pick-up/drop off points could be considered to limit the number of vehicles coming into the Cluster at peak times.
- Some comments were made regarding how stakeholders see their ground floor spaces as attractive social spaces, to be used by office workers and which give a positive public face to new developments. Ground floor spaces which are more engaging could help to generate a more dynamic public realm environment in the future.
- Comments were made about the changing nature of Leadenhall Street. There is already a change from office to retail space at ground floor level, as building owners are starting to give greater consideration to ground floor spaces as sources of activity and creating stronger identities for their buildings.
- The Bank Experiment was very positively welcomed and is seen as an exemplary precedent for how the Eastern City Cluster area can start introducing pedestrian priority or pedestrianisation on key streets.

#### Summary of results - Question no. 1 Do you support the introduction of pedestrian priority areas with the associated traffic management impacts? 5 5 9 6 Pedestrianisation of Introduction of timed Widen footways/ Temporary closures certain streets closures to certain to certain streets to reclaim carriageway streets to limit vehicle enable other activities space access at set times in the area to take during the day place (e.g events, street markets).

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Support

Strongly support

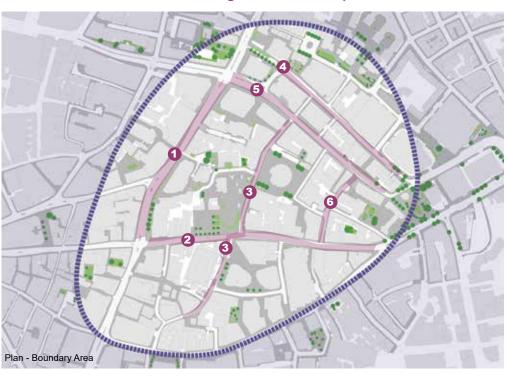
Do not support

Somewhat support

# 4. PUBLIC REALM AND GREENERY

Summary of results - Question no. 2

Do you support any of the following options in order to accomodate the increasing numbers of pedestrians?





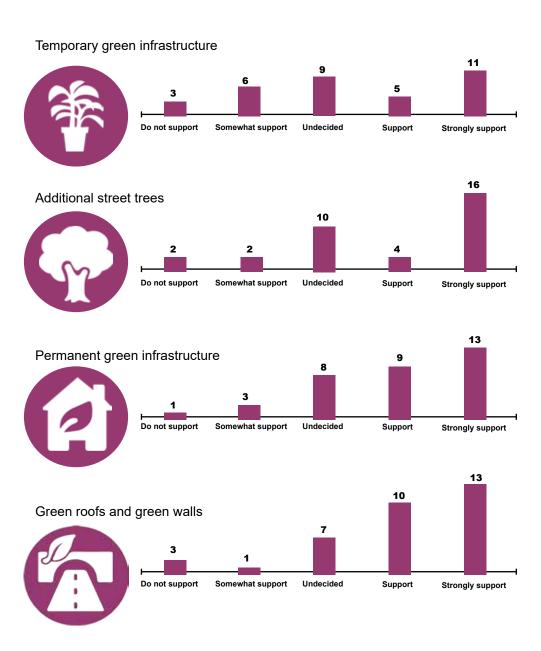
	Widen Footways	Temporary closures	Timed Closure	Complete Pedestrianisation
1 Bishopsgate	64%	0%	25%	11%
2 Leadenhall Street	51%	3%	13%	33%
3 St Mary Axe/ Lime Street North	15%	11%	22%	52%
4 Houndsditch	40%	12%	28%	20%
Camomile Street/ Bevis Marks	35%	13%	22%	30%
6 Creechurch Lane Area	18%	9%	23%	50%

## 4.1.3 Greenery

- Strong support for much more urban greenery and heavily planted areas "be bold"
- Greenery would enhance wellbeing and provide an attractive environment, where people want to spend time in, and gather.
- It is felt that there is not currently enough greenery in the ECC area, there is a desire to start planting trees now "Green now". The strategic placement of enhanced greenery can be used to influence where dwelling occurs, away from congested thoroughfares, and start animating other streets which are currently empty.

Summary of results - Question no. 3

Additional greening may require space to be re-allocated from existing carriageway. What is your appetite for increasing greenery?



# 4.2 SECURITY, TRANSPORT & SERVICING

# 4.2.1 Security

- Integrated security measures were welcomed, though should not be too overt in appearance as this can create a hostile environment. Aesthetically pleasing integrated security measures should be prioritised, and the addition of utilitarian bollards or concrete barriers avoided. Through an appropriate design process, hostile vehicle mitigation measures can be better designed and integrated.
- Integrated security measures would provide "softer boundaries" where people feel safe. There was a general consensus that gates should not be introduced, and instead a layering of various security measures (including timed vehicle access) in a comprehensive way should be pursued.
- Some expressed the view that an enhanced police presence would help to make the area feel better secured, without having to install barriers to movement.
- Others suggested that vehicle numbers could be more significantly reduced if heavier enforcement was in place, and if fines were increased to act as a more severe deterrent.
- Comments received from the City Police highlighted that the lack of traffic means vehicle speeds can increase and present a risk to crowded places. Hard and soft landscaping can provide obstacles as part of integrated design solutions.

# 4.2.2 Servicing

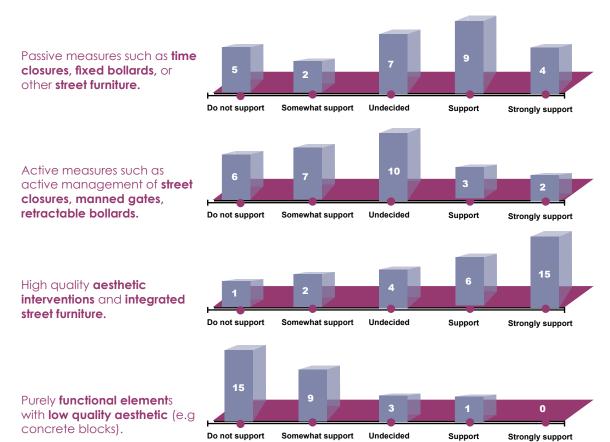
- Consolidation of deliveries was generally favoured, although it is perceived as a challenging initiative to implement. Attendees expressed concerns about the need for businesses to continue functioning as normal, and that a certain number of deliveries would need to continue to be allowed within the area, maybe through the introduction of timed entries.
- The idea of remote consolidation centres, where deliveries can be logged, checked, dispatched and ultimately tracked was deemed favourable and a good way to monitor delivery movements in and out of the cluster.
- Comments were made about other London locations where consolidation has already been implemented, for example, some large estates have achieved this fairly quickly e.g. the Crown Estate. Questions were raised about the fact that it is easier to implement at the time of creating a new business cluster, as compared to imposing the measure upon an established business cluster such as the Eastern City Cluster. What are the cost implications?
- Comments were made about the consolidated waste management scheme for Oxford Street businesses which is currently operating successfully, could this type of scheme be explored for the Eastern Cluster?

# 4.2 SECURITY, TRANSPORT & SERVICING

- Can consolidation work for SMEs? This needs to be ensured, as it is recognised the area needs small business to be able to operate, in order to bring diversity and dynamism into the area. Small businesses would find the costs associated with consolidation challenging unless it is supported by larger companies, for example on a pro rata basis.
- Comments were raised about the fact that a minimum volume is desirable for consolidation to work well. A series of incremental measures, increasing in scope and participant numbers, may help to achieve the ultimate goal.
- Attendees raised questions about whether application of Business Improvement District (BID) status could be beneficial? (Discussions around this topic have taken place in recent meetings focused on Freight and Servicing).
- Personal deliveries in the area need to be addressed. This could involve the introduction of permits/booking slots. Can such deliveries be re-timed or take place only at night time?
- Would technology offer solutions? E.g. booking delivery slots via a web 'portal' system.

Summary of results - Question no. 5

In regards to security measures, do you support the introduction of vehicle restriction measures through:



# 4.2 SECURITY, TRANSPORT & SERVICING

#### Summary of results - Question no. 6

# To what degree do you support the following mechanisms to deliver a reduction in deliveries and servicing movement in the area?

	Do not support	Somewhat support	Undecided	Support	Strongly support
Requiring deliveries to be re-timed.	11%	10%	14%	40%	25%
Requiring deliveries to come through a consolidated system.	7%	18%	21%	32%	22%
Requiring delivery and servicing suppliers to work through a central hub (for servicing tools and equipment, goods) using alternative modes of transport (e.g. electric bicycles) to/from hub(s). "Last mile sustainable transport approach."	11%	18%	22%	30%	19%
Through supporting SME's in the area to implement the changes (e.g. utilising your large building facilities for consolidated deliveries, subsidy)	18%	8%	27%	33%	14%



# 4.3 CULTURE & ART

#### **Culture and Art**

There was a general consensus that in terms of the Culture and Art programme, there is great ambition and aspiration to see an on-going programme of cultural activities and varied events, to support the Eastern City Cluster as a world class destination.

# 4.3.1

### Target audience

The general agreement was that cultural programme should be tailored to the current workforce and occupiers, and potentially extended to appeal to a wider audience, including families and cultural visitors at weekends. Comments were raised about the importance to respond to the increase in number of workers but also to consider the change in demographics in the area.

Some participants expressed the view that the programme should provide amenities for different age groups and different interests.

Summary of results - Question no. 7

# Who is the key target audience for the Cultural progamme?









**52%**Workforce/occupiers

15% Visitors/families/cultural

33% All of the above

### 4.3.2

# Type of activities and frequency

There is an appetite across te board for a wide innovative programme that is ongoing and responds to a variety of preferences among workers in the area.

Food, Urban Gardening and Archaeology were identified as suitable themes for an ongoing cultural programme, which would need to be curated and tailored to the area's workforce. Other themes for activities that were raised were: Play, sports, and fitness & well-being.

The attraction and potential value of an ongoing programme of events centred around gardening and food was considered. This was felt to be a very attractive theme for the local workforce.

Archaeology - Many of the attendees have encountered archaeological findings on their sites within the City. Questions were asked about how a programme of activities could be created around these findings? There is strong scope to use archaeology as a basis for interactive and educational programmes, both for office workers and visitors that come into the area.

Talks and tours should be used to showcase the existing local attractions and cultural offer, such as the Sculpture in the City exhibition, Leadenhall Market and open-house events in architectural landmark buildings.

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- Suggestions were made on holding an architecture-driven programme of events which could attract visitors rather than workers. This type of activity is thought to be more desirable after hours or at the weekends.
- Comments were raised in regards to the evolving range of amenities in buildings and the changing relationships between tenants and developers. Developers need to provide buildings with amenities that provide more por opportunities for social engagement, including events. Places like "WeWork" are establishing themselves as leaders in delivering flexible/social working spaces'
- One attendee highlighted that many of their new tenants coming in do not favour big institutional barriers aand instead like enganging with other tenants. These are a new type of it is a new type of users, not always from the financial sector and bringing with them a new culture in terms of working patterns and expectations.
- Some events have to be targeted at attracting people to the City at the weekend where there is opportunity for events. As an example, it was mentioned a 'Roof Gardens Weekend' where people could go from roof top to rooftop and explore views of London.

# 4.3.3 Frequency of events

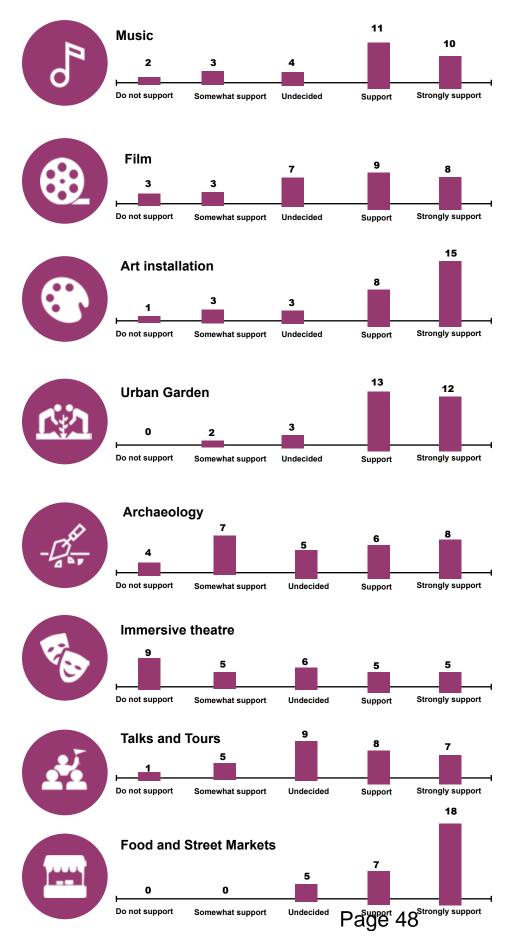
- There was a general desire 'to do more' culturally whilst at work / during the working day. Activities should be rotated to offer variety.
- Lunchtime is seen as a crucial time for the cultural offer, especially for activities that require limited time commitment and can fulfil some of the needs of the workforce (e.g. food, a space to have a break and relax). There was a general consensus that events should not take place in the morning, as this is a busy time for City workers. Evening programming would also provide City workers with a wider range of activities after work.
  - It was agreed there is potential to activate the area during weekends, if they are targeted at a wider audience, which could increase footfall and create a vibrant weekend community and economy. A series of weekend events should aim to attract people to the City on Saturdays and Sundays or Bank Holidays, when there is an opportunity to receive greater visitor numbers.
  - There was general support to involve the local community in the delivery of events, to enable social engagement.

Summary of results - Question no. 9

In terms of frequency and time of day for events respondents strongly support:

Time of day	Frequency
5% Morning	50% Seasonal programme
36% Lunchtime	23% Annual programme
40% Evenings	
42% Weekendsage 47	36% Temporary events

# What types of events would you be interested in the area?









# 4.3 CULTURE & ART

# 4.3.5 Other comments on Culture & Art strategy

- Some comments were raised in regards to land ownership boundaries and public perception, particularly areas of private land which are publicly accessible. It was suggested that the events programme could help to communicate and increase awareness of the number of spaces that are open to the public.
- Questions were raised in regards to the changing nature and identity of the area. Is there an appetite for after hours events, (24/7 life of the City). How and why has the city changed within the past 10 years? It was acknowledged that there is a change in demographic towards younger, diverse and international people, and more creative industries coming into the area. There is a rich socio-economic change to the work environment. How we can we adjust to this change?
- It was recognised that the range of amenities in buildings is evolving, and the relationship between tenants and developers is changing. Developers need to provide more spaces for social engagement and events. The focus is now about creating an identity for the building, and ensuring it is an attractive place to spend time in. Places like "WeWork" are establishing themselves as leaders in pushing the concept of flexible/social working spaces.
- One attendee mentioned that the ground floor of their building is used as a 'programmable space', and that it is worth considering what existing amenities could be used to encourage 'linking people' between buildings and businesses, in keeping with emerging tenancy trends.
- Tech-enabled events and activities, and the distribution of information electronically was favoured, to support a 24/7 active Cluster and to engage with the community. Booking and ticket-selling should be online.
- The concept of "vertical communities" was mentioned. The idea is focused on considering the office environment as spaces to socialise and as platforms for public engagement. The changing trends of new demographics of City workers, require a refocus of the office environment which can support mixed-uses in buildings, changing lifestyles and a diverse community.
- Recovering the spirit of the 'Lloyd's Coffee House' was mentioned.
- The programme should also target underused spaces, or spaces that are not yet occupied to animate the area. Events could be delivered through a partnership and engage with different retailers on a pop-up basis and offer variety and a sense of "surprise" and a "moment of inspiration".

# 4.4 IDENTITY & PERCEPTION

### 4.4.1 Identity

- There was a general consensus that a new name for the Cluster would be desirable, an inspiring name that people from outside London/the UK would recognise as a 'destination'. A new name may also help to broaden a positive perception of the area.
- It was felt by some that the image of the City needs to evolve, to ensure a welcoming environment for all. The City as a choice of workplace should be as attractive as working in other London locations, such as Soho and the West End.
- Other examples where the cultural and artistic offer has been key to successful placemaking were discussed. The example of Kings Cross was mentioned, which features a rich cultural events programme, which has established Kings Cross as a cultural destination.
- In Kings Cross, feedback from developers and investors confirms that the area has transformed into a mixed-use and attractive public realm that has generated increased visitor numbers, and an inspiring workplace model. Can we make the Eastern City Cluster more like Kings Cross?
- The desirability of King's Cross was mentioned by a number of attendees, and in particular the KX approach to delivering a diversity of offer:
  - o Selecting retailers carefully, not just any chain or concession.
  - o A curated programme of cultural activities and events.
  - o Attractive and high-quality design of the outside spaces, which are flexible and open to all.
- Overall, attendees agreed that a stronger brand would help to attract more people to come into the City and into the Cluster. Define the purpose and produce of brief for the development of a new identity and brand.
- Some attendees expressed a preference for the City Corporation to take ownership of the Culture and Art programme in order to make it consistent and to create linkages between the different areas, buildings and companies

# 4.4.2 Name Suggestions

- It was suggested a new name should draw upon the history of the area, and also highlight its unique quality. Examples suggested:
  - The Leadenhall District
  - o Leadenhall...(?): Has a connection with the area that goes back centuries, linked with the Market and the street?
  - o The Cluster
  - o Leadenhall Quarter
  - o Leadenhall Central Business District
  - o City Cluster
  - o (?) Quarter: in to a queb follandmark or destination

# 4.5 GENERAL COMMENTS

# 4.5.1 Estate Management

- In general, stakeholders were **not** strongly in favour of introducing an estate management approach. However, it was discusse that a potential joint partnership could be adopted to curate and organise cultural events and other activities. There would need to be a clearly defined set of objective and a vision for this.
- There were a number of general questions raised, related to this theme:
  - •Who manages it?
  - •What is the cost? Who pays?
  - •For what purpose?
  - •What is the scope?

# Are you interested on an estate managment approach in any form?

60% No40% Yes

### 4.5.2 Process

- Many attendees felt the process that must currently be worked through to obtain planning permission, is too time consuming and drawn out. The process is perceived as difficult and often confusing, and it was felt the Corporation should look into "slimming down" the process.
- Concerns were raised about the delivery of highways improvement works, the timescales for evaluation and implementation of highways schemes are perceived by some as excessive.
- It was noted that messages communicated to stakeholders around topics such as security bollards sometimes appear inconsistent. The process becomes difficult to manage if various divisions within the Corporation are perceived to be providing conflicting advice.

### 5 Conclusion

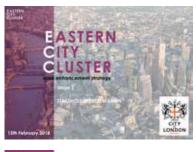
There is significant appetite for change in the Eastern City Cluster not only to accommodate the increasing numbers of people in the area but also to make the area an attractive destination where people will want to come and spend time.

In summary, the key messages from the Stakeholder workshop can be summarised as follows:

- 1. RADICAL CHANGE IS DESIRED rebalance the allocation of space in streets to provide an improved pedestrian environment. Pedestrianisation of key streets is favoured, to help ensure sustainable growth.
- 2. ENHANCE THE ENVIRONMENT- a high quality and well-designed public realm is of paramount importance, with integrated security measures which do not impede businesses' ability to operate.
- 3. INCLUSIVE, SAFE AND WELCOMING delivery of safe city streets which facilitate social interaction, cultural activities and celebrate the area's unique character.
- 4. INTRODUCE GREENERY Consider greening the environment as a catalyst for change, and to improve health and well-being.
- 5. CHANGE PERCEPTION Transport modes are evolving, the built environment should respond to the changing trends in office occupancy, visitor & workforce profiles.
- 6. DELIVER AN AMBITIOUS CURATED CULTURAL PROGRAMME To be successful the City must curate the programme. Food and Green Spaces were strongly supported as candidate themes, as well as archaeology, well-being and fitness.
- 7. BRING PEOPLE TOGETHER Support public engagement and community involvement, within buildings, but also between buildings.
- 8. TECHNOLOGY ENABLED Technology has a huge role to play in activating public spaces and communicating cultural activities. The enabling of flexible working patterns and enhanced connectivity are key aspirations.
- 9. BUILDINGS ARE CHANGING Support changing lifestyles and evolving trends amongst businesses coming into the area.
- 10. TIMING IS OF THE ESSENCE There is a desire for improvements to be delivered within shorter time frames.

# **APPENDICES**

# **APPENDIX A: Presentation from work-**

































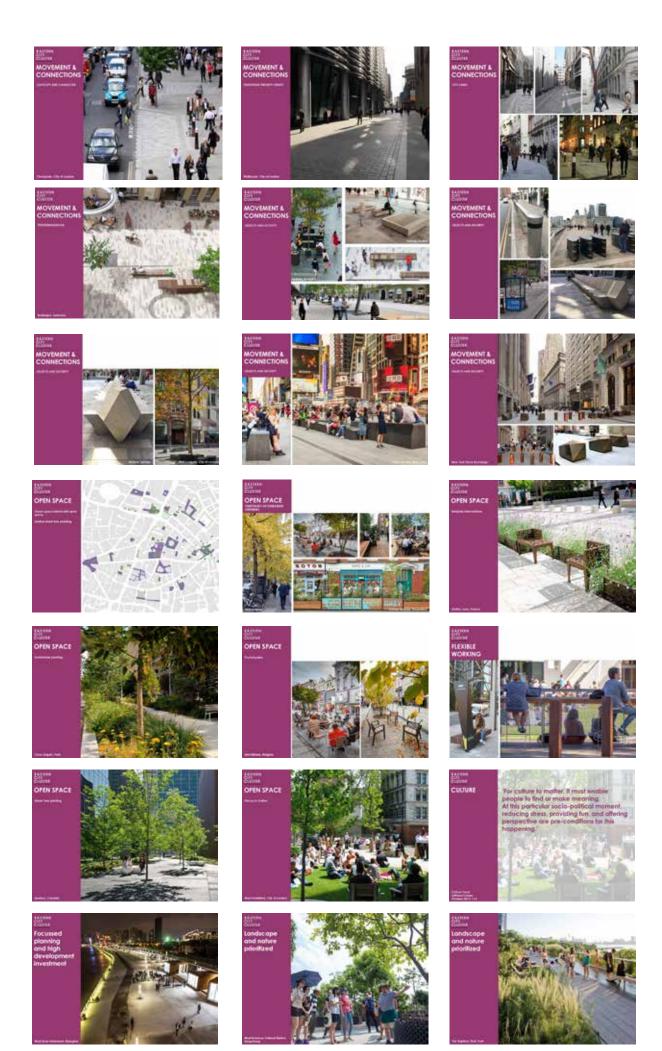












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### APPENDIX B: Presentation from work-

# Eastern City Cluster – Public realm strategy

QUESTIONS: Rate each item, 1 being "do not support" and 5 being "strongly support".

 Do you support the introduction of pedestrian priority areas with the associated traffic management impacts? For example:

	1	2	3	4	5
1.1 Pedestrianisation of certain streets.					Г
1.2 The introduction of timed closures to certain streets to limit vehicle access at set times during the day.					
1.3 Temporary closures to certain streets to enable other activities in the area to take place (e.g. events, street markets).					
1.4 Widened footways / reclaim carriageway space					

#### Considerations:

- Taxis and executive vehicle access may be restricted.
- Satellite taxi pick-up/drop-off points may be identified.
- Delivery and/or service operations may be re-timed to operate building facilities 'out-of-hours'
- London Bus services may be impacted.
- Despite 'pedestrianisation' business as usual in terms of construction/street works may still occur.
- Construction deliveries may need to be re-timed to 'out-of-hours'.

Othe	r comments on question No. 1:

2. In relation to the above, do you support any of the following options in order to accommodate the increasing numbers of pedestrians?

Select options that apply.	Widened footways	Temporary closures	Timed closure	Complete pedestrianisation
2.1 Bishopsgate				
2.2 Leadenhall Street				
2.3 St Mary Axe / Lime Street north				
2.4 Houndsditch				
2.5 Camomile Street / Bevis Marks				
2.6 Creechurch Lane area				

Othe	er comments on question No. 2:		

# QUESTIONS: Rate each item, 1 being "do not support" and 5 being "strongly support".

	Temporary green infrastructure in the form of planting and urban gardens.	1	2	3	4
3					
٥.	2 Additional street trees				
3.	3 Permanent green infrastructure in the form of new landscaped spaces.				
3.	4 Green roofs and green walls.				
c	omments on question No. 3:			_	
/ha	at is your appetite for the introduction of an estate management approach in the area	tor	:		
		1	2	3	4
4.	1 The operation of area wide security measures jointly funded by the partnership.				
4.	2 Street and open spaces enhanced maintenance.			$\vdash$	
4.	3 Curation and management of cultural events and community engagement programmes.			$\vdash$	
Ar	re you interested on an estate management approach in any form? Yes / No				
0	ther comments on question No. 4				
	arding security, do you support the introduction of vehicle restriction measures throu	ugh	1:		
eg		_			_
eg	l l	1	2	3	4
	4 Despite was a contract to the set time of also constituted by allowed any other attent formations				
	1 Passive measures such as timed closures, fixed bollards, or other street furniture			-	
5.	2 Active measures such active management of street closures, manned gates, retractable				
5. 5.					
5. 5. 5.	Active measures such active management of street closures, manned gates, retractable blards – all manned activities.     High quality aesthetic interventions and integrated street furniture.				
5. 5. 5.	2 Active measures such active management of street closures, manned gates, retractable blards – all manned activities.				

QUESTIONS: Rate each item, 1 being "do not support" and 5 being "strongly support".

6.	To what degree do you support the following mechanisms to deliver a reduction in deliveries and
	servicing movement in the area?

	1	2	3	4	5
6.1 Requiring deliveries to be re-timed.					
6.2 Requiring deliveries to come through a consolidated system.					
6.3 Requiring delivery and servicing suppliers to work through a central hub (for servicing tools and equipment, goods) using alternative modes of transport (e.g. electric bicycles) to/from hub(s). "Last mile sustainable transport approach."					
6.4 Through supporting SME's in the area to implement the changes (e.g. utilising your large building facilities for consolidated deliveries, subsidy)					

Othe	er comments on que	estion No. 6:		

#### 7. Who is the key target audience for the cultural programme?

Select one option or both if they apply.

7.3 Workforce / occupiers	
7.2 Visitors / families and cultural tourism	

#### 8. What type of events would you be interested to see in the area?

3.2 Film 3.3 Art installations 3.4 Urban garden 3.5 Archaeology 3.6 Immersive theatre 3.7 Talks and tours 3.8 Food and street markets		1	2	3	4	5
3.3 Art installations 3.4 Urban garden 3.5 Archaeology 3.6 Immersive theatre 3.7 Talks and tours 3.8 Food and street markets	8.1 Music					Г
3.4 Urban garden 3.5 Archaeology 3.6 Immersive theatre 3.7 Talks and tours 3.8 Food and street markets	8.2 Film					Г
3.5 Archaeology 3.6 Immersive theatre 3.7 Talks and tours 3.8 Food and street markets	8.3 Art installations					Г
3.6 Immersive theatre 3.7 Talks and tours 3.8 Food and street markets	8.4 Urban garden					Г
3.7 Talks and tours 3.8 Food and street markets	8.5 Archaeology					Г
3.8 Food and street markets	8.6 Immersive theatre					Г
	8.7 Talks and tours					Г
3.9 Other – please specify	8.8 Food and street markets					Г
	8.9 Other – please specify					

QUESTIONS: Rate each item, 1 being "do not support" and 5 being "strongly support".

9. In terms of frequency and time of day for events, what would you prefer?

9.1 Frequency	1	2	3	4	5
Seasonal programme					Г
Annual programme					Г
Temporary events					Г
Other – please specify					
9.2 Time of day					Г
Morning					Г
Lunchtime					Г
Evenings					
Weekend					Г

Othe	er comments on question No. 7,8, 9:	

10. Do you think the Eastern City Cluster needs a new name more appropriate for a destination? Yes / No

10.1 If you think a new identity for the area is required how would you define it or suggest we approach developing this?

10.2 Do you have any suggestions for a new name for the area?

Name:
Company details:
Email Address:
Phone number:

## For further information contact:

easternclusterarea@cityoflondon.gov.uk

This questionnaire is also available at:

https://www.surveymonkey.com/r/EasternClusterstrategy

Committee(s)	Dated:
Streets and Walkways Sub Committee – For comment Planning and Transportation – For decision	21 May 2018 29 May 2018
Subject: Dockless Cycle Hire Review	Public
Report of: Carolyn Dwyer, Director of the Built Environment Report author:	Streets and Walkways  – For comment
Eddie Jackson, Department of the Built Environment	Planning and Transportation - For Decision

#### Summary

Dockless cycle hire has been operating in London since autumn 2017, with operations based in several boroughs, including three boroughs neighbouring the City. Dockless cycle hire schemes do not require the explicit consent of the City Corporation to operate on City streets, and the City Corporation has no powers to remove bikes unless they are causing an obstruction, danger or nuisance. In October 2017 the City of London Corporation adopted a policy of working with dockless cycle hire companies operating on City streets, with certain conditions agreed with the operators. Two operators - ofo and Mobike have since launched operations in inner London and have been operating on City streets on a six-month trial basis.

The trial period has now expired and is being reviewed. This report sets out the proposal to extend the trial for a further 12 months following the adoption of additional measures to achieve more effective management of the operations. The measures include the identification of preferred locations for parking dockless bikes, and the consideration of making space available on a commercial basis in City Corporation car parks to facilitate the management of the operations. The policy of not allowing operators to place bikes directly on City streets will be continued.

### Recommendation(s)

### Members are asked to:

 Approve the proposed adoption of additional management measures for dockless cycle hire operations and the continuation of the dockless cycle hire trial for a further 12 months.

#### **Main Report**

#### **Background**

- 1. 'Dockless cycle hire' is a generic term for a short-term cycle hire scheme, similar to Santander Cycles, but entirely 'free floating' with no on street docking infrastructure required. The schemes are commercially operated and do not require any public funding or subsidy. The fact that no on-street docking infrastructure is required represents a real advantage over the Santander Cycles scheme, which often suffers from full docking stations preventing users ending their journey near their destination, or empty stations preventing people from hiring bikes.
- 2. Two operators (ofo and Mobike) have launched operations in boroughs that neighbour the City of London Hackney (ofo only), Islington (ofo and Mobike) and Southwark (ofo and Mobike). It is expected that operations will launch in other neighbouring boroughs in the near future. The City Corporation has no powers to prevent the bikes being cycled into the City.
- 3. In October 2017, Members of the Planning and Transportation Committee agreed to adopt a policy on dockless cycle hire operations within the Square Mile (see Appendix 1 and background papers). The policy recognises that the bikes will be used in the City, and allows dockless cycle hire to operate on City streets subject to conditions. These include adherence to a TfL Code of Practice (Appendix 2) and a requirement to not directly place cycles on City streets.
- ofo and Mobike have been operating on this basis since November 2017. As the agreed six-month trial period for each operator has now expired, the policy and operation has been reviewed.

#### City of London powers and current management

- 5. Under current legislation, the City Corporation has no powers to prevent dockless cycles from being parked by customers on City streets, unless those cycles cause an obstruction, danger or nuisance. Neither do operators require consent or a licence from the local authority as no docking infrastructure is placed on the highway. However, the City Corporation does have a statutory duty to assert and protect the rights of the public to use and enjoy the highway, the network management duty and a duty to secure the convenient and safe movement of traffic (including pedestrian traffic).
- 6. If a bike is deemed to be causing an obstruction, danger or nuisance, the City Corporation's Street Enforcement Officers manage dockless cycle hire bikes as follows:
  - a. As the owner of the bikes is known, any bike causing a danger or obstruction will be reported to the operator for removal within 90 minutes of notification. After this time bikes will be removed by the City Corporation without further notice.
  - b. The City Corporation as a Highway Authority also has the power to remove bikes that are deemed to be causing a danger (including a danger caused by obstructing the view) to users of the highway without notice (under Highways Act 1980 s149).

7. If a bike is removed then operators will be informed and given the opportunity to recover the bike, with operators liable for all associated costs as set out in TfL's Code of Practice.

#### Usage and operational approach

- 8. Details regarding cycle hire usage, (number of hires, etc) are commercially sensitive and are provided in a separate non-public appendix (Appendix 3).
- 9. Both dockless cycle hire operations are experiencing growing membership and use both London-wide and in the City even over the winter months. This includes a significant number of hires that are entirely within the Square Mile. It is expected that use will increase over the summer, especially if more boroughs choose to allow schemes to operate. This means there is a need to ensure that the operations are effectively managed in the future to ensure the schemes operate for the benefit of the City.
- 10. The ease and accessibility of dockless cycle hire for City workers, residents and visitors gives these schemes particular appeal for short trips within the City or central London, providing an alternative to short taxi, private hire or public transport trips.
- 11. To date operations have generated relatively few complaints to the City Corporation or to the operators themselves. There have been no complaints to the City Corporation's Contact Centre, and no bikes have been removed by the City's Street Enforcement Officers since the start of the trial.
- 12. Both ofo and Mobike have a member of staff patrolling the City 24 hours a day who can respond to requests to remove bikes. These staff also reposition bikes to move them alongside cycle stands to avoid obstructing pavements. When necessary, bikes are also redistributed back to a host borough.
- 13. Requests for bikes to be relocated that have been passed to operators have been dealt with in a timely fashion and within the target time agreed with the City Corporation.

#### **Policy Considerations**

- 14. Dockless cycle hire is a new phenomenon in the UK; but offers a lower-cost and more space-efficient type of cycle hire operation compared with the Santander Cycles scheme. The lack of docking infrastructure means that bikes are much more flexible, and can be ridden directly to the hirer's destination, increasing the appeal to additional users.
- 15. Usage patterns of dockless cycle hire presented in appendix 3 show that the dockless bikes are well used during the day for trips within the City and central London, not just for commuting.

16. The emerging draft Transport Strategy for the City of London is likely to include proposals to increase the use of cycling for short trips within the City. The availability of dockless cycle hire to help enable these short trips is expected to be a significant factor.

#### **Proposals**

- 17. Since the lack of infrastructure required to operate the schemes means that express consent is not required from the highway authority, setting out standards for operation for all operators via the City Corporation's adopted policy statement, TfL's Code of Practice and proposed additional management measures remains an effective way for the City to encourage good management and use.
- 18. Unless they are causing an obstruction, danger or nuisance, the City Corporation has no powers to remove dockless cycle hire bikes from City streets, so a policy of allowing the bikes to be hired means that bikes are moved by customers relatively frequently rather than awaiting removal by the operator themselves. In several cases where a poorly parked bike has been reported to officers, the bike has been ridden away by a customer before the operator has reached the location.
- 19. Good availability of affordable cycle hire is now an important part of the transport mix for any modern city, and dockless cycle hire operations are likely be a feature of cycle hire schemes in the future. The City of London's forthcoming Transport Strategy will set out what part cycle hire can play on City Streets in the next 25 years as part of the wider transport agenda. In addition, City Corporation officers are working proactively with TfL and central London boroughs on establishing longer term solutions for managing cycle hire operations on a London-wide scale.
- 20. Given the relative lack of powers to manage the dockless cycle hire operations, it is recommended that the current policy of working with operators is continued, with some additional measures to encourage more considerate use of dockless cycles by the public and facilitate good management of the schemes by operators. It is proposed that this be continued on a trial basis for 12 months. The following measures are proposed;
  - Both operators have suggested that identifying preferred locations for bikes would improve their management of the scheme. While space on City streets is at a premium, in many cases there is space adjacent to existing cycle parking stands which could accommodate a small number of dockless bikes in places that do not impact on space for people walking. An example is on Silk St (photo 1), where a utility cover means that there is a gap in a row of cycle stands which could be used for parking by dockless bikes.

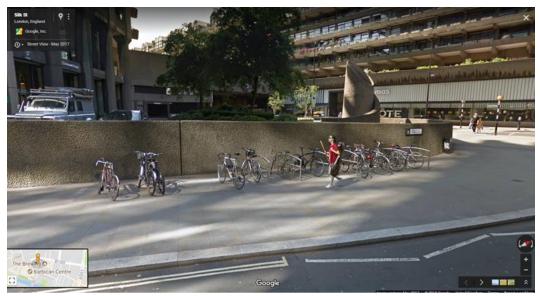


Photo 1 – example of where dockless cycle hire parking could be accommodated

- It is proposed that officers identify spaces adjacent to existing cycle parking stands where a small number of dockless cycles may be clustered, to be agreed by the Transportation and Public Realm Director. Users will be encouraged to drop bikes in these locations where possible, and operators will be required to relocate any bikes left anywhere in the City to one of these preferred locations or outside the City boundary to a borough where placing bikes is permitted within an agreed timeframe. In each location, a maximum number of bikes will be specified with the operators. If that maximum number is reached, operators will be required to move bikes outside the City boundary. All street-based City officers will be briefed to proactively report bikes parked outside the preferred locations to the relevant operator so that they can be quickly relocated.
- Dockless cycle hire operators will be reminded of the City of London's Street Obstructions policy, which states that obstructions will not be tolerated;
  - o on footways which are narrower than two metres wide
  - on footpaths identified as having a high footfall (such as transport hubs, stations and related pedestrian routes)
  - where they interrupt safe pedestrian movement (regardless of the width of the pavement)
- Officers will proactively work with operators to encourage considerate parking practices, including exploring 'geofencing' (whereby the bikes built-in GPS might be able to stop bikes being parked outside designated areas), reward mechanisms for parking in preferred areas and penalties for inconsiderate parking. The potential for setting more challenging targets for relocating poorly parked bikes will be explored.
- Officers will explore the possibility of making space in under-utilised Cityowned car parks available on a commercial basis to dockless cycle hire operators for storage of bikes to allow more effective operation and removal of

- bikes from streets. The decision to reallocate car park space in this way would be subject to Planning and Transportation committee approval.
- The policies of not permitting operators to directly place dockless cycle hire bikes on City streets, and the requirement to adhere to the London-wide Code of Practice will be continued.

#### **Corporate & Strategic Implications**

- 21. The proposals support the Corporate Plan aims to Contribute to a Flourishing Society particularly promoting good health and wellbeing and to Shape Outstanding Environments by enhancing the physical connectivity of the City.
- 22. The proposals support the emerging Draft Transport Strategy outcome to promote a relaxing cycling experience in the City.
- 23. There is a reputational risk that the City Corporation may be seen as unsupportive of a scheme to encourage cycling if neighbouring authorities permit dockless cycle hire schemes, but the City does not allow their operation within our boundaries.

#### **Legal Implications and Enforcement**

- 24. Legal Implications The City Corporation has no powers to remove bikes that are parked on City streets unless they are causing an obstruction, nuisance or danger to the public, and operators do not require consent or a licence from the local authority as no infrastructure is placed on the highway. However, setting out standards for managing the schemes is consistent with the City Corporation's duties referred to in paragraph 5.
- 25. Financial Implications Accommodating a dockless cycle hire scheme has no direct cost to the City Corporation. Costs may be incurred if the City Corporation had to remove bikes deemed to be causing a danger, nuisance or obstruction from the streets in default of the operator removing them. Storage costs would be incurred in these circumstances. No bikes have been removed under these powers during the trial. Instances of removals will continue to be monitored and inform reviews of the City's position. Costs will be sought from operators in all instances where they are liable.

#### **Health Implications**

26. The proposals would support cycle hire facilities in the City. This will encourage active travel within central London, and particularly shift journeys from short bus, taxi and tube trips, with potential benefits to air quality and public health.

#### **Equality Implications**

27. The City Corporation's management of schemes to encourage considerate use/ parking of bikes which helps protect vulnerable road users (e.g. visually impaired) is consistent with the public sector equality duty.

#### Conclusion

- 28. Dockless cycle hire operations launched in London in the latter part of 2017, and have steadily increased their presence in inner London boroughs, now operating in Hackney, Islington and Southwark. More boroughs are expected to launch schemes in the coming months.
- 29. Given that the City Corporation's express consent to operate dockless cycle hire schemes in the City is not required, the continuation of the trial for a further 12 months on the basis of the adopted Policy Statement and additional measures to support the considerate use and management of dockless cycle hire bikes is recommended.

#### **Appendices**

- Appendix 1 City of London Dockless Cycle Hire Policy Statement
- Appendix 2 TfL Dockless Cycle Hire Code of Practice
- Appendix 3 NON-PUBLIC Dockless Cycle Hire Usage

### **Background Papers**

Dockless Cycle Hire – Report to Planning and Transportation Committee 3 October 2017.

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#### Appendix 1 – City of London Dockless Cycle Hire Policy Statement

The City of London Corporation recognises that a well-run dockless cycle hire scheme can be a good addition to the transport network but must be managed to avoid negative impacts on the City streets.

The City Corporation endorses the Transport for London Dockless Cycle Hire Code of Practice and has issued the following policy statement.

- The City of London Corporation recognises the role that well-organised dockless cycle hire schemes can play in providing low-cost public access to cycles for short urban journeys and endorses the Dockless Bike Share: Code of Practice for Safe Operation in London ("the Code").
- Operators are expected to follow the requirements and recommendations of the Code.
- While the City of London is likely to be a popular destination for trips undertaken by dockless cycle hire, the street layout and extremely high footfall in the City means that highways in the City are an unsuitable location for dockless cycle hire operations to be based. An operator should not place cycles on City Corporation highway. Cycles should not be placed on any other land in the City without the consent of the land owner. The City Corporation must be informed in advance of any proposals to base cycles on private property within the City.
- The City Corporation will engage with operators wishing to operate dockless cycle hire schemes to ensure that users of the schemes leave the cycles in appropriate locations on City streets, subject to the cycle hire operators' compliance with the Code and the City Corporation Policy Statement.
- Cycles belonging to operators not complying with the Code and causing danger, obstruction or nuisance will be removed by the City Corporation and operators will be liable for costs as set out in the Code.

Operators wishing to run a dockless cycle hire scheme in the City of London should contact the Strategic Transportation team to discuss their proposals.

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# Dockless bike share code of practice

**For Operators in London** 

September 2017



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### 1. Introduction

- 1.1. Transport for London (TfL) and the Boroughs have a key role in shaping what life is like in London, helping to realise the Mayor's vision for a 'City for All Londoners'. We are committed to creating a fairer, greener, healthier and more prosperous city. The Mayor's Transport Strategy sets a target for 80 per cent of all journeys to be made on foot, by bike or using public transport by 2041. To achieve this, TfL, the Boroughs and other transport providers must work together to make the city a place where people choose to walk and cycle more often.
- 1.2. The potential to get more people cycling is huge, and dockless bikes are a way to make cycling more accessible and will complement London's existing public transport network.
- 1.3. Alongside this, streets must be made more accessible for those who prefer to walk, especially children and older and disabled Londoners. Safety remains our primary objective and it is our duty to protect the rights of the public to use and enjoy the Capital's highways and footways. Dockless bike share schemes must work for everyone without impacting, or causing a Danger to, other road users.
- 1.4. This code of practice (this Code) has been developed in collaboration with London's Boroughs. It outlines the requirements and recommendations that Operators are expected to follow as part of delivering safe and effective schemes in the Capital.
- 1.5. This Code will be reviewed and updated regularly so it continues to reflect best practice and the interests of Londoners.
- 1.6. It complements the existing legal and regulatory framework, which Operators must observe and comply with at all times. Failure to follow this Code may be taken into account should any Highway Authority take enforcement action (see Section 7 of this Code) or begin legal proceedings against any Operator.
- 1.7. Copies of this Code are publicly available, in accordance with the Local Government (Access to Information) Act 1985.

# 2. Aim and scope

- 2.1. A key aim of this Code is to ensure well-designed, dockless bike share schemes that complement London's public transport network and support the Mayor's Transport Strategy.
- 2.2. This Code applies to all Operators and sets out the operational and safety standards that Operators are expected to adhere to.

### 3. Definitions

3.1. For the purpose of this document the following definitions apply:

### **Boroughs**

3.2. Boroughs mean all of the 32 London boroughs and the City of London.

#### Danger

3.3. Danger means risk of bodily harm or injury or damage to property.

### **Geographic Controls or Geo-fencing**

3.4. Geographic Controls or Geo-fencing means the use of Global Positioning Systems (GPS) or Radio Frequency Identification Device (RFID) technology to create a virtual geographic fence. When a device moves into (or out of) the space defined by the fence, triggers are sent and the user will receive, for example, a text or push notification.

The technology allows Operators to specify where a bike can be safely parked, or create an exclusion zone that prevents the bike from being manually locked.

#### **Highway Authority**

3.5. Highway Authority means a body responsible for the administration of Public Roads including TfL, Highways England and the Boroughs.

### **Non-participating Borough**

3.6. Non-participating Borough means any Borough which is not directly associated with an Operator that could be interpreted as not supporting dockless bike share schemes, either explicitly or implicitly.

#### **Nuisance**

3.7. Nuisance means an act, omission, situation or practice that materially affects the reasonable comfort and convenience of the public.

#### **Obstruction**

3.8. Obstruction means a situation arising from the deposit of a bike or bikes (whether by reason of its or their position, their number, or otherwise) so as adversely to affect the free use of a highway (including a footway or a carriageway), or adversely to affect the free use of any other public or private land which is not specifically assigned for the purposes of dockless bikes.

#### **Operator**

3.9. Operator means any Operator running or planning to run a dockless bike share scheme on Public Roads or which may affect any premises or assets of TfL or the Boroughs.

#### **Participating Borough**

3.10. Participating Borough means a Borough that has entered into a Memorandum of Understanding (MoU) or other agreement with an Operator to support the operation of a dockless bike share scheme in that Borough.

#### **Public Road**

3.11. Public Road means any highway or other road maintainable at public expense.

# 4. General requirements

- 4.1. Any Operator wishing to run a dockless bike share scheme within the Capital should be an accredited London Living Wage Employer. It must also:
  - Comply with all applicable laws, codes of practice and standards
  - Take out and maintain appropriate insurances, for itself and users of the scheme, as well as appropriate public liability insurance

### 5. Engagement

Prior to launching a dockless bike share scheme, Operators must engage with TfL and all other relevant Highway Authorities responsible for the Public Roads on which the scheme is proposed to operate or whose premises may be affected by such scheme.

- 5.1. Engagement with Highway Authorities includes (without limitation):
  - Agreeing a detailed operations plan specifying how the scheme will comply with all of the requirements contained in this Code, in particular the provision and application of:
    - Strict Geographic Controls
    - Parking infrastructure and control
  - Agreeing detailed plans outlining where and when the Operator plans to introduce a scheme, the number of cycles and the extent to which the Operator expects the volume of bikes to grow and be managed
  - Providing evidence the Operator has engaged with Highway Authorities likely to be affected by the scheme in the Participating Borough (eg neighbouring Boroughs)

The Operator must also agree to any additional terms required by the relevant Highway Authorities to supplement this Code.

- 5.2. As well as adhering to this Code, it is recommended that Operators establish an appropriate form of agreement with Participating Borough(s). It must be noted, however, that any such agreement is without prejudice to the requirement for Operators to comply with all applicable laws including those governing interference with free passage on Public Roads.
- 5.3. Dockless bike share schemes should be introduced on a trial basis. Parameters should be set with Participating Boroughs specifying, as a minimum, the number of bikes to be deployed, when the trial will take place, how long it will last and reporting on the performance and impact of the trial scheme.
- 5.4. Operators must agree to cease operations and remove all bicycles if instructed to do so by a relevant Highway Authority.
- 5.5. Operators should also consider the benefits of wider engagement, at proposal stage and during operation, with the public, private landowners, and other stakeholders likely to be impacted by the scheme. This should include (without limitation):
  - Communicating the general nature of the scheme including approval to operate from the relevant Borough(s)
  - Explaining the scope, for instance the number of bicycles involved and the geographical area in which they may be used Page 75

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 Providing reassurance and addressing any concerns that the public and local stakeholders may have. Particular consideration should be given to vulnerable road users such as pedestrians, disabled people and those who are visually or hearing impaired

# 6. Safety and maintenance

The safety of Londoners is a primary concern and increases in the number of people cycling must be achieved safely, minimising Danger to the public. Without limitation, Operators must meet the standards set out below.

6.1. Operators must achieve and maintain ISO 4210:2014 standards for bicycles in the UK and it is always their responsibility to ensure this. They must have robust maintenance and servicing regimes in place so bicycles continue to meet applicable laws and standards. As a minimum, bicycles should be given a full service annually, with formal checks and repairs taking place regularly throughout the year.

It is, at the time of publication, a legal requirement to:

- Provide hand-operated brakes arranged left-hand rear and right-hand front
- Provide front and back lights on the bike so it can operate safely in low light conditions
   BS EN ISO 4210:1-9 The Pedal Bicycles (Safety) Regulations 2010 and Road
   Vehicle Lighting Regulations 1989
- Provide a rear red reflector and amber/yellow reflectors on the front and rear of each pedal
- Make sure all bicycles have an individually identifiable asset number

This is not a list of all legal requirements. It is the Operators' responsibility to make sure they comply with all applicable laws and standards for bicycles in the UK.

- 6.2. Operators must also comply with all applicable health and safety legislation. This includes (without limitation) setting out how they will report the number of staff and customers killed or seriously injured (if any) while working for, or using, the scheme.
- 6.3. They must have operational processes in place to enable customers and members of the public to easily report unsafe or damaged bicycles (see Section 8 (Customer experience and education)). It is the responsibility of the Operator to make sure these bicycles are no longer available for hire, and are recovered within the following service response times:
  - Where a bicycle is considered to be causing a Danger or Obstruction, the bicycle should be removed within two hours, or within the Highway Authority's emergency response time, whichever is the quickest. If bicycles are causing an immediate Danger, the relevant Highway Authority may remove them without prior notice. The Operator will be liable for all associated costs
  - Where a bicycle is reported to be causing a Nuisance, a maximum response time of 24 hours will be required
- 6.4. Operators must make sure the bicycles are cleaned frequently and within suitable timeframes as agreed with the relevant Highway Authorities. This will include, but is not limited to, removing offensive graffiti and biohazardous material proactively or when directed by the Highway Authorities.

- 6.5. TfL encourages Operators to achieve the Fleet Operator Recognition Scheme (FORS) bronze accreditation to demonstrate their business is being run safely, efficiently and in an environmentally sound manner. FORS aims to ensure:
  - Safer operations Operators meet accreditation standards and report, investigate and analyse incidents
  - Safer drivers approved training is available to drivers to increase their awareness of vulnerable road users' safety
  - Safer vehicles those over 3.5 tonnes are fitted with specified safety equipment
- 6.6. The minimum age recommended for a registered user of any scheme will be 18. If accompanied by an adult, users must be at least 14-years-old. This will be explained both in the user terms and conditions and on the bicycle.

# 7. Operations

Dockless bike share schemes must be operated so as not to cause disruption. The deposit or use of shared dockless bikes (individually or collectively) must not cause Nuisance or Obstruction, and must not restrict or affect the use or enjoyment of property on Public Roads, the premises of any Highway Authority, or private land. The Highways Act 1980 and relevant Highway Authority byelaws provide powers to remove unlawfully deposited bicycles. A Highway Authority may consider giving a warning or taking enforcement action such as issuing Fixed Penalty Notices (FPNs) or prosecuting, where this is required. Operators will be treated as responsible for the use (including the deposit) of any bike they own or manage.

- 7.1. Where an Obstruction occurs, the bike or bikes involved must be moved to a compliant parking space within the timescales set out in Section 6.3. Failure to comply may result in removal, a formal warning, FPN or prosecution.
- 7.2. Where bikes have been removed either by a Highway Authority or emergency services, the Operator will be liable to pay all associated reasonable costs.
- 7.3. Any specific infrastructure requirements that are considered necessary to support the proposed scheme, for instance demarcation, additional parking areas and Sheffield bike stands, will be agreed with the relevant Highway Authorities.
- 7.4. Operators must liaise with TfL, the relevant Borough(s) and organisations such as the Royal Parks and Network Rail, to establish guidelines for where bikes can and cannot be parked. This will include general parking rules and details of specific areas where parking is prohibited at all or certain times.
- 7.5. Operators must make that an Obstruction does not arise because of the deposit of bikes, and that bikes are not deposited in predesignated no-go areas such as around fire escapes (eg through Geo-fencing).
- 7.6. Operators must also be able to monitor and report the location of all their bikes in real time. It is recommended that they can identify any bikes that have fallen over, and so pose a safety risk, and therefore are liable to be removed.
- 7.7. Operators must have the capability to manage the removal and redistribution of bicycles including when required by a Highway Authority or the Police and (without limitation):

- When clustering of bikes occurs, for example around transport interchanges during peak times and at large stadia and other important venues
- If there has been a major incident and the emergency services have requested the immediate removal of all bikes
- When cycle journeys have ended in a Non-participating Borough
- In preparation for planned events as instructed by Highway Authorities or emergency services
- If requested to cease all operations

Service level agreements addressing these situations must be agreed with the relevant Highway Authorities.

- 7.8. The Operator must ensure the safe and lawful loading and unloading of bicycles by properly trained individuals with suitable training records kept and available for inspection.

  Obstruction must be avoided.
- 7.9. Operators' staff must be properly trained as to where bikes may and may not be deployed with suitable training records kept and available for inspection.
- 7.10. Operators must provide the Highway Authorities with a telephone number and details of a named person or persons who can be contacted directly and immediately, at any time of day, on any day, and who will have the authority and resources available to them in order to rectify any foreseeable problems or take any other appropriate action.

# 8. Customer experience and education

- 8.1. Operators must offer 24-hour communication channels. This includes a telephone number that is clearly advertised on their website, mobile apps and bicycles.
  - Customer enquiries made during business hours should go direct to the Operator. An afterhours phone menu should be available for queries outside business hours, where not direct to the Operator.
- 8.2. The Operator must make sure the terms and conditions of use for their scheme/s are easily available to customers, via their website and mobile apps. They must:
  - Require all customers to accept their scheme's terms and conditions that includes clear guidelines on where the scheme operates and where bicycles can and cannot be parked
  - Highlight important components of their terms and conditions including parking restrictions, incentives for good behaviour and penalties for non-compliance
  - Provide general advice on their mobile app as part of the sign-up process that promotes safe and lawful bicycle use in London. This should include, but is not limited to, guidance on:
    - Staying back from heavy goods vehicles
    - Not cycling on pavements
    - Staying away from parked cars
    - Stopping at red lights
    - Staying central on narrow roads

- Hand signals for safe turning
- Provide a 'frequently asked question' page on their website and mobile app
- 8.3. All Operators' deposit and payments policy must be in accordance with the Payment Card Industry Data Security Standard. It should be transparent, reasonable and clearly communicated to the customer when they sign up to the scheme and when they hire a bike.
- 8.4. Operators must have a complaints handling procedure. It must be well publicised and clearly communicated on their website and mobile app. It must also:
  - Include contact details, and the process, for making a complaint
  - State the timeframes in which the Operator will endeavour to resolve the complaint, including when they are likely to notify the complainant about its progress or resolution
  - Be accessible so that disabled customers can lodge and progress a complaint

# 9. Data requirements

The Mayor's commitment to increasing safe cycling in London requires TfL and the Boroughs to understand patterns of cycle demand and use. Dockless bike sharing provides an opportunity to do this more accurately, which will better inform the Mayor's cycling strategy for London.

- 9.1. Operators must share anonymised trip data with the relevant Highway Authority to help enhance the cycling network.
- 9.2. They must also share data with the police and other law enforcement agencies if bicycles are suspected of being used for illegal or antisocial purposes.
- 9.3. In accordance with data protection legislation, all personal data must be processed lawfully. Operators must make sure appropriate security measures are taken against unauthorised access to, or alteration, disclosure, accidental loss or destruction of, personal data.

### 10. The environment

TfL and the Boroughs are determined to reduce the impact of their transport operations on the environment. Measures in the Mayor's clean air strategy will target the most polluting vehicles in London.

- 10.1. When redistributing bikes, Operators should consider the environmental impact of any vehicles used. Compliance with the FORS bronze accreditation will contribute to this.
- 10.2. It is recommended that Operators comply with ISO 14001:2015 to minimise negative impacts on the environment.
- 10.3. Recognising that bicycles have a limited useful life, Operators must share their policy for reusing and recycling their assets with TfL and the relevant Boroughs.

### 11. Accessibility requirements

TfL and the Boroughs continue to improve the Capital's urban realm, decluttering streets and making public spaces more pleasant and easier for disabled people to use.

11.1. Operators should recognise TfL's equality and inclusion policy and must be committed to improving transport in London by making it more accessible, safe and reliable.

### 12. Future considerations

TfL, in partnership with the Boroughs, remains open to innovative new services that could help achieve the Mayor's goals for cycling, provided they are safe and effectively managed.

The introduction of dockless bike sharing will be closely monitored as appropriate governance and regulatory controls are explored to make sure it works for everyone in the Capital.

Committee(s): Date(s):			Item no.
Planning and Transportation Committee	29 May 2018		
Subject:		Public	
Postman's Park draft Supplementary Planning Document – adoption			
Report of:	For Dec	ision	
The Chief Planning Officer			

### **Summary**

A draft Supplementary Planning Document (SPD) for the Postman's Park Conservation Area was issued for public consultation during March and April 2018. In response to comments received, several amendments are proposed, set out in Appendix B to this report.

#### Recommendations

- That the amendment to the Postman's Park SPD listed in Appendix B be agreed.
- That Members resolve to adopt the amended Postman's Park SPD.

### Main Report

### **Background**

- 1. The draft SPD sets out policies and guidance for the management of the Postman's Park Conservation Area.
- 2. Section 71 (1) of the Planning (Listed Building and Conservation Areas) Act 1990 requires the local planning authority to "formulate and publish proposals for the preservation and enhancement of any parts of their area which are Conservation Areas."
- 3. The National Planning Policy Framework 2012 (NPPF) requires local planning authorities to set out a "positive strategy for the conservation and enjoyment of the historic environment" (para 126). It encourages assessment of the significance of designated heritage assets in advance of proposals for change.

- 4. The London Plan, adopted March 2015, states that heritage assets should be identified and recorded in order to sustain and enhance their significance and utilise their positive role in place shaping.
- 5. The City Corporation has prepared character summaries for conservation areas, under the umbrella document 'Conservation Areas in the City: A General Introduction to Their Character' (1994). Combined character summary and management strategy SPDs have been adopted for 18 conservation areas and will be prepared for the remainder.
- 6. The Local Development Scheme (LDS) sets out the planning policy documents to be prepared and the timetable for preparing them. The most recent update of the LDS was approved by your Committee in June 2017 and includes a programme to complete character summaries and management strategies for the remaining conservation areas which have no document, and to revise and update existing character summaries. These are being prepared in line with current Historic England guidance on the appraisal and management of conservation areas.
- 7. The City Corporation's Local Plan was adopted by Court of Common Council in January 2015. Policy CS12: 'Historic Environment' seeks to preserve and enhance the distinctive character and appearance of the City's conservation areas, while allowing sympathetic development within them. The policy seeks to safeguard the City's listed buildings and their settings, while allowing appropriate adaptation and new uses. The draft SPD is consistent with the approach outlined in the Local Plan.

#### **Current Position**

8. On 29 January 2018 your Committee agreed the draft text for the Postman's Park draft SPD for formal public consultation. The draft SPD was made available for formal public consultation for a six week period from 7 March until 20 April.

### **Results of the SPD consultation**

- Comments were received from residents, the Guild Vicar of St Botolph Aldersgate, the City of London Archaeological Trust, Historic England and Transport for London.
- 10. Before adopting a SPD the local planning authority must prepare a consultation statement. This sets out the persons consulted during the preparation of the SPD, summarises the main issues raised and explains how these were addressed in finalising the SPD. The statement is attached as Appendix A.
- 11. It is recommended that amendments are made to the SPD in response to the comments, as set out in Appendix B to this report.
- 12. Additionally, minor corrections and clarifications were made throughout the draft SPD for editorial reasons.

### **Corporate & Strategic Implications**

- 13. The Postman's Park SPD supports the Strategic aims of the Department Business Plan, relating to the sustainable design of the streets and spaces and the protection and enhancement of the City's built environment. These aims are met by promoting the protection and enhancement of the Postman's Park Conservation Area.
- 14. Equality Impact Assessments have been carried out for the draft SPD and no equality issues were identified. (Appendix D).
- 15. Sustainability Appraisal Screening Reports have been carried out for the draft SPD which has concluded a full Sustainability Appraisal/Strategic Environmental Assessment is not required. This has been confirmed by statutory consultees. (Appendix E).

### **Implications**

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

#### Conclusion

17. Subject to the amendment in Appendix B it is recommended that the SPD is adopted by resolution in accordance with statutory requirements. Under its terms of reference your Committee is authorised to adopt SPDs without reference to Common Council.

After adoption the SPD and adoption statement will be made available in accordance with statutory requirements.

### **Appendices**

- Appendix A Consultation Statement
- Appendix B Schedule of Proposed Changes
- Appendix C Postman's Park Conservation Area Character Summary and Management Strategy SPD
- Appendix D SEA Screening Statement
- Appendix E EQIA test of relevance

#### Contact:

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# **City of London**

# Postman's Park SPD

**Consultation Statement** 

May 2018



The Postman's Park Supplementary Planning Document (SPD) was published in draft for public consultation during a six-week period from 7 March until 20 April 2018. Prior to the public consultation the draft was prepared by officers in the Department of the Built Environment in consultation with colleagues in that and other departments within the City Corporation and the text was approved by the Planning and Transportation Committee.

Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 require the City Corporation to prepare a consultation statement setting out the persons consulted when preparing a supplementary planning document, a summary of the main issues raised by those persons and how these have been addressed in the SPD.

The consultation was carried out in line with the City Corporation's Statement of Community Involvement 2016.

The following measures were taken to consult the public on the SPD during the consultation period:

#### Website

The draft SPD and supporting documents were made available on the City Corporation's website. Information and a link were provided on the home page of the City's website and on the landing page of the Planning section of the website to ensure maximum exposure. Information was provided in the City of London e-shot.

#### Inspection copies

A copy of the draft SPD and supporting documents was made available at the Planning Information desk at the Guildhall and the Guildhall, Barbican, Shoe Lane and Artizan Street public libraries.

#### **Notifications**

Letters and emails containing information about the draft SPD and inviting comments were sent to relevant specific and general consultation bodies. The City Corporation maintains a database of all those who have expressed an interest in planning policy, and letters or emails were also sent to all those on the list.

Posters and leaflets advertising the SPD consultation and inviting comments were placed in the Guildhall, Barbican, Artizan Street and Shoe Lane public libraries.

The planned preparation of the draft SPD was posted in the Local Plan Bulletin and on the Consultations page of the City of London website. Members of the public were invited to make comments to contribute to the preparation of the draft SPD.

#### Responses received

A total of 28 consultation responses were received.

Nearly 20 of the respondents were residents either within the conservation area or nearby. The other respondents were interested parties or consultees including the City of London Archaeological Trust, Historic England, Natural England and Transport for London.

The table that follows summarises the comments and explains how they were addressed in finalising the SPDs. The responses are given in date order.

# Summary of comments and responses

\*comments and responses are published as received and uncorrected.

#	Section	Comment	Response
1	General	Resident – 7 March I am a resident / owner occupier in [REDACTED] on Little Britain and would like to contribute to the consultation referenced below.	Direct hyperlink to the draft SPD provided.  General comments noted.
		Please could you send me a soft-copy PDF of the SPD?  Good plans to preserve and enhance the area will be very welcome indeed; but it will also be important to ensure residents continue to have a sustainable central London living experience (eg including in relation to parking).	
2	General	Resident - 7 March I would like to recommend the utmost care possible of this green space :Postman Park in the City of London.  I do so enjoy this garden. I have shared it with many of my London friends, visitors from outside London, and abroad.  I am very aware of the number of visitors who pass through the park. I often observe how their foot fall has a tendency to make the small area look worn and sad.  It should be noted that the poignant plaques on display of brave souls who died trying to save fellow Londoners are especially cherished. Further more I love that they are included in an artwork at the Tate:  Photographs of them are included by Artist Susan Hiller in Monument 1980-1981. This work then causes many ripples. The work is on permanent view in the tanks at the Tate Modern.	General comments on the desirability of preserving and enhancing the park noted.
3	General	Enquirer – 7 March	Response issued explaining that the
		Thank you for this information.  Could you tell me what happened to the MICHAEL Arton sculpture 'Minotaur	Minotaur sculpture has now been relocated to the London Wall Place development.

#	Section	Comment	Response
		' which used to be in the park.	
4	St Botolph Aldersgate	Guild Vicar of St Botolph Aldersgate – 7 March Thank you for your email regarding the Postman's Park Conservation area. There are a number of factual errors in the document.	Response and clarifications of factual points regarding St Botolph Aldersgate welcomed; the relevant sections of text will be updated.
		On page 16 you state that St Botolph's is a 'Guild church and no longer holds regular Anglican services; currently it is used by an evangelical Christian group and the London City Presbyterian Church holds services on Sundays. As a grade I listed church in use for ecclesiastical purposes, alterations to the building are managed under the Ecclesiastical Exemption instead of the LBC system.'	Response issued clarifying the nature of the strategy proposed in the SPD.
		I write as the Church of England Guild Vicar. We do have weekly services which are advertised through The Aldersgate Talks website (www.aldersgatetalks.org) and there is a separate St Botolph's website primarily for the benefit of other users of the building (https://www.stbotolphsaldersgate.org.uk).	
		I don't know what you are referring to by 'an evangelical Christian group'- we are an Evangelical Church of England church with an Evangelical ministry like many others in the City but no other 'group' uses the church. As a Guild Church we don't have a parish and aren't obliged to have Sunday services-our focus therefore is on the working population rather than a Sunday congregation which is why LCPC use the building on a Sunday. A number of orchestras also use the buildings in the evenings.	
		On a different note it would be helpful to know how the proposed strategy differs from what is in place already. As you know the Corporation spent a lot of money last year on the Park so what do these new proposals mean in practice?	
5	General	Port of London Authority – 7 March Thank you for consulting the Port of London Authority (PLA) on the Postman's Park Conservation Area Supplementary Planning Document (SPD).	Response noted.
		For information, The PLA is the Statutory Harbour Authority for the Tidal Thames	

#	Section	Comment	Response
		between Teddington and the Thames Estuary. Its statutory functions include responsibility for conservancy, dredging, maintaining the public navigation and controlling vessel movement's and its consent is required for the carrying out of all works and dredging in the river and the provision of moorings. The PLAs functions also include for promotion of the use of the river as an important strategic transport corridor to London.	
		Due to the location of the proposed conservation area, the PLA has no comments to make on the proposals.	
6	General	Resident – 7 March Postmans Park is a shady oasis in our City of London, it is unique and has something special that the other London park do not have and should be preserved for posterity. Please do the maximum you can to preserve it in its current form.	Response noted.
7	Introduction	City of London Archaeological Trust – 8 March Thank you for circulating the draft SPD for Postman's Park. It is generally very good; the treatment of buildings in Little Britain is particularly welcome. We at CoLAT have the following comments, all minor:  i. Description of where the Roman city wall runs is perhaps not quite correct. It borders the south side of Postman's Park. Should you perhaps amend the opening text on p5?  ii. We know there have been proposals to rebuild an east end for Christchurch Greyfriars. We would support the opposition to such a proposal. It is all right as it is.	Corrections welcomed and observations noted. The SPD will be updated to reflect the suggested changes.
8	1-6 Little Britain, p.19	Resident – 9 March  Sir, I live in [REDACTED], Little Britain and read your plans with interest, particularly the page attached which relates to Little Britain. Allow me to comment.  I like the idea of pedestrianising Little Britain. However residents' vehicles and tradesmen must be allowed constant access for loading, deliveries, etc., and the car park under Milton House.	Observations welcomed.  Pedestrianizing Little Britain would enhance the character and experience of the conservation area and improve pedestrian and residential amenity. It is a long-term, aspirational measure that would be implemented when resources and circumstances allow. The text will be

#	Section	Comment	Response
		I strongly object to the ground floor of any block in this street being granted permission for commercial usage. This is a residential street and should stay that way. People have brought property in this street because it is a wholly residential street. As you are aware, every ground floor is a residential flat. When you say "animate ground floor frontages" do you mean you would grant permission for a ground floor flat to be converted and used for commercial purposes?  I strongly object to Cross Keys Square being opened. It was bad enough (smells, noise, etc.) when 200 Aldersgate attempted to hold a monthly market for a short while in 2016. Many bedrooms back on to the square. Two gyms have operating plant backing onto the square. We have had persistent problems with making Pure Gym (and prior to that LA Fitness) turn off their air conditioning at night, intrusive noise from the Virgin gym plant and from workmen working at unsocial hours, etc. Since no protection for residents with regard to plant operating hours was incorporated in the planning permissions for 200 Aldersgate or 20 Little Britain, I have no confidence at all that any protection would be included for residents with any proposed commercial premises. The last thing residents need is to have extra noise and disturbance. Additionally, 200 Aldersgate erected a gate across the rear of the square which is always closed so presumably they don't want constant public access either.  I look forward to your comments.	updated to reflect this.  The objection to commercial uses on Little Britain is noted. While it is considered that a more vibrant mix of uses would not harm the character and experience of the conservation area, the potential for adverse impacts on residential amenity is recognised. Furthermore, although historically a bustling, mixed-use street, it is recognised that tranquillity now forms part of the character of the conservation area here and that this tranquillity is in part generated by the residential use of these buildings.  Accordingly, this proposal will be deleted from the SPD and the text updated as necessary.  The objection to opening Cross Key Square is noted. Reopening this square and its connections to Little Montagu Court would enhance the permeability of the area and bring these historic spaces – visible on maps from 1676 onwards – back into the public realm. Usage only as a pedestrian route is not considered to have a significant impact on residential amenity. This is a long-term, aspirational measure that would be negotiated if and when circumstances allow. The text will be updated to reflect this.
9	General	Natural England – 14 March Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.	Response noted.

#	Section	Comment	Response
10	1-6 Little	Resident – 19 March	Observations welcomed. Please refer to the
	Britain, p.19	As a resident of Little Britain, I would like to express my views on below proposed items:	comments on response (8), above.
		• Animate ground floor frontages with appropriate commercial uses where these do not conflict with existing uses; Little Britain is entirely a residential street and, I, as a resident, would like it to remain as such.	
		• Open Cross Keys Square; I live on the ground floor and my bedroom overlooks parts of Open Cross Keys Square. I feel very uncomfortable with the idea that strangers can have a peek into my most private area of my flat. Not to mention the noise and the litter levels this may cause.	
		Pedestrianise Little Britain to create a compelling 'microquarter' of shops/restaurants facing Postman's Park (which would contribute to the Culture Mile);	
		Though I would be open to this day since ever since St. Bart's hospital inauguration, Little Britain has become busier than ever, I would still wish that residents can have access for drop offs, deliveries etc.	
11	General, 1-	Resident – 21 March	Observations welcomed and noted,
	6 Little	I write to set out my views on the Corporation of London proposals regarding	particularly the constructive suggestions of
	Britain, p.19	Postman's Park Conservation area. I write as a local resident since 1996 having	how the Postman's Park conservation area
		witnessed changes over a significant period of time.	can serve and be integrated with the
		First may I say how impressed I am with the Corporation proposals particularly	Culture Mile. The idea of a pedestrianised
		as they they cleverly seek to integrate with other plans for the area	Little Britain forming part of a route between the Culture Mile and the Cathedral is
		surrounding the Postman's Park Conservation area such as the culture mile, Smithfield conservation area and new Museum of London site.	positive and has potential. We will explore
		The value of the area from an archaeological, cutural and tourist perspective	options for producing a guided walk or
		is fully covered in your consultation document and need not be repeated.	similar.
		The question is to what extent the Corporation proposals will enhance the	
		value of the area, preserving it for the benefit of future generations. I have	On the pedestrianisation of Little Britain,
		witnessed degradation of the conservation area over the years by traffic	please see the comment on response (8),
		congestion, inapproriate trafic alterations, a pointless King Edward Street	above.

#	Section	Comment	Response
		gyratory system and heavily polluting traffic (both noise and emissions) in the	
		historic streets bordering the Park such as Little Britain. I believe that the	
		proposals particularly in relation to Little Britain significantly address those	
		concerns and I welcome them wholeheartedly.	
		My views are set out below:	
		1. Over the years, by default, I have acquired great deal of experience	
		assisting confused tourists as they search for the elusive Museum of London	
		following a visit to St Pauls. As the museum is being re located to West	
		Smithfield it makes sense for there to be a direct "culture half Mile" from St	
		Pauls and Greyfriars Church to Smithfield which will seamlessly join up with the	
		culture Mile thereby linking up with the Museum to the West and the Barbican	
		centre to the East. Such a culture half mile would allow visitors to follow a	
		route from St Paul's to Paternoster Square to the ruins of the Wren built	
		Greyfriars, past the old Postal museum and statue towards Postmans Park.	
		Visitors would then pass through the North section of Little Britain, past the	
		sensitively designed Helical Bar development and on to to Smithfied Square.	
		This route is rich in history and matters of interest and should become a	
		protected route for visitors on foot.	
		2. In order for the cuture half mile to be pleasant the route should be	
		pedestrianised as far as is practicable. Presently the area outside Barts	
		hospital is a continuous traffic jam with vehicles spewing out fumes which	
		have damaged the facades of recently cleaned buildings in Little Britain and	
		within the conservation area generally. I invite you to view the white wall	
		facing King Edward Street of the building at 75 Little Britain which clearly	
		illustrates the damage being caused. Barts patient are being disturbed by the	
		constant tooting of horns and occasional altercations between frustrated	
		drivers stuck in traffic jams.	
		3. Little Britain, opposite Postman's Park, has become a de facto car	
		park for commercial delivery drivers, minicabs, taxis and heavy goods	
		vehicles endangering cyclists using the contra flow and significantly	
		damaging the facade of the listed buildings along the road. Idling engines	
		are a huge problem as drivers play cat and mouse with parking attendants.	
		The road is full of history as illustrated by its blue plaque to John Wesley. The	
		road was immortalised in Charles Dickens "Molly Malone". The integrity of its	
		history should be protected by pedestrianisation. (I am not a gardener	

#	Section	Comment	Response
		however expect the polution emanating from these vehicles cannot be beneficial for the plants and trees within the park itself). Streams of organised groups of tourists visit little Britain but are crammed onto narrow pavements risking life an limb as vehicles navigate at speed along what has become a rat run.  4. Little Britain is used by vehicles seeking to avoid circumnavigating the pointless gyratory. I therefore agree wholeheartedly with the Corporation proposal that it be pedestrianised to help preserve the conservation area.  5. In my view the area from Greyfriars Church to the Northern section of Little Britain should be pedestrianised with local access for residents only and ambulances. This may only be possible once the gyratory has been removed. However in the meantime I see no compelling reason why the	
10	Conoral 1	pedestrianisation proposals for little Britain should not be implemented.  Resident – 22 March	Observations noted The nublic consultation
12	General, 1-6 Little Britain, p.19	I am a resident of [REDACTED], Little Britain and have been sent by email an extract of your draft Supplementary Planning Document which was published for consultation on 7 <sup>th</sup> March.	Observations noted. The public consultation on the draft SPD followed the City Corporation's Statement of Community Involvement, adopted by Members in July 2016.
		I have received no correspondence, had no sight of any site notices or received any form of information to confirm that this consultation process has been initiated by the City Council and it is clear in review of your website that the local authority have not sought to identify any formal consultation process. Whilst very little weight can be attached to the finalised SPD, it must be the case that the limitations of this consultation exercise must cast further considerable doubt on the value of this document and, in turn, any reliance the City Council might ultimately then place upon the SPD.	The motivation for producing the draft SPD is set out on page 7 of the document.  Please refer to comments on response (8) above in relation to the recommendations on page 19 of the document.
		I have, however, taken the opportunity to review the draft SPD and provide my comments below.	Detail of the character and significance of individual elements of the conservation area is given throughout the document, together with broad management strategies for
		Whilst any action taken by the City Council to preserve and enhance the existing conservation area is to be welcomed it is difficult at this moment to understand the motivation of the local authority in producing the draft SPD.	each. These will guide development management within the conservation area, safeguard its character and represent a considerable evolution of previous policy
		The only obvious candidate for redevelopment (with the exception of the	statements. A summary of character section

#	Section	Comment	Response
		Bank of America building) is the complex of commercial buildings which surround Cross Keys Square and which have their frontage to Montague Street, the 'Museum of London' roundabout and the junction with Aldersgate Street. However, this development is quite divorced for Postman's Park, with only glimpsed views through the gated access to Cross Keys Square and by limited linkage to the corner of the existing development at little Britain adjacent to the Methodist Chapel.	will be included in the text in response to Historic England's comments below.
		It is, in this context, of some concern to read the suggested 'enhancements' to Little Britain that are identified on page 19 of the draft SPD. These provisions suggest that any new development might secure:	
		<ul> <li>"Animate ground floor frontages with appropriate commercial uses where these do not conflict with existing uses;</li> <li>Open Cross Keys Square;</li> <li>Pedestrianise Little Britain to create a compelling 'microquarter' of shops/restaurants facing Postman's Park (which would contribute to the Culture Mile);</li> <li>Improve setting to rear in future development schemes."</li> </ul>	
		There are very limited opportunities to 'animate ground floor frontages' at Little Britain without the City Council engaging in the compulsory acquisition of established residential properties which by definition characterise the area and add substantially to the 'special architectural and historic interest'. Any such action by the City Council would be very difficult to justify given the established and positive character of the street as is already indirectly alluded to in the draft SPD. Whilst there may be some limited intervention at the entrance points to Little Britain this would have to be carefully considered given the quiet, tranquil and private character of the existing street.	
		It is, in this context, important to recognise that the special character of this part of Little Britain is derived from the fact that it represents one of the few remaining wholly residential streets within the heart of the City. It is this unique character which add to the peace and tranquillity of the Park and any attempt to introduce commercial activity in the form of bars, cafes and	

#	Section	Comment	Response
		restaurants will inevitably ensure that this exceptional character is lost to the homogenous and ubiquitous array of coffee shops that are found in every other street in the City.	
		The opportunities to open 'Cross Keys Square' are again limited by the enclosure of this area by established residential properties. The prospect of this area being opened to the public would only ever be a realistic possibility if it were linked to the introduction of bars, cafes and restaurants. Again, this form of development would inevitably detract from the quiet and tranquil character of the area and, as such, would significantly undermine the character and appearance of the conservation area which the City Council should be seeking to enhance and protect. It is also important to recognise that at night and at weekends this part of the City is particularly quiet and is quite sensitive to disturbance. These conditions make it very difficult to envisage that the Square could be easily opened up to any form of associated development without causing real harm to the amenity of local residents.	
		It follows that the suggested pedestrianisation of Little Britain 'to create a compelling 'micro-quarter' of shops/restaurants facing Postman's Park' is a concept that can only serve to harm the unique character of Postman's Park and its immediate environment. It is striking, in this context, that the SPD has a number of sections entitled 'character and significance' but none of them provide any actual description of the character of the designated area or its environs. This is exemplified by the assessment of 'character and significance' at page 29 of the draft SPD which describes the physical features of the Park but does little more than describe the character and significance of the area as 'an area of open space'. It is, in this and many other respects, a flawed document and it really is of no great credit to the City Council.	
		The final suggestion that new development should 'improve [the] setting to [the] rear in future development schemes' is both a statement that is difficult to fully understand or to greatly criticise. It is clearly the case that it is incumbent upon any new development to enhance the character and appearance of the conservation area and any 'policy' commitment that is	

#	Section	Comment	Response
		directed to achieving this objective is to be welcomed. I would, again,	
		suggest that this document should make some attempt to explain that	
		character if it is to serve any useful function in meeting this objective.	
		I would, in conclusion, wish to confirm my objection to the contents of page 19 of the draft SPD in the terms detailed above. Overall, I also have to contend that the draft SPD cannot assist in guiding future development without clearly explaining the character and features of the area. This is a substantive flaw to this 'policy' document and the draft SPD needs to be reconsidered and largely redrafted to ensure that it fairly and accurately identifies the character of the conservation area which it seeks to protect and enhance. It follows that the draft SPD should also identify the character of the surrounding area (and, not least, Little Britain) which clearly has a positive and	
		significant influence upon this important heritage asset.	
13	General, 1-	Resident – 22 March	Observations welcomed and noted. Please
	6 Little	I would like to contribute with my comments on the draft consultation of	refer to comments on response (8) above in
	Britain, p.19	Postman Park Conservation Area (no 7).	relation to the pedestrianisation of Little Britain.
		I have been living in Little Britain for the past 20 years. It is a lovely little road,	bilidili.
		enhanced by the old facades of the buildings and Postman's Park is like a	
		little green oasis in the City, which gets constantly busy during weekdays. I	
		think it would be very important to preserve the historical buildings and	
		facades and retain this corner of peace in the City of London by limiting	
		excessive air and accoustic pollution. Sadly it has become virtually impossible	
		for us residents to enjoy the beauty of this conservation area as Little Britain is	
		constantly used as the unauthorised parking bay for minicab drivers, who	
		regularly park on a single yellow line with their engine on, ready to depart as	
		soon as a new client approaches or speed away if the cap of a traffic	
		warden appears on their rear-view mirror from the end of Little Britain.	
		During the winter minicabs, taxis and commercial vehicles park with the	
		engine on, enjoying their lunch or checking their mobile phones or even	
		having a nap in the warmth of their cars, and the same in the summer with	
		the air conditioning on while all of us residents or passing-by people have to	
		breath the fumes of their cars or endure their insults if we kindly ask them to	
		switch their engine off. It is such an uncivilised behaviour which has gone from	

#	Section	Comment	Response
		bad to worse.	
		I really appreciated reading about the history of Postman Park Conservation area, and would happily lend my support for Little Britain to become pedestrianised, limiting the cars only to access the resident underground parking in Little Britain.	
		The effects of the pollution generated by the cars constantly on stand-by in Little Britain can be seen on the buildings and is certainly not desirable around the small pleasant green space of Postman Park. Little Britain is a narrow residential road and needs to be preserved. The whole area appears on the contrary being developed up to Smithfield market as a new residential area which would be highly enjoyable if it wasn't for the high volume of cars constantly passing in King Edward's Street.	
		Because all the traffic going east is diverted through King Edward Street, there is a constant queue of cars and buses with their engines on at the traffic lights just outside St. Bartholomew's hospital entrance in King Edward's Street, where the street narrows to allow pedestrians to cross. This happens all day outside the entrance of Postman Park in King Edward Street. It does not help that the bus waiting-bay is just outside the General Post Office Buildings.	
		I confess I could not understand how, knowing how important Postman Park is to the local community (including the doctors and nurses from Barts Hospital), it has been left completely surrounded by cars and traffic with minimal enforcement against engine-idling.	
		It would be fantastic for tourists and visitors to this historic part of the City if King Edward Street were also pedestrianised.	
		I am totally in agreement with the Corporation's bold proposals and support them wholeheartedly.	
14		Resident (in response to number 12, above) – 22 March	Observations noted. Please refer to
	Britain, p.19	Thank you for your well written email. As a resident of [REDACTED] I agree entirely on the valid points you have made on Little Britain and the SPD. I	comments on responses (8) and (12), above.

#	Section	Comment	Response
		would therefore also like to object to the contents of page 19 of the SPD with the exception that I would welcome the pedestrianisation of Little Britain as this would add value to the peaceful and quiet nature of the park, the church and most importantly to the Watts's Memorial to Heroic Self Sacrifice.	
15	1-6 Little Britain, p.19	Resident – 23 March We are the owners of [REDACTED], Little Britain. We were very interested to hear of the plans to potentially pedestrianise Little Britain. We would whole-heartedly support this proposal for the following reasons:	Observations noted. Please refer to comments on response (8) above in relation to the pedestrianisation of Little Britain.
		<ul> <li>We are disinclined to open the windows in summer due to the traffic noise</li> <li>Even when the windows are only open via the vents, black soot accumulates on the ceiling above the windows and on net curtains - we removed our net curtains due to this recurring constantly despite them being regularly washed; the water in the bath (where we washed them) turned black from the soot!</li> <li>We feel that the character and peace of the area would be greatly enhanced by pedestrianising the road</li> <li>We perceive that our quality of life would be enhanced</li> <li>We assume that access to the parking garage under the building would still be permitted for residents?</li> </ul>	
16	1-6 Little Britain, p.19	Resident – 23 March I own a flat in Little Britain and I am emailing to support the draft's suggestion that Little Britain be pedestrianised. As things stand it is used day and night as a carpark by assorted taxis and vans, seriously detracting from its amenity value. Pedestrianisation is an excellent idea.	Observations noted. Please refer to comments on response (8) above in relation to the pedestrianisation of Little Britain.
17	1-6 Little Britain, p.19	Resident – 24 March I am a resident of the conservation area. I should like to express strong support for your plan regarding the rearrangement of the gyratory system and the creation of a pedestrianised area. Not only would this increase the amenity of the space for all residents – it would also greatly improve the environment immediately to the front of the hospital.  There is one important item not mentioned in the plan. Residents of 1-6 Little	Observations noted. Please refer to comments on response (8) above in relation to the pedestrianisation of Little Britain.

#	Section	Comment	Response
		Britain and 75 Little Britain have some 50 car parking spaces under 75 Little Britain, to which they would continue to require access even after Little Britain were to be pedestrianised. This could presumably be achieved by blocking through traffic with access only for residents from the St Martin Le Grand end of Little Britain.  [ADDRESS REDACTED]	
18	General & specific sections noted	Historic England – 28 March  Thank you for consulting Historic England on the Draft Postman's Park Conservation Area SPD.  As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Accordingly, we welcome the opportunity to comment upon the above draft consultation.  We have reviewed these documents against the National Planning Policy Framework (NPPF) and its core principle that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.  Comments  Historic England welcomes the publication of this document, which will help to provide a positive framework for the management of the conservation area and listed buildings. We do not have any substantive comments but in our view, the proposed SPD would benefit from minor re-ordering and editing to provide greater clarity.  Page 5. Introduction. The document would benefit from a clear summary of the overall significance of the conservation area as part of the opening	Observations noted and suggestions for edits welcomed.  The Introduction will be updated to include a clear summary of the character and significance of the conservation area and the section on characterisation will be edited accordingly. The general environmental and architectural characteristics will be summarised.  The Planning Policies section will be updated as suggested.  The Buildings section will be updated to incorporate the suggested amendments.

#	Section	Comment	Response
		introduction. This should comprise of a brief paragraph reflecting the historic,	
		architectural, and communal significance embodied by the area.	
		The section titled Environmental is a little unclear, as the pairing of contracting	
		The section titled Environmental is a little unclear, as the pairing of contrasting and complimentary features is curious but not a defining factor of	
		environmental significance (although it may be a symptom of the areas	
		spatial and historic development). The areas special character is complex	
		and drawn from the layers of significance which reflect the development	
		from the Roman City to the present day and encompasses medieval religious	
		complexes, the influence of the GPO, the hierarchy of street patterns, historic	
		associations and the juxtaposition of intimate public spaces alongside grand	
		commercial and religious architecture. Today it is an area characterised by dense office development, but also valuable and unique public spaces	
		which offer much needed places to reflect and relax.	
		While it offer the edge places to remost and releast	
		As such, change within the conservation area needs to be informed by a	
		clear understanding of the significance of the assets affected and their	
		settings and a need to preserve its unique character. We would suggest	
		adopting a summary of character based on section 3 of the Leadenhall	
		Market CA Appraisal which sets out the defining characteristics of the area in a clear format.	
		a cical formal.	
		Page 7. Planning Policies .	
		National Policies. You may find it useful to mention that the NPPF is supported	
		by the Planning Practice Guidance.	
		https://www.gov.uk/government/collections/planning-practice-guidance	
		Historic England's Historic Environment Good Practice Advice in Planning	
		Notes give general advice against the background of the NPPF on	
		managing change and setting out a positive strategy for the historic	
		environment https://historicengland.org.uk/images-books/publications/gpa3-	
		setting-of-heritage-assets/	
		It would be helpful to incorporate the boundary section (page 12) alongside	

#	Section	Comment	Response
		the map on page 8.	
		You may wish to consider mentioning that the London Plan is currently under revision and includes strategic policies for the historic environment, transport and freight, the London View Management Framework and local views and the Central Activities Zone. The London Plan recognises the City of London's vital contribution to the economy and cultural identity of London. However, as the new London Plan is unlikely to be published before the SPD you may consider that the existing City of London Local Plan will remain compliant to the emerging policies.	
		Page 13. Buildings	
		The relative scale of the conservation area allows the component buildings to be identified individually. However, it would be useful to describe the spatial characteristics, street pattern and urban grain as a general introduction and incorporate a thumbnail map of the sub-area/building in the wider context of the conservation area if possible. There are also collective cross building characteristics such as general scale, height and the use of high quality materials which could be drawn out in the introduction.	
		Page 15, St Botolph Aldersgate. Presumably this should read "unaffected" or survived the Great Fire.	
		The last paragraph should read "amalgamation of the churchyards".	
		Page 19. The reference to a "compelling" microquarter, might be better phrased as "attractive".	
		Page 22. The second paragraph of the Character and Significance would benefit from editing to be clearer, eg. "The church was rebuilt in 1677-87 by Wren, who subsequently added its distinctive tower, completed in 1704. Widely recognised as one of Wren's finest churches the main body of the church was again destroyed in WW2. The remaining tower has an architectural complexity etc".	

#	Section	Comment	Response
		Page 35, Aldersgate Street/St Martin Le Grand. The opening sentence implies that the road runs under Aldersgate which is no longer the case. Should this therefore read under which the road ran?	·
		Conclusion  Historic England supports the publication of this document and we hope the	
		above comments will assist in its delivery. If you require clarification or wish to discuss any specific issues raised please do not hesitate to contact me.	
		Finally, it must be noted that this advice is based on the information provided by you and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently relate to this or later versions of the Guidance, Appraisals and Management Plans, and which may have adverse effects on the environment.	
19	1-6 Little Britain, p.19	Resident – 30 March	Observations noted. Please refer to comments on responses (8) and (12), above.
		Various of our neighbours have alerted us to the above document and annexes which are an addendum to the local Plan for the Conservation Area in which we live. We have not seen any notice of this posted either in the affected area or to those affected which seems a little unusual.	
		We consider the proposal to pedestrianize Little Britain (the street from 1-42) to be a positive development. This stretch of Little Britain is one of the only fully residential streets in The City (as our neighbour [NAME REDACTED] has noted in his letter/email to you) and we do believe the residential environment should be enhanced in this way. In our view, pedestrianisation would take the disruptive traffic out of the street, much of which has little to do with the residential usage of the street.	
		However, we are somewhat mystified by the almost casual reference to the fact that the street could be enlivened with small shops and restaurants as part of the branding of the Barbican area as the Culture Mile. The report says	

#	Section	Comment	Response
		and we quote	
		Animate ground floor frontages with appropriate commercial uses	
		where these do not conflict with existing uses;	
		Open Cross Keys Square;	
		Pedestrianise Little Britain to create a compelling 'microquarter' of	
		shops restaurants facing Postman's Park (which would contribute to the	
		Culture Mile);	
		As far as we are aware all the premises in the street are fully occupied residential apartments organised under a single management company and	
		whose owners own their properties on long leases. We are also mystified by	
		the reference to Cross Keys Square which has been largely unused since 200	
		Aldersgate was built and these apartments in Little Britain converted to	
		residential use in the mid 1990s. In fact, the single retail use in the street – the	
		wine bar at the end of the street – has never attracted the kind of patronage	
		to make it profitable and currently it is vacant. The key issue here is of course	
		the proposal to add retail uses and we find this to be quite contrary to the	
		idea of the conservation area and vociferously oppose it.	
		The other advantage of pedestrianisation would be that the traffic problem	
		which can be severe during the day could be solved. The street is one way	
		for vehicles and two-way for bikes. Ambulances use it as well and although	
		most go around the loop in front of the BT building and along King Edward	
		Street to Barts, some do take the short cut through Little Britain and this is	
		fraught with danger. Moreover, during the working day despite the parking	
		restrictions, limos waiting for business people and vans of various kinds are parked there with engines idling adding to pollution. At the start of the street	
		where it touches Aldersgate, people park to visit Pret a Manger for take away	
		food. All this is really dangerous and we have seen many close shaves in the	
		last 4 or so years since the bikeway came in and retail uses came to occupy	
		the ground floor of 200 Aldersgate. When the change to two ways for bikes	
		was proposed, we pointed out these dangers to and from bikes and	
		pedestrians in Little Britain due to the two way biking conflicting with one-way	
		traffic and vehicle parking in disabled spots and after 6-30pm, parked cars.	
		But this did not seem to be of concern at that point. In our view, something	
		needs to be done to solve the traffic and pollution problem in the street and	

#	Section	Comment	Response
20	General, 1-6 Little Britain	the pedestrianisation looks like it would help.  The rest of the report – which is most of it – seems sensible and Postman's Park has continued to improve during the last two or more years with sensible tree felling and sympathetic landscaping and we applaud this. We consider the proposal for adding shops and restaurants to Little Britain however would in fact detract from current use of Postman's Park which is a gentle retreat for city workers and for reflective contemplation of the fine buildings around the area. Moreover, we doubt very much that this is a serious proposal for it would involve enormous disruption to the frontages of the buildings and access to the apartments.  Resident – 1 April  Thank you very much for sending the Postman's Park Conservation Area Supplementary Planning Document.  First of all I would like to congratulate with you for the nice work you did by offering to residents of this aea an excellent opportunity to evaluate the whole zone and its relevance from an historical point of view.  Being a resident since 2004 of [REDACTED] Little Britain, I recommend, as you underline in your report, that this street could benefit from being pedestrianised. Access by car can be made for residents only since Milton house as a garage for residents.	Observations welcomed and noted. Please refer to comments on response (8) above in relation to the pedestrianisation of Little Britain.
		I am in favour of all other suggestions you recommend.	
21	1-6 Little Britain, p.19	Resident – 2 April I refer to the previous correspondence of my neighbours, namely the email of [NAME REDACTED] dated 13 March 2018, the emails of [NAME REDACTED] and [NAME REDACTED] both dated 22 March 2018 and the email of [NAME REDACTED] dated 30 March 2018.	Observations noted. Please refer to comments on responses (8), (12) and (19) above.  Please refer to page 12 of the SPD. By virtue of its scale, mass and detailing, the large
		I agree with the comments of my neighbours and strongly object to the following suggested enhancements on page 19 of the draft SPD:  • "Animate ground floor frontages with appropriate commercial uses where these do not conflict with existing uses;  • Open Cross Keys Square;	development to the rear provides an unsympathetic setting for Nos. 1-6 Little Britain. If an opportunity arises to redevelop this site, the setting of the Little Britain buildings could be improved.

#	Section	Comment	Response
		Pedestrianise Little Britain to create a compelling 'microquarter' of shops/restaurants facing Postman's Park (which would contribute to the Culture Mile)"	·
		I would support the pedestrianisation of Little Britain (allowing for residents' vehicles, deliveries and the use of the car park under Milton House). However, I strongly object to this being for the purpose of creating "a compelling 'microquarter' of shops/restaurants facing Postman's Park".	
		The fourth suggested enhancement on page 19 of the draft SPD – "improve setting to rear in future development schemes" – is unclear. The City of London Corporation should provide further details on this enhancement so that we can properly comment.	
22	1-6 Little	Resident – 6 April I would like to add my comments to your consultation.	Observations noted. Please refer to comments on response (8) above in relation
	Britain, p.19	I would like to add thy continents to your consumation.	to the pedestrianisation of Little Britain.
		I am 18 years old and live in Little Britain. I would very much support the pedestrianisation of the road to improve the area surrounding the Postman's park.	
		At present the road is nearly always full of cars with their engines running which ruins the air quality in the area. Some of the exhaust fumes stink so much they waft into the park.	
		It is used as a dropping off and collection point for visitors to the hospital who often take over the pavement with wheelchairs and sometimes drips, believe it or not, while they smoke in the lobby of my building.  If the Road is pedestrianised it will make the road much more pleasant for everybody including staff and patients from Barts hospital who use the Postman's Park to relax.	
23	1-6 Little	Resident – 10 April	Observations noted. Please refer to
	Britain, p.19	I think that pedestrianising the area around Postman's Park would be beneficial to the environment because it would reduce many harmful gasses produced by vehicles in the surrounding area.	comments on response (8) above in relation to the pedestrianisation of Little Britain.

#	Section	Comment	Response
		Furthermore, these vehicles are proving to be a problem for pedestrians around the park because they often wait leaving their engines on.	
		I really hope you pedestrianise Little Britain to improve everybody's health and clean up the environment.	
24	1-6 Little Britain, p.19	Resident – 11 April I am writing to support strongly the idea of improving the area around Postman's Park. Such a scheme would very much enhance this historic area for residents and tourists.	Observations noted. Please refer to comments on response (8) above in relation to the pedestrianisation of Little Britain.
		Closing Little Britain, and making the North end of St Edward's street a traffic free or, at least, a pedestrian prioritised, area would very much improve the experience of residents of Little Britain and the surrounding area. It would also be a real plus for patients in the hospital their friends and relatives and hard pressed hospital staff.	
		At present a good many patients emerge for some 'fresh air' from the entrance on St Edward's Street, to be confronted with a steady stream of traffic with accompanying noise and fumes. How much better it would be if they could have a peaceful place to sit, or be able to make their way across a traffic free area to Postman's Park.	
		We live overlooking the hospital entrance, and I regularly see visitors to patients, sometimes in distress, meeting and talking outside the hospital, trying to make themselves heard above the traffic noise. An area where they could sit to converse quietly, to grieve or just to sit, at what for some is clearly a difficult time would be marvellous.	
		An added bonus would be the removal of the bleeping traffic controls which I know are a real nuisance and disturbance to ourselves and many of our neighbours when the windows are open in the summer. Traffic noise is to be expected, but the noise from the traffic lights is unbelievably irritating and impedes the right to quiet enjoyment of our flats. Even if a wider scheme proves impossible to deliver it would be appreciated if something could be done to mitigate the noise from these devices.	

#	Section	Comment	Response		
25	General	City of London Access Team – 12 April  The submission of an Equality Analysis Test of Relevance is welcomed.  It is pleasing that access improvements within Postman's Park would be encouraged.	Observations noted.		
26	1-6 Little Britain, p.19	Resident – 13 April We have a flat in [REDACTED] Little Britain, since 2008 and even if we live in Rome, Italy, and we come to London a few times each year, we strongly support the project "the Postman's Park Conservation Area" that plans to make the pedestrian area; access by car can be made for residents only since Milton house as a garage for residents.  We are in favour of all other suggestions you recommend.	Observations noted. Please refer to comments on response (8) above in relation to the pedestrianisation of Little Britain.		
27	General, Streets	Transport for London – 19 April Thank you for consulting TfL on the Postman's Park Conservation Area Draft SPD. We note that once adopted, the Postman's Park Conservation Area will become a formal Supplementary Planning Document (SPD) sitting alongside the borough-wide strategic policies in the City of London Local Plan. Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the draft SPD. These comments also do not necessarily represent the views of the Greater London Authority (GLA). Any views or opinions are given in good faith and relate solely to transport issues.  We remind the City Corporation that the draft London Plan was launched for consultation on 1st December 2017. This document is now a material consideration in determining applications and in assessing general conformity of emerging local policy. As such, we will have regard to this Plan, amongst others, when assessing and responding to local planning policy consultations. Cycling  The Mayor's Transport Strategy and draft London Plan promote active travel over other modes of transport. As a result the aspirations to prioritise walking and cycling in Postman's Park including by limiting access by private motor vehicles are supported by TfL. However, it will be necessary to carefully consider the impact of future proposals for street works on cycling accessibility and bus operations, as explained in further detail below.	Observations noted and welcomed.  The wording of the Little Britain section will be updated to reflect the need to maintain cycle access.  The importance of safeguarding bus infrastructure is recognised and noted. However, it is considered reasonable to observe that the buses queueing at the bus stand detract from the settings of numerous heritage assets and pedestrian experience of the conservation area. The wording of the entry on page 35 of the SPD will be amended to reflect the necessity of maintaining bus infrastructure while also aspiring to improve conditions along King Edward Street		

#	Section	Comment	Response
		The SPD also notes that Cycle Hire docking stations on King Edward Street and	
		Newgate Street are useful amenities, which is welcome. We would	
		appreciate if this language can be strengthened to specify that they should	
		be retained in perpetuity and further capacity enhancements (i.e. expansion	
		or additional docking stations nearby) may be needed depending on future	
		demand.	
		Cycle Grid Phase 2 is proposed along Little Britain, linking Gresham Street with Little Britain via St Martin's le Grand. As a result, fully pedestrianising Little	
		Britain (pg. 35) is not consistent with this proposal. TfL therefore requests	
		assurance that designated space for Cycle Grid Phase 2 will be provided. It	
		may be advisable to amend this document to state that Little Britain will be	
		restricted to general traffic and should become a shared space which both	
		cyclists and pedestrians can use.	
		Buses	
		The draft SPD also expresses a desire to remove the bus stand on King	
		Edward's Street (pg. 35) as it interrupts views. TfL strongly objects to this	
		proposal. The removal of vital bus infrastructure without providing alternative	
		facilities that are to TfL's satisfaction to enable the bus network to be	
		maintained and expanded where necessary, has financial and efficiency	
		consequences for TfL and is therefore contrary to draft London Plan policy T3  B. Furthermore TfL expects that identifying alternative locations would be	
		practically difficult and therefore, TfL requests the deletion of this aspiration	
		from the SPD.	
		The SPD also includes an aspiration to remove the gyratory system (pg. 34)	
		part of which is identified as on the Strategic Road Network (SRN). Whilst the	
		removal of gyratory systems can support active travel such as walking and	
		cycling, TfL considers that the document should promote and demonstrate	
		the application of the Mayor's Healthy Streets approach.	
		The proposals come at the expense of the resilience of the bus network. TfL	
		welcomes further discussion and engagement with the City Corporation on	
		any emerging proposals to ensure they retain or re-provide sufficient	
		accessible space where buses can turn. This is necessary to maintain the	
		reliability of the bus network and safeguard ongoing bus operations.  In summary, all existing turning space, stops and stands currently used by TfL	
		Buses in the area must be safeguarded in the SPD document.	
		_ boses in the died most be safegodided in the st b document.	

#	Section	Comment	Response
28	1-6 Little	Resident – 20 April	Observations noted. Please refer to
	Britain, p.19	I live in Little Britain and welcome a plan for the area.	comments on response (8) above in relation to the pedestrianisation of Little Britain.
		I have lived here since the flats were developed, some 20 odd years.	
		Our quality of life has deteriorated over those years.	
		We are faced with continual abuse of parking arrangements with cars, delivery lorries etc constantly parked on the single yellow lines during the day. While following complaints from myself and fellow residents visits from parking wardens have increased it does not stop continuing parking here during the day. Add construction vehicles for the Barts Square development and its sometimes unbearable.	
		Please note that deliveries are predominantly for the surrounding areas not for residents' deliveries.	
		Please also note that there are increasing taxis dropping off patients for Barts on Little Britain even though there is designated dropping off access via Giltspur Street.	
		Heavy lorry use of the road and sometimes parking by them on pavements has lead to deterioration of the pavement and road surface.	
		I welcome the thought that through access to the road could be stopped through pedestrianisation with the proviso that I can maintain access to my parking space at 75 Little Britain.	

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## **City of London**

### Postman's Park Supplementary Planning Document

Appendix B – Schedule of proposed changes

May 2018



\*Page numbering, contents, cross-references and other document formatting will be updated following approval of the changes listed below;

\*Additional minor typos and grammatical matters have been addressed throughout the document.

Page (new Section Version)		Proposed Change	Reason for change		
p.5	Summary of character (new)	Inserted a new page summarising the character of the conservation area	In response to a Historic England comment		
p.6	Introduction	Replaced heading 'Introduction' with 'Overview' Deleted the heading 'Characterisation'.	In response to a Historic England comment		

p.6	Introduction	Deleted the first sentence of the Historical Summary and replaced with: 'In the 2 <sup>nd</sup> century AD the Roman and medieval wall was constructed, which influenced the development and form of the conservation area.'	In response to a CoLAT comment		
p.7 Introduction		Rewritten 'Environmental' section; Added new 'Architectural' section; Moved 'Archaeological' section and added sentence – 'The principal archaeological features in the conservation area are:'	In response to a Historic England comment		
p.9	Planning Policies	Information and link inserted about the NPPF Planning Practice Guidance; formatting of links	In response to a Historic England comment		
p.17	St Botolph Aldersgate	Minor typos corrected	In response to a Historic England comment		
p.18	St Botolph Aldersgate	Replace 'St Botolph's is a Guild church and no longer holds regular Anglican services; currently it is used by an evangelical Christian group and the London City Presbyterian Church holds services on Sundays.'  With: 'St Botolph's is a Guild church and holds regular Evangelical Anglican services; the London City Presbyterian Church holds services on Sundays.'	To address points of accuracy raised in response 4 by the Guild Vicar of St Botolph Aldersgate		
p.21	1-6 Little Britain	<ul> <li>Bullet points edited to read:         <ul> <li>Reopen the connections between Little Montague Court, Cross Key Square and Little Britain;</li> <li>Explore options for pedestrian and cycle prioritisation along Little Britain (while maintaining existing vehicular access requirements) and the integration of the street into a cultural spur between St Paul's Cathedral and the Culture Mile;</li> <li>Improve the currently unsympathetic rear setting of these buildings in future development schemes.</li> </ul> </li> </ul>	To address points raised by residential responses 8 and 10-28.		

p.24	Tower of Christchurch Greyfriars	The second paragraph under 'Character and Significance' has been edited to read:	In response to a Historic England comment
		'Wren rebuilt the church in 1677-87 and the tower was completed in 1704. Widely recognised as one of Wren's finest designs, the main body of the church was again destroyed in WW2. The tower has the architectural complexity, capitalising on the effects of light and shade, which is characteristic of the best of the City churches. Its prominence makes it a key landmark of the conservation area.'	
p.29	Bank of America Merrill Lynch	Amended point 1 of enhancements to 'Exploring future opportunities to open'	Clarification
p.37	Streets, Routes	Under 'Aldersgate Street', first sentence deleted and replaced with: 'This street is Roman in origin, with the Aldersgate through the City wall established in the Roman period. Remains of this survive below the road and pavement surface.'	In response to a Historic England comment
p.37	Streets, Routes	Under 'Little Britain'. Deleted 'being pedestrianised' and replaced with 'pedestrianisation/cycle prioritisation'	Clarification
p.36	Streets, Routes	Under 'King Edward Street', substitute 'remove' to 'relocate'; added 'and St Paul's Cathedral' at end	In response to a TfL comment
p.45	Appendix 2	Images of the Blue Plaques added	For clarity
p.47	Appendix 2	Page added with an image and text relating to the new Christ's Hospital sculpture	For completeness

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# **Screening Statement**

On the determination of the need for a Strategic Environmental Assessment (SEA) in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 and European Directive 2001/42/EC of the:

Postman's Park Conservation Area Draft Supplementary Planning Document

29/05/18



### Sustainability Appraisal/Strategic Environmental Assessment Screening for: Postman's Park Conservation Area Draft Supplementary Planning Document

- 1. Purpose of Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA)
  - 1.1. The SEA Directive identifies the purpose of SEA as "to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development" (Directive 2001/EC/42)
  - 1.2. Sustainability Appraisal (SA) is the process by which this Directive is applied to Local Plan documents. SA aims to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of plans.
  - 1.3. The City's Local Plan is subject to Sustainability Appraisal. However the 2008 Planning Act allows for Supplementary Planning Documents to be prepared without a full SA as long as they are screened to establish whether they will result in significant effects as defined by the SEA Directive.
  - 1.4. The SEA Directive exempts plans and programmes from assessment "When they determine the use of small areas at local level or are minor modifications to the above plans or programmes..." and states that "....they should be assessed only where Member States determine that they are likely to have significant effects on the environment."
  - 1.5. The criteria for determining the significance of effects are taken from schedule 1 (9 (2) (a) and 10 (4) (a) of the Environmental Assessment of Plans and Programmes Regulations 2004 and are defined in appendix 1. These can be split into the criteria related to (i) the scope and influence of the document (ii) the type of impact and area likely to be affected
- 2. Purpose of the Postman Park Conservation Area Draft SPD
  - 2.1. The Key objectives of this strategy are to provide guidance on managing development affecting this conservation area to ensure it is in line with legislation and national and local planning policies.
  - 2.2. This strategy is a Supplementary Planning Document which provides guidance regarding the City's Local Plan policies for historic environment, heritage asset conservation areas, listed buildings, protected views, open spaces and recreation and design.
  - 2.3. The London Plan and City of London Local Plan have been evaluated through the SA and Habitats Regulation Assessment (HRA) screening process, which incorporates the requirements of the SEA Directive, and have been found to be sound. This document provides details of how the City will apply the London Plan and Local Plan policies associated with the historic environment and open spaces.
- 3. SEA Screening Procedure
  - 3.1. The Responsible Authority (the City of London Corporation) must determine whether the plan or program under assessment is likely to have significant environmental effects. This assessment must be made

- taking account of the criteria set out in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004 (see appendix 1), and in consultation with the Environment Agency, Historic England and Natural England.
- 3.2. Where the Responsible Authority determines that the plan or programme is unlikely to have significant environmental effects, and therefore does not need to be subject to full Strategic Environmental Assessment, it must prepare a statement showing the reasons for this determination.
- 3.3. Appendix 1 shows the results of this screening process for the Postman's Park Conservation Area SPD
- 4. Screening and Consultation Outcome
  - 4.1. This screening demonstrates that the Postman's Park Conservation Area SPD is unlikely to have significant effects on the environment. Therefore it will not be necessary to carry out a full SA/SEA on this document.
  - 4.2. Each of the statutory consultees has been consulted on this initial screening statement and their responses are summarised below:

Consultee	Response
Environment Agency	No comment on this statement
Natural England	No comment on this statement
English Heritage	No comment on this statement

- 5. Determination
- 6. The Postman's Park Conservation Area SPD is unlikely to have significant effects on the wider environment since it provides guidance on the implementation of Local Plan policies which will have largely positive impacts. Therefore it will not be necessary to carry out a Strategic Environmental Assessment on this SPD

Appendix 1 Criteria for determining the likely significance of effects on the environment

1. Characteristics of the Postman's Park Conservation Area SPD having particular regard to:

SEA Directive Criteria	Summary of significant effects
Schedule 1 Environmental Assessment of	, ,
Plans and Programmes Regulations 2004	
(a) The degree to which the SPD sets out a framework for projects and other activities, either with regard to the location, nature, size or operating conditions or by allocating resources	The Postman's Park Conservation Area SPD will provide guidance to supplement the Local Plan, London Plan and national historic environment policies which are the overarching frameworks for development in the City. It will not allocate resources but will provide additional guidance to assist in development management in the Postman's Park conservation area, making sure that the historic significance of the area and its listed buildings are conserved.
(b) The degree to which the SPD influences other plans and programmes including those in a hierarchy	This SPD should influence the implementation of individual schemes within the Postman's Park Conservation Area. However this will be in line with policy in the Local Plan which was subject to full sustainability appraisal
(c) The relevance of the SPD for the integration of environmental considerations in particular with a view to promoting sustainable development	The Postman's Park Conservation Area SPD is in line with Policy CS 12, Policy CS 15 and Policy CS 18 of the Local Plan and the Management Strategy provides additional guidance on the issues of environmental enhancement, sustainability and climate change, flood risk, transport, open spaces, trees, biodiversity, soft landscaping and archaeology, which support the Local Plan approach to these issues. The Planning Inspector's report of the Local Plan examination stated that the Local Plan has taken account of the sustainability appraisal which was adequate.
(d) Environmental problems relevant to the SPD	The Postman's Park Conservation Area SPD Management Strategy and Listed Building Management Guidelines provide guidance on the implementation of the Local Plan's policies regarding sustainability and climate change identifying particular issues which affect the Postman's Park area, including open spaces and trees, biodiversity, SuDS and rainwater attenuation, air quality and transport impacts.
(e) The relevance of the SPD for the implementation of Community legislation on the environment (for example plans and programmes related to waste management or water protection)	The SPD will have a positive impact in line with Community legislation regarding climate change, energy, air quality and flood risk and will therefore contribute to local implementation of this legislation.

2 Characteristics of the effects and area likely to be affected having particular regard to:

SEA Directive criteria	Summary of significant effects
Schedule 1 Environmental Assessment of	Sommary or significant enects
Plans and Programmes Regulations 2004	
(a)The probability, duration, frequency and reversibility of the effects	The aim of the Postman's Park Conservation Area SPD is to identify the historically important features and open spaces of the area with a view to ensuring their conservation and enhancement in line with Policy CS12 and Policy CS15. Therefore any sustainability effects of this SPD are likely to be positive, in line with the findings of the SA of Policy CS12 and Policy CS15
(b)The cumulative nature of the effects of the SPD	The impact of this SPD is likely to be positive, affecting a small area at local level, therefore it is anticipated that any cumulative impacts will tend to be positive
(c)The trans boundary nature of the effects of the SPD	This SPD will cover a relatively small area at local level therefore it is unlikely to have any trans boundary effects
(d)The risks to human health or the environment (e.g. due to accident)	There are no perceived risks to human health from this SPD
(e)The magnitude and spatial extent of the effects (geographic area and size of the population likely to be affected) by the SPD	This SPD covers a small area and will only have local impacts. The area has a low residential population but a significant number of people either work in the area or pass through it daily. The conservation of the historic environment in this area will not adversely affect these populations.
(f)The value and vulnerability of the area likely to be affected by the SPD due to: Special natural characteristics or cultural heritage Exceeded environmental quality standards or limit values Intensive land use	This SPD applies to the Postman's Park conservation area, the historic, cultural and environmental characteristics of which it aims to identify and enhance. Parts of this conservation area have been identified as Local Sites of Importance for Nature Conservation. This SPD will support this designation in protecting the natural environment.
(g)The effects of the SPD on areas or landscapes which have recognised national Community or international protected status	No national or international protected sites will be affected by this SPD since it covers a small area of the City which does not contain any nationally designated sites. This SPD aims to conserve and enhance the historic landscape including protection of historic views.

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# **TEST OF RELEVANCE: EQUALITY ANALYSIS (EA)**

The screening process of using the Test of Relevance template aims to assist in determining whether a full Equality Analysis (EA) is required. The EA template and guidance plus information on the Equality Act and the Public Sector Equality Duty (PSED) can be found on Colnet at: <a href="http://colnet/Departments/Pages/News/Equality-and-Diversity.aspx">http://colnet/Departments/Pages/News/Equality-and-Diversity.aspx</a>

#### Introduction

The Public Sector Equality Duty (PSED) is set out in the Equality Act 2010 (s.149). This requires public authorities, in the exercise of their functions, to have 'due regard' to the need to:

- Eliminate discrimination, harassment and victimisation
- Advance equality of opportunity between people who share a protected characteristic and those who do not, and
- Foster good relations between people who share a protected characteristic and those who do not

The characteristics protected by the Equality Act 2010 are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership.
- Pregnancy and maternity
- Race
- Religion or belief
- Sex (gender)
- Sexual orientation

### What is due regard?

Q

- It involves considering the aims of the duty in a way that is proportionate to the issue at hand
- Ensuring that real consideration is given to the aims and the impact of policies with rigour and with an open mind in such a way that it influences the final decision
- Due regard should be given before and during policy formation and when a decision is taken including cross cutting ones as the impact can be cumulative.

The general equality duty does not specify how public authorities should analyse the effect of their business activities on different groups of people. However, case law has established that equality analysis is an important way public authorities can demonstrate that they are meeting the requirements.

Even in cases where it is considered that there are no implications of proposed policy and decision making on the PSED it is good practice to record the reasons why and to include these in reports to committees where decisions are being taken.

It is also good practice to consider the duty in relation to current policies, services and procedures, even if there is no plan to change them.

### How to demonstrate compliance

Case law has established the following principles apply to the PSED:

- **Knowledge** the need to be aware of the requirements of the Equality Duty with a conscious approach and state of mind.
- Sufficient Information must be made available to the decision maker
- **Timeliness** the Duty must be complied with before and at the time that a particular policy is under consideration or decision is taken not after it has been taken.
- Real consideration consideration must form an integral part of the decision-making process. It is not a matter of box-ticking; it must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.
- Sufficient information the decision maker must consider what information he or she has and what further information may be needed in order to give proper consideration to the Equality Duty
- No delegation public bodies are responsible for ensuring that any third parties
  which exercise functions on their behalf are capable of complying with the
  Equality Duty, are required to comply with it, and that they do so in practice. It is a
  duty that cannot be delegated.
- Review the duty is continuing applying when a policy is developed and decided upon, but also when it is implemented and reviewed.

### However there is no requirement to:

- Produce equality analysis or an equality impact assessment
- Indiscriminately collect diversity date where equalities issues are not significant
- Publish lengthy documents to show compliance
- Treat everyone the same. Rather, it requires public bodies to think about people's different needs and how these can be met
- Make services homogeneous or to try to remove or ignore differences between people.

### The key points about demonstrating compliance with the duty are to:

- Collate sufficient evidence to determine whether changes being considered will have a potential impact on different groups
- Ensure decision makers are aware of the analysis that has been undertaken and what conclusions have been reached on the possible implications
- Keep adequate records of the full decision making process

### **Test of Relevance screening**

The Test of Relevance screening is a short exercise that involves looking at the overall proposal and deciding if it is relevant to the PSED.

Note: If the proposal is of a significant nature and it is apparent from the outset that a full equality analysis will be required, then it is not necessary to complete the Test of Revance screening template and the full equality analysis and be completed.

The questions in the Test of Relevance Screening Template to help decide if the proposal is equality relevant and whether a detailed equality analysis is required. The key question is whether the proposal is likely to be relevant to any of the protected characteristics.

Quite often, the answer may not be so obvious and service-user or provider information will need to be considered to make a preliminary judgment. For example, in considering licensing arrangements, the location of the premises in question and the demographics of the area could affect whether section 149 considerations come into play.

There is no one size fits all approach but the screening process is designed to help fully consider the circumstances.

#### What to do

In general, the following questions all feed into whether an equality analysis is required:

- How many people is the proposal likely to affect?
- How significant is its impact?
- Does it relate to an area where there are known inequalities? At this initial screening stage, the point is to try to assess obvious negative or positive impact.

If a negative/adverse impact has been identified (actual or potential) during completion of the screening tool, a full equality analysis must be undertaken.

If no negative / adverse impacts arising from the proposal it is not necessary to undertake a full equality analysis.

On completion of the Test of Relevance screening, officers should:

- Ensure they have fully completed and the Director has signed off the Test of Relevance Screening Template.
- Store the screening template safely so that it can be retrieved if for example,
   Members request to see it, or there is a freedom of information request or there is a legal challenge.
- If the outcome of the Test of Relevance Screening identifies no or minimal impact refer to it in the Implications section of the report and include reference to it in Background Papers when reporting to Committee or other decision making process.

1.	Proposal / Project Title: Postman's Park draft Conservation Area Character Summary and Management Strategy SPD							
2.	Brief summary (include main aims, proposed outcomes, recommendations / decisions sought):  The draft Postman's Park CA SPD is a document that analyses the significance of the conservation area and sets out policies for its preservation and enhancement.							
3.	Considering the equality aims (eliminate unlawful discrimination; advance equality of opportunity; foster good relations), indicate for each protected group wheth there may be a positive impact, negative (adverse) impact or no impact arising from the proposal:						ch protected group whether	
	Protected Characteristic (Equality Group)	Positive Impact	Negative Impact	No E Impact	Briefly explain your answer. Consider evidence, data and any consultation.			
	Age			$\boxtimes$	The proposed documents have no relevant content			
	Disability	$\boxtimes$		\	Where appropriate, the documents encourage enhancements to access			
	Gender Reassignment			⊠ 1	The proposed documents have no relevant content			
	Marriage and Civil Partnership			⊠ 1	The proposed documents have no relevant content			
	Pregnancy and Maternity			⊠ 1	The proposed documents have no relevant content			
ס	Race			⊠ 1	The proposed documents have no relevant content			
age	Religion or Belief			<b>⊠</b> 1	The proposed documents have no relevant content			
е -	Sex (i.e gender)			⊠ 1	The proposed documents have no relevant content			
23	Sexual Orientation			⊠ 1	The proposed documents have no relevant content			
4.	There are no negative/adverse impact(s) Please briefly explain and provide evidence to support this decision:		ments touch on equalities issues only where access to the buildings/streetscape/public realm is concertourage enhancements to access where appropriate.			public realm is concerned.		
5.	Are there positive impacts of the proposal on any equality groups? Please briefly explain how these are in line with the equality aims:	re positive impacts of the proposal on Please see above.  ality groups? Please briefly explain how						
6.	As a result of this screening, is a full EA	Yes	No		xplain your answer:			
	necessary? (Please check appropriate box using $\Box$ )		$\boxtimes$	referred to a	posed documents are neutral in equalities terms aside from the positive aspect to above.			
7.	Name of Lead Officer: Tom Nancollas		Job title:	Planning Offic	cer (Historic Environment) Date of completion	<b>າ:</b> 08 Jan	uary 2018	
	gned off by Department rector:	lbbs		Name:	Kathryn Stubbs	Date:	16 January 2018	

# Agenda Item 9

Committee(s)	Dated:
Planning and Transportation Committee	29 May 2018
Subject: Transport Strategy – Vision, aims and outcomes	Public
Report of: Carolyn Dwyer – Department of the Built Environment	For Decision

### **Summary**

The City of London Transport Strategy will set the 25-year framework for future investment in, and management of, the Square Mile's streets and for improvements to transport connections. The City Corporation's Local Implementation Plan (LIP) will be developed alongside the Transport Strategy and will act as the delivery plan for its first three-years.

This report outlines the draft vision, aims and outcomes for the Transport Strategy and LIP. The Transport Strategy will include detailed proposals for achieving each outcome, as well as targets and key performance indicators (KPIs) linked to the outcomes. These proposals will be finalised following public consultation in June and July 2018 on the draft vision, aims and outcomes.

The delivery of the Transport Strategy will support the delivery of Corporate Plan outcomes 1, 3, 5, 8, 9, 10, 11 and 12. It also indirectly supports the delivery of Corporate Plan outcomes 2 and 4.

### Recommendation(s)

Members are asked to approve the draft vision, aims and outcomes.

### **Main Report**

### **Background**

- 1. How people and goods travel to, from and around the City of London has a significant impact on the experience of living, working and learning in or visiting the Square Mile. Facilitating the safe, clean and efficient movement of people and goods in the Square Mile, alongside improving the quality of streets and public spaces, will be essential to ensuring the continued success of the City as a centre for business and as a major cultural destination.
- 2. The City Corporation does not currently have a Transport Strategy. In recent years transport planning has had a short to medium-term focus, relying on the Local Implementation Plan (LIP) and Local Plan to define policy and strategy.

- 3. There is now a need for a proactive approach to addressing the medium and long-term transport challenges facing the Square Mile, particularly those relating to unprecedented growth in employment and increased competition for finite street space. This challenge is particularly acute in the Eastern City Cluster, where a significant increase in working population will require proactive management of capacity on connecting routes and services, particularly providing more space for people walking.
- 4. The Transport Strategy will identify the key transport issues and challenges facing the Square Mile and develop the proposals to respond to these. It will cover the next 25-years and will be supported by a series of short-term and regularly updated delivery plans, including the City Corporation's LIP. The LIP is a statutory document that will set out how the City Corporation will deliver the Mayor of London's Transport Strategy (MTS).
- 5. The Transport Strategy will establish:
  - Clear and ambitious vision and outcomes for streets and transport.
  - A transport evidence base and analysis of current and projected transport issues.
  - A policy framework for:
    - Reducing traffic levels to support the delivery of the Healthy Streets Approach (see paragraphs 15and 16)
    - o Improving the safety and attractiveness of walking and cycling
    - o Reducing transport related air and noise pollution
    - Managing the kerbside and the future of on and off-street parking, including motorcycle and cycle parking
    - Supporting the development of the City as a business hub and cultural destination
    - Responding to potentially disruptive transport technologies such as dockless cycle hire, automated vehicles and new mobility services
  - An approach to monitoring outcomes will allow progress on implementing the Strategy to be assessed and associated benefits to be captured and reported, supporting a learning model and enabling course-correction as needed.

### The approach to developing the Strategy and LIP

- The development of the Transport Strategy and LIP will be informed by thorough stakeholder engagement. The first phase of engagement – to identify key issues and challenges – took place in February and March 2018.
- 7. The second phase will allow the City's businesses, workers and residents, and other interested parties, to comment on the vision, aims and outcomes for the Transport Strategy and LIP. Subject to approval of the draft vision, aims and outcomes, this second consultation will then run for eight weeks from 4 June.
- 8. The consultation document will include a summary of the key analysis that has informed the development of the vision, aims and outcomes, including results from the first phase of engagement. A report providing more detailed

- results from that engagement will be published alongside the draft vison, aims and outcomes.
- 9. The results from these first two phases of engagement will inform the development of detailed proposals to be included in the draft Strategy and LIP. Consultation on the detailed proposals will take place in November and December 2018. The final LIP will be submitted to TfL in February 2019 and the final Transport Strategy will be published in March 2019.
- 10. An overview of the process and programme for developing the LIP and Transport Strategy is provided in Appendix 1.

### Draft vision, aims and outcomes

11. The draft vision, aims and outcomes for the Transport Strategy and LIP are set out below.

### **Draft vision**

12. The Square Mile enjoys world-class connections and streets that inspire and delight.

### **Draft aims**

- 13. We aim to:
  - Ensure the Square Mile is accessible to all and an easy, attractive and healthy place to work, live, learn and visit.
  - Support the development of the Square Mile as a vibrant global commercial centre and cultural destination.

### **Draft outcomes**

- 14. We will achieve these aims by delivering the following outcomes:
  - a. The Square Mile is a great place to walk and spend time
    - People will view the City of London's streets and public spaces as great places to walk and spend time.
    - People walking will have their needs prioritised.
    - The experience of walking and spending time on our streets will be improved through investment in high quality public realm, street greening and motor traffic reduction.

### b. Our streets are accessible to all

- People of all ages and abilities will be able to travel easily around the Square Mile.
- Barriers to walking, cycling and travelling by public transport will be removed.

Appropriate vehicle access will be provided for those that need it.

### c. People using our streets and public spaces are safe and feel safe

- Everyone will feel safe when travelling around the Square Mile.
- We will continually strive to reduce road danger and eliminate traffic related death and serious injury (Vision Zero).
- Proportionate security measures will be sensitively incorporated into buildings and the streetscape while enhancing the public realm.

### d. People enjoy a relaxed cycling experience in the Square Mile

- A more diverse range of people will choose to cycle.
- The design and management of streets will enable cycling at a pace that suits the City and make cycling a relaxing and enjoyable way to travel.

### e. The Square Mile is cleaner and quieter

- Carbon emissions and people's exposure to air and noise pollution will be reduced.
- There will be fewer motor vehicles and those that remain will be smaller, lighter and zero emissions.

# f. Delivery and servicing needs are met in ways that benefit the Square Mile

- Future development and growth will be supported by changing the way that goods are moved around the Square Mile
- The transport, delivery and servicing requirements of businesses and residents will be met in ways that maximise social, economic and environmental benefits.

### g. Street space is used more fairly and effectively

- The use of streets will be better matched to the priorities of people and businesses.
- Street space will be used more flexibly, recognising that priorities can vary by time of day and seasonally.
- Transformational change will be accelerated through temporary interventions and trialling projects prior to making permanent changes.

### h. Our street network is resilient to changing circumstances

- The impact of planned and unplanned disruption on the movement of people and goods will be minimised.
- Emergency services will be able to respond rapidly to incidents.
- The City's readiness for a changing climate and extreme weather events will be supported by incorporating sustainable drainage, greenery, shade and shelter into our streets.

### i. The Square Mile benefits from better transport connections

 Businesses, residents, workers, learners and visitors will benefit from improved local, national and international connections – particularly improvements to walking, cycling, public transport and freight connectivity.

### j. Emerging transport technologies benefit the Square Mile

- People and businesses will feel that the City has benefited from emerging transport technologies and services.
- Automated vehicles and other new transport technologies and services will work for the City, supporting efforts to reduce motor traffic and deliver inclusive, safe, attractive and vibrant streets.

### **Healthy Streets Approach**

- 15. The Healthy Streets Approach provides the framework for delivering the MTS (the relevant section of the MTS is provided in Appendix 2). It is proposed that it also provides the framework for the City of London Transport Strategy. Adopting this approach will place improving people's health and their experience of using streets at the heart of the City Corporation's transport decision making.
- 16. The ten Healthy Streets Indicators (Figure 1) capture the elements that are essential for making streets better places to walk, cycle and spend time, and for supporting social and economic activity. All the outcomes outlined above will contribute to the delivery of Healthy Streets.



Figure 1: Healthy Streets Indicators (Source: Lucy Saunders)

### Reducing motor traffic

- 17. In November 2016 Members agreed an objective of reducing traffic in the City (Policy and Resources Committee, 17 November 2016, Planning and Transportation Committee, 28 November 2016).
- 18. An aspiration to significantly reduce the number of motor vehicles using the Square Mile's streets will be set out alongside the vision, aims and outcomes. This reduction is necessary to enable the delivery of the Transport Strategy's outcomes and the Healthy Streets Approach. It will reduce the dominance of moving and parked motor vehicles and support the redistribution of street space in favour of people walking, cycling and travelling by bus. Less motor traffic will also help make freight and servicing trips more reliable.
- 19. The Transport Strategy will include a target for motor traffic reduction and proposals to proactively reduce motor traffic, with a focus on those modes that are the least space efficient in terms of moving people.

### **Corporate and Strategic Implications**

- 20. The new Corporate Plan and the MTS provide the framework within which to set the Strategy. There is good alignment between the aims and outcomes of the Corporate Plan and the MTS, which seeks to: improve London's streets to make them healthy, inclusive and safe; provide a good public transport experience; and support the delivery of homes and jobs.
- 21. The delivery of the Transport Strategy will support the delivery of the Corporate Plan outcomes 1, 3, 5, 8, 9, 10, 11 and 12. It also indirectly supports the delivery of Corporate Plan outcomes 2 and 4. The relationships between Transport Strategy and Corporate Plan outcomes are mapped in Appendix 3.
- 22. The Strategy will help the City contribute to a flourishing society by:
  - Making streets safer and reducing the number of traffic related deaths and serious injuries;
  - Enabling people to walk and cycle and reducing the negative health impacts of transport; and
  - Ensuring streets are accessible to all and provide an attractive space for the City's diverse community to come together.
- 23. A thriving economy will be supported by:
  - Enabling the City to continue to grow and accommodating the associated increase in demand for our limited street space;
  - Improving the quality of streets and transport connections to help attract talent and investment; and
  - Helping create a smarter City, that supports and enables innovative transport technology and other mobility solutions.
- 24. The Strategy will help shape outstanding environments by:
  - Advocating for improved local, national and international transport connections:

- Reducing motor traffic levels to enable space to be reallocated to walking, cycling, greenery and public spaces;
- Improving air quality and reducing noise from motor traffic; and
- Ensuring streets are well maintained and resilient to natural and manmade threats.

### Conclusion

25. The development of the Transport Strategy will help support the City's growth and ensure the Square Mile remains an attractive place to work, live, learn and visit. The consultation on the draft vision and outcomes will allow feedback to be gathered from the public and other stakeholders prior to finalising detailed proposals.

### **Appendices**

- Appendix 1 Transport Strategy process and programme
- Appendix 2 Focus on: The Healthy Streets Approach (excerpt from the Mayor's Transport Strategy)
- Appendix 3 Corporate Plan outcome mapping

### **Background Papers**

Traffic in the City of London, Policy and Resources Committee, 17 November 2016 and Planning and Transportation Committee, 28 November 2016

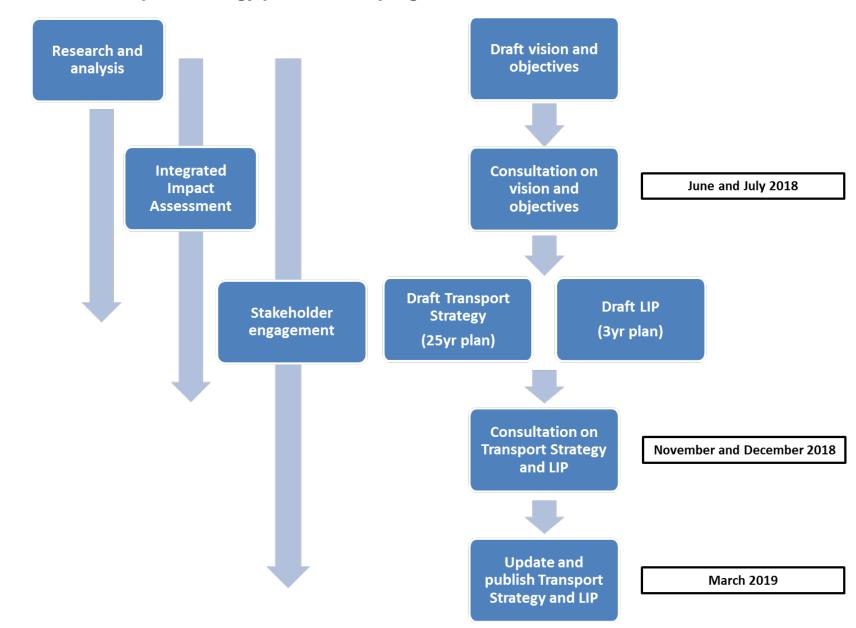
### **Bruce McVean**

Department of the Built Environment

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**Appendix 1 – Transport Strategy process and programme** 



Appendix 2 – Focus on: The Healthy Streets Approach (excerpt from the Mayor's Transport Strategy)

FOCUS ON: THE HEALTHY STREETS APPROACH

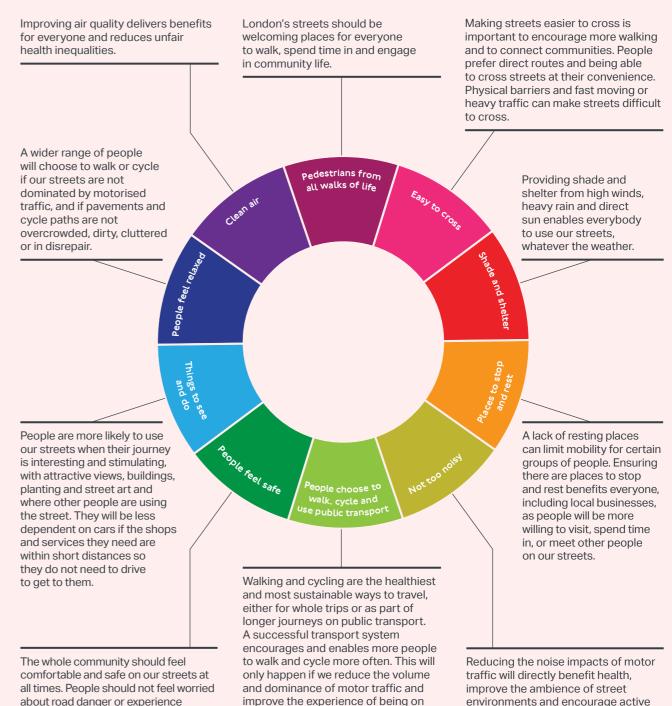
Whatever mode of transport Londoners use, the quality of the experience of using London's streets helps to define the quality of their journey. Eighty per cent of Londoners' trips are entirely on streets<sup>5</sup>, and all Tube and rail journeys rely on good street access to stations. A good street experience is therefore key to providing attractive public transport options of whatever mode.

The wider role streets play in virtually every aspect of London life also provides an enormous opportunity to use the Mayor's strategy for transport to improve Londoners' broader experience of their city. Streets are where Londoners spend their time and meet other people – they make up 80 per cent of the city's public space. They are places where people live, shop and work, where children play, where communities connect and where

businesses can thrive. The experience of being on London's streets is particularly important for older people, the very young, disabled people and those living on lower incomes, who disproportionately feel the negative impacts of living in a car-dependent city. Improving public transport and assisted transport services for older and disabled people will help a wider range of people to become less car dependent, and improving streets to increase active travel levels, reduce road danger, improve air quality and reconnect communities will be vital in reducing unfair health inequalities.

The Healthy Streets Approach provides the framework for putting human health and experience at the heart of planning the city. It uses ten evidencebased indicators, shown in Figure 3, to assess the experience of being on our streets. Good performance against each indicator means that individual streets are appealing places to walk, cycle and spend time. Improvements against all the indicators across the city's streets will radically transform the day-to-day experience of living in London, helping to fulfil this strategy's overall aim of creating a better city for more people to live and work in.

### FIGURE 3: THE TEN HEALTHY STREETS INDICATORS



our streets.

travel and human interaction.

Source: Lucy Saunders

threats to their personal safety.

## FOCUS ON: THE HEALTHY STREETS APPROACH (continued)

The following chapters explain how the Healthy Streets Approach will be applied to help deliver the aims of this strategy:

- Chapter three 'Healthy Streets and healthy people' – explains how street environments and the wider street network will be planned to promote healthier, more efficient and more sustainable transport options. This includes the better planning and operation of freight and servicing trips to reduce their impact on people
- Chapter four 'A good public transport experience' explains how consideration of the whole journey will improve quality of life and reduce car dependency by providing attractive and accessible alternatives to car use. This includes providing higher-quality public transport services, better planned transport networks and the extension of public transport links to new areas

 Chapter five – 'New homes and jobs' – applies the Healthy Streets Approach to London's future development, creating the principles of Good Growth. This will ensure that regeneration and future development are planned around walking and cycling for shorter trips, and cycling and public transport for longer ones

Using the Healthy Streets Approach to improve the lives of all Londoners will also require wider action to support the work of this strategy. To help achieve this, the Mayor is embedding the Healthy Streets Approach in the full range of London strategy documents, including the Health Inequalities Strategy, the London Environment Strategy and the London Plan. This holistic approach to planning the city will help to transform London for the benefit of all of its residents.



# **Appendix 3 – Corporate Plan outcome mapping**

Transport Strategy outcome	Corporate Plan outcome
The Square Mile is a great place to walk and spend time	9. We are digitally and physically well-connected
Our streets are accessible to all	<ul><li>3. People have equal opportunities to enrich their lives and reach their full potential</li><li>8. We have access to the skills and</li></ul>
	talent we need
People using our streets and public spaces are safe and feel safe	People are safe and feel safe
People will enjoy a relaxed cycling experience in the Square Mile	9. We are digitally and physically well-connected
The Square Mile is cleaner and quieter	11. We have clean air, land and water and a thriving and sustainable natural environment
Delivery and servicing needs are met in ways that benefit the Square Mile	5. Businesses are trusted and socially and environmentally responsible
Street space is used more fairly and effectively	9. We are digitally and physically well-connected  10. We inspire enterprise, excellence, creativity and collaboration
Our street network will be resilient to changing circumstances	12. Our spaces are secure, resilient and well-maintained
The Square Mile will benefit from better transport connections	We are digitally and physically well- connected
Emerging transport technologies benefit the Square Mile	9. We are digitally and physically well-connected

Committee(s)	Dated:
Planning and Transportation Committee	29 May 2018
Subject: Transport Strategy - Phase one engagement report	Public
Report of: Carolyn Dwyer – Department of the Built Environment	For information

### **Summary**

The City of London Corporation is currently drafting its first long-term Transport Strategy. This will set the 25-year framework for future investment in, and management of, the Square Mile's streets.

The development of the Transport Strategy will be informed throughout by thorough stakeholder engagement. The first phase of engagement – to identify key issues and challenges – took place in February and March 2018.

This report outlines the activities undertaken during this phase of engagement and the key themes emerging from this engagement – details findings are provided in Appendix 1.

### Recommendation

Members are asked to note the report.

### Main report

### Background

- 1. The City of London Transport Strategy will identify the key transport issues and challenges facing the Square Mile and develop the proposals to respond to these. It will cover the next 25-years and will be supported by a series of short-term and regularly updated delivery plans, including the City Corporation's Local Implementation Plan (LIP). The LIP is a statutory document that will set out how the City Corporation will deliver the Mayor of London's Transport Strategy (MTS).
- 2. The development of the Transport Strategy and LIP will be informed throughout by thorough stakeholder engagement. The first phase of engagement to identify key issues and challenges took place in February and March 2018. The results of this engagement have informed the development of the vision, aims and objectives for the Transport Strategy, and will inform the development of proposals to deliver these objectives.
- 3. A second engagement phase will allow the City's businesses, workers and residents, and other interested parties to comment on the vision, aims and

- outcomes for the Transport Strategy and LIP. This consultation will then run for eight weeks from 4 June.
- 4. The results from these first two phases of engagement will inform the development of detailed proposals to be included in the draft Strategy and LIP. Consultation on the detailed proposals will take place in November and December 2018. The final Transport Strategy and LIP will be published in March 2019.

### Phase one engagement activities

- 5. The engagement activities undertaken during the first phase were:
  - a. Public survey: The City Streets public survey opened on 3 February 2018 and ran for eight weeks. 1949 people accessed the survey. Survey question topics included: perceptions of the City's streets, desired priorities for the use of streets and kerb-side space, and ideas and suggestions for future street and transport improvements. Promotional activities included:
    - Articles/adverts in City Resident, City AM and City Matters
    - On-street distribution of flyers, including through Cheapside Business Alliance Ambassadors
    - City of London newsletters, e.g. Active City Network, City Police, Business Healthy and CityAir
    - City Centre newsletters and events notifications
    - Twitter, with regular tweets from @squarehighways and promoted tweets from @cityoflondon, plus retweets from other City of London accounts
    - City Corporation website home page and Transport Strategy page
    - Letters to residents of Mansell Street and Middlesex Street estates,
       Barbican e-broadcast, and Barbican and Golden Lane noticeboards
  - b. **Stakeholder workshops:** Seventy-seven representatives from City businesses, transport user groups and other organisations with an interest in transport in the Square Mile attended workshops to share their views on the transport challenges and opportunities.
  - c. Citizens Panel: Populus have been appointed to facilitate a Citizens Panel of City workers and residents. This panel will meet three times during the development of the Transport Strategy and will enable us to gain a deeper understanding of residents and workers' transport needs and concerns. Approximately 40 people half residents, half workers attended the first panel workshop on the evening of 20 March 2018. Attendees took part in exercises and discussion tasks aligned to the City Streets survey questions, with Populus staff facilitating the discussion.
  - d. **Drop-in sessions:** Nine drop-in sessions were held at various locations around the City. Members of the Strategic Transportation team were available to answer questions about the Transport Strategy and discuss transport issues. A combination of lunchtime and evening sessions aimed to make the drop-ins accessible to both City workers and residents. The

- sessions were advertised on the City Corporation website, through flyers distributed at events and on-street, and through City Corporation social media.
- e. **City Streets exhibition:** A supporting exhibition was held at the City Centre on Basinghall Street from 5 February to 31 March 2018. The exhibition took visitors through historic and recent changes to the City's streets and presented future challenges. More than 7000 people visited the City Centre over the two-month period.

### **Engagement findings**

- 6. Over 2000 individuals who work in, live in, study in or visit the City of London were engaged through the activities described above (excluding visitors to the City Streets exhibition). Comments and responses have been analysed and the results are set out in the City of London Transport Strategy: Phase one engagement report, provided in Appendix 1. This will be published on Transport Strategy web page and publicised alongside the consultation on the draft vison aims and outcomes.
- 7. The key themes emerging from the comments, suggestions, and ideas received (ordered by the most common themes emerging from survey respondent comments) were:
  - a. Key theme 1 Traffic levels on City streets are too high: Over 1400 (or four in five) survey respondents felt that motor traffic levels on City streets are too high. Instituting targeted or City-wide restrictions on motor vehicle traffic was the most commonly requested action from the Improving the City's streets question responses. Respondents felt that air pollution and the unpleasantness of motor vehicle-dominated spaces were the main problems caused by traffic. Fewer than 3% said that traffic was an issue because it delayed cars. Traffic levels were also raised as a concern at most workshops, with construction traffic and large numbers of private hire vehicles mentioned most often as causes of excessive vehicle numbers.
  - b. Key theme 2 Prioritising people walking: Approximately 1500 (or three in four) respondents identified themselves as people who walk on City streets. A significant majority of survey respondents felt that not enough street space was allocated to people walking. Respondents clearly ranked pedestrians as the desired first priority users of City streets, with private motor vehicles ranking last. More space for people walking was the second most commonly requested action from the Improving the City's streets question responses. Space allocation was also a key theme emerging from all workshops, with many attendees suggesting that pavement space allocated to people walking is not sufficient given the number of people moving around the City on foot; especially at peak times and near stations. Safety of people walking was also a key concern for the Citizens Panel, with improved crossings and less traffic seen as key to reducing road danger for people walking. The Citizens Panel also commented on the need to better maintain pavements.

- c. Key theme 3 Improved cycling infrastructure and safer cycling: A majority of survey respondents felt that people cycling were underprioritised and given too little space on City streets. Protected cycle lanes were the single largest street infrastructure improvement requested by survey respondents. Respondents also ranked cycle parking as the second desired priority of kerbside space usage. However, conflicts between people walking and cycling was also one of the top ten comment themes identified in the Improving the City's streets question responses. Safer cycling environments and other cycling infrastructure improvements were also commonly requested actions. Workshop and Citizens Panel participants also identified the challenges posed by conflicts between people walking and cycling. Many suggested further separation of these two modes, alongside separation of walking and cycling from motor vehicle traffic.
- d. Key theme 4 Greenery, seating, and improving the public realm: Greening the City was the largest non-transport mode specific request made by survey respondents and ranked sixth overall for most mentioned comment type from the Improving the City's streets question responses. Respondents ranked greenspace and seating as the first desired priority for kerbside space usage. Respondents also scored noise levels and the ease of finding seating the second and third lowest out of the 10 indicators of healthy, vibrant streets (only air quality scored poorer).
- e. Key theme 5 City air pollution needs immediate improvement: Survey respondents scored the quality of the City's air the lowest out of 10 indicators of healthy, vibrant streets. Improving air quality was the second largest non-mode specific request made by survey respondents. Air pollution was also the most common barrier to travelling to or around the City raised by disabled people. Both the stakeholder workshops and the Citizen Panel mentioned air quality as a key challenge the City needs to tackle immediately.
- f. Key theme 6 Support for using streets more flexibly: The opportunity of using streets more flexibly to accommodate the various demands on them at different times of the day was highlighted at most workshops. Specifically, timed restrictions on motor traffic was also requested by a number of survey respondents, particularly in relation to freight vehicles.
- g. Key theme 7 Improved accessibility on City streets: Approximately 7% of survey respondents reported having an activity-limiting health problem or disability, with more than 100 of these individuals leaving comments on how to make the City a more accessible place, namely through reducing both air pollution and motor vehicle volumes. Citizen Panel and workshop participants also highlighted improving accessibility on City streets through minimizing pavement obstructions, introducing more drop kerbs, and through reducing motor vehicle dominance on City streets. Construction-related activities were also seen as a significant barrier to pedestrian accessibility.

h. Key theme 8 – The need to improve the management of freight: Despite the relatively low numbers in the City, freight traffic was seen by nearly everyone as both a significant challenge and a golden opportunity. Freight vehicles were seen as significant contributors to air pollution and road danger. Workshop participants suggested retiming freight, consolidating deliveries into fewer vehicles and introducing freight restrictions during peak hours. These approaches were also raised by a number of survey respondents and Citizens Panel participants.

#### Conclusion

- 8. The first phase of engagement achieved a good level of public and other stakeholder engagement and reach. This has provided a good understanding of the concerns and priorities; which will inform the development of the Transport Strategy.
- 9. The feedback from the participants in the different engagement activities was consistent, suggesting workers and residents share concerns and priorities with City businesses and other interested bodies.
- 10. Further engagement will take place in June and July 2018, with consultation on the proposed vision, aims and outcomes. This will include a second meeting of the Citizens Panel.

### **Appendices**

 Appendix 1 - City of London Transport Strategy: Phase one engagement report

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Appendix 1 - City o	of London Transpo	ort Strategy: Ph	ase one engage	ment report



# City Streets: Transport for a changing Square Mile

City of London Transport Strategy
Phase one engagement report

## Introduction and key findings

The City of London is currently drafting its first long-term Transport Strategy. This will set the 25-year framework for future investment in, and management of, the Square Mile's streets. This report provides an overview of the results from the first phase of engagement activities that will inform the development of the Transport Strategy. This engagement sought the views of the public and organisations with an interest in transport in the Square Mile on the challenges and opportunities that will need to addressed over the coming decades.

Engagement activities included an online survey, a series of stakeholder workshops, and an independently facilitated Citizens Panel. These activities took place throughout February and March 2018, and were supported by the *City Streets: Transport for changing Square Mile* exhibition at the City Centre. Over 2000 individuals who work in, live in, study in, and visit the City of London made their voices heard through these forums. The key themes emerging from their comments, suggestions, and ideas (ordered by the most common themes emerging from survey respondent comments) were:

## ₩ey theme 1 – Traffic levels on City streets are too high

Over 1400 (or four in five) survey respondents felt that motor traffic levels on City streets are too high. Instituting targeted or City-wide restrictions on motor vehicle traffic was the most commonly requested action from the *Improving the City's streets* question responses. Respondents felt that air pollution and the unpleasantness of motor vehicle-dominated spaces were the main problems caused by traffic. Fewer than 3% said that traffic was an issue because it delayed cars. Traffic levels were also raised as a concern at most workshops, with construction traffic and large numbers of private hire vehicles mentioned most often as causes of excessive vehicle numbers.

#### Key theme 2 – Prioritising people walking

Approximately 1500 (or three in four) respondents identified themselves as people who walk on City streets. A significant majority of survey respondents felt that not enough street space was allocated to people walking. Respondents clearly ranked pedestrians as the desired first priority users of City streets, with private motor vehicles ranking last. More space for people walking was the second most commonly requested action from the *Improving the City's streets* question responses. Space allocation was also a key theme emerging from all workshops, with many attendees suggesting that pavement space allocated to people walking is not sufficient given the number of people moving around the City on foot; especially at peak times and near stations. Safety of people walking was also a key concern for the Citizens Panel, with improved crossings and less traffic seen as key to reducing road danger for people walking. The Citizens Panel also commented on the need to better maintain pavements.

#### Key theme 3 - Improved cycling infrastructure and safer cycling

A majority of survey respondents felt that people cycling were underprioritised and given too little space on City streets. Protected cycle lanes were the single largest street infrastructure improvement requested by survey respondents. Respondents also ranked cycle parking as the second desired priority of kerbside space usage. However, conflicts between people walking and cycling was also one of the top ten comment themes identified in the *Improving the City's streets* question responses. Safer cycling environments and other cycling infrastructure improvements were also commonly requested actions. Workshop and Citizens Panel participants also identified the challenges posed by conflicts between people walking and cycling, and many suggested further separation of these two modes, alongside separation of walking and cycling from motor vehicle traffic.

## Introduction and key findings

#### Key theme 4 - Greenery, seating, and improving the public realm

Greening the City was the largest non-transport mode specific request made by survey respondents and ranked sixth overall for most mentioned comment type from the *Improving the City's streets* question responses. Respondents ranked greenspace and seating as the first desired priority for kerbside space usage. Respondents also scored noise levels and the ease of finding seating the second and third lowest out of the 10 indicators of healthy, vibrant streets (only air quality scored poorer).

#### Key theme 5 – City air pollution needs immediate improvement

Survey respondents scored the quality of the City's air the lowest out of 10 indicators of healthy, vibrant streets. Improving air quality was the second largest non-mode specific request made by survey respondents. Air pollution was also the most common barrier to travelling to or around the City raised by disabled people. Both the stakeholder workshops and the Citizen Panel mentioned air quality as a key challenge the City needs to packle immediately.

### Rey theme 6 – Support for using streets more flexibly

The opportunity of using streets more flexibly to accommodate the various demands on them at different times of the day was highlighted at most workshops. Specifically, timed restrictions on motor traffic was also requested by a number of survey respondents, particularly in relation to freight vehicles.

#### Key theme 7 – improved accessibility on City streets

Approximately 7% of survey respondents reported having an activity-limiting health problem or disability, with more than 100 of these individuals leaving comments on how to make the City a more accessible place, namely through reducing both air pollution and motor vehicle volumes. Citizen Panel and workshop participants also highlighted improving accessibility on City streets through minimizing pavement obstructions, introducing more drop kerbs, and through reducing motor vehicle dominance on City streets. Construction-related activities were also seen as a significant barrier to pedestrian accessibility.

#### Key theme 8 - The need to improve the management of freight

Despite the relatively low numbers in the City, freight traffic was seen by nearly everyone as both a significant challenge and a golden opportunity. Freight vehicles were seen as significant contributors to air pollution and road danger. Workshop participants suggested retiming freight, consolidating deliveries into fewer vehicles and introducing freight restrictions during peak hours. These approaches were also raised by a number of survey respondents and Citizens Panel participants.

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**City Streets survey results** 

## 1.1 Survey introduction

This chapter provides an overview of the results from the City of London Corporation's *City Streets: Transport for a Changing Mile Survey* (the survey). This survey gathered public feedback on a number of City transport-related topics.

The survey was open to any individual that has recently travelled to or through the City and asked questions related to the City's street network, public realm, parking, and street cleansing, planning and management. The survey was launched on 2 February 2018 and was open for eight weeks. Respondents could fill in the survey online, in person at any *City Streets* event, or by mail-in paper copy.

This chapter is structured as follows:

Sections 1.2 provides an ov
demographic profile and travel be
Section 1.3 visualises the results

Sections 1.2 provides an overview of the survey respondent demographic profile and travel behaviours;

Section 1.3 visualises the results of the Healthy Streets Indicators and priority ranking sections of the survey;

Section 1.4 goes into further detail on traveller perceptions of City streets alongside mode-specific experiences; and

 Section 1.5 describes the response results of the survey's Improving the City's streets open text survey question.

#### Data protection and use

The City is a registered data controller in respect of processing personal data under the relevant data protection legislation. This includes the Data Protection Act 1998, Data protection Act 2018 and the General Data Protection Regulation (GDPR). Further relevant details are presented below.

Any personal data provided by respondents, for the purposes of this survey, has been done so in accordance with the requirements of the EU-U.S. Privacy Shield. The personal data processed by the City, and by the processor, for the purposes of this Survey, has been done so on the legal basis of respondents' consent.

Any respondent who took part in this survey has the right to request a copy of their data, ask us to make changes to ensure that their data is up to date, ask that the City deletes their information or object to the way we use their data. To do this please write to Data Protection Officer, City of London, PO Box 270, Guildhall, London, EC2P 2EJ or email information.officer@cityoflondon.gov.uk.

Readers may reproduce any figure in this report with reference to the Strategic Transportation Team, Department of the Build Environment, City of London Corporation. If you have any questions regarding the contents of this report, please contact <a href="mailto:strategic.transportation@cityoflondon.gov.uk">strategic.transportation@cityoflondon.gov.uk</a>.

## 1.2 Demographic profile and travel behaviours

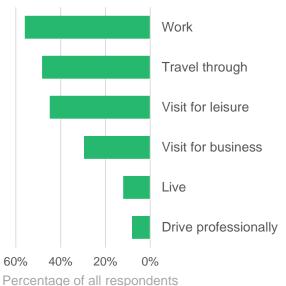
#### Respondent profile

The survey respondent profile is presented in the two figures on this page. For figures 1.2.1 and 1.2.2 it is important to note that percentages do not add up to 100% as respondents could select multiple options for each related question. In total, 1949 people accessed the survey of which 85% continued the survey to completion. The overall male/female breakdown was approximately 65/30 (with 5% choosing other options), this broadly aligns with the gender split of the City's working population<sup>1</sup>.

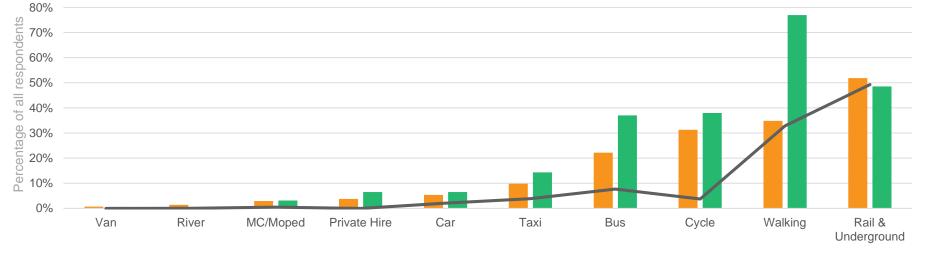
Figure 1.2.2 (below) shows the percentages of respondents that said they used each mode to commute to work (in yellow) and to travel around the City (in green). These values are compared against the <u>London Travel Demand Survey</u><sup>2</sup> (LTDS), results for the City of London (grey line). While this visualisation does not allow one to compare "like for like" (as the response profile from the City does not add up to 100% like the LTDS does) it does provide some context to assess the representativeness of the Survey sample.

This comparison suggests that relatively more people who travel by cycle, bus, taxi and car responded to the survey than travel to the City by those modes (according to the LTDS). This could be as a result of these user groups being more 'vocal' than others, the inclusion of individuals that only travel through the City (the LTDS only represents City-bound traffic), and that three in four respondent selected more than the content of the

Figure 1.2.1 Multi-select responses on reasons respondents travelled to/through the City



Rigure 1.2.2 Comparison of multi-select responses to modes used to commute to/from and around the city and LTDS City-destination mode share data



To/from Around —LTDS

## 1.3 Healthy Streets indicators and priority rankings

#### **Priority rankings**

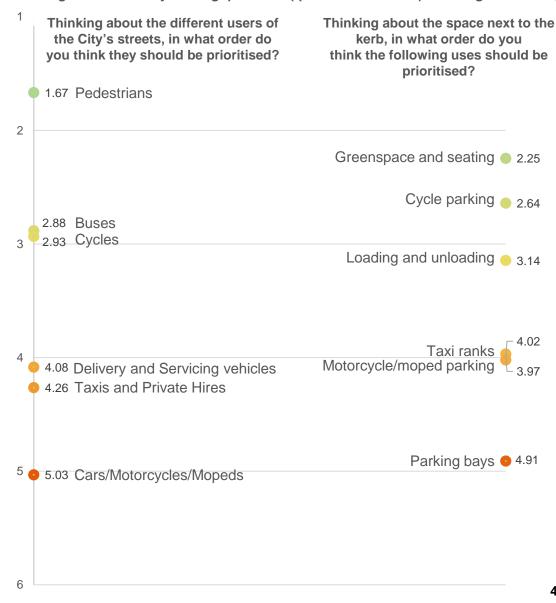
Figure 1.3.1 visualises the results of the two ranking questions posed by the survey. In the first question respondents were asked to rank the six different user groups of the City's streets by desired priority. In the second question respondents were asked to rank the six different use groups of kerb-side space by desired priority.

The results of these ranking questions has been derived by calculating weighted ranking averages for each use/user group. These weighted averages have been visualised on a number line to give a sense of the significance of each ranking. For instance, "pedestrians" ranked as the top user group of the City's streets by a clear margin (weighted average of 1.67), whereas "buses" and "cycles" rank nearly the same at second and third priority respectively (weighted averages of 2.88 and 2.93 respectively). Thus, the space obstween options shows how the options rank against each sther. A simplified ranking is also presented in Figure 1.3.2 obelow).

Figure 1.3.2 Overall street user and use group priorities

Priority	User Group	Use Group	
1	Pedestrians	Greenspace and seating	
2	Buses	Cycle parking	
3	Cyclists	Loading and unloading	
4	Delivery and servicing vehicles	Taxi ranks	
5	Taxi and Private hire	Motorcycle/moped parking	
6	Cars/Motorcycles/Moped	Parking bays	

Figure 1.3.1 Survey ranking questions (question text below) and weighted rankings



## 1.3 Healthy Streets Indicators and priority rankings

#### Healthy Streets Indicator scores

Respondents were asked to score their general experience of the City's streets against a number of indicators on a scale of 1 to 5. These indicators (listed below in Figure 1.3.4) broadly aligned to the Healthy Streets Indicators (Figure 1.3.3, right) used by Transport for London (TfL) to assess the 'healthiness' of streets and roads across London. The ten evidence-based indicators used in the TfL Healthy Streets Approach<sup>3</sup> highlight what make streets attractive places to walk, cycle and spend time.

The results of the survey indicator scoring questions are shown on the following page in Figure 1.3.5. The weighted average of all ten scoring questions is also shown on the graph and compared to the London-wide Healthy Streets average from a TfL study<sup>4</sup> of 80 streets and roads across Greater London. The City Streets average is significantly lower than that of streets and roads across London (although this can partly be explained by methodological differences in data collection and analysis).

verall, the Square Mile's streets scored relatively poorly in all areas except personal safety from crime and anti-social behaviour. All public realm and environment indicators Oscored very low. The 'cleanness' of City's air ranked below a score of 2 with 43 percent → of respondents giving the lowest possible score. Indicators on availability of seating, Ahade and shelter, and noise levels also scored below average.

abilities?

igure 1.3.4 Survey questions and related Healthy Streets Indicator		
City Streets Survey Question	Healthy Streets Indicator	
How clean do you think the air is?	Clean Air	
How intimidated do you feel by motor traffic?	People feel relaxed/People feel safe	
How intimidated do you feel by cyclists?	People feel relaxed/People feel safe	
How safe from crime and anti-social behaviour do you feel?	People feel safe	
How noisy do you find the streets?	Not too noisy	
How easy do you find the streets to cross?	Easy to cross	
How easy do you think it is to find shelter, for example if it was sunny or raining?	Shade and shelter	
How easy would it be to find somewhere to sit or rest if you needed to?	Places to stop and rest	
How enjoyable do you find being on City streets?	Things to do and see	

How accessible do you think the City's streets are for people of all ages and Pedestrians from all walks of

Figure 1.3.3 Healthy Streets Indicators (Source: Lucy Saunders)



## 1.3 Healthy Streets indicators and priority rankings

How accessible do you think the 2.4 Inaccessible Accessible City's streets are for people of all ages and abilities? 2.8 How enjoyable do you find being on Not enjoyable Enjoyable City streets? How easy would it be to find 2.3 Easy Not easy somewhere to sit or rest if you needed to? 2.4 How easy do you think it is to find Not easy shelter, for example if it was sunny or • raining? T 2.9 Not easy easy do you find the streets to cross? 2.2 How noisy do you find the streets? Not noisy Noisy 3.7 How safe from crime and anti-social Unsafe behaviour do you feel? Intimidated How intimidated do you feel by cyclists? 2.6 Intimidated How intimidated do you feel by motor traffic? 1.9 Not clean How clean do you think the air is? 1.5 2 2.5 3 3.5 4 4.5

Figure 1.3.5 Comparison of Healthy Streets indicator question scores

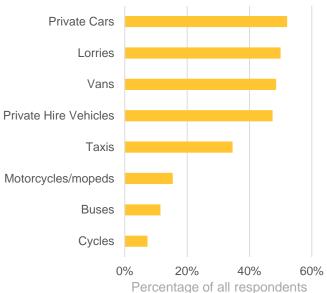
#### Traffic volumes and issues arising from traffic

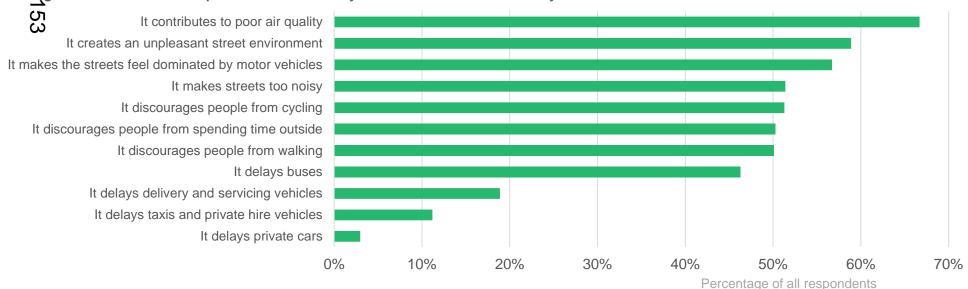
Respondents were asked whether traffic levels in the City were too high. More than 1400 respondents (or four in five) answered "yes", with two in five respondents stating that traffic levels were too high "all day". Figure 1.4.1 (right) and 1.4.2 (below) show the results of subsequent questions on which vehicle volumes were too high and what issues resulted from traffic levels being too high in the City. It is important to note that percentages do not add up to 100% as respondents could select multiple options for each question.

Overall, private car, lorry, van, private hire and, to a lesser extent, taxi volumes were considered to be too high by a significant proportion of respondents. Thus, respondents thought the volumes of the majority of motor vehicle modes in the City are too high. The main traffic-dependent issues respondents identified in the survey were related to air pollution, the pleasantness of the street environment, and the feeling of being in a space dominated by motor vehicles. Delays to vehicular traffic were the least important reasons according to respondents. These findings suggest that the healthiness of a street, both physically and psychologically, are the main reasons why people perceive high motor traffic volumes to be an issue in the City.

Figure 1.4.2 Multi-select responses on reasons why the amount of traffic in the City is an issue

Figure 1.4.1 Multi-select responses on vehicular modes whose traffic volumes are "too high"



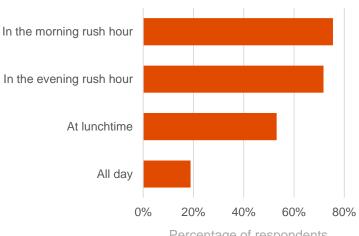


## The experience of walking in the City

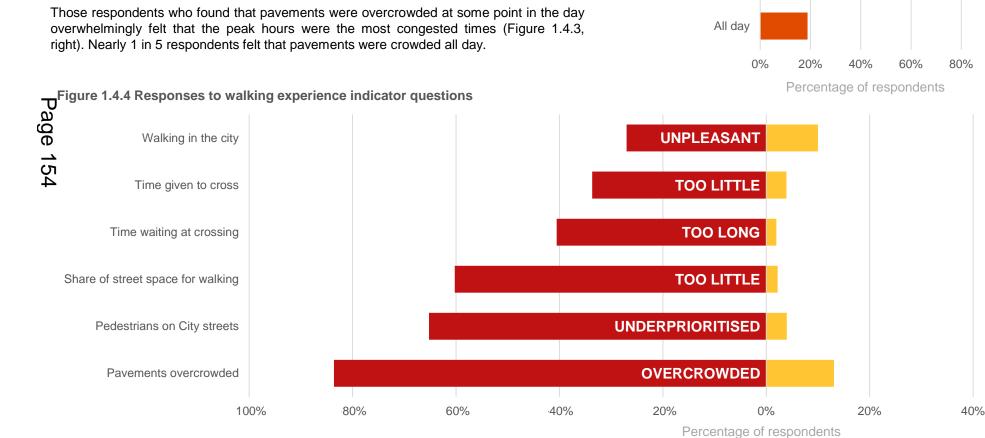
The results of a series of questions on the experience of and conditions for walking on the City's streets are shown in Figure 1.4.4 (bottom). Overall, nearly all walking experience indicators scored poorly, with a significant proportion of respondents finding themselves under-prioritised on too little street space, waiting too long to cross and given too little time to cross. Nearly a quarter of respondents found walking in the City "unpleasant" while 80% found pavements to be overcrowded at some point in the day, highlighting the opportunity for improved walking infrastructure and increasing pavement space and priority.

Those respondents who found that pavements were overcrowded at some point in the day overwhelmingly felt that the peak hours were the most congested times (Figure 1.4.3, right). Nearly 1 in 5 respondents felt that pavements were crowded all day.

Figure 1.4.3 Multi-select responses on when City pavements are overcrowded



Percentage of respondents



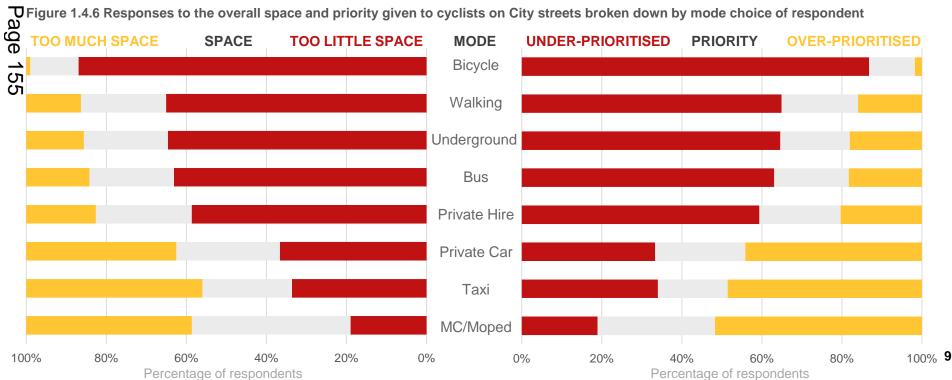
#### The experience of cycling in the City

The results of two survey questions on the priority and space given to people cycling are shown in Figure 1.4.6 (below), broken down by respondent mode of travel around the City. Overall 3 in 5 respondents thought that people cycling were under-prioritised on the City's streets and a similar proportion found that people cycling were given too little share of street space. Over half of respondents who cycle in the City also found the cycling experience in the City "unpleasant". While overlaps exist between each individual mode (e.g. a person who cycles that also uses taxis), the findings suggests that respondents who travel by private motorised vehicular modes are less likely to believe that people cycling are under-prioritised and more likely to think people cycling are given too much space.

Figure 1.4.5 (right) shows the results of asking respondents how safe they feel/perceive cycling is on City streets. Just over half of all respondents gave a score of 1 ("least safe") or 2, suggesting that a significant number of respondents do not feel safe cycling.

Figure 1.4.5 Responses to the perceived safety of cycling in the City Most safe Least safe 3

Proportion of all respondents



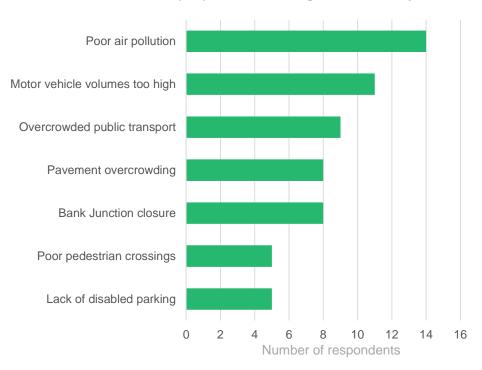
## The experience of travelling for people whose day-to-day activities are limited

The survey also asked respondents whether their day-to-day activities were limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months. In total, just over 110 people responded as having their mobility limited in some way. Approximately 7% of respondents answered "yes" with 1.4% of respondents answering "yes, limited a lot" and 5.7% of respondents answering "Yes, limited a little".

These respondents were also asked how easy it was to travel to/from the City and around the City on a scale of 1 (least easy) to 5 (most easy). The weighted averages for these questions were 2.95 and 2.8 respectively, suggesting it is slightly easier to get to/from the City than around the City for those with health problems or disabilities.

Respondents were also asked what barriers they encountered when ctravelling to/from and around the City. Responses were coded for the Chemes discussed (full methodology described in Chapter 1.5). All themes dentified by five or more respondents are shown in Figure 1.4.7 (right). These results suggest that the key barriers for these respondents were associated with air pollution, high levels of motor vehicles and overcrowding on public transport.

Figure 1.4.7 Open text response analysis to what barriers disabled people face travelling around the City



#### Overview and methodology

The survey asked respondents 'If you could change one thing to improve your experience on the City's streets, what would it be?' The question was optional and left 'open' for respondents to fill in themselves. Three quarters of respondents (1,434 people) answered the question.

A significant variety of responses was received. Each response was reviewed and analysed by categorising the subject of each comment into 'subtopics'. Some respondents provided more than one change/proposal and/or expressed a concern or support for a specific subject, location or scheme. Only the first three changes or issues a respondent mentioned were reviewed and categorised into sub-topics to prevent those respondents who provided significantly longer responses from skewing analysis results. As such, there are more changes/proposals than the number of respondents who answered the question. Other comments, concerns and support that did not directly inswer the question were also reviewed and noted when relevant.

Response text analysis began by categorising each statement into one of 50 detailed sub-topics. The sub-topics were created by taking a sample of 400 desponses and identifying the 50 most common changes that were proposed. Additional sub-topics were then created where necessary as analysis continued. Finally, a full review at the end of the categorisation was undertaken to ensure all comments fitted in to the most appropriate sub-topic. Any sub-topic with fewer than five responses attributed to it was removed from the final categorisation. The sentiment of the sub-topic was also noted (i.e. whether the respondent was in support of or against the sub-topic).

Once all comments were categorised, sub-topics were then grouped into similar 'themes'. A theme consisted of a higher-level categorisation of related sub-topics. A sample of comments and their associated sub-topic and theme are shown in Figure 1.5.1 (right).

Figure 1.5.1 A sample of comments and associated sub-topic and theme

Comment: 'More motor traffic free streets'		
Theme:	Sub-topic:	
Reduce or restrict	Targeted motor vehicle	
motor vehicles	ban	

Comment <i>:</i> ' <i>Widen footway</i> '		
Theme:	Sub-topic <i>:</i>	
More space for people	<i>Wider</i>	
walking	pavements	

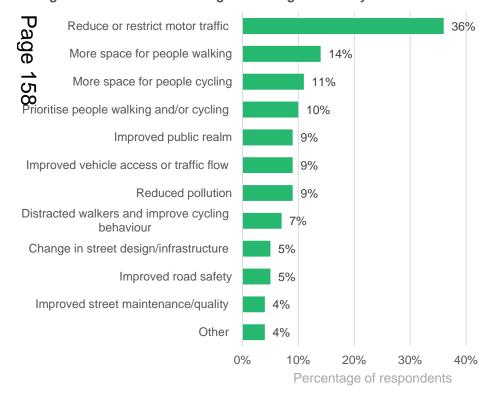
Comment: 'Greater priority to vehicles'		
Theme:	Sub-topic:	
Improved vehicle	Motor vehicle	
access or traffic flow	prioritisation	

Comment <i>:</i> ' <i>Clean air</i> '	
Theme: Reduce pollution	Sub-topic: Reduction in air pollution

#### **Themes**

The themes of the proposals stated by respondents are listed below in Figure 1.5.2 and are ranked in order of the most to least mentioned. It is important to note that percentages do not add up to 100% as responses from each respondent could contain up to three themes. Distinct themes emerged around motor traffic levels; space allocation/prioritisation of people walking and cycling; improvements to street maintenance and design; road safety; public realm; pollution; vehicle access; walking and cycling behaviour; and improvements in noise and air quality. Proposals to restrict or reduce motor traffic was the most frequent theme with over a third of all respondents proposing a motor vehicle volume reduction, cap, or targeted or city-wide ban.

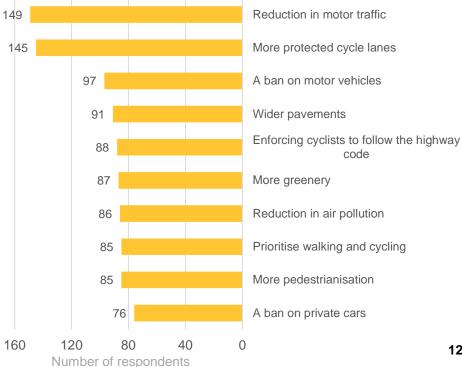
#### Figure 1.5.2 Themes to change one thing on the City's streets



#### **Sub-topics**

Each theme groups together similar sub-topics. The sub-topics provide more detail on specific changes or proposals made by respondents. The list of sub-topics contained in each theme are summarised on the following page and the ten most frequently mentioned changes respondents would like to see on City streets are shown below in Figure 1.5.3.

Figure 1.5.3 Top ten specific proposals (sub-topics) mentioned



#### Overview of themes and sub-topics

A summary of the most common themes alongside the sub-topics that comprise them is presented below.

#### Reduce or restrict motor traffic

As mentioned previously, this theme included any proposal associated with a reduction, restriction, ban or cap on motor traffic, either all motor traffic or a specific type. Further analysis of the sub-topics of this theme are explored in subsequent pages.

#### More space for people walking

The most common proposal was to widen footways followed by more pedestrianisation. Avoiding narrowing pavements for construction works and **Tr**padworks was also mentioned.

## mproved public realm

Ø

Several proposals were made for improved public realm, the most common being more greenery, then decluttering of pavements, then more seating.

#### More space for people cycling

This theme included mostly more protected cycle lanes and more street space for cycling.

#### Improved vehicle access or traffic flow

The proposals varied in this theme from change the Bank on Safety scheme to allow taxis through (most common) to the removal of protected cycle lanes.

#### Prioritise people walking and/or cycling

This theme was mostly made up of proposals to prioritise both walking and cycling, followed by proposals to prioritise people walking.

#### Reduce pollution (air and noise)

This theme mostly consisted of proposals to reduce air pollution, but also included reductions in noise pollution.

#### Distracted walkers and improve cycling behaviour

This theme consisted mainly of enforcing poor behaviour of people who cycle (e.g. not to use the pavement, obey red traffic lights) and the remainder were associated with people distracted by their mobile phones while walking.

#### Improved road safety

Proposals were mainly to reduce conflicts between people walking and cycling (mostly through shared space areas), and the remainder to create a safer cycling environment.

#### Change in street design/infrastructure

This theme mostly consisted of proposals to improve pedestrian crossings, and the remainder were to convert cycle lanes to be timed, remove contra flow cycle lanes and change signal timings.

#### Improved street maintenance/quality

This theme contained proposals related to reducing or better co-ordinating roadworks, have less litter on the street, improve pavement quality or reduce the number of potholes.

#### Other

This category included more bus provision, less bus provision, more bus lanes and better wayfinding.

#### Motor vehicle restriction theme analysis

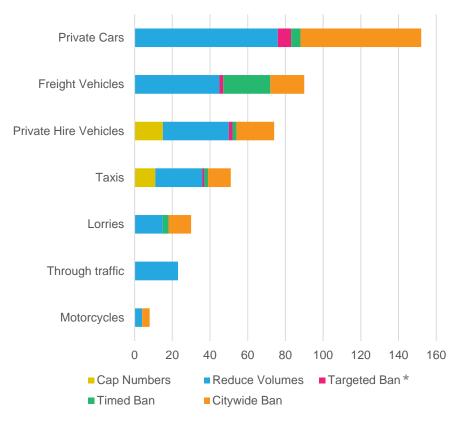
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Reducing or restricting motor traffic was the most common proposal, with over 500 respondents mentioning it in their *Improving the City's streets* responses. Within this theme there were specific proposals to ban, restrict or reduce the level of motor traffic in general or of a specific type. Further analysis on these comments was undertaken to understand to what extent respondents wanted a reduction in motor traffic levels.

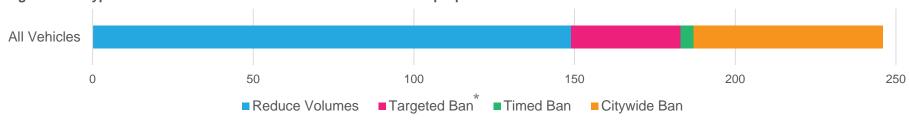
Nearly half of all proposals to reduce or restrict motor traffic were related to all motor vehicles irrespective of type (Figure 1.5.6, below). Of these, most were associated with a reduction in motor vehicle volumes, a fifth to ban traffic City-wide, and the remainder to ban motor traffic on some streets or part of the City, or during certain Ttimes of the day.

The remaining proposals associated with a reduction or restriction of traffic were associated with a specific mode (Figure 1.5.5, right). Again, the most common proposals were to reduce volumes or introduce a City-wide ban, with private cars being the most common specific mode mentioned. Proposals around private hire vehicles and taxis also include a cap on vehicle numbers, while more proposals around a timed ban (outside of peak hours) were mentioned for freight vehicles than any other mode.

Figure 1.5.5 Types of restrictions and reductions of specific modes







# Stakeholder engagement workshop findings

## 2.1 Stakeholder engagement workshops – introduction

#### Workshop format

Seventy seven representatives from City businesses, transport user groups and other organisations with an interest in transport in the Square Mile attended workshops to share their views on transport challenges and opportunities. A list of organisations represented at the workshops is shown below in Figure 2.1.1.

Attendees were presented with a high-level overview of transport in the Square Mile prior to the collaborative portion of the workshop. The presentation was followed up by facilitated discussions on transport challenges and opportunities, and measures of success. The key themes discussed at the workshops are summarised on the following pages.

Figure 2.1.1 List of organisations that attended workshops

Age UK Arup

Bearing Point Black Rock

-British Motorcycle Federation

**p**Broadgate Estates

©Brookfield ©C2C ⇒CBRE

Centre for Accessible Environments

CEVA

City of London Access Group

City of London School City of Westminster Cross River Partnership

Deutsche Bank

Doddle

E Cargo Bikes Fieldfisher

Future City Logistics

**Gnewt Cargo** 

Greater London Forum for Older People

Landsec Living Streets

London Borough of Hackney London Borough of Lambeth London Cab Drivers Club London Cycling Campaign London Fire Brigade

London Fire Brigade

London Taxi Drivers Association London Tourist Coach Association

**London Travel Watch** 

Lloyd's

Momentum Transport Consultancy

Motorcycle Action Group Port of London Authority

Publica Railwatch Recharge Cargo Steer Davies Gleave

Staples Sustrans

**Thames Clippers** 

The Alliance of British Drivers

The Ned
The Ramblers

The Worshipful Company of Chartered Architects
The Worshipful Company of Hackney Carriage

Drivers

Transport for London

Unite UPS

Wilson James

WYG

#### Street space allocation

Many attendees suggested that the **pavement space allocated to people walking is not sufficient** for the numbers of people moving around the City, especially at peak times and near stations.

Construction and building work were mentioned as a source of frustration for people on foot, creating pinch points that may force people to step off the pavement.

Several participants felt that a **flexible or intelligent use of streets will** be the only way to respond to demands being placed on limited street space. Particularly the timed use of streets – for example making some streets pedestrian-only at peak times.

ome participants felt that **greater separation of modes is required** – particularly dedicated space for cycling and buses. Others noted that **O**protected cycle lanes are not always well used for much of the day.

particularly by freight industry representatives who noted the need to provide convenient loading facilities.

A number of participants felt that space should be re-allocated from car parking to public spaces.

Representatives from motorcycle groups highlighted that **motorcycle parking on City streets is oversubscribed** and needs to be secure.

The tourist coach industry noted that a key challenge for coaches is finding space to pick up and set down near key attractions, as well as space for coaches to wait.

Taxi industry representatives noted the **demand for taxi ranks** – especially at stations – with the ranks needing to be accessible. Ranks were considered to be better for drivers and passengers, avoiding the need to drive around empty, contributing to pollution.

TfL Buses representatives noted the success of the Bank on Safety scheme in reducing journey times for buses. They also raised concerns that too many restrictions on motor traffic may impact on bus movements and emphasised the difficulty of changing bus routes.

It was suggested that **street clutter – such as signage – should be minimised** to make the most of the available space.

Several people suggested making better use of the City's network of alleyways and smaller streets for walking – helping people avoid walking along heavily trafficked streets.

#### Traffic levels

Most workshop attendees agreed that **traffic should be reduced**, however no single proposal or opportunity emerged as the most popular.

Professional drivers, such as taxi and freight companies, and several City businesses raised the challenges of **long or unreliable journey times**.

The taxi trade noted that the unreliability of journey times made it difficult for taxi drivers to estimate the cost of trips, and that costs are passed on to the passenger.

Workshop attendees cited a few common factors that they felt contributed to traffic levels and delays, with **construction traffic and large numbers**of private hire vehicles (PHV) mentioned most often as causes.

Reduced capacity for motor vehicles following the introduction of Ocycle Superhighways was noted by some attendees as another cause of Helays, particularly on Upper Thames Street and Lower Thames Street.

The number of buses moving around the City was mentioned by some as a source of traffic delays – several noted that bus occupancy was low outside the morning and evening peak.

Several forms of traffic reduction technique were discussed, including local or City-wide motor vehicle bans, confining motor traffic to key corridors, using modal filters to discourage or prevent through traffic, and targeted measures aimed at reducing particular types of vehicle, for example PHVs.

#### Road danger

The safety of people moving around the City was mentioned as a challenge at most of the workshops. Often this was mentioned in combination with the challenge of how street space is allocated, with many people saying that pavement overcrowding means that people walking are forced to step into the carriageway – conflicting with motor traffic and people on bikes.

It was suggested by some attendees that **people on foot being distracted by mobile phones is an increasing problem** in the City.

Several people mentioned **poor behaviour of people cycling** as a challenge – with high cycling speeds, disobeying of traffic signals and conflict with people walking cited most often.

Freight industry representatives highlighted the safety challenge of people on foot sharing space with goods vehicles.

Some representatives of City businesses noted **the security of streets** as a challenge, with a need for measures to be taken to mitigate the threat from hostile vehicles.

Attendees from neighbouring boroughs acknowledged that the Mayor of London's 'Vision Zero' target to eliminate death and serious injury on London's streets by 2041 is a huge challenge, with no easy way to achieve this and the need for a fundamental shift in how streets operate.

Opportunities to improve the safety of City streets were closely linked to other opportunities, rather than being specifically identified as safety interventions. Opportunities aimed at reducing traffic more generally, and for making freight more efficient would also reduce instances of conflict between people walking and cycling and other motor traffic.

#### Air quality

**Air quality was mentioned as a key challenge** by several stakeholders, with some mentioning empty buses, 'circulating' PHVs and freight vehicles as sources of air pollution.

#### Deliveries and servicing

**Opportunities to more effectively manage freight movements** were discussed by all the workshops as ways of reducing traffic, improving safety, and addressing poor air quality.

Several stakeholders, including the freight industry, considered **freight consolidation** to be part of the solution. However, freight and City business representatives highlighted the limits of physical consolidation, in particular the potential additional cost of double-handling goods and distribution centres outside the City.

One freight industry representative suggested that most **consolidation** consolidation through the procurement process, with physical consolidation centres used only where the supply chain cannot efficiently consolidate deliveries.

Some people suggested that the City Corporation has a role in facilitating consolidation, particularly for smaller businesses.

Borough representatives suggested that **consolidation targets could be** a requirement of each Local Authority's Local Plan – in the way that Housing targets currently exist.

**Micro-consolidation within the Square Mile** was mentioned as part of the solution for last mile deliveries.

**Re-timing freight movements** was discussed in most workshops as a way of improving streets. As with consolidation, most people acknowledged that re-timing is part of the solution but does not work for all deliveries, particularly those to small businesses.

The freight industry and some City businesses mentioned **the challenges of retiming** some delivery trips to reduce daytime traffic – particularly where there are planning restrictions on delivering to premises overnight.

Several freight industry representatives said that **delivering overnight**, **when traffic is lighter**, **is helpful for hauliers**, as personnel and vehicles can work more efficiently – reducing costs.

Making greater use of the river for freight transport was mentioned by several people, often in conjunction with efficient last-mile delivery using electric vehicles or cargo bikes. It was noted that river transport for goods is not generally commercially viable and is not as flexible as road transport.

Some City businesses suggested that the City Corporation should be stronger in requiring certain behaviours from occupiers in the City – setting firm conditions on how deliveries should be carried out in the City.

#### Growth and the 24/7 City

**The growing City** was seen by several participants as a significant challenge for the future, with more people – particularly on foot – using an already busy street network.

The increase in people walking and spending time near new Crossrail stations was highlighted as a particular challenge.

It was noted that technology is enabling **changing working patterns**, with more sectors able and willing to work remotely or flexibly.

Many people suggested that **the City Corporation should encourage leisure activities in the City** during the evenings and weekends, with all—weekend operation of the Waterloo and City line suggested by one person.

Some stakeholders mentioned the challenge of embracing a 24/7 City Cand suggested that this may not be desirable, with a quieter City at the weekends being good for residents.

\*\*Use of the quieter City at the weekend was raised by some people as an opportunity for freight movements, in particular for construction sites where large vehicles are required to service building activities.

#### New and emerging technologies

New and emerging technologies – particularly **automated vehicles and drones** – were mentioned by many as a challenge and opportunity.

Most agreed that significant technological change would happen in the near future, but there was **no consensus on how the technology should be used**. Some people felt that drone technology offered opportunities –particularly for deliveries – but others felt that automated vehicles were a threat to the City environment and could be a nuisance.

Boroughs raised the fact that **TfL** and **Central Government appear to be relatively far behind the market** – creating a potential regulatory and policy gap.

The taxi trade noted the need for a good electric vehicle-charging network to improve air quality.

## 2.3 Stakeholder engagement workshop – successful outcomes

Many people expect a successful transport strategy to provide **more space for people walking** on City streets, especially at peak times, and streets would be uncluttered.

Some stakeholders noted that the **space should be flexible**. Emergency service representatives said that even pedestrianised space must be **accessible to large emergency vehicles when required**.

Streets must be accessible to all users, regardless of age and ability.

Some stakeholders mentioned the need to **maintain the City's 'buzz'** as part of its appeal for investors and workers.

Many people expect to see a greater proportion of electric vehicles on the City's streets, and most see some role for electric vehicles in the long term. The move to electric vehicles, particularly taxis, was widely expected to contribute to cleaner air in the City in the future.

Several people highlighted the desire for a greener environment as part of a future City streetscape – with a few pointing out that the City has a lot of biodiversity which should be enhanced and enjoyed.

Some people expect that working habits will change in the future, and the traditional **commuter peaks of demand in the morning and evening will reduce**, even with an increase in the City's working population. Others see the desire to work in the City as enduring, evidenced by the high demand for office space in the Square Mile.

Most workshop attendees see **reduced traffic as a desirable outcome**, with several suggestions on how this may be achieved. Most people believed that vehicle access to most streets will be required in the future, but there was wide variation in suggestions for the number and type of vehicles that should be permitted. Several stakeholders referred to **'essential' vehicles being retained on most streets**.

Some people mentioned the **removal of through traffic as a way of reducing traffic**, and others mentioned a significant reduction in the number of freight vehicles in the future.

Boroughs suggested that there is a need to work together with the City Corporation and TfL on the future development of road pricing – as it needs a co-ordinated approach.

Most people felt that **safer streets** are a desirable outcome, although few specific interventions were proposed to achieve this, with the implication that safety improvements would come from traffic reductions.

Some businesses said that having a very safe City would be a selling point for property investors – this applies to the reduction of road danger and the security of the City against attacks.

Many people expect the City to **promote and embrace the heritage of the Square Mile** – with several people suggesting that the streets of the future should do more to enhance the City's unique history and heritage.

The river was mentioned in several workshops as an under-used asset – the City should, in the future, **promote the riverside walkway as a commuter and leisure walking route**.

# Citizen Panel and drop-in session findings

## 3.1 Citizen Panel and drop-in session findings

#### Citizen Panel

Populus, a consultancy specialising in political, reputation, stakeholder and customer research, have been appointed to facilitate a Citizens Panel of City workers and residents. This panel will meet three times during the development of the Transport Strategy and will enable us to gain a deeper understanding of residents and workers' transport needs and concerns.

Approximately 40 people – half residents, half workers – attended the first panel workshop on the evening of 20 March 2018. Attendees took part in exercises and discussion tasks aligned to the City Streets survey questions, with Populus staff facilitating the discussion.

The discussions raised several key challenges and opportunities for improvement that are broadly in line with those emerging from the workshops and survey. These are:

Competition for space on streets and crowding of pavements, and the need to improve arrangements for people walking at construction sites

Poor pavement and carriageway quality producing unsafe conditions for people walking and cycling

Poor air quality and the appearance and tidiness of pavements (e.g. overflowing bins and rubbish awaiting collection)

- Pressure of development and economic activity especially construction and associated HGVs – causing traffic delays and making footways unsafe for people on foot
- Behaviour of people on foot and on street making getting around the Square Mile slow and frustrating
- Poor accessibility of City streets for people with disabilities or pushing buggies, this is exacerbated by pavement crowding and obstruction
- Pedestrian safety, including inadequate crossing facilities, high traffic speeds and the danger posed by HGVs associated with the construction industry
- The need to educate or improve all users' behaviour through measures such as traffic calming and campaigns

#### **Drop-in sessions**

A series of consultation drop-in sessions were held at various locations around the City. Members of the Strategic Transportation team were available to answer questions about the Transport Strategy and discuss transport issues. Attendees were also able to complete the survey. A combination of lunchtime and evening sessions aimed to make the drop-ins accessible to both City workers and residents. The sessions were advertised on the City Corporation website, through flyers distributed at events and on-street, and through City Corporation social media.

Attendance at the drop-in sessions was generally low, but in line with expectations for engagement of this type - with 26 people attending in total. The drop-in sessions also allowed staff to engage with people passing by and hand out flyers advertising the survey.

Discussions at drop-in sessions largely reflected the issues raised by City Streets survey respondents and workshop participants. Drop-in attendees often spoke about the allocation of space on City streets; the need to prioritise people walking, cycling and using public transport users; reducing air pollution and road danger; and finding ways to manage freight more efficiently.

4

City Streets: Transport for a changing Square Mile exhibition

## 4.1 City Streets: Transport for a changing Square Mile exhibition

The City Streets: Transport for a changing Square Mile exhibition was held at the City Centre from 5 February to 31 March 2018. The exhibition took visitors through historic and recent changes to the City's streets and presented the future challenges for transport and streets. The information presented in the exhibition was intended to provoke discussion and visitors were encouraged to feed back their thoughts through the online survey.

The exhibition was open six days a week, including Saturday, providing an opportunity for City workers, residents and visitors to view background materials prior to completing the survey. The City Centre was also used as a base for the majority of formal engagement events. Over 7000 people visited the City Centre over the two-month period.

The exhibition included an informal 'voting' exhibit, which encouraged visitors to answer the question "What are the top three transport issues facing the lity" using counters to register their vote. While not a robust consultation ool, the outcomes provide a broad indication of the priorities of those visiting the exhibition. Figure 4.1.1 (right) shows the final outcomes, the votes cast for each option were:

Improving the walking experience 224 211 Improving air quality Reducing the amount of traffic 127 Providing more seating and public space 102 96 Improving the cycling experience 81 Making streets safer 73 Managing deliveries and servicing Making bus journeys quicker 56 Making it easier to find a taxi 29

Figure 4.1.1 Exhibition voting exhibit and display panels







## **Endnotes**

- 1. City statistics briefing February 2018 update
- 2. <u>TfL's London Travel Demand Survey webpage</u>
- 3. TfL's Healthy Streets for London report
- 4. TfL's Key findings from the Healthy Streets survey report

## Agenda Item 11

Committee(s)		Dated:
Streets & Walkways Sub	<ul><li>For decision</li></ul>	21/05/2018
Planning & Transportation	<ul><li>For decision</li></ul>	29/05/2018
Court of Common Council	<ul><li>For decision</li></ul>	21/06/2018
Subject: Tudor Street/New Bridge Street – Update Report		Public
Report of:		For Decision
Carolyn Dwyer, Director of the Built Environment		
Report author:		
Sam Lee		

#### Summary

Following the decision of the Court of Common Council, officers have been working with Transport for London (TfL) and the Temples to establish if a new layout to improve access, egress and safety at the Tudor Street/New Bridge Street junction is viable.

TfL have now completed their technical assessments and have confirmed that the scheme is viable but to proceed to the next stage of the scheme, they require confirmation of funding. However, since this scheme was formally debated by Members in September 2017, two key developments in the area have come to light. These include a new combined court building and potential new police station, and the re-development of Fleet House.

The transport and security requirements to facilitate a new combined court are not yet known but are likely to be very significant; particularly in relation to security needs. It is likely that this development would require improved security and greater restriction or control on vehicular movement, including access. These needs could therefore impact the Tudor Street/New Bridge Street scheme.

The main work to deliver the Fleet House development could commence from early next year. If the Tudor Street/New Bridge Street scheme was implemented, then the Fleet House development is likely to require temporary changes to be made to enable lorry access or egress from New Bridge Street.

Therefore, to avoid the likelihood of abortive works and unnecessary costs, it is recommended that the Tudor Street/New Bridge Street scheme be deferred until the transport and security needs of the new combined court are known, the scheme no longer impacts on the Fleet House construction and the strategy for servicing Fleet House has been finalised.

#### Recommendation(s)

#### Members are asked to:

- Agree to the scheme in principle as shown in Appendix 1 (excluding the wider hostile vehicle mitigation (HVM) across Blackfriars Bridge and the urban realm improvements in Bridewell Place) but further progression subject to funding being identified and approved.
- Agree to defer progressing this scheme until the transport and security needs
  of the new combined court service/potential new police station are known, the
  scheme no longer impacts on the Fleet House construction and the strategy
  for servicing Fleet House has been finalised.

#### Main Report

## Background

- In October 2017, the Court of Common Council authorised officers to continue to work with TfL and the Temples to establish the viability of a new layout at the Tudor Street/New Bridge Street junction to improve motor vehicle access, egress and road safety. The scheme is shown in Appendix 1. Members also endorsed officers to explore potential funding opportunities.
- 2. To confirm scheme viability, Members were advised that TfL would be taking the layout through their formal assessment process including traffic modelling and safety audits. Members were advised that the scheme would cost in the order of £2.3M.

#### **Current Position**

- 3. TfL have now completed their assessments and have advised officers that the scheme is viable. They have provided a more detailed cost estimate and have advised that to proceed to the next stage of the scheme, which is public consultation, confirmation of funding is required.
- 4. Since the above-mentioned committee meetings, two key developments in the area have come to light. These developments could potentially have very significant implications, particularly relating to access, egress and security needs both during construction and once those buildings are in use.
- 5. This report therefore informs members of the outcome of TfL's assessments and the potential implications arising from these developments.

#### TfL assessments

6. TfL's assessment included carrying out traffic modelling and road safety audits. They have also carried out a detailed cost exercise and have consulted internally with different departments. Based on these assessments, they have confirmed that the scheme is viable. A summary of the assessment is detailed below and in Appendices 2 to 4.

- a. The traffic modelling assessment has shown that the scheme would introduce very marginal increases in some journey times. In the worst-case scenario, of up to 2 minutes for buses but in most cases, there are no changes when compared to the existing performance. See Appendix 2. The principle reason for the bus delay is the introduction of an additional bus stop.
- b. The Stage 1 Road Safety Audit (an audit based on concept/outline design) identified three minor road safety problems and six design issues with the proposed scheme. TfL believe that the audit findings are not very significant and believe that they can be addressed in the detailed design or that the risks are low and therefore the risks are acceptable.
- c. TfL has estimated that to deliver the scheme it would cost £2.33M. However, in their estimation, they have included a tolerance of +/- 30% to address any issues around estimating accuracy. Consequently, the cost range of the scheme is between £1.63M to £3.03M. A summary breakdown of the estimate is provided in Appendix 3. It should be noted that the estimate includes a small element of urban realm improvements (to maximise the opportunity) on Bridewell Place but does not include any hostile vehicle mitigation (HVM) works which may be necessary around the bus stop on Blackfriars Bridge. HVM is not currently included because the nature and type of HVM requirements are still being assessed. Any HVM costs which may be necessary because of this scheme may therefore need to be factored in at a later date.

#### **Key developments**

- 7. Members will be aware of the decision taken by the City Corporation in October last year, to commission a feasibility study on a new combined court service (NCC) to be built in the Fleet Street area. The site being considered could also potentially be used to accommodate a new police station.
- 8. Plans for the court are being developed in partnership with HM Courts and Tribunal Services and feasibility studies are in progress to assess the scheme.
- However, as this development is in the early stages, the transport and security requirements to support the NCC have not yet been scoped out but some discussions have taken place with relevant officers.
- 10. One of the requirements that appears to be relevant, is the need to protect crowded and iconic places as well as critical national infrastructure from international terrorism. It is highly likely that a NCC would be seen as an iconic or critical establishment and therefore security needs would be essential.
- 11. Members may also be aware of the Corporation's own Fleet House development located on the corner of New Bridge Street and Bridewell Place. The main servicing for the development had been identified to take place on-street from two locations, Bridewell Place and New Bridge Street. Only the location on New Bridge Street

has a dedicated loading bay marked out. Implementation of the planning permission has taken place; however, the main deconstruction and construction of the new building is not expected to start until Q2 2019 at the earliest. When these works start, there will be a need for lorries to transport material, plant and spoil to and from the site.

#### **Implications**

- 12. The transport and security requirements to facilitate the NCC are not yet known but it is likely to be very significant particularly in relation to security needs. It is likely that this development may require improved security with greater restriction and control on vehicular movement including access. The wider transport needs are also not known. If the Tudor Street/New Bridge Street scheme was to be progressed, it may subsequently be required to make changes to facilitate the new NCC. This could result in costly abortive works.
- 13. It should be noted that part of the agreed design for the Tudor Street/New Bridge Street scheme requires the closure of Bridewell Place (at its junction with New Bridge Street) together with a new bus stop positioned opposite. If the scheme was implemented, it would therefore impact the Fleet House development both during construction and when it is in occupation thereafter.
- 14. With one of the identified servicing areas for the Fleet House development located on Bridewell Place, servicing vehicles would either need to reverse from Tudor Street or if they have already arrived in a forward direction, they could then reverse, utilising the "lay by" to the west of the site to then leave in a forward direction. See Appendix 4. Although reversing is not ideal, on-street servicing in Bridewell Place can still be carried out and as with many cul-de-sacs in the City, this is not an uncommon scenario. Furthermore, the development has the benefit of using another, specifically marked out, loading bay in New Bridge Street. TfL's suggested urban realm improvements in Bridewell Place as shown in Appendix 1, would however, not be possible without further implications to servicing.
- 15. The proposed closure of Bridewell Place would severely hinder the construction of Fleet House because lorries would not be able to easily access or leave the site. It would therefore most likely require temporary alterations to the closure to enable lorry access or egress. If temporary changes weren't possible, which is a likely possibility because of additional safety and bus operational impacts, transport movements servicing the development would then need to be managed in a much more confined space, such as a requirement to reverse up or down Bridewell Place. As a result, the number of lorries accessing the site at any time may also have to be limited.
- 16. While the traffic and highway authority cannot necessarily be required make changes to accommodate developments, it is acknowledged that without suitable adjustments, it is unlikely the needs of the City can be met. It has also been found unreasonable for the highway authority to prevent development which has been granted planning permission by withholding highway approvals. The City as street

authority must also use best endeavours to co-ordinate the execution of works of all kinds in the streets, including to minimise inconvenience to road users.

- 17. Given the potential implications arising from these two developments, it is proposed that the Tudor Street/New Bridge Street scheme be deferred until the transport and security needs of the NCC are known and until this scheme would no longer impact on the Fleet House construction and the strategy for servicing Fleet House has been finalised. This would avoid the likelihood of any abortive works and un-necessary costs and help meet the City's responsibility for coordination of works.
- 18. This report does not currently address the funding strategy that would be required to deliver the scheme. However, funding options will be set out when the scheme is brought back for authorisation to progress.

## **Corporate & Strategic Implications**

19. The deferment of the scheme will ensure improved co-ordination of highway works, which will reduce unnecessary inconvenience and achieve better value for money by reducing potential for abortive costs.

#### Conclusion

- 20. TfL has confirmed that the scheme is viable but to proceed to the next stage they require confirmation of funding. Their assessment has revealed some minor implications, but these are not insurmountable.
- 21. Two key developments in the area which may have material access, egress and security needs have come to light. To improve co-ordination of works and avoid abortive and un-necessary costs, it is recommended that this scheme is deferred.

## **Appendices**

- Appendix 1 The proposals
- Appendix 2 Summary of traffic modelling
- Appendix 3 Cost estimate summary
- Appendix 4 Fleet House Bridewell Place servicing swept path

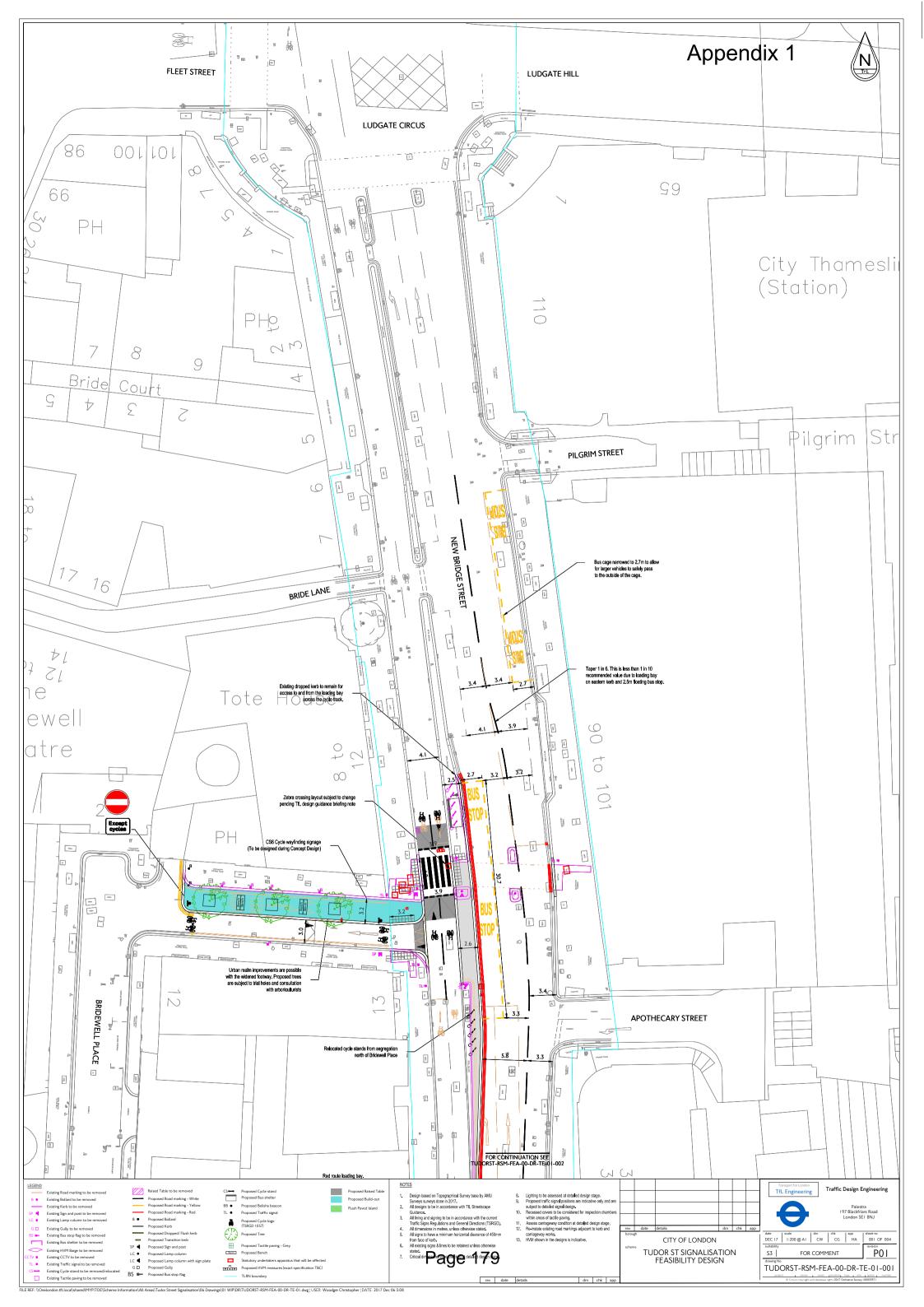
#### Sam Lee

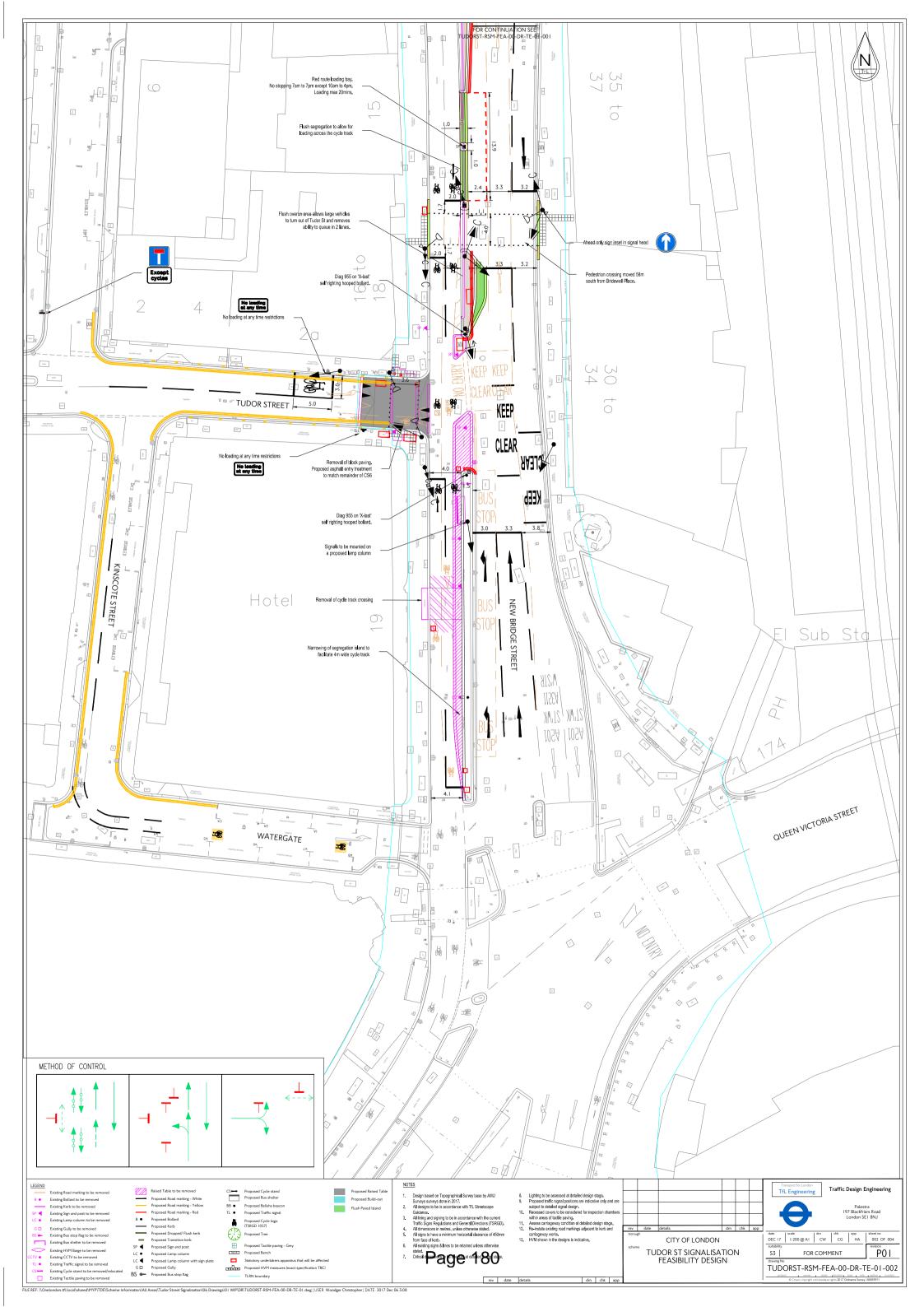
Group Manager, Department of the Built Environment

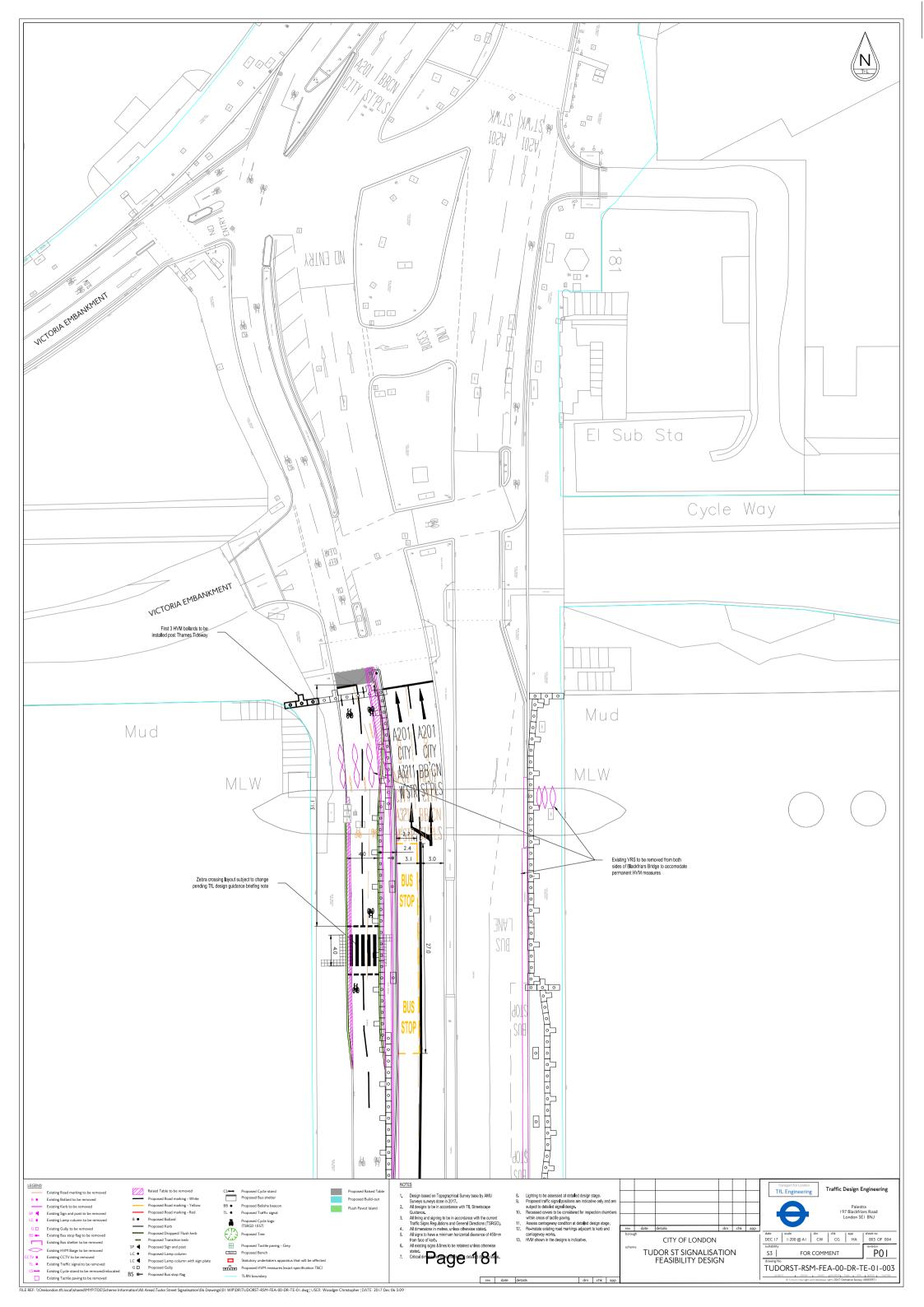
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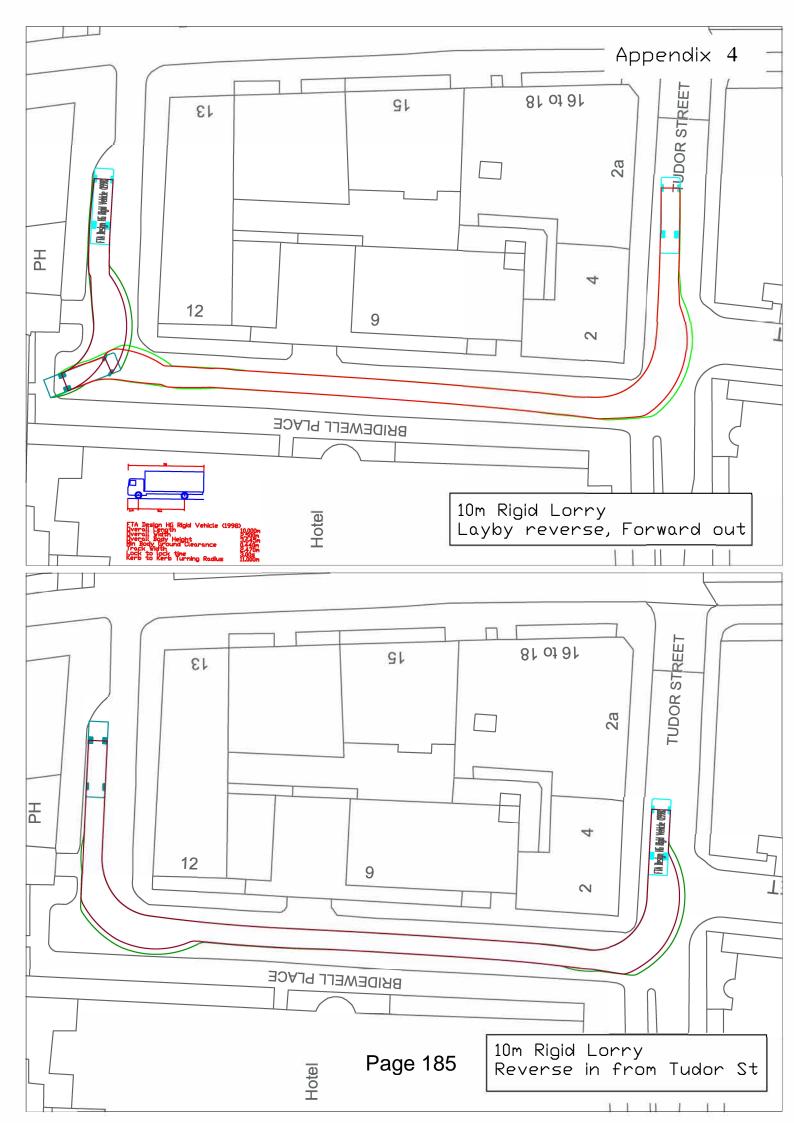


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## **Tudor Street Scheme - Summary of modelling results**

	Correct as of 16/01/2018 (Includes		ides CS6 phase 2)			Mitigated Do Something Journey Times (Minutes)				Difference between Base and Mitigated Do Something (Minutes)	
ŀ		Current journey	S	AM	PM	Journeys modelle	ed	AM PM		AM	PM
	Buses	Route 45 between London Road and	To Charterhouse	12-14	14-16	Route 45 between London Road and	To Charterhouse	14-16	14-16	0-1	No change
	Average journey times on	Charterhouse Street	To London Road	16-18	20-25	Charterhouse Street	To London Road	16-18	20-25	No change	0-1
	two key bus routes through the scheme area (Minutes)	Route 63 between London Road and	To King's Cross Road	18-20	20-25	Route 63 between London Road and	To King's Cross Road	20-25	20-25	1-2	No change
		King's Cross Road	To London Road	20-25	25-30	King's Cross Road	To London Road	20-25	25-30	No change	0-1
ĺ	<b>Cycling</b> Average journey times (minutes)	Stamford Street to Blackfriars - Blackfriars to Charterhouse Street -	To Blackfriars	3-4	2-3	Stamford Street to Blackfriars	To Blackfriars	4-5	2-3	0-1	No change
			To Stamford Street	1-2	2-3		To Stamford Street	1-2	2-3	No change	No change
			To Charterhouse	6-7	4-5	Blackfriars to Charterhouse Street	To Charterhouse	6-7	4-5	No change	-(0-1)
			To Blackfriars	6-7	6-7		To Blackfriars	5-6	6-7	No change	No change
U	General Traffic	The Cut to Feminades	To Farringdon	10-12	9-10	The Cut to Farringdon	To Farringdon	10-12	9-10	No change	No change
age	Average journey times (minutes)	The Cut to Farringdon	To The Cut	8-9	12-14		To The Cut	8-9	12-14	No change	0-1
200	Pedestrians	Farringdon Road Crossing  Maximum wait	Average Wait Time (Seconds)	55	55	Farringdon Road Crossing	Average Wait Time (Seconds)	55	55	No change	No change
	Average and Maximum wait times (seconds)		Maximum Wait Time (Seconds)	114	114		Maximum Wait Time (Seconds)	114	114	No change	No change

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Committee(s)	Dated:
Planning and Transportation Committee	29 May 2018
Subject: Towards a Sustainable Future: The City of London Corporation's Responsible Business Strategy, 2018-23	Public
Report of: The Chamberlain and the Chief Grants Officer	For information
Report author:	
Amelia Ehren, Corporate Strategy Officer	

## **Summary**

This paper presents the current draft version of 'Towards a Sustainable Future: The City of London Corporation's Responsible Business Strategy, 2018-23'. The strategy states a commitment by the City of London Corporation (City Corporation) to 'creating a positive impact and reducing negative impact across all our activities and decisions because it is the right thing to do and will help ensure a sustainable future.' It sets out how the City Corporation will create social and environmental value by adopting responsible business practices throughout its day-to-day work and decision making, to create a future where:

- 1. Individuals and communities flourish; and
- 2. The planet is healthier.

The paper also outlines the process by which this strategy was developed, including the role of the Responsible Business Task and Finish Group which is chaired by your Chamberlain and your Chief Grants Officer, the next steps for its implementation and its corporate implications, with specific reference to implications for City Corporation's planning and transportation remit. Amended versions of this paper will be presented to several other committees, as outlined in paragraph 8, to highlight the relevant implications for each committee. The paper seeks comments and input from Members on the current draft version, to be incorporated into a final version, which will go to Policy and Resources Committee for approval in July 2018.

#### Recommendations

#### Members are asked to:

 Comment and provide feedback on the current draft version of 'Towards a Sustainable Future: The City of London Corporation's Responsible Business Strategy, 2018-23' at Appendix 1.

## **Main Report**

## **Background**

1. We are in an era when organisations are asked to look beyond their core business and consider the ways in which they might create and sustain social and

environmental value. As an organisation with private, public and charitable and community sector responsibilities, and significant capabilities and commitments, the City Corporation is well placed to role model responsible business practices internally across all our activities and externally across all three sectors.

- 2. The strategy brings together two strands of work where we can make an impact. These are:
  - Impact achieved in pursuit of our core purpose, how we deliver our operations and how we procure our resources.
  - Impact achieved through our advocacy and role-modelling to others.

By bringing together these two strands of work into one corporate strategy, the City Corporation can make sure it is doing all it can to move towards a sustainable future. It strengthens the City Corporation's internal practices and its outward-facing commitments to promoting responsible business across multiple sectors. It will also offer additional coherence and consistency to the Economic Development Office's (EDO) responsible business campaigns and the Lord Mayor's Business of Trust campaign.

- 3. In June 2017, the City Corporation commissioned a review of its internal responsible business practices using the B-Lab UK model. The review highlighted many areas of excellence and a variety of recommendations to strengthen the City Corporation's work.
- 4. In September 2017 an Internal Responsible Business Task and Finish Group (TFG), co-chaired by your Chamberlain and your Chief Grants Officer, was set up to act as the advisory group to support the development of the strategy.
- 5. The draft strategy, **at Appendix 1**, was developed through a collaborative and participatory approach with the TFG, key departments and staff across the organisation. The TFG initially reviewed the recommendations from the B-Lab review alongside the 90 United Nations Sustainable Development Goals. These 90 sustainability issues were then narrowed down to 19 issues by:
  - Conducting a materiality assessment, which is an exercise in stakeholder engagement that helps define and determine the environmental, social and governance issues that are most relevant to delivering the outcomes in the Corporate Plan 2018-23; and
  - Carrying out internal consultation with staff in the form of meetings with relevant departments and an online staff survey, completed by 147 respondents. The consultation process enabled staff to give their views on which topics and issues were most important to them.

More details of the materiality assessment process can be found on pages 11-13 in **Appendix 1**.

6. The strategy builds upon the successes and achievements of the City Corporation to date in this area and considers the ways in which it can improve its responsible

business practices, by capturing what is already doing and outlining other actions that it can take to contribute further to a truly sustainable future.

## **Current position**

7. The strategy describes the City Corporation's continuous and substantive commitment to creating positive impact and reducing negative impact on society and the environment across all its activities and decisions, to help ensure a sustainable future. It makes clear the City Corporation's commitment to responsible business and how this will be fulfilled, set within the framework of the Corporate Plan 2018-23. The strategy identifies eight topics, across two themes, and sets out how it will drive activity in these areas. The strategy is summarised below:

Our commitment	We are committed to creating positive impact and indecisions because it is the right thing to do and will	reducing negative impact across all our activities and help ensure a sustainable future.		
We will achieve this by	<ul> <li>Focusing our efforts on:</li> <li>Impact achieved in pursuit of our core purpose, how we deliver our operations and how we procure our resources.</li> <li>Impact achieved through our advocacy and role-modelling to others.</li> <li>Using responsible business practices through our every day work and decision making to ensure that we conduct ourselves in the most ethical and responsible ways possible.</li> </ul>			
	<ul> <li>Engaging our employees</li> <li>Using our convening power</li> <li>Connecting our communities</li> <li>Ensuring transparency</li> </ul>	<ul> <li>Championing responsible investment</li> <li>Leading responsible procurement</li> <li>Preventing bribery, fraud and corruption</li> <li>Promoting human rights</li> </ul>		
To create a future	Individuals and communities flourish	The planet is healthier		
where	Create and champion equal opportunities, diversity and inclusion across our organisation, and networks; and safeguard people and communities from social issues impacting London.	Reduce our environmental impact across all operations while increasing our positive impact through cleaning, greening, advocacy and influence Air quality  Waste		
	People's wellbeing	Plastics and packaging		
	<ul><li>Equal opportunities</li><li>Diverse organisations</li></ul>	<ul><li>➤ Climate change</li><li>➤ Loss of biodiversity</li></ul>		
Resulting in	An organisation that makes the right decisions An organisation that works collaboratively and inn An organisation that is trustworthy An organisation that leads the way in responsible			
Corporate Plan 2018-23 links	This strategy is one of the main mechanisms for de socially and environmentally responsible. It also did 4, 8, 11 and 12.	elivering Outcome 5: Businesses are trusted and rectly supports the achievement of Outcomes 1, 2, 3,		

## **Next steps**

8. As part of the Member consultation on this strategy, the current draft version will also be presented to the committees below. The feedback received from Members will feed into the final version of the strategy, which will then be taken to Policy and Resources Committee in July for final approval.

Committee	Date
City Bridge Trust Committee	2 May 2018

Markets Committee	9 May 2018
Establishment Committee	22 May 2018
Port Health and Environmental Services Committee	22 May 2018
Public Relations and Economic Development Sub Committee	29 May 2018
Open Spaces Committee	4 June 2018
Community and Children Services Committee	8 June 2018

9. As the strategy will have specific implications for different departments and divisions within the City Corporation, a slightly amended version of this paper will be presented to each committee to highlight the relevant implications.

## Implementation

- 10. The strategy outlines the following five next steps that are essential in implementing the strategy successfully over the next five years.
  - To bring together good practice.
  - To assign lead officers and develop action plans.
  - To monitor and report.
  - To define success.
  - To tell the City Corporation's story on responsible business.
- 11. The TFG has been repurposed to continue with the same Chairs and become the Responsible Business Implementation Group (RBIG). It will drive forward the implementation of the strategy and lead on devising detailed and SMART (specific, measurable, achievable, realistic and time-limited) action plans relating to each outcome area.
- 12. The success of the strategy also relies on the continued support of Members and staff, who will be enabled to take collective responsibility for making responsible business part of the City Corporation's everyday work. To engage Members and staff with the strategy, a Communications Plan will be developed. Activities and engagement channels in the Plan will include: a Members' briefing session, the Senior Leaders Forum in September, the Corporate Plan staff engagement sessions and an internal communications campaign.
- 13. The strategy will be regularly reviewed over the five-year term, to ensure it is a live document that is relevant and responsive to the issues of the time, which allows for new ideas and opportunities to be integrated into it.

## **Corporate & Strategic Implications**

- 14. To achieve the outcomes set out in the Corporate Plan 2018-23, the City Corporation will need to consider how best to maximise social and environmental benefits through its business activities and its work with others.
- 15. The strategy is one of the main mechanisms for delivering Corporate Plan Outcome 5 Businesses are trusted and socially and environmentally responsible as it embeds responsible business practices throughout the organisation and across its operations and activities.

- 16. Although the principles in the strategy are integrated into all the Corporate Plan outcomes, it directly supports the achievement of the outcomes below, through the actions outlined under each of the priority areas.
  - Outcome 1 People are safe and feel safe.
  - Outcome 2 People enjoy good health and wellbeing.
  - Outcome 3 People have equal opportunities to enrich their lives and reach their full potential.
  - Outcome 4 Communities are cohesive and have the facilities they need.
  - Outcome 8 We have access to the skills and talent we need.
  - Outcome 11 We have clean air, land and water and a thriving and sustainable natural environment.
  - Outcome 12 Our spaces are secure, resilient and well-maintained.
- 17. It is your Chamberlain and Chief Grants Officer's belief that the Department of Built Environment and the City Surveyor's Department will have essential roles in delivering this strategy. The departments are in a position to contribute to 'Outcome 2: The planet is healthier' through its priorities around 'Waste', 'Plastics and Packaging', 'Climate Change' and 'Loss of biodiversity'. Additionally, the departments could have a role to play in terms of embedding the responsible business practices set out in the strategy within their day-to-day work, procurement processes and decision making. Through their work with others, it is then hoped that the departments will champion the strategy and, through their spheres of influence, encourage others to adopt responsible business practices.

## Conclusion

18. 'Towards a Sustainable Future: The City of London Corporation's Responsible Business Strategy' sets out a commitment to creating positive impact and reducing negative impact across all the City Corporation's activities and decision to help ensure a sustainable future where individuals and communities flourish and the planet is healthier. It is hoped that the strategy will have been through all officer and Member governance by July 2018, for it to be launched at the Senior's Leader Forum in September 2018.

## **Appendices**

• Appendix 1- Towards a Sustainable Future: The City of London Corporation's Responsible Business Strategy, 2018-23.

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# **Towards a Sustainable Future**

The City of London Corporation's Responsible Business Strategy

2018-2023





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## **Executive Summary**

We are in an era when organisations are asked to look beyond their economic impact and consider the way in which they create social and environmental value. As an organisation with private, public and charitable and community sector responsibilities, and significant capabilities and commitments, we are well placed to rolemodel responsible business practices internally across all of our activities and externally across other organisations.

The crategy set out here states our commitment to responsible business and how we will fulfil it, set within the framework of our Corporate Plan 2018-23. We will embed responsible practices throughout the City Corporation's work to take us towards a sustainable future.

We know that we are on a journey to becoming a more responsible business and will need to build on our strengths and learn from others along the way. We will champion what we are currently doing well and celebrate, for example, our role in conservation, philanthropy and responsible procurement. Implementing this strategy provides us with further stories of change and impact to share with our wide range of partners. By openly sharing our progress, impact and learning we aspire to be a responsible business role model to other similar organisations.

Our commitment	We are committed to creating positive impact and r decisions because it is the right thing to do and will	educing negative impact across all our activities and help ensure a sustainable future.			
We will achieve this by	<ul> <li>Focusing our efforts on:</li> <li>Impact achieved in pursuit of our core purpose, how we deliver our operations and how we procure our resources.</li> <li>Impact achieved through our advocacy and role-modelling to others.</li> <li>Using responsible business practices through our every day work and decision making to ensure that we conduct ourselves in the most ethical and responsible ways possible.</li> </ul>				
	<ul> <li>Engaging our employees</li> <li>Using our convening power</li> <li>Connecting our communities</li> <li>Ensuring transparency</li> </ul>	<ul> <li>Championing responsible investment</li> <li>Leading responsible procurement</li> <li>Preventing bribery, fraud and corruption</li> <li>Promoting human rights</li> </ul>			
To create a future	Individuals and communities flourish	The planet is healthier			
where	Create and champion equal opportunities, diversity and inclusion across our organisation, and networks; and safeguard people and communities from social issues impacting London.	Reduce our environmental impact across all of operations while increasing our positive imperations through cleaning, greening, advocacy and influencing Air quality			
	People's wellbeing	<ul><li>Waste</li><li>Plastics and packaging</li></ul>			
	<ul><li>Feople's wellbeing</li><li>Equal opportunities</li></ul>	> Climate change			
	<ul><li>Diverse organisations</li></ul>	> Loss of biodiversity			
Resulting in	An organisation that makes the right decisions An organisation that works collaboratively and inn An organisation that is trustworthy An organisation that leads the way in responsible leads				
Corporate Plan 2018-23 links	This strategy is one of the main mechanisms for delivering Outcome 5: Businesses are trusted and socially and environmentally responsible. It also directly supports the achievement of Outcomes 1, 2, 4, 8, 11 and 12.				



## Introduction

Catherine McGuinness, Chairman of Policy and Resources & John Barradell, The Town Clerk and Chief Executive

The City of London Corporation has a reach that extends far beyond the Square Mile, spanning the private, public, and charitable and community sectors. Across our diverse responsibilities, our work is guided by our core aims of contributing to a flourishing society, supporting a thriving economy and shaping outstanding environments, for the scalar Mile, City, London and beyond. We are also guided by our commitment to being a relevant, responsible, reliable and radical organisation.

Our Corporate Plan 2018-23 maps out our vision of a vibrant and thriving City, supporting a diverse and sustainable London within a globally-successful UK. To achieve this, we need to consider both how we manage our own business, as well as the contribution we make to our communities and networks. Being a responsible business, that is committed to creating positive impact and reducing our negative impact on society and the environment, underpins all aspects of our work and will be embedded throughout the organisation.

Recent events have put businesses, charities and governments in the spotlight, with the public increasingly calling for transparency, accountability, and probity across a range of issues. More than ever, there is the need to create a lasting legacy of better business trusted by society. This strategy is, therefore, both timely and necessary.

Adopting a responsible business strategy is crucial for motivating our employees, attracting talent and developing trust with our stakeholders and communities. During the consultation regarding this strategy, many employees passionately described their commitment to a wide variety of sustainability issues facing the organisation and our stakeholders. This strategy will support us in our ambition of having an engaged and motivated workforce who are catalysts for change and work to magnify our impact.

We hope that this strategy and our journey to implement it, will provide an example for other organisations starting on their responsible business journey. We will share our progress openly and learn from others as we go, and will use our story as a mechanism for inspiring others in our networks and spheres of influence to follow our example and join us in striving to create a more positive impact on society and the environment. Successfully implementing this strategy will require our Members and staff to be fully engaged with our responsible business practices, as everyone has a role to play in building a sustainable future.

Photo

Catherine McGuinness, Chairman of Policy and Resources Photo

John Barradell, The Town Clerk and Chief Executive



## **Towards a Sustainable Future**

## Our Responsible Business Strategy, 2018-23

In June 2017, we underwent an external assessment with B-Lab to assess the efficacy of our responsible business practices. These findings, which included the recommendation to develop a centrally located responsible business strategy, resulted in the formation of a dedicated Task and Finish Group, with responsibility to drive forward the development of the strategy. More details of how the strategy was developed can be found in Appendix 1.

The roulting strategy - 'Towards a Sustainable Future: Our Responsible Business Strategy'- brings toge Her two strands of work where we can make an impact. These are:

- Introact achieved in pursuit of our core purpose, how we deliver our operations and how we procure our resources our business activities.
- Interact achieved through our advocacy and role-modelling to others our work with others.

By bringing together these two strands of work into one corporate strategy, we can make sure we are doing all we can to move towards a sustainable future. We are well placed to achieve impact in these areas owing to our unique blend of capabilities and commitments, as set out in our Corporate Plan 2018-23.

This strategy will support the achievement of the aims and outcomes in the Corporate Plan and is one of the main mechanisms for delivering Outcome 5 'Businesses are trusted and socially and environmentally responsible' through our internal and external work. Although the principles outlined in the strategy are integrated into all the Corporate Plan outcomes, it also directly supports the achievement of Outcomes 1, 2, 3, 4, 8, 11 and 12.

Working to this strategy will require us to create a shift in the way we think, plan and implement our work. Underpinning the Corporate Plan is a variety of existing and emerging strategies that ensure our decisions in this sphere are robust, including but not limited to our: Climate Action Strategy, Air Quality Strategy, Volunteering Strategy, Responsible Procurement Strategy, Responsible Investment Strategy, Social Mobility Strategy, Philanthropy Strategy and Access to Talent programme.

## Responsible business practices

We have developed a set of responsible business practices that we must utilise and embed in our work and in our decision-making processes.

Engaging our employees	We enable and empower our staff to act as a catalyst for change within the communities they live and work in.
Using our convening power	We lend our voice and influence, as an independent and respected organisation, to highlight and advocate for responsible practices across our networks and partnerships.
Connecting with our communities	We listen to our communities and wider stakeholders, within the Square Mile and beyond, to understand the challenges they face and to include them in our planning and decision-making processes, as appropriate.
Ensuring transparency	We embrace transparency and accountability across all our work, including our governance structures and use of funds.
Preventing bribery, corruption and fraud	We actively prevent fraud, corruption and bribery in our own operations and influence our supply chain and partners to do the same.
Promoting human rights	We advocate for human rights in our decision-making processes so that people are treated appropriately and with dignity.
Championing responsible investment	We ensure that our own investments reach and exceed the standards set by United Nations supported Principles for Responsible Investment.
Leading responsible procurement	We apply our responsible business principles to our procurement procedures to maximise social value, minimise environmental impact and strive to ensure the ethical treatment of people throughout our supply

chains.



# Creating a sustainable future

Our commitment to creating a sustainable future is based on two pillars where we can make positive social and environmental impact. In this strategy, we outline where we currently make positive impacts and then set out actions we will pursue to further create positive impact and reduce our negative impaction society and the environment.

This strategy allows us to amplify specific responsible business outcomes through our own siness and by influencing others. We have indicated the types of activities we will pursue to further these aims and will establish detailed action plans for each outcome and priority during the implementation of this strategy. We also know that working closely with our partners, stakeholders, communities and networks will be essential to achieving the positive future we want to create.

## Individuals and communities flourish

## Where we make impact

We are committed to championing equal opportunities and reducing inequality through tackling the barriers that exist for different groups and creating a positive and inclusive culture within our organisation, the Square Mile, London and the UK. We are also committed to creating opportunities for development and progression and building a collaborative and supportive organisation. Our external reach, which involves working with organisations across all sectors, puts us in a unique position to influence the agenda around equality, diversity and inclusion across these industries.

Our unique blend of capabilities also enable us to support communities to become stronger, better connected and more resilient. We play a particular role in this area by supporting the development of resilient communities, managing risks, protecting children and adults at risk, promoting health and wellbeing, and as the police authority for the Square Mile. We also advocate for disadvantaged groups across London, tackling exclusion, hate crime, and harassment through our networks of influence, events and community spaces to build a culture of tolerance. We also support these ambitions by funding a range of charities, through our charitable funder City Bridge Trust.

## The planet is healthier

## Where we make impact

As a major custodian of London's green belt and the local planning authority for the Square Mile, our role in supporting London and the UK's environment continues to grow in importance. We manage over 11,000 acres of green space across London, which improve air quality, people's health and wellbeing, safeguard biodiversity and contribute to vital ecosystem services.

As a planning authority, we work with our London partners to set challenging environmental targets for property developers to ensure that our ambitious Local Plan is delivered. Our role as provider of local authority services also provides us with opportunities to implement cleaning and greening programmes in the public realm, influence licence-holders, manage flood risk and work with residents, businesses, workers and visitors through environmental campaigns. Through our direct operations, we are also able to reduce our contribution to climate change, for example through our energy use.

## **Corporate Plan Links**

Outcomes 1, 2, 3, 4, 5 and 8

Key related strategies

Volunteering Strategy, Philanthropy Strategy, Access to Talent, Social Mobility Strategy, Education Strategy, Bridging Divides

Outcomes 5, 11 and 12

Climate Action Strategy, Air Quality Strategy, Local Plan, Waste Strategy, Sustainability Plan, Biodiversity Action Plan



# Outcome 1: Individuals and communities flourish

Create and champion equal opportunities, diversity and inclusion across our organisation and networks; and safeguard people and communities from social issues impacting London.

## Priority 1: People's wellbeing

Recent world events have highlighted that workplaces and public environments continue to be unsafe for a variety of groups. The safety of women and girls against harassment and sexual assault, and incressed incidents of hate crime are key issues.

Through our business activities, we will:

- Emed third party reporting mechanisms for people who experience domestic abuse, sexual violence or hate crime to help ensure we provide appropriate services.
- Improve the health and wellbeing of our own workforce, building an even more collaborative and supportive working environment.
- Protect, and where possible enhance, the acoustic environment to mitigate against the effects of noise and contribute to an improvement in well-being for the people who live, learn, work and visit here.

Through our work with others, we will:

- Convene organisations and groups tackling hate crime and other violence against minorities to strengthen their collective voice.
- Continue to promote the safety of groups facing discrimination and harassment through funding, facilitation and advocacy.
- Help tackle violence and inequality in communities across London, by delivering City Bridge Trust's 'Bridging Divides'.

## **Priority 2: Equal opportunities**

To create a more fair and equal society, we must support social mobility and reduce inequalities at an organisational, local, regional and UK-wide level. We are committed to promoting equality of opportunity for all, regardless of background, and will champion this within our own organisation and use our influence to encourage others to do the same.

Through our business activities, we will:

- Develop an ambitious organisation-wide strategy and vision on social mobility, which outlines the key internal enablers, systemic changes and cultural shifts that we need to pursue.
- Enhance access to training and skills for our workforce.
- Create pathways to fulfilling employment in our organisation by providing and supporting opportunities such as volunteer roles, work experience placements, apprenticeships and graduate schemes.
- Develop clear progression pathways through our own organisation to enable staff to reach their full potential, regardless of their background.
- Strengthen and promote our Employee Volunteering Programme to encourage staff learning and development.

Through our work with others, we will:

- Support a more successful and inclusive London, by delivering our Employability Strategy for 2017-20.
- Work with City businesses to create pathways to fulfilling employment and open up more City jobs to people of all backgrounds.
- Understand the future skills gaps and build programmes to address them in partnership with businesses, communities, schools and universities.
- Provide funding, via City Bridge Trust, to charities that aim to improve social mobility outcomes for a wide range of Londoners.

## **Priority 3: Diverse organisations**

To develop a diverse and inclusive workforces, we need to consider carefully how to remove the barriers to employment that exist for different groups who experience more exclusion or disadvantage than others.

Through our business activities, we will:

- Ensure diversity and representation within our decision-making processes, groups and wider activity, in line with the Public Sector Equality Duty.
- Continue to build flexibility within our HR processes and procedures that consider the barriers and needs of excluded and protected groups to ensure their retention and employee satisfaction.
- Increase the gender-balance of our workforce, particularly at senior management levels, and ensure gender pay equality.
- Analyse, identify and tackle issues within the recruitment and progression systems that present barriers to groups who experience more exclusion or disadvantage through consultation with our stakeholders including HR, our staff diversity networks and Trade Unions.

Through our work with others, we will:

- Take a lead role on advocating for diversity and inclusion within the sectors where we have influence.
- Champion the role of women in sectors they typically face increased barriers in, for example the financial and professional services sector, and highlight the issues they face.



## Outcome 2: The planet is healthier

Reduce our environmental impact across all our operations while increasing our positive impact through cleaning, greening, advocacy and influencing.

## **Priority 1: Air quality**

Air pollution is a major issue affecting the health of every Londoner. It has been estimated that annually up to 9,500 people in London die prematurely due to poor air quality. Due to its location at the centre of London and the density of development, the Square Mile has some of the highest levels of pollution in the country. With our local authority duties, we keep a responsibility to improve local air quality by reducing emissions of air pollutants in the Square Mile.

Through our business activities, we will:

- Improve local air quality in the Square Mile and reduce exposure to air pollution by continuing to develop and deliver the City of London Air Quality Strategy.
- Increase the number of clean vehicles in our fleet and continue to trial new technology.
- Encourage and facilitate the uptake of clean alternative vehicles amongst our supply chain.
- Reduce emissions of air pollutants from our building stock.

Through our work with others, we will:

- Provide leadership for air quality policy and action across London.
- Encourage City businesses to be come air quality champions and support our work for cleaner air.
- Support research and development into measures to improve air quality with London Universities.
- Act as a facilitator for collaborative action on air pollution in London.

## **Priority 2: Waste**

Pursuing more sustainable methods of waste disposal is increasingly important for a healthier planet and as pressures on current waste disposal methods are becoming more acute. Our overall waste production and recycling programmes across our operational practices, as well as our local authority waste collection operations, are therefore becoming more relevant. Our reliance on other waste planning authorities to take the waste produced within the Square Mile is a growing risk, with landfill sites closing and an increasing focus on treating and/or disposing of wastes within reasonable proximity to their point of generation. We need to pursue other waste disposal methods that are more sustainable. Further, there is significant staff appetite to ensure that our own internal recycling programme is better adhered to by colleagues.

Through our business activities, we will:

- Develop a consistent and robust approach to waste reduction and collection, including recycling, across all our operational properties.
- Promote circular economy principles, where resources are kept in use for as long as possible before being recycled or disposed of, across the organisation.
- Deliver a recycling campaign across the organisation to ensure that waste is correctly sorted and disposed of by staff day-today.

Through our work with others, we will:

• Investigate the use of on-site waste disposal systems, such as anaerobic digestors in new build projects, with developers.

## **Priority 3: Plastics and packaging**

The impact of non-biodegradable plastics and packaging on the health of our ecosystems has become an increasingly important public concern. We have a unique opportunity to influence this issue through our role as a local authority service provider with excellent relationships with businesses, retailers, and suppliers. However, we also need to ensure that there is coherence between our outward messaging and our internal actions.

Through our business activities, we will:

- Reduce the amount of non-biodegradable plastics and packaging used across all our internal and contracted retail operations.
- Eliminate single use plastics from our operational properties.

Through our work with others, we will:

• Lead on a campaign for a 'Plastic free City'.



## Outcome 2: The planet is healthier

Reduce our environmental impact across all our operations while increasing our positive impact through cleaning, greening, advocacy and influencing.

## **Priority 4: Climate change**

Flooding, temperature variations and their effect on infrastructure and public health, and extreme weather events will affect London and the communities we work with in and around the Square Mile and wider London. As a responsible organisation, we need to ensure that we minimise our effect on climate change through our direct operations while taking a more central role in advocating good practice across our networks and spheres of influence.

Through our business activities, we will:

- Develop and implement the 2018 Climate Action Plan for the Square Mile.
- Reduce the risk and impact of flooding on the Square Mile by implementing the City of London Local Flood Risk Management Strategy.
- Source 100% renewable electricity across our operational and investment portfolios in the short term.
- Invest in renewable energy installations in the medium term, to increase renewable energy supply and resilience for our organisation.
- Increase the proportion of renewable gas in our energy supply in the longer term.
- Reduce the use of diesel vehicles being used by staff to travel to and from work and during work, by encouraging more environmentally-friendly forms of travel.
- Reduce energy use in our offices.

Through our work with others, we will:

• Influence developers to prioritise green construction through our planning policy.

## **Priority 5: Loss of biodiversity**

The impacts of urbanisation, loss of green areas, land use changes and intensification of farming are harming our environment and reducing our biodiversity, which negatively effects the resilience and sustainability of our natural environment. This can be particularly felt in urban areas where pressure from housing and infrastructure can threaten green areas. With our local and planning authority responsibilities, and as part of our own works projects, we can prioritise sustainable development and greening initiatives through policy which affects developers and our own public realm initiatives.

Through our business activities, we will:

- Protect existing habitats and create new biodiverse habitats in the Square Mile through our planning policies and corporate requirements.
- Support the continued management of 11,000 acres of green space in and around London to ensure high quality habitats and biodiversity.
- Increase the greening of our operational properties.

Through our work with others, we will:

- Set challenging environmental targets for developers, contractors, occupiers, workers and residents.
- Use planning policy and strengthened corporate requirements to prioritise sustainable development and greening in new developments and the public realm.



## Making strategy a reality

We have outlined five next steps that are essential in implementing the strategy successfully over the next five years, which all rely on the continued commitment of our staff and elected Members. These steps are underpinned by our responsible business practices that we must embed in to our everyday work to achieve our aims, such as champoning responsible investment and leading responsible procurement. Delivering on these steps will also help us to tell our story more powerfully, building on our curred work and amplifying our potential.

## 1. Bringing together good practice

Work has already taken place on identifying initiatives, programmes and services which are contributing to our responsible business outcomes, through both existing work streams and the development of this strategy. However, we know that we have not yet captured the full range of our impact and excellence. By knowing this, we can tell our responsible business story with more confidence and energy, focusing on our outcomes and practices to demonstrate our impact.

## 2. Responsibility and Action Planning

Indicative actions have been identified for our key priority areas under each of our outcomes. To successfully deliver these actions, dedicated staff resource will be needed to develop detailed action plans, which include specific outputs, targets and measures, promote collaboration and measure the success of our activities in achieving each of our outcomes and commitments. However, the success of this strategy also relies on all staff taking collective responsibility for making responsible business part of their everyday work and for challenging decisions that do not align with our commitments and aims. As part of the implementation process, we will develop a comprehensive communications plan to engage staff with the commitments and practices set out in this strategy.

## 3. Monitoring and Reporting

Monitoring our progress to ensure we are on track to achieve our vision and aims is an important part of our responsible business approach. We will measure our performance against the impact we are having on our outcomes and priority areas and against the targets set out in the detailed action plans. We will be transparent in our reporting on where we are having the greatest impact and the areas where there is still room for improvement. Over the five-year term of the strategy, we will regularly review it to ensure it remains relevant and responsive to the issues of the time.

## 4. Defining success

We see success as building on our values and outcomes to ensure that we are an organisation that:

- Evaluates our decision making and activities in the context of responsible business, ensuring that we make the most positive impact while reducing our negative impact.
- Works collaboratively and innovatively across our organisation in order to meet the outcomes we have defined in this strategy.
- Involves our communities in our decision making and activities, with our outward messages matching our inward actions, thus building trust in our organisation.
- Becomes a leader in responsible business, sharing our expertise and insights with other government bodies, charitable and community sector organisations and nonprofit organisations.

## 5. Telling our story

We want our responsible business journey to inspire and influence others to follow our example, both within our organisation and externally through our partners and stakeholders. We will start by sharing and championing the successes we have already achieved, including for example the conservation and enhancement of biodiversity across our 11,000 acres of green spaces, the hiring of 100 apprentices in 2017/18 and the implementation of low emission zones in the Square Mile.

We will use this strategy to generate and tell real stories of change and impact which we hope that others will use as examples to start their own responsible business journeys. We will share these messages through an internal and external communications campaign, aimed at internally embedding a collective understanding of what responsible business is in practice and externally at inspiring other similar organisations.



## Acknowledgements

We are very grateful for the time, knowledge and passion of all our contributors and stakeholders who have informed the development of this strategy.

We owe a special thank you to the members of the Task and Finish group who drove the development of this strategy forward:

peter Kane - Chamberlain (co-chair)

Dayid Farnsworth - Chief Grants Officer, City Bridge Trust (co-chair)

**Grace Rawnsley** – Internal Responsible Business Strategy Officer, Town Clerk's

Amelia Ehren – Corporate Strategy Officer, Town Clerk's

Sufina Ahmad – Corporate Strategy Manager, Town Clerk's

Natalie Evans - Responsible Procurement Manager, Chamberlain's

**Noa Burger** - Head of Responsible Business, Economic Development

**Simon Cribbens** - Assistant Director, Children and Community Services

**Jon Averns** - Assistant Director, Markets and Consumer Protection

Paul Beckett – Policy and Performance Director, Built Environment

Esther Sumner – Business Manager (previous), Open Spaces

Mansi Sehgal – Energy Manager, City Surveyors

James Rooke – Energy Manager (maternity cover), City Surveyors

Tracey Jansen – Assistant Director, Human Resources

Fiona Rawes – Head of Philanthropy Strategy, City Bridge Trust

Inspector Lorenzo Coniglairo – Counter Terrorism, City of London Police

"We can be rightly proud of what we have already achieved in becoming a responsible business but this strategy underlines our passionate commitment to building a more sustainable future."

**Dr Peter Kane, Chamberlain and David Farnsworth, Chief Grants Officer** (Cochairs of the Task and Finish Group)



## **Appendix 1**

## **Developing the strategy**

In June 2017, we commissioned a review of our internal responsible business practices using the B-Lab UK model. This review highlighted many areas of excellence and a valety of recommendations to strengthen our internal work. One of these recommendations was a centrally located Responsible Business Strategy aiming to bring coherence between our inward actions and outward messaging, and aligning our work more closely with the Corporate Plan, 2018-2023.

A Task and Finish Group with representation from across the organisation, and chaired by the Chamberlain and Chief Grants Officer, began a collaborative and participatory process of designing the strategy in September 2017. Using desk based research, commissioned reviews, 1-2-1 meetings, UN Sustainable Development Goals and the corporate risk register, the group initially identified over 90 issues and opportunities that touch the organisation's operations and corporate outcomes. Some of these issues were very localised and could be dealt with by individual teams or departments, some of the issues were large and complex and require a corporate response. Using a materiality approach, this list was narrowed down to 19 topics that were the most relevant to delivering our corporate plan outcomes.

In December 2017, staff were surveyed to identify which of the 19 issues should form the focus of the current five-year strategy. 147 staff contributed to the survey and ranked the issues in order of importance. The issues were then assessed against their impact on the delivery of the Corporate Plan. The results of the materiality assessment identified eight topics to become the priorities for this strategy.

## **UN Sustainable Development Goals**

We have identified ten UN Sustainable Development Goals where we feel we can have the most impact through our internal responsible business strategy. These goals sit at the heart of our thinking around responsible business and have influenced the development of our strategy.





## **Materiality assessment**

There are hundreds of social and environmental issues facing the planet; within our supply chains, our communities and our business. Our aim is to create social and environmental impact through all our activities by reducing our negative impact and maximising our positive impact.

Output material issues and opportunities give direction for the foels of our organisation's responsible business work into the future. We will continue to update our materiality assessment to capture new risks and opportunities that the organisation faces.

## **Societal issues**

Increasingly, individuals and communities are facing a number of societal issues. As a responsible organisation, we have a part to play in championing equal opportunities, promoting diversity, reducing inequality and safeguarding people from negative risks within our organisation, the Square Mile, London and the UK.

## **Key material issues**

- Equal opportunities
- Diverse workforce
- Pay differentials
- Women in the workplace
- Employment within socially excluded groups
- Crisis and resilience
- Intensification of London's population
- Affordable housing
- Support for SMEs
- Support for charities
- People's wellbeing

## **Environmental issues**

Our planet is under increasing pressure from a variety of sources including climate change. As a responsible organisation, we have a part to play in ensuring that our operations and supply chains are as environmentally friendly as possible, while recognising our unique responsibilities and opportunities to influence as a major contributor to London's green belt and the planning authority for the Square Mile.

#### **Key material issues**

- Air quality
- Waste
- · Plastics and packaging
- Climate change
- · Loss of biodiversity
- · Embodied carbon
- Emissions through energy use
- Food security

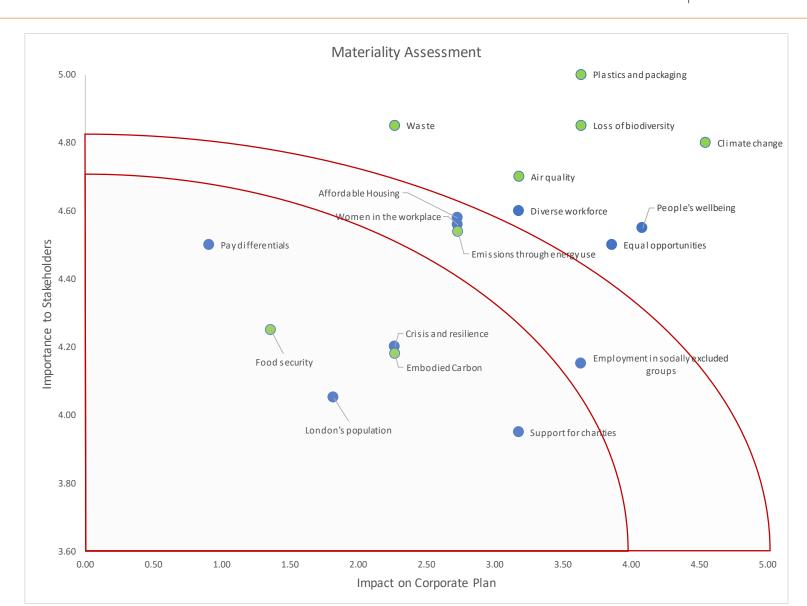


## Materiality assessment

Every five years, we are committed to focusing in on a smaller number of our material issues to provide more focus, drive and meaningful impact. We work closely with our staff and stakeholders to identify the issues that they are most pressing and relevant to the organisation. The diagram illustrates our eight focus areas for our five-year strategy (in red).

The materiality assessment graph to the right shows the relationship between the importance to our employees and the impact on our Corporate Plan for each issue on a 1-5 scale. The importance to employees is derived from our internal staff survey on our material issues completed by 147 staff members and the impact on the Corporate Plan is estimated based on the number of outcomes for which each issue presents risks and opportunities. The graph is divided into our priority areas for the next five years in the top right-hand corner. A second tier of issues is highlighted in light grey which may gain in importance and impact over the next five years and should be monitored.

This process does not minimise the importance of the other material issues we have highlighted, and we are committed to continue to support and report on our actions to minimise our negative impact and create meaningful positive impact across all these issues.



Committee(s)	Dated:
Port Health & Environmental Services – For Information	22/05/2018
Planning and Transportation – For Information	29/05/2018
Subject:	Public
Senior Officer Recruitment	
Report of:	For Information
Director of the Built Environment	
Report author:	
Carolyn Dwyer, Director of the Built Environment	

## **Summary**

Under the Senior Officer Recruitment Procedure, a Chief Officer should report the resignation/ retirement of a senior officer and propose a suggested recruitment timeframe. This report notes the retirement of one senior officer, the planned retirement of a second senior officer and proposes a recruitment plan to recruit to both posts before the summer recess.

#### Recommendation

Members are asked to:

Note the report.

## **Main Report**

## **Background**

- 1. The District Surveyor retired last year. Over the year the post has been covered between the Chief Officer and the Transportation and Public Realm Director whilst it has been reviewed. The assistant directors who reported to the District Surveyor have been extremely pro active and helpful during this time.
- 2. The review is now complete and the Transportation and Public Realm Director is now planning to retire.

#### **Current Position**

- 3. The job description for the District Surveyor has been reviewed to include coordination of the City's response to environmental resilience which better reflects work undertaken by the previous post holder and ongoing requirements. The job will be retitled Environmental Resilience Director.
- 4. The Transportation and Public Realm Director has announced that he plans to retire later this year.
- 5. This now provides the opportunity to recruit to both posts.

## **Proposals**

6. In accordance with the Senior Officer Recruitment Procedure the Chairmen and Deputy Chairmen of Planning and Transportation and Port Health and Environmental Services Committees will be involved in the recruitment process.

The level of involvement will be agreed with the Chairmen and Deputy Chairman in each case.

7. It is proposed to run a recruitment campaign for both posts commencing in May with a view to completing recruitment before the summer recess.

## **Corporate & Strategic Implications**

8. The previous and existing post holders have been valued members of staff who have made significant contributions to delivering corporate outcomes. The recruitment of new staff to these posts is a key part of succession planning for the Department.

## **Implications**

9. There will be a small cost associated with the advertising campaigns and this will be met from the Department's Local Risk budget.

## **Health Implications**

10. None

#### Conclusion

11. It is intended to recruit to the posts of Environmental Resilience Director and Transportation and Public Realm Director by August 2018.

## **Appendices**

None

## **Carolyn Dwyer**

Director of the Built Environment

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## PLANNING AND TRANSPORTATION COMMITTEE - OUTSTANDING ACTIONS

Item	Date	Action	Officer responsible	To be completed/ progressed to next stage	Progress Update
1.	9 January 2018 23 January 2018 26 March 2018 8 May 2018	Ludgate Circus  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.	Steve Presland	SP arranging meeting between senior TfL reps and chairman and Deputy of P&T	Completed – Letter sent on 9 January and circulated to Members on 10 January.  Meeting between Chairman, Deputy Chairman and TfL representatives took place on Tuesday 23 <sup>rd</sup> January to discuss this issue.  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.  UPDATE: Data was exchanged and CoL have provided written comments back to TfL on their data just before the Easter break. We would expect TfL to respond within the next two weeks.

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Item	Date	Action	Officer responsible	To be completed/ progressed to next stage	Progress Update
2.	9 January 2018 23 January 2018 20 February 2018 26 March 2018 8 May 2019	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.	lan 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.
3.	9 January 2018 20 February 2018 26 March 2018 8 May 2019	'Green' Initiative  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
4.	9 January 2018 20 February 2018 26 March 2018 9 May	Yellow Bikes  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.
5.	9 January 2018 20 February 2018 26 March 2018 9 May 2019	Blackfriars Bridge Underpass  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.  Officers advised that there were overlapping responsibilities between the CoL and TfL and discussions were taking place with TfL to address the problem.	Jim Graham		A detailed response was sent to the Member on 09/01/2018.  The City are Monitoring it, increasing inspections, scheduled and adhoc cleaning as required is now in place.  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.

Item	Date	Action	Officer responsible	To be completed/ progressed to next stage	Progress Update
6.	23 January 2018 20 February 2018 26 March 2018 9 May 2018	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.	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.
7.	26 March 2018 9 May 2018	Wind Measurement On Tall Buildings.  Question – when will the promised "before and after construction" wind measurements on 20 Fenchurch St be made available  Officers advised that a number of extra trees had been planted outside 20 Fenchurch Street and agreed to produce a full report in due course of relevant and predicted readings.	CPO		

Item	Date	Action	Officer responsible	To be completed/ progressed to next stage	Progress Update
8.	20 February 2018 26 March 2018 9 May 2018	The Town Clerk suggested that If Members would like more training and would like to indicate what areas they would like to be covered and in what format they would find most helpful then this could be provided and it was agreed that a report be prepared for a future meeting.	Town Clerk	Ongoing	
9.	9 May 2018	Funding Officer for Enforcement Officer for City Bridges.  Members questioned if one officer was sufficient for the task and it was agreed that the Committee should be provided with a progress report in case further resources were needed,	Director of Markets & Consumer Protection		

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Committee:	Date:	
Planning and Transportation	29 May 2018	
Subject:	Public	
Old Pathology Building & Residential Staff Quarters Building St Bartholomew's Hospital West Smithfield London EC1A 7BE		
Refurbishment and extension of the Old Pathology Block and the former Residential Staff Quarters building to provide Private Hospital and North Block facilities, to include: (i) dismantling and rebuild of the rear facade with a five storey extension (3.5m deep); (ii) removal of redundant roof plant and erection of a roof extension on the Old Pathology Block; (iii) replacement of the existing infill facade between the Old Pathology Block and Pathology Museum; (iv) replacement of existing plant room on the Pathology Block Extension; (v) creation of a new entrance with associated accessibility provision on the north and rear elevation of the Residential Staff Quarters building; (vi) replacement of the existing windows on the Pathology Block Extension and Residential Staff Quarters building; (vii) landscaping to outer courtyard of Old Pathology Block and creation of additional cycle parking and a service yard.		
Ward: Farringdon Without	For Decision	
Registered No: 16/01311/FULL	Registered on: 9 January 2017	
Conservation Area: Smithfield	Listed Building: No	

# Summary

The two buildings subject of this application are the Old Pathology Block (OPB) and connected Pathology Block Extension (PBE), and the former Residential Staff Quarter building (RSQ). The site is located within the St Bartholomew's Hospital campus within the Smithfield Conservation Area.

There are a number of designated heritage assets in the immediate vicinity of the site. Located between the OPB and RSQ is the grade II listed Pathology Museum. To the north of the OPB, is the Gatehouse (grade I) and associated perimeter screen wall (grade II\*). To the east, is the Church of St Bartholomew-the-Less (grade II\*), the Hospital chapel (grade II\*) and further east is the north east block of the Hospital and attached buildings (grade II). To the south are the East, West and North Blocks (Gibbs Building) comprising the central square of the Hospital complex (grade I), with associated historic lanterns and central fountain (grade II). Directly outside the OPB, on the

eastern side of Giltspur Street, is a grade II listed K2 telephone box. It is considered that the proposal would have an impact on the setting of these designated heritage assets. Both the OPB and the RSQ are considered to be non-designated heritage assets.

The Old Pathology Building and the Residential Staff Quarters building are six storeys (including a basement). Both buildings are in healthcare use and both buildings are currently vacant.

Planning permission is sought to extend the Old Pathology Block and refurbish both the Pathology Building and Residential Staff Quarters building bringing them back into long-term healthcare use and provide a new private healthcare facility.

The development comprises demolition and rebuild of the rear façade of the Old Pathology Building with a five storey extension (3.5m deep); removal of redundant roof plant and erection of a roof extension on the Old Pathology Block; replacement of the existing infill facade between the Old Pathology Block and Pathology Museum; replacement of existing plant room on the Pathology Block Extension; and other minor alterations include the extension, in width but not height, of an existing lift overrun on the RSQ building to accommodate a trolley lift at roof level and an existing door and window will be swapped around on the rear elevation.

Representations have been received across three rounds of consultation. The issues raised include the impact of the proposal on nearby heritage assets and the Smithfield Conservation Area, the provision of a lift and storage space to support the needs of the North Wing and the use of the buildings as a private healthcare facility.

The application was first considered under delegated powers in June 2016 and the proposals were considered acceptable subject to a Section 106 agreement.

Before the section 106 was signed and before any decision was issued further representations were submitted and concerns were raised about the provision of lift and catering facilities for the North Wing. The scheme has been amended to address the concerns raised and these amendments have been consulted upon.. The revised scheme provides a dedicated lift and entrance and storage facilities solely for the use for the North Wing.

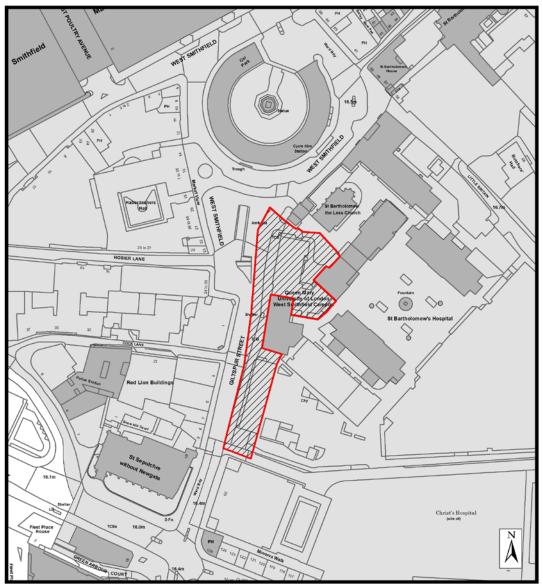
The proposals would result in less than substantial harm to the settings of the gateway and Bartholomew-the-Less and the Smithfield Conservation Area. Elements of the proposed development, namely the removal of a significant amount of redundant plant on the PBE, the reduction in height and retreatment of the elevation of the PBE facing Giltspur Street, the reinstatement of the bottle balustrade on the OPB and the restoration of the historic north entrance to the RSQ, are all enhancements which weigh in favour of the proposed development. These benefits together with the bringing two vacant buildings back into healthcare use weigh in favour of the proposed development.

It is considered that the development complies with the NPPF and the Development Plan as a whole and is appropriate subject to conditions, and a Section 106/Section 278 Agreement being entered into and complied with.

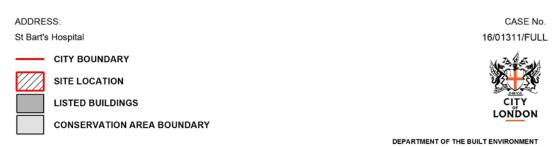
#### Recommendation

- (1) That planning permission be granted for the above proposal in accordance with the details set out in the attached schedule subject to:
- (a) planning obligations and other agreements being entered into under Section 106 of the Town & Country Planning Act 1990 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed;
- (b) That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 and any necessary agreements under Section 278 of the Highway Act 1980.

# **Site Location Plan**



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#### **Main Report**

#### <u>Site</u>

- 1. The two buildings subject of this application are the Old Pathology Block (OPB) and connected Pathology Block Extension (PBE), and the former Residential Staff Quarter building (RSQ). The site is located within the St Bartholomew's Hospital campus within the Smithfield Conservation Area.
- 2. There are a number of designated heritage assets in the immediate vicinity of the site. Located between the OPB and RSQ is the grade II listed Pathology Museum. To the north of the OPB, is the Gatehouse (grade I) and associated perimeter screen wall (grade II\*). To the east, is the Church of St Bartholomew-the-Less (grade II\*), the Hospital chapel (grade II\*) and further east is the north east block of the Hospital and attached buildings (grade II). To the south are the East, West and North Blocks (Gibbs Building) comprising the central square of the Hospital complex (grade I), with associated historic lanterns and central fountain (grade II). Directly outside the OPB, on the eastern side of Giltspur Street, is a grade II listed K2 telephone box. It is considered that the proposal would have an impact on the setting of these designated heritage assets. Both the OPB and the RSQ are considered to be non-designated heritage assets.

# Relevant Planning History

- On 20th December 2012 planning permission was granted (ref. 11/00999/FULL) for works to the Pathology Building and link extension in order to provide a Private Patient Unit. The works included the formation of a new entrance on Giltspur Street and the erection of a mansard roof extension on the OPB.
- 4. On 29th April 2014 planning permission (ref. 13/01227/FULL) and listed building consent (13/01228/LBC) were granted for the demolition of the 1960s link extension. External and internal alterations were proposed to the North Block in order to upgrade the existing facilities.
- 5. On 9th June 2015 planning permission (ref: 14/00952/FULL) was granted for refurbishment of the Pathology Building to provide a Private Patient Unit (PPU) and ancillary NHS offices and North Block Facilities, to include: (i) new access from Giltspur Street; (ii) removal of redundant roof plant and erection of a mansard roof extension; and (iii) new rear entrance with associated accessibility provision.
- 6. These three planning permissions were not implemented.
- 7. The Old Pathology Block has been assessed for listing by Historic England. While of clear local interest and making a positive contribution to the conservation area in which it is located, the former Pathology Block was not considered to be of sufficient architectural interest to merit listing. A decision was issued on 31 May 2017.

#### **Proposals**

- 8. The NHS propose to refurbish the OPB, PBE and RSQ buildings in order to provide for a private patients unit, and storage and catering facilities for use in association with the North Block (the uses fall within the existing Class C2 use of the premises). Planning permission is sought for the following works:
  - (i) demolition and rebuild of the rear façade of the OPB with a five storey extension (3.5m deep);
  - (ii) removal of redundant roof plant and erection of a roof extension on the Old Pathology Block;
  - (iii) replacement of the existing infill facade between the Old Pathology Block and Pathology Museum;
  - (iv) replacement of existing plant room on the Pathology Block Extension;
  - (v) creation of a new entrance with associated accessibility provision on the north elevation of the Residential Staff Quarters building:
  - (vi) replacement of the existing windows on the Pathology Block Extension and Residential Staff Quarters building;
  - (vii) landscaping to outer courtyard of Old Pathology building and creation of additional cycle parking and a service yard
  - (viii) Other minor alterations include the extension, in width but not height, of an existing lift overrun on the RSQ building to accommodate a trolley lift at roof level and an existing door and window will be swapped around on the rear elevation.
- 9. The application was first considered under delegated powers in June 2016 and the proposals were considered acceptable subject to a Section 106 agreement.
- 10. Before the section 106 was signed and before any decision was issued other concerns were raised by the Friends of the Great Hall. After discussions between the applicant, the Friends of the Great Hall and the City of London Corporation, the scheme has been amended. The revised scheme provides a dedicated lift and entrance and storage facilities solely for the use for the North Wing to address these concerns. These amendments have been consulted upon.

#### **Consultations**

11. The views of other City of London departments have been taken into account in the preparation of this redevelopment scheme and some detailed matters remain to be dealt with under conditions and the Section 106 agreement.

- 12. Following receipt of the planning application by the City, the application has been advertised in the press and site notices were put up around the site, and statutory and non-statutory bodies were consulted.
- 13. Statutory and non-statutory bodies have been consulted three times since the receipt of the application. After the first round of consultation, the scheme has been amended twice and each time the amendments have been re-consulted upon.
- 14. The first amendment comprised reducing the volume of accommodation on the PBE and re-designing the roof extension on the OPB to reduce the perceived bulk and scale.
- 15. The second amendment comprised internal alterations within the PBE to provide a dedicated lift from basement to first floor, a dedicated entrance to access the lift from St Bartholomew's Square and retaining 81-82sqm of storage space within the basement all solely for the use for the North Wing.
- 16. Below are a summary of the consultation responses received during each round of consultation. Copies of the representations are provided in the background papers.

#### First Round of Consultation – January 2017

- 17. A letter of objection was received from Historic England. Historic England had no objections to the principle of the proposals: the rebuilding of the rear façade and the increase in the width of the building would cause some harm to the settings of nearby listed buildings, but this harm was considered to be relatively minor and could be outweighed by public benefits. However Historic England raised concern regarding the proposed plant enclosure on the Old Pathology Block, that they were not convinced that this harm was necessary and a roof extension on the Old Pathology Block could be successful if carried out in a scholarly manner and should appear as a seamless whole. A plant enclosure could be designed in a different way to complement the building below.
- 18. An objection was received from the Georgian Group raising concerns about the potential impact of the proposals on the setting of the Grade I listed North Block and Hospital Square. The Group was concerned that the character of the square and the wider Conservation Area would be harmed by the visual intrusion of the proposed roof extension.
- 19. An objection has been received which raises concerns about the use of the Old Pathology Block which has always been used as a mortuary and as teaching space, there has never been a clinical facility in the Old Pathology Block and that it is unsuitable for clinical use as a private patients' unit. The objector states that the Bart's Hospital site has always been dedicated to caring for those without means and it is unconscionable to introduce private clinical facilities for paying patients. The objector also considers that to demolish the south elevation and rebuild it 3m closer to the façade of the Grade I listed North Block causes substantial harm to the significance of the heritage asset. The present application makes use of the Pathology Extension and it compromises the integrity of the North Block. The Pathology Extension

- was earmarked for removal in 'the Hopkins scheme' (pp ref 13/01227/FULL) and this proposal reverses that vision. The objector raises concerns about the lack of viable catering facilities for the North Block in the Pathology Extension. The proposal provides basement storage space and a shared lift to be used for catering facilities and patients. A shared lift cannot meet health and safety regulations. A dedicated catering lift is essential. The storage space in the basement is inadequate for food preparation, refrigeration, washing up, dry goods storage, table and chair storage and catering staff lavatories and changing. The objector raises concerns that the proposal would impact on the Bart's Archives and Museum.
- 20. The Victorian Society raised objections to the large roof extension and that it would impact on the setting of the adjacent Grade II listed library and museum building, the Grade I listed Gibbs Building and the wider Conservation Area. Allowing a monolithic, hipped roof extension would be inappropriate and harmful to the significance of numerous designated heritage assets. The Victorian Society consider that the use of glass between the Old Pathology block and the Museum Block would be an improvement and suggest setting back any link block by as much as it is reasonably possible.
- The Chairman of the Friends of The Great Hall and Archive of St 21. Bartholomew's Hospital (the Friends) submitted a comment stating that the Nuffield Health's scheme would provide catering space which fulfils the basic needs to enhance the North Wing's catering requirements and that they could support the Nuffield Health proposals. Concerns were raised about the practicality of a shared lift to transfer food from the basement to the first floor but they acknowledged that it was not possible at this stage in the development to define the catering requirement. Concerns were also raised that the rear extension of the Old Pathology Block by 3m may dominate the north façade of the James Gibbs building. In conclusion, Nuffield Health's scheme with the catering space allocation does fulfil the basic needs to enhance the North Wing's catering requirements. There are alternative opinions of details as to how this will be delivered in the future. The Friend's Committee are now able to support the Nuffield Health proposals.
- 22. The CEO of the Bart's Health NHS Trust has written in support of the application. The CEO noted that the Pathology Block has been unoccupied and this proposal represents an opportunity for the Trust to repair this building and bring the buildings in long term viable healthcare use at no cost to the NHS. Nuffield Health had been appointed as preferred bidder for a Private Patients Unit Strategic Partner. At the end of the Nuffield Health use, the buildings would revert to the Trust in a state of full repair for NHS occupation, or could continue to operate in a private capacity on a new lease to generate a guaranteed income to the support NHS services.
- 23. LAMAS has commented that the proposal was accepted as a marginal improvement.
- 24. The Conservation Area Advisory Committee has raised no objections.

25. Living Streets has commented on the application recommending a delivery and servicing plan to control air pollution and reduce emissions and the implementation of a travel plan.

# Second Round of Consultation – May 2017

- 26. Historic England and the Georgian Group withdrew their objections following the re-design of the roof on the Old Pathology Block.
- 27. Save Britain's Heritage submitted a letter objecting to the impact on the adjacent listed buildings, including the Grade I North Wing and Grade II\* Church of St Bartholomew the Less. Whilst acknowledging that the existing facade of the Old Pathology Building will be rebuilt an improvement on earlier design iterations they consider the positioning 3m further out would have a harmful impact and would be detrimental to the setting of the Grade I listed heritage asset. Save Britain's Heritage express concerns that the application may jeopardise the Great Hall's future use due to limited lift provision and the amount of catering and storage and this has implications for the viability of the Great Hall, and consequently for the maintenance of the listed building. Save Britain's Heritage also express concerns relating to the impact on the historic archives of St Bart's that if adequate lift space is not provided then the basement of the North Wing may have to be used as an alternative, forcing the relocation of the Archives away from their historic site.
- 28. A letter of objection has been received which raises concerns that the construction of the Private Patients Unit would adversely affect the existing buildings and interfere with the relocation of the Arts and the London Archives Centre and hamper the facilities required by that academic and historical resource centre. The objector is in agreement with the other more detailed objections provided.
- 29. A second letter has been received from the objector to re-iterate their objection to for a private hospital on the site. There is no improvement in the amended drawings to mitigate the harm to the Smithfield Conservation Area and particularly to the North Wing. The objector states that it is not adequate to provide a shared lift to transport food with hospital patients for the Great Hall. It is disallowed by the Health and Hygiene Legislation. Enough storage space at basement level is not set aside for the range of catering facilities needed. The objector supports the objections written by SAVE and The Georgian Group. The areas of harm generated by this application for a private hospital are as follows:
  - Change of use of the Pathology Block to clinical operations is unsuitable and it should be retained for teaching and as a mortuary. There has never been a private hospital on the Barts site.
  - The re-building of the rear wall 3m further out will have a harmful impact on the façade of the Grade I listed North Wing.
  - The proposals cause substantial harm to the Smithfield Conservation Area and its numerous listed buildings.
  - The visual intrusion of the roof extension upset as the aesthetic harmony of this grouping of buildings

• Without proper catering facilities, the sustainable future of the Great Hall and the North Wing is not viable.

If this application is not refused then the basement of the North Wing may have to be used as a catering alternative, forcing the relocation of the Archives away from their historic site.

- 30. The CEO of the Bart's Health NHS Trust has submitted a second letter reinforcing his support for the proposal and has reviewed third party representations providing the following comments:
  - The modern hospital has no need for a pathology use in the Old Pathology Building. Previous attempts to provide a healthcare use in the building have not proven possible to implement as they required additional development on the Pathology Block Extension and would have impacted views from the Square and harmed the setting of the North Block.
  - The proposal to extend the rear façade allows for the removal of the majority of the 5th floor of the Pathology Block Extension and improves the setting of the North Block and the Square.
  - The proposal provides storage space for the North Block to support its functions and provides a lift from basement level.
  - The proposal will have no adverse impact on the Archives store.
  - The proposed development is likely to be the optimum solution to bring these buildings back into long-term healthcare use.

#### Third Round of Consultation – May 2018

- 31. Following amendments to the scheme to provide a dedicated lift, an entrance solely for the use of the North Wing, as well as storage space at basement level of the PBE, two draft letters of support were received from Bart's Heritage and The Friends of the Great Hall and Archive of St Bartholomew's Hospital stating that subject to a S106 obligation providing commitment that the proposal would provide basement storage space of circa 81sqm 82sqm, which includes the lift shaft and an internal lift from basement to first floor which includes an independent external access to the lift, the proposal now meets the concerns that they had in relation to the development.
- 32. A third letter has been received from the objector following the third round of consultation. He acknowledges that the proposal now provides a dedicated catering lift, however the scheme still falls short of what is needed for the proper functioning and viable future of the Great Hall and St Barts Archives. The size of the storage area within the basement would be inadequate to accommodate a fully serviced kitchen. No services are indicated on the drawings. Other concerns raised include:
  - The Lower Ground floor should have a link to the Archives.
  - The Ground Floor plan shows the catering lift discharges directly to open air, and for health and hygiene reasons this lift should have a large lobby. There should be an opening into the North Wing to provide access for catering staff.

- The first floor lift lobby is narrow and tight and it would be difficult to manoeuvre catering trolleys and other equipment.
- The second floor plan indicates the lift overrun. However, a lift and stair are needed at this level of the North Wing to serve the Gibbs room for wheelchair access and escape. The lift overrun should be at third floor level.
- The objector reiterates his concerns about rebuilding the rear façade 3m closer to the North Wing and the use of the building as a private hospital.
- The objector raises concerns that the private hospital will thwart the City of London's initiative on the Cultural Mile. The Pathology Block has the potential to make Smithfield and Barts a heritage centre of outstanding significance.

Annotated drawings have been submitted with the objection in an attempt to point a way to overcoming some of these deficiencies.

33. An objection has been received by the Chair of Barts Health Archives Committee raising concerns that the building is too small to be a private hospital and not fit for purpose for clinical use without the demolition of the entire rear façade of the building. He states that the Pathology building has been used for Pathology Laboratories and Mortuary and the to use the building for clinical and patient activity is inappropriate in this setting. The objector stated that the Pathology Block has the potential for public and social benefit. It is sandwiched between the Pathology Museum and Medical School Library on one side and the North Wing and its archives on the other. Combined with City of London's initiative of the Cultural Mile and the relocation of the Museum of London to Smithfield, the objector considers that there is an opportunity to make this corner of Barts and Smithfield a heritage and cultural site of outstanding significance.

## **Policy Context**

- 34. 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.
- 35. There is relevant City of London including the Temples Conservation Area Character Summary and GLA supplementary planning guidance in respect of Planning Obligations and Sustainable Design Construction. Government Guidance is contained in the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG).

#### **Considerations**

- 36. 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).

- 37. For development within or adjoining a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area and its setting (S72 (1) Planning (Listed Buildings and Conservation Areas) Act 1990)
- 38. 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 the desirability of preserving the setting of listed buildings;
- 39. 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.
- 40. 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.
- 41. 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 impact of the proposal on designated and non-designated heritage assets;
  - Provision of additional private healthcare facilities

#### **Heritage and Design Considerations**

# Significance of Old Pathology Block and Residential Staff Quarters Building

- 42. There are three distinct buildings which comprise the application site, the Old Pathology Block (OPB), the attached Pathology Block Extension (PBE) and the separate former residential staff quarters (RSQ).
- 43. The OPB, by E. B. L'Anson, then architect to the Barts Medical Board, was built 1907-09. The OPB is a well-composed Italianate palazzo-style block of ashlar Portland stone: it is symmetrical in composition, of five bays to Giltspur Street with flanking and central bays emphasised by segmental pediments and crowned by a frieze and modillion cornice. The

- building is appreciated in 3-dimension, with prominent and formal side and rear elevations visible from within the Hospital complex and from West Smithfield. It historically accommodated the Pathological Department, a developing specialism in the early 20<sup>th</sup> Century.
- 44. It's architecture, style, detail and material, complement the strong architectural tradition of the ancient Hospital complex, with group value when appreciated alongside the Gibb's square, the Pathology Museum and RSQ, while its association with medical advancement at this significant hospital complex make the building of sufficient architectural and historic interest to be considered a 'non-designed heritage asset'. It also makes a strong contribution to the character, appearance and significance of the Smithfield Conservation Area.
- 45. The PBE was completed 1970-72 and is a large extension, also faced in Portland stone, which enclosed the gap between the OPB and the Pathology Museum on Giltspur Street. It also extends, facing the Square, to the south, where it reads as a western wing to the North Block. The height, mass, bulk and proportions of the PBE are considered to detract from the OPB and the settings of the Pathology Museum, East, West and North Blocks and the Smithfield Conservation Area.
- 46. The RSQ, by E B L'Anson, finished 1909, is the near contemporary of the OPB, and is a significant part of the transformation of the Hospital complex in the early 20<sup>th</sup> Century, comprising the southern book-end of the group of classical blocks running north-south along Giltspur Street and culminating in the tower of the Old Bailey a fine townscape view. Architecturally, it is in a freer-Italianate manner with heavier 'Gibbsian' treatment, a solid garret roof and two projecting pedimented flanking ranges. Given its architecture, style, detail, material and wider group value when viewed as part of the ancient Hospital complex, it is considered of sufficient architectural and historic interest to be considered a 'non-designed heritage asset'.

#### Impact on the Old Pathology Building and Pathology Block Extension

47. The proposed re-building of the rear and part of the side elevation in new matching Portland Stone, rather than the retention and re-building of the historic fabric, is considered satisfactory in the context of the wider planning balance. The applicant's specialist contractor and conservation architect have undertaken a feasibility assessment for re-using the historic fabric. Expert advice and opening up works revealed the historic masonry is bedded in a hard-cementitious mortar, while some of the stonework was found to be in a poor state of repair - which could accentuate the deterioration of the current stonework during the removal process. It was considered that this could result in a significant amount of new stone being required to repair a rebuilt façade which could result in a fragmented appearance which would detract from the uniform appearance of the architectural whole. On balance, given that the building is not listed, and that the integrity of the external character and appearance of the building usurps the protection of historic fabric, then

- an approach utilising new stonework is considered satisfactory, in this instance.
- 48. To ensure the accuracy of the re-built façade, a condition is recommended requiring a full measured survey of the elevations for reproduction. A Method Statement detailing how the loss of authentic fabric will be mitigated and how retained fabric will be preserved during the construction process would be reserved for condition. It is necessary to include a panel for the removal of an MRI scanner in the future. Such a panel can be detailed sensitively, and the details are reserved for condition.
- 49. The roof extension on the OPB would significantly alter the proportions of the building, which would detract from the well-composed and proportioned block however it has been demonstrated that a roof extension is necessary to accommodate the mechanical and engineering services required to run 21st Century clinical hospital care.
- 50. To compensate and mitigate this harm, it is proposed to re-instate the lost bottle balustrade which once crowned the OPB, which would enhance its significance and contribution to the wider setting. The 'faux' roof (in essence, a plant enclosure) would be formed like a traditional true mansard roof, with three dormer windows in the principle elevation to break up the overall bulk and to reinforce the overall architectural composition, in a manner which is subservient.
- 51. The significant rear extension of the OPB would upset the well-considered proportions of the palazzo block, stretching the side elevation past the existing quoins detail. To ensure compliance with the Building Regulations, it is necessary to enclose the existing external metal escape stair attached to the existing rear projection to provide a secondary means of escape over all floors. This would result in a considerably larger rear projection, which would abut the principal crowning cornice, creating an uncomfortable relationship with the principal block, and challenging its pre-eminence. However, subject to achieving a sensitive and scholarly treatment of the detailing, it is considered that this harm could be mitigated to deliver a more organic extension to the building. The replacement of an existing ground floor door and stair with a window to match would not harm the architectural or historic interest of the OPB.
- 52. It is proposed to reduce the height of the PBE elevation facing Giltspur Street by approximately 1.7m and to undertake a scholarly restoration of the cornices and return elevations of the OPB and Pathology Museum. It is also proposed to re-face this elevation in contemporary architectural glazing, which would replace the current Portland stone. Subject to detail, which is reserved for condition, it is considered that the reduction in height to below the principal crowning cornices, the restoration of important architectural detailing and the architectural glazing would enhance an appreciation of the architectural expression of the OPB and Pathology Museum, reducing their bleeding into one another. This is considered a significant enhancement to the OBP.

- 53. Much discussion has been had to reduce and consolidate the plant/servicing requirement in the basement and on the roof of the OPB. However, whilst a significant amount of plant space would be removed from the 5th floor of the PBE, a smaller amount of space would need to be retained, in the south western part of that roof. This would be setback 3m from the Giltspur Street elevation and would be flush with the rear elevation of the OPB, reducing the impact of the existing high-level bulk when viewed from the street. The detailed materiality of this aspect would be the subject of a condition.
- 54. Overall, it is considered that the rear and roof extensions would challenge the well-considered proportions of the host building. However, it is considered a scholarly detailed restoration, in addition to the reinstatement of the historic bottle balustrade, reduction in height and restoration of the return cornice, glazing of the PBE elevation to Giltspur Street and reduction in high level bulk on the PBE, are enhancements which would sufficiently mitigate that harm.

# Impact on the Setting of the North Block

- 55. The North Block forms the centrepiece of a unique and elegant early Georgian formal square in the Palladian vogue, by renowned architect James Gibbs, built between circa 1720-1750, containing the Great Hall and ceremonial stair painted by William Hogarth. It is of high architectural and historic significance, as a result of its architecture, art and historical associations. An appreciation of the North Block in association with the East and West Blocks, as part of a formal symmetrical townscape composition, makes a large contribution to its significance.
- 56. The rear extension of the OPB toward the North Block would partially obscure the North Block on approach from West Smithfield, whilst the additional height would make it a more imposing building in contrast to the scale of the North Block. It is considered that the rear extension of the OPB would cause some harm to the setting of the North Block.
- 57. The proposal to significantly reduce the amount of high level plant enclosure on the PBE would remove the presence of high level bulk which currently detracts from the North Block in prominent views from the square, which weighs in favour of the proposal as a significant enhancement.

#### Impact on the Setting of the Gatehouse and Perimeter Screen

58. The gatehouse, of 1702, is a high quality piece of English Baroque in the Wren tradition, with a temple front composed of giant order lonic pilasters supporting a pediment and centred on an aedicule containing the only public statue of King Henry VIII in London. The screen is later although 18<sup>th</sup> Century in a complementary style, rusticated with Doric colonnade. Both are of high significance as a result of their architecture and historic association with the Hospital complex. When viewed as a group, in association with the complementary architecture of the Hospital, their significance is accentuated.

- 59. The increase in height, bulk and mass of the OPB will alter the current harmonious relationship it enjoys with the gatehouse. It will reduce the sky gap between the OPB and the gatehouse, whilst the height will more apparently breach its main ridge, when appreciated in wider view from West Smithfield. However, with the reinstatement of the balustrade the massing of the roof would appear more recessive and less apparent, mitigating that impact. It is considered that the setting of the gatehouse would remain open and it is sufficiently robust to accommodate the additional height and bulk proposed. The screen wall would still be appreciated in the context of the coherent hospital complex ensemble, and the proposal would not harm an appreciation or understanding of it.
- 60. It is considered that the proposal would result in some less than substantial harm to the setting of the gatehouse and would have a neutral impact on the setting of the associated screen wall.

# Impact on the Setting of St Bartholomew-the-Less

- 61. St Bartholomew-the-Less is the Hospital chapel, comprising a squat medieval 15<sup>th</sup> Century tower of rag stone rubble in the authentic Perpendicular manner connected to a distinctive octavinal nave by Thomas Hardwick of 1823-25 in the revival 'Gothik' style. Its special interest/significance derives from its ancient fabric, association with the Medieval Hospital and its distinctive architectural history.
- 62. The openness of its setting, in particular its landmark status appreciated in silhouette when viewed above the screen wall from West Smithfield, contributes to an appreciation of its significance and that of the Hospital complex as a whole.
- 63. At present, the tower and ogee cupola of the Church rise above the ridges of the buildings comprising the Hospital complex. The additional height and bulk of the OPB would challenge this pre-eminence, albeit not significantly.
- 64. It is considered that the proposal would cause some less than substantial harm to the Church of St Bartholomew-the-Less, by reason of the additional height and bulk.

## Impact on Setting of the Pathology Museum

- 65. The Pathology Museum dates from 1878 by E L'Anson and is Portland stone faced in a scholarly Italianate manner, comprising rusticated basement with Gibbs surrounds, pedimented piano nobile and robust crowning cornice with an unusual hipped roof lantern. Significance derives from its architectural expression and appreciation as part of a group when appreciated alongside the OPB, RSQ and the main body and tower of the Old Bailey in views from West Smithfield/Giltspur Street. The PBE, attached to its northern elevation, detracts from an appreciation of it as a distinct regular block, causing it to bleed into the adjacent OPB, breaching its principal crowning cornice and balustrade height, detracting from its architectural integrity.
- 66. The additional height, bulk and mass, particularly at roof level of the OPB, changes the dynamic of the relationship with the Pathology

- Museum. However, the roof extension would be no higher than the lantern roof which projects above the principal cornice in views from Giltspur Street/West Smithfield. The negotiated bulk, massing and detailed design of the OPB roof extension would better harmonise with the distinctive architecture of its surroundings, mitigating the impact of the increased height/bulk. It would still allow an appreciation of the Pathology Museum as the centrepiece in those important wider views.
- 67. The partial reduction in the height of the PBE, where it addresses Giltspur Street, would reduce the height of its parapet below the level of the crowning cornice of the Museum. At this stage it is not known if the return elevation of the OPB still exists or was demolished at the time the PBE was constructed. Exposing or restoring the return northern elevation in a scholarly manner will be reserved for condition. This would enhance an appreciation of an important architectural feature, of it as a distinct block and increase the subservience of the PBE to the Museum.
- 68. The re-treatment of the elevation facing Giltspur Street, in contemporary architectural glazing, would reduce the bleeding of the Museum into the OPB, reinforcing the separate identities of the historic individual blocks in important views. The applicant has demonstrated that it would be unviable to provide a meaningful set-back in the elevation of facing Giltspur Street, although would investigate through a detailed design process how some additional relief could be achieved via a detailed design, which has been reserved for condition.
- 69. Overall, it is considered that the proposed development would result in a minor enhancement to the special interest/heritage significance of the Pathology Museum, and this has been weighed into the planning balance.

# Impact on the Character and Appearance and Heritage Significance of the Smithfield Conservation Area

- 70. The OPB and RSQ are considered to make a strong contribution to the character, appearance and significance of the Conservation Area.
- 71. It is considered that the negotiated height, bulk and massing of the proposal would, subject to detail, provide an addition to the host building and wider roofscape that responds to its character and appearance. The elements of the scheme, namely the removal of a significant amount of 5th floor level bulk on the PBE, the reduction in height and re-treatment of the elevation of the PBE facing Giltspur Street, the re-instatement of the bottle balustrade on the OPB, all make minor enhancements to the character, appearance and significance of the Conservation Area.
- 72. It is considered that less than substantial harm would be caused to the character, appearance and significance of the Smithfield Conservation Area.

#### Former Residential Staff Quarters

73. The proposed development seeks to restore the northern (side) entrance of the RSQ, which was removed and the elevation altered in the 1970s, to its historic appearance in a scholarly manner, the details of which are

- reserved for condition. This would enhance the architectural and historic significance of the non-designated heritage asset, which is a benefit in favour of the proposed development.
- 74. The swapping of a door for a window at the rear of the RSQ would be acceptable.

#### **Impact on St Paul's Heights**

75. The proposal would not breach the St Paul's Heights grid in accordance with Local Plan Policy CS 13(2) and CS 14(2).

# Impact on the London View Management Framework

76. The proposal would not breach the Landmark Viewing Corridor of View 1 or either the Wider Setting Consultation Area or the Background Setting Areas of Views 2, 3 and 6 of the LVMF.

#### **Provision of Healthcare**

77. Policy CS22 seeks to support the improvement of St Bartholomew's Hospital and encourages the provision of private health facilities in the City. The OPB and the RSQ are currently vacant buildings in a poor state of repair. The refurbishment of the OPB and the RSQ would provide new private healthcare facilities and return two vacant buildings bringing them back into long-term healthcare use. The refurbished buildings would provide acute hospital facilities, diagnostic treatment and health assessment services. These services would support NHS treatment, providing a healthcare provision to patients and would assist in retaining medical staff at St Bartholomew's Hospital. The proposal development would provide capacity for 170 patients and 200 staff. This increase in the provision of healthcare services would be welcome.

#### Safeguarding the Long Term of the North Block

- 78. Objections were received raising concerns that the proposal may jeopardise the Great Hall's future use to the detriment of the future viability of the North Block. A dedicated storage room would be provided in the basement of the Pathology Block Extension measuring (81.2sqm) and this room could be used for catering support and storage.
- 79. The applicant has submitted an amendment to the planning application to provide improved facilities for the North Wing. The proposed amendments comprise;
  - Internal amendments to provide a dedicated lift for use for the North Wing which provides access from basement to first floor of the North Wing.
  - External amendment to provide a dedicated entrance from St Bartholomew Square for the North Wing to access the dedicated lift
  - External amendment to rebuild the rear façade of the Old Pathology Block in new stone, to match existing rather than a combination of new and retained stone.

- 80. The Friends of the Great Hall and Archive of St Bartholomew's Hospital and St Bartholomew's Heritage have submitted letters of support acknowledging that the amended proposal fulfils the agreed spatial area required for storage and that a dedicated internal lift from basement to first floor which includes an independent external access to the lift satisfies their requirements, subject to a S106 obligation which states that the Private Patients Unit shall not be occupied until the dedicated lift has been constructed and made available for use.
- 81. With the provision of a dedicated lift and entrance and storage space within the Pathology Building, it is considered that the proposal would secure and protect the long-term viability and the future use of the North Wing.

#### **Access**

82. The main visitors' entrance to the Pathology Buildings would be on Giltspur Street. A staff entrance would be located on the rear elevation at the rear of the PBE. A ramp and steps would be provided to deal with the level difference. The proposed entrance to the RSQ building would be located on the north elevation and a separate staff entrance would be located at the rear of the building. All the new entrances would provide level access into the OPB, PBE and the RSQ buildings. New lifts would be provided within the two buildings to allow the movement of patients, visitors and staff to access all occupied areas of the building. Staff would be able to move between the OPB and the RSQ through an existing rear route. The Access Officer has reviewed the access provisions and is satisfied they meet the requirements in line with Local Plan policy DM10.8.

#### **Archaeology**

- 83. The site is in an area of archaeological potential outside the City walls and in a known Roman cemetery area. There is high potential for significant Roman, medieval and post medieval archaeological remains relating to the Roman cemetery, Roman structural and occupational evidence and for structures related to the medieval and post-medieval priory and Hospital of St Bartholomew.
- 84. An Historic Environment Assessment, Heritage Statement, WSI for Archaeological Evaluation and Structural Engineer's Report and Construction Method Statement have been submitted with the application. Geotechnical investigations have been carried out in the northern part of the site and late medieval remains were recorded.
- 85. The scheme would have an archaeological impact where new groundworks are proposed in the Pathology Building. This would include the demolition of the rear elevation and rebuilding with a new extension to the east of the building, comprising an extended basement, new foundations, lift core and underpinning to the west and north elevations. A crane base with piled foundations is proposed.
- 86. There are no below ground works proposed in the Residential Staff Quarters building.

- 87. Archaeological evaluation is required to provide additional information on the archaeological impact of the proposals. This work would provide additional information on the potential survival of Roman or late medieval burials, medieval and post medieval structures and buildings which would be affected by the scheme.
- 88. Conditions are recommended to cover a programme of archaeological work and foundation design.

#### **Trees**

89. A mature London Plane tree is located directly to the north of the OPB and is partially located within the site boundary. Any tree pruning that is required to enable the works to be carried out has been subject to a separate section 211 notice. A condition is recommended to provide further details on how the tree would be protected during demolition and construction.

## **Environmental Impacts from Construction**

90. The permission would be subject to conditions requiring the noise levels of any new plant to comply with the City's noise standards. The Environmental Health Officer has recommended conditions for further details to be submitted to protect the amenity of nearby residents and occupiers during demolition and construction. A Demolition and Construction Management Plan would be secured via condition.

# Transport and Cycle Parking

- 91. The proposal provides 48 new cycle parking spaces which would meet the London Plan Cycle Parking Standards. The proposed cycle parking spaces would be located within the Courtyard to the rear of the Old Pathology Block (30 spaces) and between the Pathology and Museum Building (18 spaces).
- 92. It is proposed that servicing and deliveries are undertaken from the service yard to the east of the OPB. This service yard is relatively small with restricted vehicle access. During servicing and deliveries it is proposed that personnel will monitor vehicles entering and exiting the yard and while parked to ensure pedestrians and cyclists are not in conflict with the vehicles while servicing and deliveries take place. Hours of servicing would be secured via a condition.

#### **Waste and Refuse**

93. Refuse and clinical waste storage has been provided within the site. The refuse and clinical waste collection would be collected by a commercial waste company. The Amenity and Waste Officer is satisfied the waste storage and collection facilities comply with their requirements.

#### **Energy and Sustainability**

94. Policy CS15 requires demonstration that the highest feasible and viable sustainability standards have been designed into the building. The energy statement provides confirmation that this development would

provide significant carbon emission improvements compared with the existing buildings and will exceed the 2013 Building Regulations requirements by 17% for the Old Pathology Building and 24% for the RSQ Building. Further improvement is constrained by the historic status of the buildings and the need to retain existing structures. The reuse of existing buildings is welcomed in line with Local Plan Policy CS15.3 which encourages conservation of materials. The Environmental Impact section of the Design and Access Statement addresses how energy and carbon reduction would be achieved. The buildings would be connected to the existing St Bart's Hospital CHP.

#### **Completion of the Development**

95. If the works to refurbish the buildings were not to be carried out in their entirety then there could be a detrimental impact on the character and appearance of the conservation area. A condition is recommended that the buildings shall not be occupied until the development of the whole building has been completed in their entirety.

# Planning Obligations and Community Infrastructure Levy

- 96. 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.
- 97. 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.
  - local procurement
  - local training skills and job brokerage
  - delivery servicing plan
  - travel plan
- 98. A Section 106 obligation is recommended that the development shall not be occupied prior to the dedicated catering lift being constructed and made available for the sole use of the North Wing.
- 99. The Mayoral and City Community Infrastructure Levy charge would be Nil as the development is proposed to be used wholly for the provision of medical or health services.

#### **Conclusions**

100. Overall, it is considered that the architectural and historic significance of the OPB, as a non-designated heritage asset, would be harmed by the proposed development. It is considered that the proposal would cause less than substantial harm to the settings of the gateway and Bartholomew-the-Less. However, elements of the proposed development, namely the removal of a significant amount of redundant

- plant on the PBE, the reduction in height and re-treatment of the elevation of the PBE facing Giltspur Street, the reinstatement of the bottle balustrade on the OPB and the restoration of the historic north entrance to the RSQ, are all enhancements which weigh in favour of the proposed development.
- 101. The proposed works would contribute towards securing the long-term future of the North Block, would provide a private healthcare facility and would support the continued presence and improvement of St Bartholomew's Hospital in accordance with policy CS22 of the Local Plan.

#### **Background Papers**

#### Internal

Department of Markets and Consumer Protection dated 18 January 2017

Department of Open Spaces 12 January 2017

#### External

Daylight and Sunlight Report dated 16 November 2016

Planning Statement dated December 2016

Townscape and Visual Impact Appraisal dated November 2016

Energy Statement dated November 2016

Waste Management Strategy dated November 2016

Noise Survey dated 19 July 2016

Roof Plant Considerations dated November 2016

Design and Access Statement – Issue for Planning\_Rev A\_ 30.11.16

Design and Access Statement - Issue for Plannig\_RevC\_19.04.17

Delivery and Servicing Plan Rev B Project 15-296 dated April 2017

Draft Construction Management Plan Rev A Project 15-296 dated April 2017

Ecological Impact Assessment April 2017

Engineering Services Plant Options Appraisal dated April 2017

Historic Environment Assessment Version 7 dated 21 April 2017

Planning Statement dated April 2017

Scheme Amendments Report dated April 2017

Transport Assessment Rev E 15-296 dated April 2017

Travel Plan Rev D 15-296 dated April 2017

Townscape and Visual Impact Appraisal Addendum dated April 2017

Verified Views - Document Reference No. V3D 161003A

Letter, Museum of London Archaeology, dated 6 April 2017

Historic Environment Assessment (Version 7), Museum of London Archaeology, 21st April 2017

Heritage Statement v.4 Museum of London Archaeology 21/04/17

Structural Engineers Report and Construction Method Statement dated October 2016

Structural Engineer's Report and Construction Method Statement, Sinclair Johnston & Partners, March 2017

Written Scheme of Investigation for a Trial Trench Evaluation, Museum of London Archaeology, dated 6 April 2017

Letter Historic England 16 January 2017

Letter Historic England 10 May 2017

Letter Victorian Society 03 March 2017

Email David McKinstry (The Georgian Group) 09 March 2017

Email Peter Schmitt 09 March 2017 and 25 May 2017 and 17 May 2018

Letter Friends of the Great Hall and Archive of St Bartholomew's Hospital

Letter Barts Health NHS Trust 3 February 2017

Letter Barts Health NHS Trust 4 May 2017

Online Richard Lambert, Living Street 26 January 2017

Email LAMAS 08 February 2017

Letter Save Britain's Heritage 17 May 2017

Email Mike Swash 24 May 2017

Email Zachary Osborne (The Georgian Group) 01 June 2017

Letter Conservation Area Advisory Committee 7 February 2017

Draft Letter Friends of the Great Hall and Archive of St Bartholomew's Hospital [Not Dated]

Draft Letter St Bartholomew's Heritage [Not Dated]

Delegated Report dated 6 June 2017

Email Gerald Libby dated 18 May 2018

#### Appendix A

#### London Plan Policies

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

- Policy 3.2 New developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities.
- Policy 3.16 Protection and enhancement of social infrastructure additional and enhanced social infrastructure provision to meet the needs of a growing and diverse population.
- Policy 3.17 Health and social care facilities Provision of high quality health and social care appropriate for a growing and changing population, particularly in areas of under provision or where there are particular needs.
- 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 6.3 Development proposals should ensure that impacts on transport capacity and the transport network are fully assessed.
- 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 7.4 Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.
- Policy 7.6 Buildings and structures should:
- a be of the highest architectural quality
- b be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm
- c comprise details and materials that complement, not necessarily replicate, the local architectural character

- d not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings
- e incorporate best practice in resource management and climate change mitigation and adaptation
- f provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces
- g be adaptable to different activities and land uses, particularly at ground level
- h meet the principles of inclusive design
- i optimise the potential of sites.
- Policy 7.8 Development should identify, value, conserve, restore, re-use and incorporate heritage assets, conserve the significance of heritage assets and their settings and make provision for the protection of archaeological resources, landscapes and significant memorials.
- Policy 7.12 New development should not harm and where possible should make a positive contribution to the characteristics and composition of the strategic views and their landmark elements identified in the London View Management Framework. It should also, where possible, preserve viewers' ability to recognise and to appreciate Strategically Important Landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated Viewing Places.

## Relevant Local Plan Policies

## CS12 Conserve or enhance heritage assets

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

#### 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.

#### CS22 Maximise community facilities

To maximise opportunities for the City's residential and working communities to access suitable health, social and educational facilities and opportunities, while fostering cohesive communities and healthy lifestyles.

#### DM10.1 New development

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

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

## DM12.1 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.

#### DM12.4 Archaeology

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

#### CS15 Creation of sustainable development

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

#### 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.

#### DM15.7 Noise and light pollution

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

#### DM21.3 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.

#### 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.

# CS16 Improving transport and travel

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

#### DM16.2 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.

#### DM15.8 Contaminated land

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

#### DM16.3 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.

# CS17 Minimising and managing waste

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

#### DM17.1 Provision for waste

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

# CS19 Improve open space and biodiversity

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

## DM19.2 Biodiversity and urban greening

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

- a) green roofs and walls, soft landscaping and trees;
- b) features for wildlife, such as nesting boxes and beehives;
- c) a planting mix which encourages biodiversity;
- d) planting which will be resilient to a range of climate conditions;
- e) maintenance of habitats within Sites of Importance for Nature Conservation.

#### SCHEDULE

APPLICATION: 16/01311/FULL

Old Pathology Building & Residential Staff Quarters Building St Bartholomew's Hospital West Smithfield

Refurbishment and extension of the Old Pathology Block and the former Residential Staff Quarters building to provide Private Hospital and North Block facilities, to include: (i) dismantling and rebuild of the rear facade with a five storey extension (3.5m deep); (ii) removal of redundant roof plant and erection of a roof extension on the Old Pathology Block; (iii) replacement of the existing infill facade between the Old Pathology Block and Pathology Museum; (iv) replacement of existing plant room on the Pathology Block Extension; (v) creation of a new entrance with associated accessibility provision on the north and rear elevation of the Residential Staff Quarters building; (vi) replacement of the existing windows on the Pathology Block Extension and Residential Staff Quarters building; (vii) landscaping to outer courtyard of Old Pathology Block and creation of additional cycle parking and a service yard.

#### CONDITIONS

- 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 the bottle balustrade and louvres
  - (b) large scale details of the new stonework for the re-built façades of Pathology Building, including details of to facilitate the MRI removal (c) details of ground floor entrances
  - (c) details of ground floor entrances
  - (d) details of the flank elevations of the Old Pathology Block and the Pathology Museum that are to be exposed;
  - (e) details of windows, glazing and external joinery;
  - (f) details of soffits, hand rails and balustrades;
  - (g) details of the treatment, junctions and expansion joints including between the Old Pathology Block, Pathology Block Extension and the Pathology Museum and the stone archway
  - (h) details of the plant, flues, fire escapes and other excrescences at roof level
  - (i) details of the treatment of the new roof including dormers and plant enclosures

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

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2, DM 10.4 and DM19.2

- Prior to works thereby affected, details of measures to be taken during the period of demolition and construction for the protection of the trees to be approved.
  - REASON: In order to ensure the continued protection of the trees in accordance with the following policies of the Local Plan: DM 10.4 and DM19.2
- A scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during demolition shall be submitted to and approved in writing by the Local Planning Authority prior to any demolition taking place on the site. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

- (a) No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'. The risk assessment must be submitted to and approved in writing by the Local Planning Authority.
  - (b) Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation

- scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.
- (c) Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.
- (d) Within five working days of any site contamination (not previously identified) being found when carrying out the development the contamination must be reported in writing to the Local Planning Authority and an investigation and remedial action conducted and reported in accordance with parts A-C of this condition.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. 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.

- No works except demolition to basement slab level shall take place before details of the foundations and piling configuration, to include a detailed design and method statement, have been submitted to and approved in writing by the Local Planning Authority, such details to show the preservation of surviving archaeological remains which are to remain in situ.
  - REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
- Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall include relevant measures from Section 3 of the Mayor of London's Construction Logistics Plan Guidance for Developers issued in April 2013, and specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Cyclist Safety (CLOCS) Standard for Construction Logistics, Managing Work Related Road Risk. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

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

commencing in order that the impact on the transport network is minimised from the time that demolition starts.

No works except demolition to basement slab level shall take place until the developer has secured the implementation of a programme of archaeological work to be carried out in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.

REASON: In order to allow an opportunity for investigations to be made

REASON: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are understood to exist in accordance with the following policy of the Local Plan: DM12.4.

- 9 Unless otherwise agreed in writing with the Local Planning Authority, archaeological evaluation shall be carried out in accordance with the Written Scheme of Investigation for an Archaeological Evaluation, V.3, dated 21/04/17.
  - REASON: To ensure that an opportunity is provided for the archaeology of the site to be considered and recorded in accordance with the following policy of the Local Plan: DM12.4
- Before the works thereby affected are begun a full measured survey of the north east (rear) and north (side) elevations of the OPB and the stone archway (providing access to the facilities management yard), which includes accurate measurements of all openings and architectural details, shall be undertaken and submitted to the Local Planning Authority alongside a Method Statement detailing how the current facades will be de-constructed, stored, re-erected and where necessary repaired, having consideration for maximising the re-use of existing fabric, and this shall be approved by the Local Planning Authority in writing.

REASON: To preserve and enhance the character and appearance of the Smithfield Conservation Area in accordance with the following policy of the Local Plan: CS12, DM12.1, DM12.2, DM 12.3

11 A scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction shall be submitted to and approved in writing by the Local Planning Authority prior to any construction work taking place on the site. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority.

The development shall not be carried out other than in accordance with the approved scheme.

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.

- 12 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.
- 13 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.
- 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 or used to serve the building.

  REASON: To comply with policy DM15.6 of the Local Plan and policies 7.14B a and c of the London Plan.
- 15 (a) No CHP plant in the thermal input range 50kWth to 20MWth with NOx emissions exceeding that specified in Band B of Appendix 7 to the GLA Sustainable Design and Construction Supplementary Planning

- Guidance published April 2014 (or any updates thereof) shall at any time be installed in or used to serve 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:
- (i)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
- (ii)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.
- No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.
  - REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3.
- (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.
- 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.

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

The testing regime of the standby generator hereby permitted shall not be carried out except between the hours of 10am and 5pm Monday to Friday and 9am and 2pm on Saturday. Other than for testing, the generator hereby permitted shall not be operated except in the event of a loss of power supply to the hospital and then its use shall be ceased at the first available opportunity to the satisfaction of the Local Planning Authority

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

- No cooking shall take place within any part of the building hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.
  - REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.
- Prior to occupation a full schedule of works of repair and cleaning of the external elevations of the Old Pathology Block and Residential Staff Quarters shall be submitted to and approved in writing by the Local Planning Authority, detailing the proposed method(s) of cleaning the external elevations suggested change to trigger.

  REASON: To preserve and enhance the character and appearance of the Smithfield Conservation Area in accordance with the following policy of the Local Plan: CS12, DM12.1, DM12.2
- No part of the proposed development including plant structures to which this permission relates shall infringe or exceed the heights specified on the St. Paul's Heights code.

  REASON: To ensure compliance with St. Paul's Heights restrictions and to ensure protection of the view of St. Paul's Cathedral in accordance with the following policy of the Local Plan: CS14, DM10.1, DM12.1.

- 23 Unless otherwise approved by the LPA there must be no building, roof structures or plant above the top storey, including any building, structures or plant permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.
  - REASON: To ensure protection of the view of St Paul's Cathedral and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS14, DM10.1 DM12.1.
- 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.
- All unbuilt surfaces shall be treated in accordance with a landscaping scheme to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. 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.
- 26 Before any works thereby affected are begun and notwithstanding the details shown on drawings hereby approved, a detailed scheme for the restoration of the ground floor of the northern elevation of the Residential Staff Quarters building, including revised details of the dimensions of the window openings and entrance shall be submitted to and approved in writing by the Local Planning Authority.

  REASON: To preserve and enhance the character and appearance of the Smithfield Conservation Area in accordance with the following policy of the Local Plan: CS12, DM12.1, DM12.2
- The building(s) shall not be occupied until the whole of the development, including the landscaping of the unbuilt areas, has been completed in accordance with the terms of this permission and any approved details pursuant to conditions of the permission.

  REASON: To ensure that the whole development is satisfactorily completed in accordance with the following policies of the Local Plan: DM 12.1 and DM12.2

28 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: BARTS\_STW\_PATH\_XX\_DR\_A\_1000 Rev C, BARTS\_STW\_PATH\_XX\_DR\_A\_1003 Rev C, BARTS STW PATH XX DR A 1009 Rev B, BARTS\_STW\_PATH\_LG\_DR\_A\_1100 Rev E, BARTS STW PATH 0G DR A 1101 Rev F, BARTS\_STW\_PATH\_01\_DR\_A\_1102 Rev F, BARTS\_STW\_PATH\_02\_DR\_A\_1103 Rev F, BARTS STW PATH 03 DR A 1104 Rev D, BARTS\_STW\_PATH\_04\_DR\_A\_1105 Rev D, BARTS\_STW\_PATH\_05\_DR\_A\_1106 Rev G, BARTS\_STW\_PATH\_RF\_DR\_A\_1107 Rev E, BARTS STW PATH XX DR A 2000 Rev G, BARTS\_STW\_PATH\_XX\_DR\_A\_2001 Rev G, BARTS\_STW\_PATH\_XX\_DR\_A\_2002 Rev H, BARTS STW PATH\_XX\_DR\_A\_2003 Rev G, BARTS STW PATH XX DR A 2004 Rev G. BARTS STW PATH XX DR A 2005 Rev F, BARTS\_STW\_PATH\_XX\_DR\_A\_2006 Rev B, BARTS\_STW\_PATH\_XX\_DR\_A\_2007 Rev B, BARTS\_STW\_PATH\_XX\_DR\_A\_2008 Rev B, BARTS\_STW\_PATH\_XX\_DR\_A\_3000 Rev F, BARTS STW PATH XX DR A 3001 Rev G, BARTS\_STW\_PATH\_XX\_DR\_A\_3002 Rev A, BARTS\_STW\_PATH\_XX\_DR\_A\_1008 Rev B, BARTS STW RSQ PLA LG DR A 1100 Rev C, BARTS STW RSQ PLA LG DR A 1101 Rev C. BARTS STW RSQ PLA LG DR A 1102 Rev C, BARTS\_STW\_RSQ\_PLA\_LG\_DR\_A\_1103 Rev C, BARTS\_STW\_RSQ\_PLA\_LG\_DR\_A\_1104 Rev C, BARTS STW RSQ PLA LG DR A 1105 Rev C, BARTS\_STW\_RSQ\_PLA\_LG\_DR\_A\_1106 Rev A, BARTS\_STW\_RSQ\_PLA\_XX\_DR\_A\_2001 Rev C, BARTS\_STW\_RSQ\_PLA\_XX\_DR\_A\_2002 Rev C, BARTS\_STW\_RSQ\_PLA\_XX\_DR\_A\_2003 Rev B, BARTS\_STW\_RSQ\_PLA\_XX\_DR\_A\_3001 Rev C, BARTS\_STW\_RSQ\_PLA\_XX\_DR\_A\_3002 Rev C, BARTS\_STW\_RSQ\_PLA\_XX\_DR\_A\_1006 Rev C, Written Scheme of Investigation for an Archaeological Evaluation V.3, Museum of London Archaeology, 21/04/17, Reconstruction of the Rear Façade Report -Rev C, Stone Façade Proposals Report - Rev 3. 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**

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.

- (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 the Department of Markets and Consumer Protection 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 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) Methods of odour control.
  - (h) The control of noise from plant and equipment;
- Wet cooling towers are recommended rather than dry systems due to the energy efficiency of wet systems.
- 4 (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.

#### Boilers and CHP plant

- (f) The City is an Air Quality Management Area with high levels of nitrogen dioxide. All gas boilers should therefore meet a dry NOx emission rate of <40mg/kWh in accordance with the City of London Air Quality Strategy 2015.
- (g) All gas Combined Heat and Power plant should be low NOX 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 2015.

- (h) 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.
- (i) 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

- (j) 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.
- (k) 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.
- (I) 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.

#### Ventilation of Sewer Gases

(m) 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

- (n) 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.
- (o) 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.

(p) From the 1 July 2007, the Health Act 2006 and associated Regulations prohibited the smoking of tobacco products in all enclosed or partially enclosed premises used as workplaces or to which the public have access. All such premises are required to provide signs prescribed by Regulations. Internal rooms provided for smoking in such premises are no longer permitted. More detailed guidance is available from the Markets and Consumer Protection Department (020 7332 3630) and from the Smoke Free England website: www.smokefreeengland.co.uk.

You are advised to contact the Markets and Consumer Protection Department who will advise in respect of Food Hygiene and Safety, Health and Safety at Work, Environmental Impact and any other matters relevant to that department. Should the Markets and Consumer Protection Department require any external design alterations you should advise the Planning Department which will advise as to whether planning permission will be required for such works.

Ventilation for any kitchens will need to be provided to roof level. Planning permission will be required for any ducts, vents or plant that would materially affect the external appearance of the building. It

- cannot be assumed that ductwork will be permitted on the exterior of the building.
- Any works, including the potential relocation, of the grade II listed K2 telephone box opposite the Old Pathology Block on the eastern side of Giltspur Street, as necessary for the execution of the hereby approved works, would be subject to an application for listed building consent to the Local Planning Authority.

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Ms Bhakti Depala City of London PO Box 270 Guildhall London EC2P 2EJ Direct Dial: 020 7973 3774

Our ref: P00547614

16 January 2017

Dear Ms Depala

Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015 OLD PATHOLOGY BUILDING & RSQ BUILDING ST BARTHOLOMEW'S HOSPITAL WEST, SMITHFIELD LONDON EC1A 7BE Application No 16/01311/FULL

Thank you for your letter of 12 January 2017 notifying Historic England of the above application. We have considered the proposals in detail and can offer the following advice.

#### Summary

The Old Pathology Block, whilst unlisted, forms an important part of a remarkable ensemble of Classical buildings associated with St. Bartholomew's Hospital. Although elements of its original architecture, such as the balustrades at parapet level, have been lost, the building forms an integral part of the group and makes a significant contribution to the settings of the nearby listed hospital buildings and to this part of Smithfield Conservation Area. Any roof extension needs to be considered carefully, and be designed in a way that enhances the building and its wider setting. In our view, the current proposed roof extension is poorly conceived and bears little relation to the Italianate Palazzo-inspired architecture of the building. It would appear incongruous among the group of historic buildings, and we are therefore unable to support the proposals in their current form.

### **Historic England Advice**

Significance

The significance of the Old Pathology Block lies principally in its aesthetic value as a carefully designed Italianate building from 1907 by E.B. I'Anson. It forms part of a great parade of Classical buildings (designed by E.B. I'Anson or, in the case of the grade II listed former Medical School his father E. I'Anson) along this part of Giltspur Street. These buildings were constructed for the hospital between 1878 and 1907, and were designed in a Classical idiom in the spirit of the 18th century hospital buildings by Gibbs (all grade I listed), the gatehouse (grade I listed) and screen wall (grade II\* listed). We acknowledge that the Old Pathology Block is not listed in its own right, but







this may be due to a lack of intact historic interiors. The exterior remains mostly as designed and is of high quality. It makes a positive contribution to the settings of the nearby listed buildings and to this part of Smithfield Conservation Area.

#### Impact of the proposals

In summary, the proposals are for the re-use of the building as a specialist clinic for Nuffield Health. The principal exterior changes include the demolition of the rear facade and rebuilding it to match the existing, but brought circa 3 metres further out (resulting in a wider building), and the provision of a new roof structure to enclose plant. The parapet balustrades, which were removed during the later 20th century, will be restored. The narrow infill building between the Old Pathology Block and former Medical School will be demolished and rebuilt with a predominantly glazed elevation.

#### Policy Context

Both Section 16 and Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and their settings.

Section 72 of the same Act sets out the statutory duty on local planning authorities to pay special regard to preserving or enhancing the character or appearance of conservation areas.

Government guidance on how to carry out those duties is found in the National Planning Policy Framework (NPPF). At the heart of the framework is a presumption in favour of 'sustainable development' where conserving heritage in a manner appropriate to their significance is one of the 12 core principles.

NPPF policy advises that for new development to be sustainable it needs to encompass an economic, social and environmental role, with the latter (paragraph 7) including the protection and enhancement of the built and historic environment. Paragraph 8 notes that these roles are mutually dependent and should not be taken in isolation; and that to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.

Section 12 of the NPPF sets out how the historic environment should be conserved and enhanced and makes it clear at paragraph 132 that when considering the impact of a proposed development on a heritage asset (which includes its setting), 'great weight' should be given to preserving its significance. Harm to significance should be exceptional and any harm or loss should require clear and convincing justification.

Where harm is caused to a heritage asset, the NPPF requires decision makers to determine whether the harm is substantial, or less than substantial. If the harm is deemed to be less than substantial, paragraph 134 of the NPPF requires that harm to be weighed against the public benefits of the proposals.

If the harm is substantial, or results in a total loss of significance, paragraph 133 states that local authorities should refuse consent unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss, or all of four criteria apply:







- The nature of the heritage asset prevents all reasonable uses of the site; and
- No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- The harm or loss is outweighed by the benefit of bringing the site back into use.

#### Historic England position

We have no objection to the principle of the proposals, and welcome the re-use of the Old Pathology Block. We also welcome the re-instatement of the parapet balustrades and the provision of a more transparent glazed link block to replace the existing structure. The rebuilding of the rear facade and the increase in the width of the building will cause some harm to the settings of nearby listed buildings and to the conservation area due to the resulting proportion of the building and the increased encroachment upon the Gibbs block to the rear, but this harm is relatively minor and could be outweighed by public benefits. We urge the City to take steps to ensure that any consented rebuilding of the elevation is carefully controlled in order to ensure a high quality design and finish.

We are concerned about the proposed new roof-like plant enclosure, which is substantially larger than that of the consented scheme. The consented scheme, by virtue of its smaller scale and footprint, strongly defers to the architecture of the building and allows the restored balustrade to take visual precedence at roof level. The proposed new structure, by contrast, is much larger and appears as a roof form that has no architectural relationship with the building below. There is no historical precedent for this type of roof on a Classical, Italianate Palazzo building such as the Pathology Block. The resulting incongruous relationship between roof and building erodes the carefully designed Classicism of the Old Pathology Block, and, by turn, harms the settings of the nearby listed buildings and neither preserves nor enhances the character of this part of Smithfield Conservation Area.

#### Recommendation

We are not convinced that this harm is necessary, as an enclosure could be designed in a different way that would complement the building below. In that regard, Historic England cannot support the current proposals. We believe a roof extension to the Old Pathology Block could be successful if carried out in a scholarly manner so that it appears as a credible element of the building. Roof and building should appear as a seamless whole.

Roof structures behind parapet balustrades are not uncommon to Classical buildings such as the Old Pathology Block, and there many examples to reference.

We would welcome the opportunity of advising further. Please consult us again if any additional information or amendments are submitted. If, notwithstanding our advice, you propose to approve the scheme in its present form, please advise us of the date of







the committee and send us a copy of your report at the earliest opportunity.

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

Yours sincerely



**Michael Dunn** 

Principal Inspector of Historic Buildings and Areas E-mail: michael.dunn@HistoricEngland.org.uk







Ms Bhakti Depala City of London PO Box 270 Guildhall London EC2P 2EJ Direct Dial: 020 7973 3774

Our ref: P00547614

10 May 2017

Dear Ms Depala

Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015 OLD PATHOLOGY BUILDING & RSQ BUILDING ST BARTHOLOMEW'S HOSPITAL WEST, SMITHFIELD LONDON EC1A 7BE Application No 16/01311/FULL

Thank you for your letter of 5 May 2017 notifying Historic England of the application for planning permission relating to the above site. Our specialist staff have considered the information received and we do not wish to offer any comments on this occasion.

#### Recommendation

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

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

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

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







Yours sincerely

#### **Michael Dunn**

Principal Inspector of Historic Buildings and Areas E-mail: michael.dunn@HistoricEngland.org.uk





## THE VICTORIAN SOCIETY

The champion for Victorian and Edwardian architecture

Bhakti Depala Development Management City of London Guildhall London EC2P 2EJ

PLNComments@cityoflondon.gov.uk

Your reference: 16/01311/FULL Our reference: 2017/03/008

03 March 2017

RE: Old Pathology Building (*E.B. l'Anson*, 1907-9) and former residential staff quarters building (*E.B. l'Anson*, St Bartholomew's Hospital; refurbishment and extension to provide a Private Patient Unit and North Block facilities

Thank you for consulting the Victorian Society on this application. Whilst we note that a similar consent already exists, we are concerned that the current proposals, by virtue of their greater scale, would seriously compromise the architectural integrity of the Pathological Block and subsequently negate the strong contribution it makes to Smithfield Conservation Area.

St Bartholomew's Hospital is perhaps, historically, the most important hospital complex in the country, with medical services having been offered on this site since 1123 to the present day – an unmatched 900 years. The Hospital comprises an outstanding group of architecturally important hospital buildings which date from the early-eighteenth century, with major additions throughout the nineteenth and early twentieth centuries. The two buildings that this applications concern fall towards the end of the hospital's architectural heyday, but they are no less integral in their contribution as prominent, street facing blocks of high aesthetic and townscape value. Both were designed by Edward Blakeway l'Anson who had been appointed surveyor to the hospital (and the Charterhouse) following in his father's footsteps - before him had been several generations of the Hardwick dynasty of architects. All were responsible for significant phases of work complimenting the original Grade I listed Gibbs building and E.B. I'Anson oversaw the Hospital's last major expansion. He chose a slightly freer style than his predecessors, which is perhaps less correct, although by the same token, more original, whilst still maintaining a strong Gibbsian language. As two high quality buildings that are a sophisticated and contextual response to the site, we have submitted listing applications for both and strongly believe that the Edwardian phase of the Hospital merits this protection owing to their contribution to the wider group.

Turning to the proposals, the large roof extension is of greatest concern considering the views that this would impact – including the setting of the adjacent Grade II listed library and museum building (Grade II, *E. l'Anson*, 1877-9), the Grade I listed Gibbs buildings and the wider Conservation Area. The consented roof extension is just visible from street level and in wider views – even this is undesirable. Italianate or

Patron
HRH The Duke of Gloucester KG, GCVO
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The Lord Briggs
Chair

Professor Hilary Grainger

Vice Presidents
Sir David Cannadine
The Lord Howarth of Newport CBE
Sir Simon Jenkins
Griff Rhys Jones
Fiona MacCarthy OBE

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Palazzo style buildings were normally designed so that they appear to finish at eaves level, sometimes crowned by a balustrade. Much of the architectural effect derives from there not being any visible attic storeys, only a flat building line, or deep cornice, framed against the sky. Allowing such a monolithic, hipped roof extension would be a particularly harmful and inappropriate addition. This would also diminish the legibility and coherence of the hospital group as a whole – harming the significance of numerous designated heritage assets. Whilst we welcome the reinstatement of the missing roof top balustrade, this should certainly not be taken to outweigh the harm arising.

Finally, any proposals for the modern pathology building should seek to create a less visible link between the Old Pathology Block and Museum Block by being set back further from the street. The use of glass is an improvement here, but the historic buildings are supposed to be read as two separate volumes given that this is how they were designed, so we suggest that setting back any future link block by as much as is reasonably possible would greatly improve the overall composition.

As the proposals stand, we recommend their withdrawal for significant amendments. I would be grateful if you could inform me of your decision in due course.

Yours sincerely,

Alex Bowring

Conservation Adviser

cc.
David McKinstry, The Georgian Group
Michael Dunn, Historic England

#### **Broughton, Helen**

From:

David McKinstry

Sent:

09 March 2017 16:19

To:

**PLN - Comments** 

Cc:

Alex Bowring

Consult

Subject:

16/01311/FULL: Old Pathology Building St Bartholomew's Hospital

#### Dear Bhakti Depala

RE: Old Pathology Building (E.B. l'Anson, 1907-9) and former residential staff quarters building (E.B. l'Anson, St Bartholomew's Hospital; refurbishment and extension to provide a Private Patient Unit and North Block facilities

The above application has been brought to the attention of the Georgian Group by the Victorian Society.

We are concerned by the potential impact of the proposals on the setting of James Gibbs's GI listed north block and the hospital square.

St Bartholomew's Hospital is the oldest of London's hospitals to occupy its original, if enlarged, site. On entering Strong's North Gate from West Smithfield, in passing St Bartholomew-the-Less and approaching the central courtyard from beneath Gibbs' North Wing, the hospital can be compared with the collegiate character of Inner and Middle Temples. However, the formal relationship between Gibbs' three original blocks and the square (despite the loss of his South Block), combine to form townscape character which is unique in the City.

The Group is very concerned that the character of the square and wider conservation area would be harmed by the visual intrusion of the proposed roof extension. Despite insensitive later interventions St Batholomew's Hopsital Square is one of the chief set-pieces of Georgian London, akin to Somerset House in its architectural significance, if not in its scale. Therefore any negative impact on its setting should be treated very seriously.

From the information supplied it appears that the proposed roof extension would undermine the scale and hierarchy of this important grouping, and cause harm to the wider conservation area. The L'Anson and Gibbs buildings speak a similar architectural language, and the proposed roof extension upsets that aesthetic harmony

As the proposals stand, we recommend their withdrawal for significant amendments and would like to be assured that any revised proposal will have no visual impact above the roofline of the Gibbs buildings.

Yours sincerely,

David

David McKinstry Secretary



The Georgian Group 6 Fitzroy Square London W1T 5DX

#### **Broughton, Helen**

From: PLN - Comments

**Subject:** FW: Nuffield Health Planning Application 16/01311/FULL

From: Peter Schmitt Sent: 09 March 2017 13:09

To: Depala, Bhakti

Subject: Nuffield Health Planning Application 16/01311/FULL

Dear Ms Depala,

Location: Old Pathology Building & RSQ Building of St. Bartholomew's Hospital West Smithfiels London EC1A 7BE

Proposal: Refurbishment and extension of the old pathology building and the former residential staff quarters building to provide a private patient unit (PPU) and North Block facilities

I wish to register my OBJECTION to the application (16/01311/FULL) to convert the old Pathology Building, including the Pathology Extension, for use as a private hospital.

There has never been a clinical facility in the old Pathology Building. Nor should there be. It was built between 1907-09 (with the Pathology Extension completed in 1971) and is sandwiched between the Medical School Library (1879) plus the Pathology Museum (1879) and the Neo-Palladian North Block, designed by James Gibbs (1730-32). Barts is unique among hospitals in England in caring for the sick poor on the same site for going-on 900 years of continuous existence, ever since its foundation in 1123 - without relocating. This site has always been dedicated to caring for those without means in their illnesses. With the newly built Barts Health NHS Trust hospital there is a surfeit of clinical care on site. It is unconscionable to introduce private clinical facilities for paying patients in this context.

The Pathology Building of 1907-09 was built to provide laboratories for dissection, a post-mortem room, mortuary, cold store and teaching and administrative space for the Medical School. It was originally connected to the Pathology Museum by a bridge. It was intended for teaching purposes as part of the Medical School. The existing building is totally unsuitable for clinical use as a private hospital. Hence, this application to gut the interior, demolish the rear facade and rebuild a five storey extension some 3m closer to Gibbs's Grade-1 Listed North Block. The narrow space between the two facades is already cramped. The effect of the nearer new facade will be to impinge even further upon the fine north facade of the James Gibbs building, obstructing it and causing substantial harm to the significance of a heritage asset.

The present application also makes use of the Pathology Extension, designed by Adams Holden and Pearson and completed in 1971. This has always compromised the integrity of the North Block, as originally envisaged by Gibbs as a standalone building. In the Hopkins scheme (13/01227/FULL), which was granted unanimous approval by your Planning Committee, the Pathology Extension was earmarked for removal along with the Finance Block. In the words of Historic England (18 November 2013) this created "great potential to enhance the architecture of the Grade-1 listed North Wing, as well as ... the character and appearance of this part of the Smithfield Conservation Area." This proposal reverses that vision by allowing the Pathology Extension to continue to abut the North Block. The harm done should be calculated against the loss of a potential gain for the heritage setting of this precious Conservation Area of Listed Buildings.

But it is the lack of viable catering facilities for the North Block in the Pathology Extension that will do incalculable and far-reaching damage. I object to this most strongly. The Hopkins scheme provided for a catering lift and for catering facilities in the basement, retained after the Pathology Extension is demolished, in order to secure the longevity of the Archives in the North Block, enhance their research space in an extended North-Block basement and expand the Museum. The private hospital proposal has taken over almost all of this valuable basement space in the Pathology-Extension, which is served by a shared lift. This is daft and cannot possibly meet health and hygiene regulations. Who could countenance eating food transported by a lift shared with hospital disease and infection. The 62sq.m allowance in the basement is woefully inadequate for food preparation, cooking, refrigeration, washing up, dry-goods storage, chair-and-table storage, catering-staff lavatories and changing. A dedicated catering lift is essential. The consequences of this parsimonious provision for the North Block is that catering for the Great Hall is not feasible. This fact was brought home to the Archives Committee at its Meeting on 23 February 2017. The Chairman of the Friends of The Great Hall and Archives of St Bartholomew's Hospital made two astounding statements:

- that the North Block would have to accommodate a new lift and catering facilities in its basement, where the historic Archives are housed.
- that the historic Bart's Archives and Museum would have to pay their way from now on.

This is catastrophic for heritage - to put a levy on historic Archives or, alternatively, boot them out of the the space they have traditionally occupied at Barts to make way for ovens, sinks and stacked tables. The resources for what are public records are non-existent. The Museum is staffed by volunteers, serves a limited audience and cannot be self-sufficient. To relocate the Museum will jeopardise its hard-won accreditation status. Where will the Archives and Museum go? Something has gone madly wrong. The Archives, their great documents, such as the grant by Rahere of 1137 and the re-foundation of Barts by Henry VIII in 1546, the Collection, such as Hogarth's Pool of Bethesda and the Good Samaritan, and the Museum form Bart's heritage and are of world importance. And to remove them from their historic habitat is unpardonable and reckless. So the newly formed 'Heritage Trust', as registered without funds or directors, for the North Block will be a misnomer. It is a Trust in name, which is about to jettison the Heritage justifying its existence.

Nuffield Health and Barts Health NHS Trust have failed to allocate the necessary catering facilities within their proposal for a private hospital. The result of this denial of adequate space and a separate catering lift is threefold:

- Necessary catering facilities and lift for the North Block are incompatible with the Archives in the basement of the North Block. So the Archives will be forced to vacate to the detriment of the historic siting of the Collection.
- The Archives have always been on the Bart's site, which is where they belong.
- The Archives serve as a public and heritage resource. It is not in their nature to be subject to market forces. They cannot pay their way. They have no calculable monetary value; rather they give value to all who use them and underpin Bart's heritage.

As a member of Barts Health NHS Trust Archives Committee, I wish to register my strong OBJECTION to this application and the farreaching damage it will cause to the North Wing and Bart's Archives and heritage.

"Spare thy people, O Lord, and give not thine heritage to reproach." Joel 2:17

Yours sincerely,

Peter Schmitt BA M-Arch FAAR RIBA 12 Lydon Road London SW4 0HW From: Depala, Bhakti
To: PLN - Comments

Subject: FW: OBJECTION to Nuffield Health Planning application 16/01311/FULL

**Date:** 30 May 2017 10:01:09

From: Peter Schmitt
Sent: 25 May 2017 15:30
To: Depala, Bhakti

Subject: OBJECTION to Nuffield Health Planning application 16/01311/FULL

Dear Ms Depala,

Location: Old Pathology Building & RSQ Building of St Bartholomew's Hospital West

Smithfield London EC1A 7BE

Proposal: Refurbishment and extension of the Old Pathology Building and former residential staff quarters (RSQ) building to provide a private patient unit (PPU) and North Block facilities

I refer to your letter dated 4 May 2017 and wish to reiterate my OBJECTION to this application (16/01311/FULL) for a private hospital. I can see no improvement in the documents recently lodged online to mitigate the harm that will ensue to the Smithfield Conservation Area and particularly to the North Wing by James Gibbs. Therefore, I stand by the reasons for my Objection contained in my email of 9 March 2017.

It is of great dismay that Nuffield are not prepared to provide the catering infrastructure for the North Wing in the Pathology Extension that had been envisaged and had been agreed by all concerned.

It is untenable for the North-Wing caterers to transport food for the Great Hall in a lift shared with ill hospital patients, as proposed in the Nuffield plans. It cannot be countenanced much less defended by a hospital of the standing of Barts Health, as they do in their letter of 10 May 2017. It is disallowed by Health and Hygiene legislation. The lift must be used solely for catering. Nor is enough space set aside in the basement of the Pathology Extension for the range of catering facilities needed. I have shaded green on the attached basement plan the actual area (62sq.m) designated for catering, while Nuffield claim it is 75sq.m, which is woefully inadequate, in any case.

Both SAVE and The Georgian Group have written in OBJECTION. I support these objections.

The areas of harm generated by the Nuffield application for a private hospital are as follows:

- change of use of the Pathology Block to clinical operations is unsuitable, hence the need for extensive demolition and enlargement. It was designed for teaching and as a mortuary and should be put back under the auspices of the Medical School. This would secure the potential for this site to be a larger heritage complex, tracing the 900-year history of Barts and medical treatment for the sick poor back to its foundation in 1123.
- For going on 900 years, there has never been a private hospital on the Barts site, which has a unassailable lineage of caring for the sick poor since 1123, re-established by Henry VIII in 1546 and continuing under the auspices of the National Health Service since 1948.
- The rebuilding of the rear wall 3m further out will have a harmful impact on the facade of the Grade-1 Listed North Wing.
- The proposals cause substantial harm to the Smithfield Conservation Area and its numerous Listed Buildings.
- The visual intrusion of the roof extension, including the cliche of an alien mansard roof, compromises
  and upsets the aesthetic harmony of this grouping of buildings, in particular the roofline of the
  Gibbs building.
- The fact that the lift in the Nuffield proposal is shared with ill and sick patients renders it unusable for North-Wing catering. A standalone lift is required by Health and Hygiene legislation. The catering space in the Nuffield basement is also grossly inadequate for functions in the North Wing. The

- alternative being considered is to occupy the very basement of the North Wing, where Bart's historic Archives are housed, forcing them to vacate their historic location. This is detrimental to the wider heritage of Barts Hospital.
- In the Hopkins scheme, which was granted unanimous Planning Approval, the Archives were given pride of place with reading desks, improved and increased storage, and display space for the museum. This is now threatened.
- Without proper catering, the sustainable future of the Great Hall and the North Wing is not viable. A
  dedicated catering lift and enough space for catering infrastructure are not provided in the Nuffield
  proposals.
- Nor do Nuffield have the vision to share scanners with the newly opened Barts Health NHS Hospital, which would free up space.

If this application is not refused, then it is the basement of the North Wing that may have to be used as a catering alternative, forcing the relocation of the priceless Archives away from their historic site. The Barts Health NHS Trust Archives Committee, of which I am a member, voted against this, which leaves the future viability and use of the North Wing unresolved.

I object to the far-reaching damage this proposal will cause to Gibbs's North Wing, jropardising its future viability, to Barts Archives and to the wider heritage of this unique site going back to the 12th century.

"Spare thy people, O Lord, and give not thine heritage to reproach." Joel 2:17

Yours sincerely,

Peter Schmitt BA M-Arch FAAR RIBA 12 Lydon Road London SW4 0HW



Virus-free, www.avast.com

From: Depala, Bhakti
To: PLN - Comments

Subject: FW: OBJECTION to Nuffield Health Planning application 16/01311/FULL

**Date:** 18 May 2018 10:20:22

Hello

Can you please scan and acknowledge attached objection?

Kind regards,

Bhakti

From: Peter Schmitt Sent: 17 May 2018 16:34

To: Depala, Bhakti

Subject: OBJECTION to Nuffield Health Planning application 16/01311/FULL

Dear Ms Depala,

Location: Old Pathology Building & Residential Staff Quarters (RSQ) Building, St Bartholomew's Hospital West Smithfield London EC1A 7BE

Application proposal: Refurbishment and extension of the Old Pathology Block and the former Residential Staff Quarters (RSQ) building to provide a Private Hospital and North Block facilities Thank you for your letter of 3 May 2018 concerning the above application.

I note that on the same date Nuffield Health submitted nine revised drawings, which after a year of negotiation with the Friends of the Great Hall include for a dedicated catering lift from the Lower Ground Floor of the Pathology Block to serve the first Floor of the North Wing. At face value, this concession appears to save the 'national treasure' of the Great Hall, as reported in the Evening Standard on 9 May by Ross Lydall.

However, this is far from the case. What is offered is parsimonious in the extreme and falls far short of what is needed for the proper functioning and viable future of the Great Hall and St Barts Archives. What is needed was set down comprehensively in the service 'bustle' of the Hopkins scheme, which received unanimous approval by your Planning Committee. The inadequacies are in the particulars of the revised plans. My OBJECTION is based on the following:

- The Lower Ground floor zone for the North Wing (81sq,m) includes 7.5sq.m for a catering lift of unspecified size, reducing the net area for catering facilities below the 75sq.m deemed minimum for a fully serviced kitchen. This excludes space necessary for chair and table storage, for toilets and changing facilities for kitchen staff, which under Health and Hygiene Regulations cannot be shared, especially with hospital staff and the risk of infection and disease that entails. No services are indicated on the drawings, e.g. drainage, water services, electrical supplies and cooking extract, which requires a service duct with a flue up to roof level. Although some lift-lobby space has been designated for the North Wing demise, I query why the space next to the FM Stores (consumables) has been taken away from the demise in this latest plan. It was included in the earlier iteration. It is now designated a hospital FM Office Workshop (11sq.m). This area needs to be be returned plus the adjacent FM Stores to help reduce the shortfall in space for catering staff and for storage for the proper functioning of the North Wing.
- The Lower Ground floor should have a link to the Archives, as proposed in the Hopkins scheme, for escape and lift access. This is not provided.
- The Ground Floor plan shows the catering lift, which discharges directly to open air, without lobby or even a canopy for unloading comestibles and provide protection in all weather. For reasons of health and hygiene this lift should have a proper lobby large enough for maneuvering space for catering trolleys and other equipment. There should also be an opening into the North Wing to provide access for catering staff. To be forced to walk outside to the lift in all weathers is unacceptable.
- The First Floor plan makes adjustment for the slightly higher first-floor level of the North Wing. But this is achieved with a skewed lobby, which will be tortuous for catering trolleys and furniture on dollies to navigate. There is even a partition cutting into the lift door, making it impossible to open fully. Indeed, the narrow passageway and tight lobby contrasts markedly with the generous circulation space for the private hospital. This circulation route needs to be re-planned for generous turning and parking space (refer attached sketch).

• The Second Floor plan indicates the lift overrun. However, a lift and stair are needed at this level of the North Wing to serve the Gibbs Room for wheelchair access and escape. This has not been provided. The Hopkins 'bustle' includes for this. The lift overrun should be at third floor level.

I feel that the essential requirements of the North Wing cannot be satisfied by the minimalist and unrealistic allowances shown on the plans. Hopkins 'bustle' is the benchmark. Accordingly, I have marked up some of the Nuffield plans, relocating the lift, in an attempt to point a way to overcoming some of these deficiencies, as attached.

I reiterate my OBJECTION to demolishing the Northeast Elevation of the Pathology Block and rebuilding it some 3m closer to the North Wing. The space between the two buildings is already limited. I support SAVE on the harmful impact this will have on adjacent Listed buildings, not just the North Wing but the church of St Bartholomew the Less. It will be damaging to the setting of the Grade-1 Listed heritage asset and severely limit any chance of appreciating Gibbs's elegant facade. I reiterate my OBJECTION to the change of use. The Pathology Block was built for teaching and learning and as a mortuary. It is clear from this application that it is too small to be a private hospital. The floor plate has to be extended three whole meters to make it fit for clinical purposes and viable as a hospital. Nuffield's ambitious brief with a tight profit margin is shoehorned into a site that leaves scant space for the very real needs of the North Wing, which are admirably delineated in the Hopkins 'bustle'. The result is detrimental to the wider heritage of Barts Health.

This application is designed to generate a 'multimillion pound revenue stream' according to Ross Lydall's draft of his Evening Standard article. Its damaging and expensive proposals are for speculative investment at the behest of Barts Health. It is ill-conceived and on the wrong site. Why not gut and extend the obsolete RSQ building, away from these sensitive and Listed buildings. I also OBJECT because this private hospital will thwart the City of London's initiative on the Cultural Mile. Berlin has its museum island. Kensington has Albertopolis. Now with the imminent relocation of the Museum of London to Smithfield, the City of London has the chance to create a major new centre for culture and scholarship. The addition of medical and nursing resources of the quality available at Barts Health, supplemented by its new pioneering NHS hospital building, is an opportunity not to be dismissed. "This resource requires", as Professor Michael Swash put it in his OBJECTION, dated 24 May 2017, "a nurtured environment with space to develop." The space is in the Pathology Block, which has the potential to make this corner of Smithfield and Barts a heritage centre of outstanding significance. It is located between the Medical School Library, the unique Pathology Museum, the Great Hall and the North Wing's museum and collection. Also housed here are Bart's priceless Archives, which I believe, as a member of Barts Health Archives Committee, should be enhanced and made more available for research and learning. It is an aspiration of the newly formed Heritage Trust, which affects the wider heritage of this site, bristling with Listed buildings. We have the opportunity to make this precious corner of Barts Health, touching Smithfield, an academic and historical campus of outstanding importance, devoted to 900 years of medical care for the 'sick poor' under the instrument of Rahere's foundation and having a history as the one city in England that William the Conqueror dared not list in the Domesday Book. It is in jeopardy of being still born for all of the reasons stated above, were this application for a private hospital to be allowed.

I would to register my willingness to speak at the Planning Committee Meeting. Yours sincerely,

Peter Schmitt BA M.Arch FAAR RIBA 12 Lydon Road London SW4 0HW

# Friends of The Great Hall and Archive of St Bartholomew's Hospital

Chairman: Sir Marcus Setchell, KCVO

Ground Floor 12 Cock Lane London EC1A 9BU

Dear Ms Depala,

## RE Nuffield Health Planning Application 16/01311/FULL

The Committee will be aware that the aims and interests of the Friends of The Great Hall and Archive of St. Bartholomew's Hospital are solely concerned with the conservation, restoration and viability of the Listed Grade I and II Heritage Buildings of St. Bartholomew's Hospital, and their contents. We are the only body who exist exclusively to promote the importance of maintaining these fine architectural and art and archival national treasures.

The NHS has had ownership and responsibility for the heritage site since 1948; since then the greatly expanded NHS Trust has become responsible for the management of the very large coalition of Healthcare Sites and services in the north east sector of London. For many years the NHS and indeed successive governments have been conscious of the dichotomy presented by supporting healthcare and heritage, and other ways have been explored by which the heritage site could become a separately funded and managed self-funding charitable Trust. To this end they have begun the legal process to make this happen and St. Bartholomew's Heritage Trust (No. 1167316) is registered by the Charity Commission, and its Memorandum and Articles incorporated at Companies House on 18 May 2016.

This is real progress, and our efforts to promote recognition of the rights and needs of the Heritage Buildings have been recognised by this planning authority, the NHS, and its chosen partners for other new projects (Maggie's Bart's Cancer Centre), and now Nuffield Health. It is only by pressure and negotiation that support services and facilities, vital for the functional viability of the future of the North Wing have been obtained. Efforts have also been made to ensure that damage to the structure and setting of the heritage buildings have been minimised.

Nuffield Health's Planning Application is a considerably expanded scheme from the Outline Planning Application (14/00952/FULL) for a Private Patient Unit, submitted by the NHS before there was an identified preferred provider, and which was granted approval. The current proposal is for a full-blown Private Hospital, with in-patient and out-patient care operating theatres and diagnostic facilities. We are pleased to note that the drawing added to the current application on 6 February does now fulfil the agreed spatial *area* required for catering. We do have concerns about the practicality of a shared lift for transfer of food, staff, and stored tables and chairs from the basement to the first floor for large functions, and the limited lift service to the upper floors of the west end of the North Wing. It is not possible at this stage in the development of the future management structure of the Heritage Trust to fully define the extent of the catering requirement and processes required for food preparation and cooking in this space. We have had some preliminary work done on this by a catering facilities planning expert, and more detailed work is imminent

# Friends of The Great Hall and Archive of St Bartholomew's Hospital

We are encouraged by the willingness of Nuffield to engage in ongoing discussions about provision of power, extract, electrical, gas and plumbing facilities for the North Wing's catering functional viability. Health and Safety issues will need to be carefully considered and agreed in relation to shared lift usage, as well as priority for lift usage when Great Hall functions are taking place.

Whilst recognising the current untidiness and ugliness of the existing external fire safety stairs on the Pathology Block in St. Bartholomew's Courtyard, there has been considerable expression of concern about the effect on the setting of the North Wing from the expansion by 3 metres southwards of the external wall of the Pathology Block into the Courtyard, potentially dominating the fine north façade of the James Gibbs building.

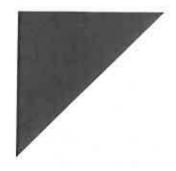
In conclusion, Nuffield Health's scheme with the updated drawing of catering space allocation does fulfil the basic needs to enhance the North Wing's catering requirements. There are alternative opinions of detail as to how this will best be delivered in the future. The Friends' Committee are now able to support the Nuffield Health proposals, with the understanding that as the details of catering requirements are defined by the Heritage Trust or ourselves and advisers, there is a commitment to achieve the best possible outcomes for the North Wing's viability. "

Yours sincerely,



Marcus Setchell

Sir Marcus Setchell, KCVO FRCS FRCOG
Chairman
The Friends of the Great Hall & Archive of St. Bartholomew's Hospital



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# Barts Health NHS

Alwen Williams
Chief Executive
Executive Offices
Barts Health NHS Trust
Ground Floor Pathology and Pharmacy Building
80 Newark Street
London E1 2ES

Bhakti Depala
City of London
Department of Planning and
Transportation
PO Box 270
Guildhall
London
EC2P 2F.I

By e-mail and letter bhakti.depala@cityoflondon.gov.uk

3<sup>rd</sup> February 2017

Dear Madam.

## Ref: Planning application for development of 'Nuffield Health at St. Bartholomew's Hospital'

I am writing on behalf of the Trust Board of Barts Health NHS Trust as we are in receipt of planning application 16/01311/FULL for the proposed healthcare development known as Nuffield Health at St. Bartholomew's Hospital. The Trust Board wishes to record our full support for this healthcare development proposal at St. Bartholomew's Hospital. The development would provide several major benefits to healthcare provision at the hospital, as well as bring the Pathology Building and the Residential Surgeon's Quarter Building (RSQ) at St. Bartholomew's Hospital back into long-term viable healthcare rather than remaining predominantly vacant as present.

Earlier in 2016 it was announced that Nuffield Health had been appointed as our preferred bidder following a competitive dialogue procurement by the Trust for a Private Patients Unit Strategic Partner (OJEU 2014/S 159-286272). Barts Health NHS Trust is the freeholder of the buildings to which this planning application relates. At the end of the Nuffield Health use, the buildings would revert to the Trust in a state of full repair for NHS occupation, or could continue to operate in a private capacity on a new lease to generate a guaranteed income to support NHS services as a hospital.

The Nuffield Health at St. Bartholomew's Hospital proposal has been developed in close consultation with the Trust and is fully aligned with the Trust's healthcare development strategy, which includes private patient provision at the hospital. The provision of private patient facilities assists in the recruitment and retention of the highest calibre healthcare staff which benefits all patients. It also means that consultants spend more time on campus rather than travelling to off-site locations, providing enhanced access to them for NHS patients.

The Trust appreciates the heritage status of the hospital and has considered the planning impact on the overall sites current and future performance and resilience. The Trust has consulted with a wide set of stakeholders, such as the City of London Health and Social Care Scrutiny Committee, Clinical Commissioning Groups and the Friends of the North Wing. We support the design which has evolved in liaison with planning officers. We are also reassured by liaison with Nuffield Health and their preferred contractor that the development works can be managed and will have no adverse impact on healthcare provision.



We acknowledge and support the significant investment being made in these two predominantly vacant buildings by Nuffield Health to develop them into long-term viable and modern healthcare facilities. The Pathology building has been largely unoccupied for ten years. This proposal represents an opportunity for the Trust to repair this building, and then have both buildings in long-term viable healthcare use at no cost to the NHS. Bringing these buildings back into use after so long is of great benefit to us compared to the operational inefficiencies of them continuing to remain vacant.

Overall, we hope that the City of London can also see the planning merits of the Nuffield Health proposal and the significant long-term benefits it provides to patients, the campus, the Trust and St. Bartholomew's Hospital as a whole. The Trust Board would therefore urge the City to please fully support planning application 16/01311/FULL, as we do.

We would be very happy to provide any further information you may require.

Yours faithfully,

Alwen Williams
CEO. Barts Health NHS Trust





Alwen Williams
Chief Executive
Executive Offices
Barts Health NHS Trust
Ground Floor Pathology and Pharmacy Building
80 Newark Street
London E1 2ES

Bhakti Depala
City of London
Department of Planning and Transportation
PO Box 270
Guildhall
London
EC2P 2EJ

4 May 2017

Dear Bhakti

Nuffield Health at St Bartholomew's Hospital Site: Old Pathology Building and RSQ Building, West Smithfield, London, EC1A 7BE Planning application ref: 16/01311/FULL

Further to our prior letter dated 3 February 2017, we are writing to reinforce our support for the Nuffield Health at St Bartholomew's Hospital planning proposal, submitted by our preferred bidder Nuffield Health. The development remains of great importance to supporting and enhancing future healthcare provision at the hospital, and bringing two long-term vacant buildings back into viable long-term use.

Nuffield Health has sought to address all feedback and advice received from the Planning Department in the formal application amendment, except where it would compromise the quality of the proposed healthcare provision. As a result, we are encouraged that the City can fully support and recommend the scheme for approval.

For additional comfort we have reviewed third party representations received to date on the previous proposal, and provide the following comments:

#### **Proximity to Grade I Listed North Block**

The modern hospital has no need for a pathology use in the Old Pathology Building and the Island Site is protected for healthcare use. Two previous attempts to provide a healthcare use in the building have not proven possible to implement as they required additional development on Modern Pathology (also known as the "Pathology Extension"), which would have impacted views from The Square and harmed the setting of North Block.

The proposal to extend the rear façade allows for much of the harmful development of Modern Pathology to be removed from The Square and from Giltspur Street. The removal of the majority of the 5<sup>th</sup> Floor of Modern Pathology is directly facilitated by the rear extension. We feel that the setting of North Block and The Square is dramatically improved as a result of this change and is a major planning gain.

The proposal also significantly enhances the appearance of the rear of Pathology Building by cleaning and repairing the existing façade; enclosing the existing inappropriate staircase in stone; reinstating the original stone balustrade; introducing a Yorkstone landscaped area and relocating the previously approved cycle and motorcycle parking from directly adjacent to North Block. As a result, the setting of North Block is greatly improved in this location too.

The rear extension therefore makes it possible to deliver a number of wider benefits to North Block, the wider St Bartholomew's campus and the wider Conservation Area. These would not be possible otherwise.

Overall, we feel that the setting of North Block is enhanced from The Square and from the Old Pathology Building as a direct consequence of the rear extension. The proposal results in great enhancements compared to the existing site conditions and any prior planning approval. In addition, all works to the rear façade will be controlled via condition to ensure no harm can occur. We feel that this compensates and controls any potential for harm from the rear extension.

#### North Block Catering Storage Space

The scheme has been designed to accommodate storage support space exclusively for the use of North Block for the life of the development. The space provided has been confirmed as appropriate by the users of the building, and is greater than has been possible to allocate exclusively previously (additionally assisted by the rear extension discussed above).

The principal of providing this storage space was established in extant planning permission 14/00952/FULL. This proposal accords with the established principal, but provides additional space to support North Block functions, providing enhanced support to North Block than previously approved.

#### **Lift Access to Catering Space**

The principal of a shared lift to the North Block Catering Storage Space was also previously established in planning permission 14/00952/FULL. The current proposal does not derogate from this. We confirm that it is possible to operate the lift with no compromise to the hospital functions or the storage space.

The principal for this operation has been established in planning terms and is being complied with. There is no harm to patients, staff, visitors or those accessing the storage space.

#### **Archive Displacement**

Again, the development is not derogating from the principals established in extant planning permission 14/00952/FULL. The proposed development will have no adverse impact upon the Archive stores, and does not necessitate Listed Building Consent proposals to be made to North Block. The proposed development will better control temperature and humidity compared to the existing building conditions.

In conclusion, we feel that the current proposal is likely to be the optimum solution in terms of bringing these buildings back into a viable long-term healthcare use; protecting the Island Site for healthcare use; providing a viable best-in-class healthcare facility for the City; and providing planning gain to the wider hospital campus and Conservation Area.

We have spent close to a decade seeking a long-term solution to bring these buildings back in to use. From this experience, we believe that in Nuffield Health we have the best partner possible to

support us in our vision for the hospital. As evidenced by the formal amendment to the application and response to consultee comments, Nuffield Health is committed to providing an exemplary healthcare facility whilst respecting the context of the development, supporting NHS operations, and the operations of surrounding uses.

Due to the scheme amendments made, we trust that the City is in a position where they can support planning application 16/01311/FULL.

We would be very happy to provide any further information you may require.

Yours sincerely



Alwen Williams
Chief Executive

# **Comments for Planning Application 16/01311/FULL**

## **Application Summary**

Application Number: 16/01311/FULL

Address: Old Pathology Building & RSQ Building St Bartholomew's Hospital West Smithfield

London EC1A 7BE

Proposal: Refurbishment and extension of the old pathology building and the former residential staff quarters building to provide a private patient unit (PPU) and North Block facilities, to include: (i) demolition and rebuild of the rear facade with a five storey extension (3.5m deep); (ii) removal of redundant roof plant and erection of a mansard roof extension on the old pathology building; (iii) creation of a new rear entrance with associated accessibility provision and landscaping; (iv) replacement of the existing infill extension between the old pathology building and Pathology Museum; (v) replacement of existing plant room on the modern pathology building and creation of a secondary entrance at the rear (vi) creation of a new entrance to the former residential staff quarter building on the Giltspur Street elevation and replacement of the existing windows (vii) creation of additional cycle parking and creation of a new patient drop off point.

Case Officer: Bhakti Depala

#### **Customer Details**

Name: Mr Richard Lambert

Address: Living Streets, 4th Floor Universal House, 88-94 Wentworth Street, London E1 7AS

#### **Comment Details**

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Residential Amenity
- Traffic or Highways

Comment: As part of a service level agreement between City of London & Living Streets, we comment on planning applications within the City of London from a pedestrians perspective to ensure developments support pedestrians.

We would recommend that the Deliveries and servicing plan has a policy that states that any delivery vehicles will switch off their engine once they have stopped and do not turn them back on until they are ready to leave - and that this is communicated to all delivery companies by the DSP coordinator.

This links in with both the City of London and London wide policy on improving air quality and reducing emissions from idling vehicles and will make for a cleaner environment around the hospital.

We support the creation of addition cycle parking to encourage more active and sustainable travel by visitors to the hospital.

In addition, we would like to offer our support in the implementation of the hospitals travel plan with regards to the aims of increasing the proportion of walking trips at the site; raising awareness of the implications of all forms of travel on the environment and health; and also contribute to the improved health & wellbeing of staff through promoting walking.

Through the SLA with the City of London we can offer some services free of charge, such as staff engagement sessions to increase walking trips, assessments of the walking environment from a pedestrians point of view, running seminars and workshops that focus around promoting walking and many more - so measures that are both hard and soft are available.

We feel this offer could compliment and add to the existing travel plan. If the Travel Plan Coordinator would like to find out more please contact Richard.lambert@livingstreets.org.uk

From: To: Subject: Date: Attachm

COL - Contact Centre
PIn - CC - Development D:
FW: PLN FW: 16/01311/FULL - St Bartholomew's Hospital, West Smithfield, EC1 COL:04354928
08 February 2017 16:32:44
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From: Vicki Fox
Sent: 08 February 2017 12:45
To: PlanningQueue
Cc: Christopher Oliver
Subject: Ref: 16/01311/FULL - St Bartholomew's Hospital, West Smithfield, EC1

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#### To whom it may concern

This Committee met on Tuesday, 24 January 2017 and discussed the above case. The proposal was accepted as a marginal improvement and subsequently approved despite our previous objection. The Committee therefore made no further comments but it was, however, noted that MOLA were seeking to have the building recorded.

Please accept my apologies for the delay in responding.

Vicki Fox (Hon. Secretary) LAMAS - Historic Buildings & Conservation Committee Ms Bhakti Depala Case Officer Department of the Built Environment City of London PO Box 270 Guildhall London EC2P 2EJ



<u>plans@cityoflondon.gov.uk</u> By email

17 May 2017

Dear Ms Depala,

Planning application 16/01311/FULL | Old Pathology Building & RSQ Building of St Bartholomew's Hospital, West Smithfield, London, EC1A 7BE | Refurbishment and extension of the old pathology building and the former residential staff quarters building to provide a private patient unit (PPU) and North Block facilities

SAVE Britain's Heritage writes to **object** to this planning application, proposing alterations to, and a change of use of, the Old Pathology and RSQ buildings. We note that we are not alone in objecting to this application, with the Georgian Group and the Victorian Society also submitting comments, as well as members of the public.

SAVE objects for two principal reasons. The first relates to the impact on adjacent listed buildings, including the Grade I North Wing designed by James Gibbs, and the Grade II\* church of St Bartholomew the Less. Whilst acknowledging that the existing façade of the Old Pathology Building will be rebuilt - an improvement on earlier design iterations - we consider that its positioning some 3m further out would have a harmful impact. The space between the Old Pathology Buildings and the Great Hall is already limited, so a loss of 3m would be detrimental to the setting of the Grade I listed heritage asset.

The second reason relates to the ongoing use of the North Wing as an events space. The Great Hall is an equivalent to the great livery halls in the City and needs to be able to function in a similar manner. You will no doubt be aware of legal proceedings undertaken

70 Cowcross Street London EC1M 6EJ

by the Friends of the Great Hall in 2014 to ensure provisions were made to protect the hall's future use, as part of the new Maggie's Centre, now under construction.

We are concerned that this current application may jeopardise the Great Hall's future use, due to limited lift provision and the amount of space provided for catering and storage; the singular lift for instance, to be shared with the private hospital, may not be suitable for catering purposes. This has implications for the viability of the Great Hall, and consequently for the maintenance of the listed building.

There are already concerns about the fabric of the Great Hall, with what appears to be outbreaks of damp and rot in the plasterwork ceiling. Restricting events use, which we consider this application would do, would be to restrict one of the main ways funds can be raised for maintenance and repair. As a Grade I listed building this is an important long-term viability point which must be considered.

A further concern relates to the potential impact this application may have on the historic archives of St Barts, currently housed in the basement of the North Wing. This point is dealt with in greater detail by Mr Peter Schmitt, a member of the Barts Health NHS Trust Archives Committee, in his letter of 9 March 2017. In summary, Mr Schmitt asserts that if adequate lift space is not provided as part of this application, then the basement of the North Wing may have to be used as an alternative, forcing the relocation of the archives away from their historic site. This would be detrimental to the wider heritage of St Barts Hospital.

For these reasons, we object to this application. We would encourage the applicant to engage in further design work, particularly on the question of lift, catering and access space provision. Ensuring the sustainable future use of the Great Hall could make this application acceptable. I trust these comments are useful to you. Please contact me at this office if you require further information.

Yours sincerely.

Mike Fox Deputy Director

70 Cowcross Street London EC1M 6EJ

 From:
 Depala, Bhakti

 To:
 PLN - Comments

 Subject:
 FW: 16/01311/FULL

 Date:
 24 May 2017 15:00:50

From: Mike Swash Sent: 24 May 2017 14:43 To: Depala, Bhakti

**Subject:** 16/01311/FULL

# Old Pathology Building & RSQ Building, St Bartholomew's Hospital, West Smithfield, London EC1A 7BE.

Sir

I wish to add my objection to this plan for a private hospital at Barts, simply because the designation is ill-considered and past scant attention to the nearby built environment. Its construction as planned will adversely affect the existing buildings, seriously interfere with the relocation of the Arts and the London Archive Centre, and hamper the facilities required by that academic and historical resource centre; one of the most unique and complete such centres in Britain.

The likely arrival of the Museum of London at Smithfield introduces a major new source of scholarship to the City of London, and the addition of a medical and nursing resource of the quality available at Barts and the London is an opportunity not to be missed. Thus resource requires a nurtured environment with space to develop.

Others have provided more detailed objections, with which I am in agreement.

Michael Swash MD FRCP FRCPath Professor Emeritus of Neurology Barts and the London School of Medicine

### Begum, Shupi

From: Depala, Bhakti
Sent: 01 June 2017 17:53
To: DBE - PLN Support

**Subject:** FW: 16/01311/FULL - Old Pathology Building & RSQ Building St Bartholomew's

Hospital West Smithfield London EC1A 7BE

Please can you scan, print and acknowledge the comment below for 16/01131/FULL

Kind regards,

Bhakti

From: Eley, Ben

Sent: 01 June 2017 17:51

To: Depala, Bhakti

Subject: FW: 16/01311/FULL - Old Pathology Building & RSQ Building St Bartholomew's Hospital West Smithfield

London EC1A 7BE

FYI

From: Zachary Osborne [

**Sent:** 01 June 2017 14:40

To: Eley, Ben

Subject: FW: 16/01311/FULL - Old Pathology Building & RSQ Building St Bartholomew's Hospital West Smithfield

London EC1A 7BE

Dear Sir/Madam,

# 16/01311/FULL - Old Pathology Building & RSQ Building St Bartholomew's Hospital West Smithfield London EC1A 7BE

Having studied the revised proposals in detail, the Georgian Group are content that the changes to the design substantially address the concerns raised by the Group in our letter of 9<sup>th</sup> March 2017.

Kind regards, Zach

Zachary Osborne South East Caseworker



The Georgian Group 6 Fitzroy Square London W1T 5DX The information contained in this e-mail and any files transmitted with it are confidential and intended solely for the use of the individual(s) named. If you are not the named addressee(s) you should not copy, disseminate or distribute this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free since information can arrive late or contain viruses, or be corrupted, destroyed, incomplete, intercepted, or lost. The sender therefore does not accept liability for any errors or omissions in the contents of this message which arise as a result of e-mail transmission. If verification is required please ask for a hard-copy version.

## **City of London Conservation Area Advisory Committee**

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

7<sup>th</sup> February 2017

Dear Sir,

At its meeting on 2<sup>nd</sup> February 2017 the City of London Conservation Area Advisory Committee considered the following planning application and reached the decision given below:

# C.17 16/01311/FULL - Old Pathology Building & RSQ Building, St Bartholomew's Hospital, West Smithfield, London EC1A 7BE

Smithfield Conservation Area//Farringdon Without Ward. Ward Club rep. Lester Hillman. Refurbishment and extension of the old pathology building and the former residential staff quarters building to provide a private patient unit (PPU) and North Block facilities, to include: (i) demolition and rebuild of the rear facade with a five storey extension (3.5m deep); (ii) removal of redundant roof plant and erection of a mansard roof extension on the old pathology building; (iii) creation of a new rear entrance with associated accessibility provision and landscaping; (iv) replacement of the existing infill extension between the old pathology building and Pathology Museum; (v) replacement of existing plant room on the modern pathology building and creation of a secondary entrance at the rear (vi) creation of a new entrance to the former residential staff quarter building on the Giltspur Street elevation and replacement of the existing windows (vii) creation of additional cycle parking and creation of a new patient drop off point.

The Committee had no objection to the proposed demolition and rebuild of the rear façade requesting that, if at all possible, the site be refurbished in keeping with the existing building. The Committee had no objection to the removal of the redundant roof plant on the understanding that the balustrade was erected in a position so as to reduce the visual impact, accepting the glass infill subject to detailing. The Committee also had no objections to the remainder of the application, supporting the creation of the side entrance rather than using the frontage window at ground level. The Committee requested that in view of the complexity of the proposal the application be designated a special case.

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

Yours faithfully,



Mrs. Julie Fox Secretary

## Friends of The Great Hall and Archive of St Bartholomew's Hospital

Chairman: Sir Marcus Setchell, KCVO

Ground Floor 12 Cock Lane London EC1A 9BU

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

12 April 2018

# Planning application for the development of "Nuffield Health at St. Bartholomew's Hospital Planning application reference number: 16/01311/FULL

Dear Sir/Madam,

Following previous representations to the City of London Planning Department, The Friends of the Great Hall and Archive of St Bartholomew's Hospital write to withdraw objections to planning application 16/101311/FULL.

Subject to the Section 106 Agreement providing, in the agreed form of wording set out below, for the construction of a lift to serve the North Wing ("the Lift Works"), the proposal now meets the concerns we had in relation to the development of the 'Pathology Link Extension (West End)' as referred to in the Settlement Agreement signed on 3rd December 2014 between The Friends of the Great Hall and Archive of St Bartholomew's Hospital, The City of London Corporation, Barts Health NHS Trust and Maggie Keswick Jencks Cancer Caring Centres Trust.

The Friends of the Great Hall and Archive of St Bartholomew's Hospital acknowledges and agrees that obligations on the Barts Health NHS Trust as set out in paragraphs 2.2.2, 2.2.3 and 2.2.4 of the Settlement Agreement shall be satisfied by the updated plans and drawings set out below. The Friends of the Great Hall and Archive of St Bartholomew's Hospital confirm that the Lift Works meet their requirements for the West End of Barts Great Hall, and this confirmation shall satisfy paragraph 2.2.5 of the Settlement Agreement. The Friends of the Great Hall and Archive of St Bartholomew's Hospital and the Barts Health NHS Trust confirm and agree that, in respect of the pathology building only, the plans for the Lift Works supersede and replace the points of clarification set out in paragraph 2.3.4 of the Settlement Agreement.

The proposal to provide a basement space of circa 81sqm - 82sqm, which includes the lift shaft and an internal lift from basement to first floor which includes an independent external access to the lift is acknowledged.

We conclude that the proposal by Nuffield Health will satisfy our desires to secure and protect the long term viability of the North Wing.

For avoidance of doubt, the updated plans and drawings that we agree to are as follows:

- 1. BARTS STW PATH PLA LG DR A 1100 Rev E Lower Ground Floor Plan
- 2. BARTS\_STW\_PATH\_PLA\_0G\_DR\_A\_1101\_Rev F Ground Floor Plan
- 3. BARTS\_STW\_PATH\_PLA\_01\_DR\_A\_1102\_Rev F First Floor Plan
- 4. BARTS\_STW\_PATH\_PLA\_02\_DR\_A\_1103\_Rev F Second Floor Plan
- 5. BARTS STW PATH PLA XX DR A 2003 Rev G South East Courtyard Elevation
- 6. BARTS\_STW\_PATH\_PLA\_XX\_DR\_A\_2004\_Rev G South Courtyard Elevation
- 7. BARTS\_STW\_PATH\_PLA\_XX\_DR\_A\_2001\_Rev G North Elevation Outer Courtyard
- 8. BARTS\_STW\_PATH\_PLA\_XX\_DR\_A\_2002\_Rev H North East Elevation
- 9. SKE\_500B\_21\_02\_2018 Critical Dimensions 205

# Friends of The Great Hall and Archive of St Bartholomew's Hospital

For the avoidance of doubt, The Friends of the Great Hall and Archive of St Bartholomew's Hospital understand that, in the event that the building within which the lift is to be sited is not started, or is started but not completed, or if the work to install the lift is not started or is started but not completed Barts Health NHS Trust shall have no obligation to enforce any rights which the Trust may have against Nuffield Health.

Yours faithfully,



Sir Marcus Setchell

Chairman, The Friends of the Great Hall and Archive of St. Bartholomew's Hospital



# Friends of The Great Hall and Archive of St Bartholomew's Hospital

Wording for s.106 Agreement

12 April 2018

### The North Wing Catering Lift

- 1. The Owner<sup>1</sup> and the Developer<sup>2</sup> covenant:
  - not to Occupy<sup>3</sup> nor permit Occupation of the Development<sup>4</sup> prior to the North Wing 1.1 Catering Lift<sup>5</sup> being constructed and being made available for the sole use of the North Wing; and
  - 1.2 to maintain the North Wing Catering Lift to ensure that it is operational and available at all times save for a) emergency works and b) scheduled maintenance (with reasonable notice to be given).

<sup>&</sup>lt;sup>1</sup> Owner is defined as Barts Health NHS Trust

<sup>&</sup>lt;sup>2</sup> Developer is defined as Nuffield Health

<sup>&</sup>lt;sup>3</sup> Occupation is defined as taking beneficial occupation of a building forming part of the Development for any purpose authorised by the Planning Permission but not including occupation by personnel engaged in construction, fitting out finishing or decoration of that building, nor occupation in relation to site and building security operations and "Occupier" "Occupied" "Occupy" or "Occupancy" shall be construed accordingly.

<sup>&</sup>lt;sup>4</sup> Development is defined as the works on the Site as set out in the Application, pursuant to the Planning Permission

<sup>&</sup>lt;sup>5</sup> The North Wing Catering Lift is defined as the dedicated lift designated for the sole use of the North Wing, as shown in the updated plans and drawings BARTS-STW PATH 1101,1102,1103,11002003,2004,2001,2002,and in particular the amended SKE-500B 21 02 208 with Critical Dimensions marked.



## St Bartholomew's Hospital,

West Smithfield, London EC1A 7BE

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

12 April 2018

Dear Sir/Madam,

# Planning application for the development of "Nuffield Health at St. Bartholomew's Hospital Planning application reference number: 16/01311/FULL

St Bartholomew's Heritage (a charity) are pleased to write confirming support for the development of 'Nuffield Health at St. Bartholomew's Hospital', subject to the completion of a Section 106 Agreement providing (in the agreed form of wording set out in the Friends' letter of even date) for the construction of a lift to serve the North Wing.

We acknowledge the proposal to provide a basement space of circa 81sqm - 82sqm, which includes the lift shaft and an internal lift from basement to first floor which includes an independent external access to the lift.

We fully support the proposal for a circa 3-metre rear extension of The Old Pathology building, and rebuilding the rear façade of The Old Pathology building in new Portland stone to match the existing rear façade.

We conclude that the proposal by Nuffield Health will satisfy our desires to secure and protect the long term viability of the North Wing.

For avoidance of doubt, the updated plans and drawings that we are in full support of are as follows:

- 1. BARTS\_STW\_PATH\_PLA\_LG\_DR\_A\_1100\_Rev E Lower Ground Floor Plan
- 2. BARTS\_STW\_PATH\_PLA\_0G\_DR\_A\_1101\_Rev F Ground Floor Plan
- 3. BARTS\_STW\_PATH\_PLA\_01\_DR\_A\_1102\_Rev F First Floor Plan
- 4. BARTS\_STW\_PATH\_PLA\_02\_DR\_A\_1103\_Rev F Second Floor Plan
- 5. BARTS\_STW\_PATH\_PLA\_XX\_DR\_A\_2003\_Rev G South East Courtyard Elevation
- 6. BARTS STW PATH PLA XX DR A 2004 Rev G South Courtyard Elevation
- 7. BARTS\_STW\_PATH\_PLA\_XX\_DR\_A\_2001\_Rev G North Elevation Outer Courtyard
- 8. BARTS\_STW\_PATH\_PLA\_XX\_DR\_A\_2002\_Rev H North East Elevation
- 9. SKE 500B 21 02 2018 Critical Dimensions

For the avoidance of doubt, St Bartholomew's Heritage understands that, in the event that the building within which the lift is to be sited is not started, or is started but not completed, or if the work to install the lift is not started or is started but not completed Barts Health NHS Trust shall have no obligation to enforce any rights which the Trust may have against Nuffield Health..

Yours faithfully.

Sir Marcus Setchell
Deputy Chairman

Registered Office: St Bartholomew's Hospital, West Smithfield, London EC1A 7BE Charity number: 1167316 Registered in England and Wales: 10097955

Trustees: Michael Smith (Chairman); Sir Marcus Setchell (Deputy Chairman);
Brendan Finucane Colombia Charles Knight

From: Marlene Campbell
To: PLN - Comments

**Subject:** Objection to planning application 16/01311/FULL

**Date:** 18 May 2018 13:43:34

Ms Bhakti Depala, Case Officer
Department of the Built Environment
City of London
P.O. Box 270
Guildhall
London EC2P 2EJ

Emailed to PLNComments@cityoflondon.gov.uk

18<sup>th</sup> May 2018

Dear Ms Depala,

**Ref: OBJECTION** 

Planning application 16/01311/FULL - Old Pathology Building & RSQ Building of Bart's Hospital. West Smithfield, London EC1A 7BE - Refurbishment and extension of the old pathology building and former RSQ building to provide a private patients unit (PPU) and North Block facilities

My OBJECTION is to the CHANGE OF USE that this application entails.

The Pathology Building lies adjacent to the Grade-1 Listed North Wing and the Historic Gate House. The building has been used for Pathology Laboratories and Mortuary together with the Medical College and Dean's offices.

It is too small to be a private hospital and not fit for purpose for clinical use without the demolition of the entire rear of this handsome building. The floor plate has to be extended three whole metres to make a hospital viable, all to the detriment of Gibbs's masterpiece of the Grade-1 Listed North Wing and any chance of appreciating a view of its elegant facade.

The proposal to use this now for clinical and patient activity is inappropriate in this setting.

The Pathology Block has the potential for public and social benefit. It is sandwiched between the Pathology Museum and Medical School Library on one side and the North Wing and its priceless archives on the other. Combined with City of London's initiative of the Cultural Mile and the relocation of the Museum of London to Smithfield, we have here the opportunity to make this corner of Barts and Smithfield a heritage and cultural site of outstanding significance, devoted to 900 years of medical care for the sick poor.

Yours faithfully

Gerald W. Libby, Chair of Barts Health Archives Committee
Professor of Gastrointestinal Psychiatry, Barts and the London School of Medicine and
Dentistry

9 Upper Wimpole Street London W1G 6LJ

### **Department of the Built Environment**

**Application Number:** 16/01311/FULL

Property: Old Pathology Building & Residential Staff Quarters Building St Bartholomew's

Hospital West Smithfield London EC1A 7BE

**Proposal:** Refurbishment and extension of the Old Pathology Block and the former

Residential Staff Quarters building to provide Private Hospital and North Block facilities, to include: (i) dismantling and rebuild of the rear facade with a five storey extension (3.5m deep); (ii) removal of redundant roof plant and erection of a roof extension on the Old Pathology Block; (iii) replacement of the existing infill facade between the Old Pathology Block and Pathology Museum; (iv) replacement of existing plant room on the Pathology Block Extension; (v) creation of a new entrance with associated accessibility provision on the north and rear elevation of the Residential Staff Quarters building; (vi) replacement of the existing windows on the Pathology Block Extension and Residential Staff Quarters building; (vii) landscaping to outer courtyard of Old Pathology Block and creation of additional cycle parking and a service yard

[RECONSULTATION ON THE PROVISION OF A DEDICATED LIFT]

<b>Application Valid:</b> 9 January 2017	<b>Application Type:</b> FULL
Ward: Farringdon Without	Listed Building: No

**Conservation Area:** Smithfield

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.

- Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
  - (a) particulars and samples of the materials to be used on all external faces of the building including the bottle balustrade and louvres
  - (b) large scale details of all new stonework as part of the re-build facades
  - (c) details of ground floor entrances
  - (d) details of the flank elevations of the Old Pathology Block and the Pathology Museum that are to be exposed;
  - (e) details of windows, glazing and external joinery;
  - (f) details of new roof dormers;
  - (g) details of soffits, hand rails and balustrades;
  - (h) details of the treatment and junctions including between the Old Pathology Block, Pathology Block Extension and the Pathology Museum and the stone archway

- (i) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level
- (j) details of the treatment of the roof above the link building facing Giltspur Street and the final height level;
- (k) details of all ground level surfaces including materials to be used and external seating;
- (l) details of external surfaces within the site boundary including hard and soft landscaping;
- (m) measures to be taken during the period of demolition and construction for the protection of the trees to be retained and details of any pruning of the trees; REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2, DM 10.4 and DM19.2
- A scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during demolition shall be submitted to and approved in writing by the Local Planning Authority prior to any demolition taking place on the site. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

(a) No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'. The risk assessment must be submitted to and approved in writing by the Local Planning Authority.
(b) Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after

remediation.

(c) Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

(d) Within five working days of any site contamination (not previously identified) being found when carrying out the development the contamination must be reported in writing to the Local Planning Authority and an investigation and remedial action conducted and reported in accordance with parts A-C of this condition.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. 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.

- No works except demolition to basement slab level shall take place before details of the foundations and piling configuration, to include a detailed design and method statement, have been submitted to and approved in writing by the Local Planning Authority, such details to show the preservation of surviving archaeological remains which are to remain in situ.
  - REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
- Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall include relevant measures from Section 3 of the Mayor of London's Construction Logistics Plan Guidance for Developers issued in April 2013, and specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Cyclist Safety (CLOCS) Standard for Construction Logistics, Managing Work Related Road Risk. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

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

No works except demolition to basement slab level shall take place until the developer has secured the implementation of a programme of archaeological work to be carried out in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority. REASON: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are understood to exist in accordance with the following policy of the Local Plan: DM12.4.

- Unless otherwise agreed in writing with the Local Planning Authority, archaeological evaluation shall be carried out in accordance with the Written Scheme of Investigation for an Archaeological Evaluation, V.3, dated 21/04/17.

  REASON: To ensure that an opportunity is provided for the archaeology of the site to be considered and recorded in accordance with the following policy of the Local Plan: DM12.4
- Before the works thereby affected are begun a full measured survey of the north east (rear) and north (side) elevations of the OPB and the stone archway (providing access to the facilities management yard), which includes accurate measurements of all openings and architectural details, shall be undertaken and submitted to the Local Planning Authority alongside a Method Statement detailing how the current facades will be de-constructed, stored, re-erected and where necessary repaired, having consideration for maximising the re-use of existing fabric, and this shall be approved by the Local Planning Authority in writing.

  REASON: To preserve and enhance the character and appearance of the Smithfield Conservation Area in accordance with the following policy of the Local Plan: CS12, DM12.1, DM12.2, DM 12.3
- 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) thee 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.
- A scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction shall be submitted to and approved in writing by the Local Planning Authority prior to any construction work taking place on the site. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme.

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.

- 12 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.
- 13 Before any construction works thereby affected are begun details of rainwater harvesting and grey water recycling systems shall be submitted to and approved in writing by the local planning authority.

  REASON: To improve sustainability and reduce flood risk by reducing potable water demands and water run-off rates in accordance with the following policy of the Local Plan: CS18. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 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.
- 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 or used to serve the building. REASON: To comply with policy DM15.6 of the Local Plan and policies 7.14B a and c of the London Plan.
- (a) No CHP plant in the thermal input range 50kWth to 20MWth with NOx emissions exceeding that specified in Band B of Appendix 7 to the GLA Sustainable Design and Construction Supplementary Planning Guidance published April 2014 (or any updates thereof) shall at any time be installed in or used to serve 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:
  (i)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

- (ii)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.
- No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.
  - REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3.
- 18 (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.
  - To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 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.
- Any generator within the development shall be used solely on intermittent and exceptional occasions when required in response to a life threatening emergency or an exceptional event requiring business continuity and for the testing necessary to meet that purpose and shall not be used at any other time. At all times the generator shall be operated to minimise noise impacts and emissions of air pollutants and a log of its use shall be maintained and be available for inspection by the Local Planning Authority.

The testing regime of the standby generator hereby permitted shall not be carried out except between the hours of 10am and 5pm Monday to Friday and 9am and 2pm on Saturday. Other than for testing, the generator hereby permitted shall not be operated except in the event of a loss of power supply to the hospital and then its use shall be ceased at the first available opportunity to the satisfaction of the Local Planning Authority

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

No cooking shall take place within any part of the building hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.

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

- Before any works hereby affected are begun a Method Statement shall be submitted to and approved in writing by the Local Planning Authority, detailing the proposed method(s) of cleaning the external elevations of the Old Pathology Block and Residential Staff Quarters buildings.
  - REASON: To preserve and enhance the character and appearance of the Smithfield Conservation Area in accordance with the following policy of the Local Plan: CS12, DM12.1, DM12.2
- No part of the proposed development including plant structures to which this permission relates shall infringe or exceed the heights specified on the St. Paul's Heights code.
  - REASON: To ensure compliance with St. Paul's Heights restrictions and to ensure protection of the view of St. Paul's Cathedral in accordance with the following policy of the Local Plan: CS14, DM10.1, DM12.1.
- Unless otherwise approved by the LPA there must be no building, roof structures or plant above the top storey, including any building, structures or plant permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.
  - REASON: To ensure protection of the view of St Paul's Cathedral and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS14, DM10.1 DM12.1.
- 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.

All unbuilt surfaces shall be treated in accordance with a landscaping scheme to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. 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.

- Before any works thereby affected are begun and notwithstanding the details shown on drawings hereby approved, a detailed scheme for the restoration of the ground floor of the northern elevation of the Residential Staff Quarters building, including revised details of the dimensions of the window openings and entrance shall be submitted to and approved in writing by the Local Planning Authority. REASON: To preserve and enhance the character and appearance of the Smithfield Conservation Area in accordance with the following policy of the Local Plan: CS12, DM12.1, DM12.2
- 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:

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BARTS STW PATH XX DR A 1000 Rev
C,BARTS STW PATH XX DR A 1003 Rev C.
BARTS STW PATH XX DR A 1009 Rev B,
BARTS STW PATH LG DR A 1100 Rev
D,BARTS STW PATH 0G DR A 1101 Rev E,
BARTS STW PATH 01 DR A 1102 Rev D,
BARTS STW PATH 02 DR A 1103 Rev D,
BARTS STW PATH 03 DR A 1104 Rev D,
BARTS STW PATH 04 DR A 1105 Rev D,
BARTS STW PATH 05 DR A 1106 Rev G,
BARTS STW PATH RF DR A 1107 Rev E,
BARTS STW PATH XX DR A 2000 Rev
G,BARTS STW PATH XX DR A 2001 Rev F,
BARTS STW PATH XX DR A 2002 Rev G,
BARTS STW PATH XX DR A 2003 Rev F,
BARTS STW PATH XX DR A 2004 Rev F,
BARTS STW PATH XX DR A 2005 Rev F,
BARTS STW PATH XX DR A 2006 Rev B,
BARTS STW PATH XX DR A 2007 Rev B,
BARTS STW PATH XX DR A 2008 Rev B,
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BARTS STW PATH XX DR A 3001 Rev G,
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BARTS STW PATH XX DR A 3002 Rev A,
BARTS STW PATH XX DR A 1008 Rev B,
BARTS STW RSQ PLA LG DR A 1100 Rev C,
BARTS STW RSQ PLA LG DR_A_1101 Rev C,
BARTS STW RSQ PLA LG DR A 1102 Rev C,
BARTS STW RSQ PLA LG DR A 1103 Rev C,
BARTS STW RSO PLA LG DR A 1104 Rev C,
BARTS STW RSQ PLA LG DR A 1105 Rev C,
BARTS STW RSQ PLA LG DR A 1106 Rev A,
BARTS STW RSQ PLA XX DR A 2001 Rev C,
BARTS STW RSQ PLA XX DR A 2002 Rev C,
BARTS STW RSQ PLA XX DR A 2003 Rev B,
BARTS STW RSQ PLA XX DR A 3001 Rev C,
BARTS STW RSQ PLA XX DR A 3002 Rev C,
BARTS STW RSQ PLA XX DR A 1006 Rev C, Written Scheme of Investigation
for an Archaeological Evaluation V.3, Museum of London Archaeology, 21/04/17.
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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**

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

detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available;

a full pre application advice service has been offered;

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

- 2 (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 the Department of Markets and Consumer Protection 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 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) Methods of odour control.
- (h) The control of noise from plant and equipment;
- Wet cooling towers are recommended rather than dry systems due to the energy efficiency of wet systems.
- 4 (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.

#### Boilers and CHP plant

(f) The City is an Air Quality Management Area with high levels of nitrogen dioxide. All gas boilers should therefore meet a dry NOx emission rate of <40mg/kWh in accordance with the City of London Air Quality Strategy 2015.

- (g) All gas Combined Heat and Power plant should be low NOX 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 2015.
- (h) 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.
- (i) 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**

- (j) 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.
- (k) 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.
- (l) 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.

#### Ventilation of Sewer Gases

(m) 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

(n) 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.

(o) 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.

(p) From the 1 July 2007, the Health Act 2006 and associated Regulations prohibited the smoking of tobacco products in all enclosed or partially enclosed premises used as workplaces or to which the public have access. All such premises are required to provide signs prescribed by Regulations. Internal rooms provided for smoking in such premises are no longer permitted. More detailed guidance is available from the Markets and Consumer Protection Department (020 7332 3630) and from the Smoke Free England website: www.smokefreeengland.co.uk.

You are advised to contact the Markets and Consumer Protection Department who will advise in respect of Food Hygiene and Safety, Health and Safety at Work, Environmental Impact and any other matters relevant to that department. Should the Markets and Consumer Protection Department require any external design alterations you should advise the Planning Department which will advise as to whether planning permission will be required for such works.

Ventilation for any kitchens will need to be provided to roof level. Planning permission will be required for any ducts, vents or plant that would materially affect the external appearance of the building. It cannot be assumed that ductwork will be permitted on the exterior of the building.

Any works, including the potential relocation, of the grade II listed K2 telephone box opposite the Old Pathology Block on the eastern side of Giltspur Street, as necessary for the execution of the hereby approved works, would be subject to an application for listed building consent to the Local Planning Authority.

#### Relevant Local Plan Policies:

CS12 Conserve or enhance heritage assets

CS10 Promote high quality environment

CS22 Maximise community facilities

DM10.1 New development

DM12.1 Change affecting heritage assets

DM12.2 Development in conservation areas

DM12.4 Archaeology

CS15 Creation of sustainable development

CS21 Protect and provide housing

DM15.7 Noise and light pollution

DM21.3 Residential environment

DM15.6 Air quality

CS16 Improving transport and travel

DM16.2 Pedestrian movement

DM15.8 Contaminated land

DM16.3 Cycle parking

CS17 Minimising and managing waste

DM17.1 Provision for waste

CS19 Improve open space and biodiversity

DM19.2 Biodiversity and urban greening

#### Notes

It is recommended that planning permission, subject to a S106 agreement, is granted under delegated authority but that the decision is not issued until a s106 agreement has been entered into as set out below.

#### The Site

The two buildings subject to this application are the Old Pathology Block (OPB) and connected Pathology Block Extension (PBE), and the former Residential Staff Quarter building (RSQ). The site is within the Smithfield Conservation Area.

There are a number of designated heritage assets in the immediate vicinity of the site. Located between the OPB and RSQ is the grade II listed Pathology Museum. To the north of the OPB, is the Gatehouse (grade I) and associated perimeter screen wall (grade II\*). To the east, is the Church of St Bartholomew-the-Less (grade II\*), the Hospital chapel (grade II\*) and further east is the north east block of the Hospital and attached buildings (grade II). To the south are the East, West and North Blocks (Gibbs Building) comprising the central square of the Hospital complex (grade I), with associated historic lanterns and central foundation (grade II). Directly outside the OPB, on the eastern side of Giltspur Street, is a grade II listed K2 telephone box. It is considered that the proposal would have an impact on the setting of these designated heritage assets. Both the OPB and the RSQ are considered to be non-designated heritage assets.

#### The Proposal

The NHS propose to refurbish the OPB, PBE and RSQ buildings in order to provide for a private patients unit, and storage and catering facilities for use in association with the North Block (the uses fall within the existing Class C2 use of the premises). Planning permission is sought for the following works:

- (i) demolition and rebuild of the rear façade of the OPB with a five storey extension (3.5m deep);
- (ii) removal of redundant roof plant and erection of a roof extension on the Old Pathology Block:

- (iii) replacement of the existing infill facade between the Old Pathology Block and Pathology Museum;
- (iv) replacement of existing plant room on the Pathology Block Extension;
- (v) creation of a new entrance with associated accessibility provision on the north elevation of the Residential Staff Quarters building;
- (vi) replacement of the existing windows on the Pathology Block Extension and Residential Staff Quarters building;
- (vii) landscaping to outer courtyard of Old Pathology building and creation of additional cycle parking and a service yard

Other minor alterations proposed include the extension, in width and not height, of an existing lift overrun on the RSQ building to accommodate a trolley lift at roof level and the existing door and window will be swapped around on the rear elevation.

### Relevant planning History

On 20th December 2012 planning permission was granted (ref. 11/00999/FULL) for works to the Pathology Building and link extension in order to provide a Private Patient Unit. The works included the formation of a new entrance on Giltspur Street and the erection of a mansard roof extension on the OPB.

On 29th April 2014 planning permission (ref. 13/01227/FULL) and listed building consent (13/01228/LBC) were granted for the demolition of the 1960s link extension. External and internal alterations were proposed to the North Block in order to upgrade the existing facilities.

On 9th June 2015 planning permission (ref: 14/00952/FULL) was granted for refurbishment of the Pathology Building to provide a Private Patient Unit (PPU) and ancillary NHS offices and North Block Facilities, to include: (i) new access from Giltspur Street; (ii) removal of redundant roof plant and erection of a mansard roof extension; and (iii) new rear entrance with associated accessibility provision.

The Old Pathology Block has been assessed for listing by Historic England. While of clear local interest, and making a positive contribution to the conservation area in which it is located, the former Pathology Block was not considered to be of sufficient architectural interest to merit listing. A decision was issued on 31 May 2017.

#### Representations

Following receipt of the planning application by the City, the application has been advertised in the press and site notices were put up around the site, and statutory and non-statutory bodies were consulted.

The applicants amended the design and the amended design was re-consulted on. A total of 4 objections have been received.

A letter of objection was received from Historic England during the first round of consultation. Historic England had no objections to the principle of the proposals: the rebuilding of the rear façade and the increase in the width of the building would cause some harm to the settings of nearby listed buildings, but this harm is relatively minor and could be outweighed by public benefits. However Historic England raised concern regarding the proposed plant enclosure on the Old Pathology Block, that they were not convinced this harm is necessary and a roof extension on the Old Pathology Block could be successful if carried

out in a scholarly manner and should appear as a seamless whole. A plant enclosure could be designed in a different way to complement the building below.

An objection was received from the Georgian Group raising concerns about the potential impact of the proposals on the setting of the Grade I listed North Block and Hospital Square. The Group was concerned that the character of the square and the wider Conservation Area would be harmed by the visual intrusion of the proposed roof extension.

Historic England and the Georgian Group withdrew their objections during the second round of re-consultation on the re-designed scheme.

An objection has been received which raises concerns about the use of the Old Pathology Block which has always been used as a mortuary and as teaching space and that it is unsuitable for clinical use as a private patients' unit. The objector considers that to demolish the south elevation and rebuild it 3m closer to the façade of the Grade I listed North Block causes substantial harm to the significance of the heritage asset.

The objector raised concerns to the lack of viable catering facilities for the North Block in the Pathology Extension and to the shared lift to be used for catering facilities and patients. A dedicated catering lift is essential.

Following the re-consultation, a second objection was submitted re-iterating the objections.

The Victorian Society raised objections to the large roof extension and that it would impact on the setting of the adjacent Grade II listed library and museum building, the Grade I listed Gibbs Building and the wider Conservation Area. Allowing a monolithic, hipped roof extension would be inappropriate and harmful to the significance of numerous designated heritage assets.

The Victorian Society consider that the use of glass between the Old Pathology block and the Museum Block would be an improvement and would suggest setting back any link block by as much as it reasonable possible.

Following the re-consultation, a further letter of objection has been received which raises concerns that the construction of the Private Patients Unit would adversely affect the existing buildings and interfere with the relocation of the Arts and the London Archives Centre and hamper the facilities required by that academic and historical resource centre. The objector is in agreement with the other more detailed objections provided.

Save Britain's Heritage submitted a letter objecting to the impact on the adjacent listed buildings, including the Grade I North Wing and Grade II\* Church of St Bartholomew the Less. Whilst acknowledging that the existing facade of the Old Pathology Building will be rebuilt - an improvement on earlier design iterations - they consider the positioning 3m further out would have a harmful impact and would be detrimental to the setting of the Grade I listed heritage asset.

Save Britain's Heritage express concerns that the application may jeopardise the Great Hall's future use due to limited lift provision and the amount of catering and storage and this has implications for the viability of the Great Hall, and consequently for the maintenance of the listed building. Save Britain's Heritage also express concerns relating to the impact on the historic archives of St Bart's that if adequate lift space is not provided then the basement of the North Wing may have to be used as an alternative, forcing the relocation of the Archives away from their historic site.

The Chairman of the Friends of The Great Hall and Archive of St Bartholomew's Hospital (the Friends) state that the Nuffield Health's scheme provides catering space which fulfils the basic needs to enhance the North Wing's catering requirements and can support the Nuffield Health proposals but raises some concerns that the rear extension of the Old Pathology Block by 3m may dominate the north façade of the James Gibbs building.

The CEO of the Bart's Health NHS Trust has written twice in support of the application. The Pathology Block has been unoccupied and this proposal represents an opportunity for the Trust to repair this building and have the buildings in long term viable healthcare use at no cost to the NHS. Nuffield Health had been appointed as preferred bidder for a Private Patients Unit Strategic Partner. At the end of the Nuffield Health use, the buildings would revert to the Trust on a state of full repair for NHS occupation, or could continue to operate in a private capacity on a new lease to generate a guaranteed income to the support NHS services.

The CEO of the Bart's Health NHS Trust submitted a second letter reinforcing his support for the proposal and has reviewed third party representations providing the following comments:

- The modern hospital has no need for a pathology use in the Old Pathology Building. Previous attempts to provide a healthcare use in the building have not proven possible to implement as they required additional development on the Pathology Block Extension and would have impacted views from the Square and harmed the setting of the North Block.
- The proposal to extend the rear façade allows for the removal of the majority of the 5th floor of the Pathology Block Extension and improves the setting of the North Block and the Square.
- o The proposal provides storage space for the North Block to support their functions and provides a lift from basement level.
- o The proposal will have no adverse impact on the Archives store.
- o The proposed development is likely to be the optimum solution to bring these buildings back into long-term healthcare use.

Living Streets has commented on the application recommending a delivery and servicing plan to control air pollution and reduce emissions and the implementation of a travel plan.

LAMAS commented that the proposal was accepted as a marginal improvement.

The Conservation Area Advisory Committee raised no objections.

#### Considerations

The main considerations are:

- o The impact on the designated and non-designated heritage assets
- o Provision of additional private healthcare
- o Compliance with Local Plan policies

#### Design and Heritage Considerations

The OPB is a well-composed Italianate palazzo block of ashlar Portland stone: it is symmetrical, of five bays to Giltspur Street with the flanking and central bays emphasised by segmental pediments. It's architecture, style, detail and material, complement the strong classical tradition of the Hospital complex, while its association with medical advancement at this significant hospital complex make the building of sufficient architectural and historic interest to be considered a 'non-designed heritage asset'. It also makes a strong contribution to the character, appearance and significance of the Smithfield Conservation Area.

It is proposed to dismantle and re-build the rear (north eastern) and part of the side (north) elevation of the OPB and extend the rear building line approximately 3m south and east. The re-building would involve the re-use of as much authentic fabric as possible, stitching new masonry to match in material and detail, where necessary. The method and detail of this is reserved for condition. This will assist in preserving the distinct architectural identity of the historic Hospital complex.

It is proposed to erect a 'faux' mansard roof, measuring 25m wide x 3.7m high x 15.5m deep, with three traditional dormer windows on the Giltspur Street elevation. This would significantly alter the proportions of the host building, however it has been demonstrated that a roof extension is necessary to accommodate a significant amount of plant/servicing required for a 21st Century clinical hospital.

The significant rear extension of the OPB would upset the well-considered proportions of the palazzo block, in particular when viewed from West Smithfield, where it would stretch the side elevation past the existing quoins details. In addition, it is necessary to enclose the existing external metal escape stair attached to the existing rear projection in order to provide a secondary means of escape over all floors. This would result in a considerably larger rear projection, which would abut the principal crowning cornice, creating an uncomfortable relationship with the principal block, challenging its pre-eminence. However, subject to achieving a sensitive and scholarly treatment of the detailing, it is considered that this harm could be mitigated so as to deliver a more organic extension to the host building. The replacement of an existing ground floor door and stair with a window to match would not harm the architectural or historic interest of the OPB.

The full refurbishment of the rear elevation, which following years of neglect and investment is in a state of dilapidation, is welcomed.

The detail of a panel which will be formed in the rear elevation, necessary for the removal of an MRI scanner, is reserved for condition.

The PBE was completed 1970-72 and is a large extension, also faced in Portland stone, which enclosed the gap between the OPB and the Pathology Museum on Giltspur Street. The height, mass, bulk and proportions of the PBE detract from the OPB and the settings of the Pathology Museum, East, West and North Blocks and the Smithfield Conservation Area.

It is proposed to reduce the height of the PBE elevation facing Giltspur Street by approximately 1.7m and to undertake a scholarly restoration of the cornices and return elevations of the OPB and Pathology Museum. It is also proposed to re-face this elevation in contemporary architectural glazing, which would replace the current Portland stone. Subject to detail, which is reserved for condition, it is considered that the reduction in height to below the principal crowning cornices, the restoration of important architectural detailing and the architectural glazing would enhance an appreciation of the architectural expression of the OPB and Pathology Museum, reducing their bleeding into one another. This is considered a significant enhancement to the OBP.

Much discussion has been had to reduce and consolidate the plant/servicing requirement in the basement and on the roof of the OPB. However, whilst a significant amount of plant space would be removed from the 5th floor of the PBE, a smaller amount of space will need

to be retained, in the south western part of that roof. This would be set-back 3m from the Giltspur Street elevation and would be flush with the rear elevation of the OPB, reducing the impact of the existing high level bulk when viewed from the street. The detailed materiality of this aspect will to the subject of a condition. The applicant is proposing the re-instatement of a bottle balustrade above the crowning cornice, which would enhance the overall composition and restore the integrity of the historic block, whilst reducing the impact of the bulk and massing of the new roof.

The replacement of all windows with conservation-type double glazed timber-framed sash units is acceptable in principle, and the details reserved for condition.

Overall, it is considered that the rear and roof extensions would challenge the well-considered proportions of the host building. However, it is considered a scholarly detailed restoration, in addition to the re-instatement of the historic bottle balustrade, reduction in height and restoration of the return cornice, glazing of the PBE elevation to Giltspur Street and reduction in high level bulk on the PBE, are enhancements which would mitigate that harm.

The proposal is seeking to consolidate plant/servicing in the basement and roof of the OPB/PBE. This has resulted in reducing the amount of space required in the PBE roof, which would be demolished and re-built in part, the building line brought significantly back to that of the rear elevation of the OPB. As demonstrated in the Townscape and Visual Impact Assessment this would reduce the visual impact of the high level bulk from the majority of views from the square. This would reduce the mass and bulk of the PBE and enhance the setting of the square. This enhancement weighs in favour of the development proposals.

#### Impact on the Setting of the North Block

The rear extension of the OPB toward the North Block would partially obscure the North Block on approach from West Smithfield, whilst the additional height would make it a more imposing building in contrast to the scale of the North Block. Therefore it is considered that the rear extension of the OPB would cause some harm to the setting of the North Block.

#### Impact on the Setting of the Gatehouse and Perimeter Screen

The current setting of the gatehouse is open and the scale of surrounding development allows it to be appreciated as a landmark entrance to the Hospital complex from West Smithfield. An ability to appreciate the screen wall in the context of the gatehouse and the other buildings comprising the Hospital Complex is the fundamental aspect of its setting.

The increase in height, bulk and mass of the OPB will alter the current harmonious relationship it enjoys with the gatehouse. It will reduce the sky gap between the OPB and the gatehouse, whilst the height will more apparently breach its main ridge, when appreciated in wider view from West Smithfield. However, with the reinstatement of the balustrade the massing of the roof has been massaged so that it would be more recessive and less apparent, in order to mitigate that impact. It is considered that the setting of the gatehouse would remain open and it is sufficiently robust to accommodate the additional height and bulk proposed. The screen wall would still be appreciated in the context of the coherent hospital complex ensemble, and the proposal would not harm an appreciation or understanding of it.

It is considered that the proposal would result in some less than substantial harm to the setting of the gatehouse and would have a neutral impact on the setting of the associated screen wall.

Impact on the Setting of St Bartholomew-the-Less

At present, the tower and ogee cupola of the Church rise above the ridges of the buildings comprising the Hospital complex. The additional height and bulk of the OPB would challenge this pre-eminence, albeit not significantly.

It is considered that the proposal would cause some less than substantial harm to the Church of St Bartholomew-the-Less, by reason of its height and bulk,

### Impact on Setting of the Pathology Museum

The additional height, bulk and mass, particularly at roof level of the OPB, changes the dynamic of the relationship with the Pathology Museum. However, the roof extension would be no higher than the lantern roof which projects above the principal cornice in views from Giltspur Street/West Smithfield. The negotiated bulk, massing and detailed design of the OPB roof extension would better harmonise with the distinctive architecture of its surroundings, so as to mitigate the impact of the increased height/bulk. It would still allow an appreciation of the Pathology Museum as the centrepiece in those important wider views.

The partial reduction in the height of the PBE, where it addresses Giltspur Street, would reduce the height of its parapet below the level of the crowning cornice of the Museum. At this stage it is not known if the return elevation of the OPB still exists or was demolished at the time the PBE was constructed. Exposing or restoring the return northern elevation in a scholarly manner will be reserved for condition. This would enhance an appreciation of an important architectural feature, of it as a distinct block and increase the subservience of the PBE to the Museum.

The re-treatment of the elevation facing Giltspur Street, in contemporary architectural glazing, would reduce the bleeding of the Museum into the OPB, reinforcing the separate identities of the historic individual blocks in important views. The applicant has demonstrated that it would be unviable to provide a meaningful set-back in the elevation of facing Giltspur Street, although would investigate through a detailed design process how some additional relief could be achieved via a detailed design, which has been reserved for condition.

Overall, it is considered that the proposed development would result in a minor enhancement to the special interest/heritage significance of the Pathology Museum, and this has been weighed into the planning balance.

Impact on the Character and Appearance and Heritage Significance of the Smithfield Conservation Area

The OPB and RSQ are considered to make a strong contribution to the character, appearance and significance of the Conservation Area.

It is considered that the negotiated height, bulk and massing of the proposal would, subject to detail, provide an addition to the host building and wider roofscape that responds to its character and appearance. The elements of the scheme, namely the removal of a significant amount of 5th floor level bulk on the PBE, the reduction in height and re-treatment of the elevation of the PBE facing Giltspur Street, the re-instatement of the bottle balustrade on the OPB, all make minor enhancements to the character, appearance and significance of the Conservation Area.

It is considered that less than substantial harm would be caused to the character, appearance and significance of the Smithfield Conservation Area.

### Former Residential Staff Quarters

The proposed development seeks to restore the northern (side) elevation of the RSQ, which was removed and the elevation altered in the 1970s, to its historic appearance in a scholarly manner, the details of which are reserved for condition. This would enhance the architectural and historic significance of the non-designated heritage asset, which is a benefit in favour of the proposed development.

The swapping of a door for a window at the rear of the RSQ would be acceptable.

#### Impact on St Paul's Heights

The proposal would not breach the St Paul's Heights grid in accordance with Local Plan Policy CS 13(2) and CS 14(2).

## Impact on the London View Management Framework

The proposal would not breach the Landmark Viewing Corridor of View 1 or either the Wider Setting Consultation Area or the Background Setting Areas of Views 2, 3 and 6 of the LVMF.

## Safeguarding the Long Term of the North Block

Objections are raised that the proposal may jeopardise the Great Hall's future use to the detriment of the future viability of the North Block. A dedicated storage room would be provided in the basement of the Pathology Block Extension measuring (81.2sqm) and this room could be used for catering support and storage. A lift would be provided from basement level which would provide stepfree access to the North Wing to help improve the catering arrangements.

The Friends of the North Wing acknowledge in their letter that the proposal fulfils the agreed spatial area required for catering.

It is not considered that the proposal would prejudice the future use of the North Block.

#### Provision of Healthcare

The proposal would increase the amount in health use and is welcomed in line with Policy CS22 which seeks to support the improvement of St Bartholomew's Hospital and encourages the provision of private health facilities in the City.

#### Access

The new entrances would provide level access into the OPB, PBE and the RSQ buildings. The Access Officer has reviewed the access provisions and is satisfied they meet the requirements.

#### Archaeology

The site is in an area of archaeological potential outside the City walls and in a known Roman cemetery area. There is high potential for significant Roman, medieval and post medieval archaeological remains relating to the Roman cemetery, Roman structural and occupational evidence and for structures related to the medieval and post-medieval priory and Hospital of St Bartholomew.

An Historic Environment Assessment, Heritage Statement, WSI for Archaeological Evaluation and Structural Engineer's Report and Construction Method Statement have been submitted with the application. Geotechnical investigations have been carried out in the northern part of the site and late medieval remains were recorded.

The scheme would have an archaeological impact where new groundworks are proposed in the Pathology Building. This would include the demolition of the rear elevation and rebuilding with a new extension to the east of the building, comprising an extended basement, new foundations, lift core and underpinning to the west and north elevations. A crane base with piled foundations is proposed.

There are no below ground works proposed in the Residential Staff Quarters building.

Archaeological evaluation is required to provide additional information on the archaeological impact of the proposals. This work would provide additional information on the potential survival of Roman or late medieval burials, medieval and post medieval structures and buildings which would be affected by the scheme.

Conditions are recommended to cover a programme of archaeological work and foundation design.

#### Trees

There is a mature tree directly to the north of the site. Any tree pruning that is required to enable the works carried out would be subject to a separate requirement for consent.

#### Noise

The permission would be subject to conditions requiring the noise levels of any new plant to comply with the City's noise standards. The Environmental Health Officer has recommended conditions for further details to be submitted to protect the amenity of nearby residents and occupiers during demolition and construction. A Demolition and Construction Management Plan would be secured via a condition.

## Transport and Cycle Parking

The proposal provides 48 new cycle parking spaces which would meet the London Plan Cycle Parking Standards. The proposed cycle parking spaces would be located within the Courtyard to the rear of the Old Pathology Block (30 spaces) and between the Pathology and Museum Building (18 spaces).

It is proposed that servicing and deliveries are undertaken from the service yard to the east of the OPB. This service yard is relatively small with restricted vehicle access. During servicing and deliveries it is proposed that personnel will monitor vehicles entering and exiting the yard and while parked to ensure pedestrians and cyclists are not in conflict with the vehicles while servicing and deliveries take place. Hours of servicing would be secured via a condition.

## Waste and Refuse

Refuse and clinical waste storage has been provided within the site and the Amenity and Waste Officer is satisfied the waste storage and collection facilities comply with their requirements.

### Energy

Policy CS15 requires demonstration that the highest feasible and viable sustainability standards have been designed into the building. The energy statement provides confirmation that this development would provide significant carbon emission improvements compared with the existing buildings and will exceed the 2013 Building Regulations requirements by 17% for the Old Pathology Building and 24% for the RSQ Building. Further improvement is constrained by the listed status of the buildings and the need to retain existing structures. Sustainability

The reuse of existing buildings is welcomed in line with Local Plan Policy CS15.3 which encourages conservation of materials.

The Environmental Impact section of the Design and Access Statement addresses energy and carbon reduction but does not provide details of how the design addresses other sustainability priorities for the City. Further details would be to demonstrate how this development will address water conservation and flood risk management

#### S106 and CIL

The Mayoral and City Community Infrastructure Levy charge would be Nil as the development is proposed to be used wholly for the provision of medical or health services.

The applicant would be required to enter into a Section 106 agreement which would include the following obligations

- 1. Local Training, Skills and Job Brokerage Strategy (Demolition and Construction)
- 2. Local Procurement Strategy
- 3. Travel Plan
- 4. Delivery Service Management Plan
- 5. Highways Reparation

There is a concern that if the works were not to be carried out in their entirety then there could be a detrimental impact on the character and appearance of the conservation area. The applicant has agreed to enter into a S.106 agreement to commit to undertake the works in their entirety. The agreement would also provide that new tenants are not to go into occupation before the works are completed.

### Conclusion

A balanced decision needs to be made weighing up the benefits and dis-benefits of the scheme. Overall, it is considered that the architectural and historic significance of the OPB, as a non-designated heritage asset, would be harmed by the proposed development. It is also considered that the settings of the gateway and Bartholomew-the-Less would be harmed, causing less than substantial harm to their significance. However, elements of the proposed development, namely the removal of a significant amount of redundant plant on the PBE, the reduction in height and re-treatment of the elevation of the PBE facing Giltspur Street, the reinstatement of the bottle balustrade on the OPB and the restoration of the historic north entrance to the RSQ, are all enhancements which weigh in favour of the proposed development.

On balance, these benefits together with the need to support long-term health care on the site in accordance with Local Plan Policy CS22 results in an acceptable scheme, the proposed scheme is considered to be acceptable. It is considered that the development proposal would

need to be implemented in full and not part implemented, in order to be acceptable in planning terms.

**Background Papers** 

Daylight and Sunlight Report dated 16 November 2016

Planning Statement dated December 2016

Townscape and Visual Impact Appraisal dated November 2016

Energy Statement dated November 2016

Waste Management Strategy dated November 2016

Noise Survey dated 19 July 2016

Roof Plant Considerations dated November 2016

Design and Access Statement - Issue for Plannig\_RevC\_19.04.17

Delivery and Servicing Plan Rev B Project 15-296 dated April 2017

Draft Construction Management Plan Rev A Project 15-296 dated April 2017

Ecological Impact Assessment April 2017

Engineering Services Plant Options Appraisal dated April 2017

Historic Environment Assessment Version 7 dated 21 April 2017

Planning Statement dated April 2017

Scheme Amendments Report dated April 2017

Transport Assessment Rev E 15-296 dated April 2017

Travel Plan Rev D 15-296 dated April 2017

Townscape and Visual Impact Appraisal Addendum dated April 2017

Verified Views - Document Reference No. V3D 161003A

Letter, Museum of London Archaeology, dated 6 April 2017

Historic Environment Assessment (Version 7), Museum of London Archaeology, 21st April 2017

Heritage Statement v.4 Museum of London Archaeology 21/04/17

Structural Engineers Report and Construction Method Statement dated October 2016

Structural Engineer's Report and Construction Method Statement, Sinclair Johnston &

Partners, March 2017

Written Scheme of Investigation for a Trial Trench Evaluation, Museum of London Archaeology, dated 6 April 2017

Letter Historic England 16 January 2017

Letter Historic England 10 May 2017

Email Peter Schmitt 09 March 2017

Letter Victorian Society 03 March 2017

Letter Friends of the Great Hall and Archive of St Bartholomew's Hospital

Letter Barts Health NHS Trust 3 February 2017

Letter Barts Health NHS Trust 4 May 2017

Email David McKinstry (The Georgian Group) 09 March 2017

Online Richard Lambert, Living Street 26 January 2017

Email LAMAS 08 February 2017

Letter Save Britain's Heritage 17 May 2017

Email Mike Swash 24 May 2017

Email Zachary Osborne (The Georgian Group) 01 June 2017

Department of Markets and Consumer Protection dated 18 January 2017

Department of Open Spaces 12 January 2017

Letter Conservation Area Advisory Committee 7 February 2017

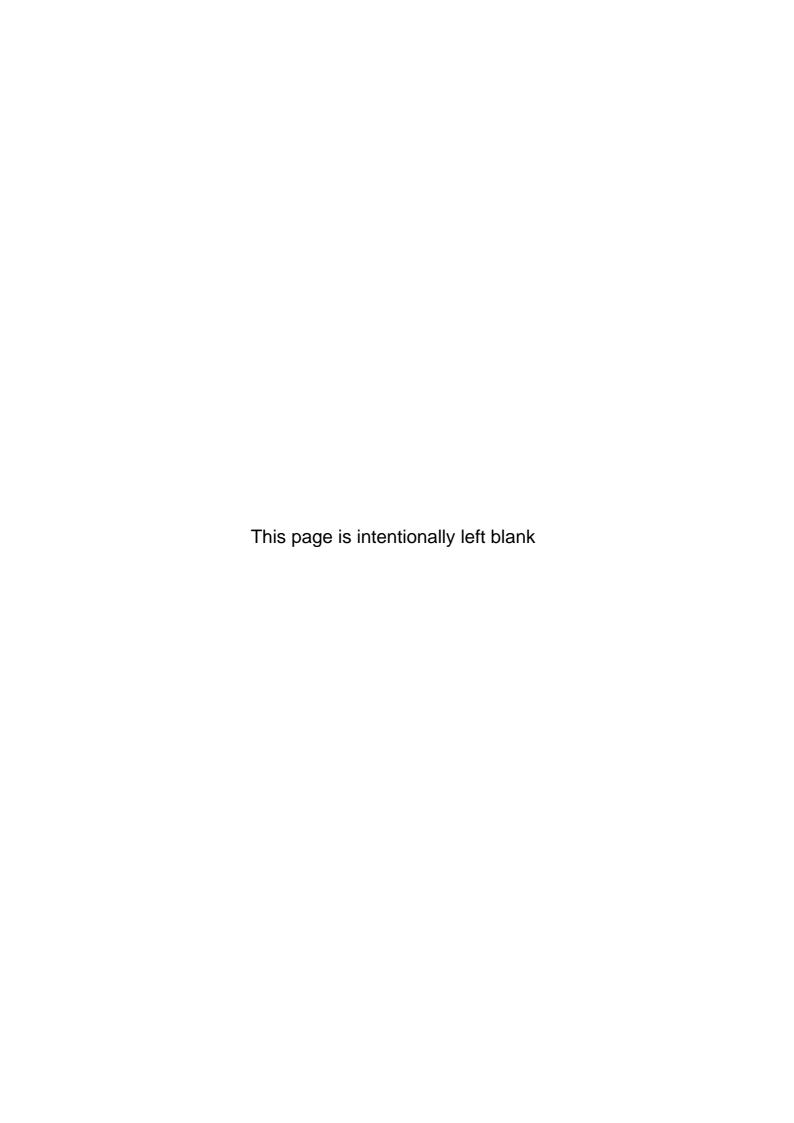
PT\_BXD/6 June 2017

# Agenda Item 18

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

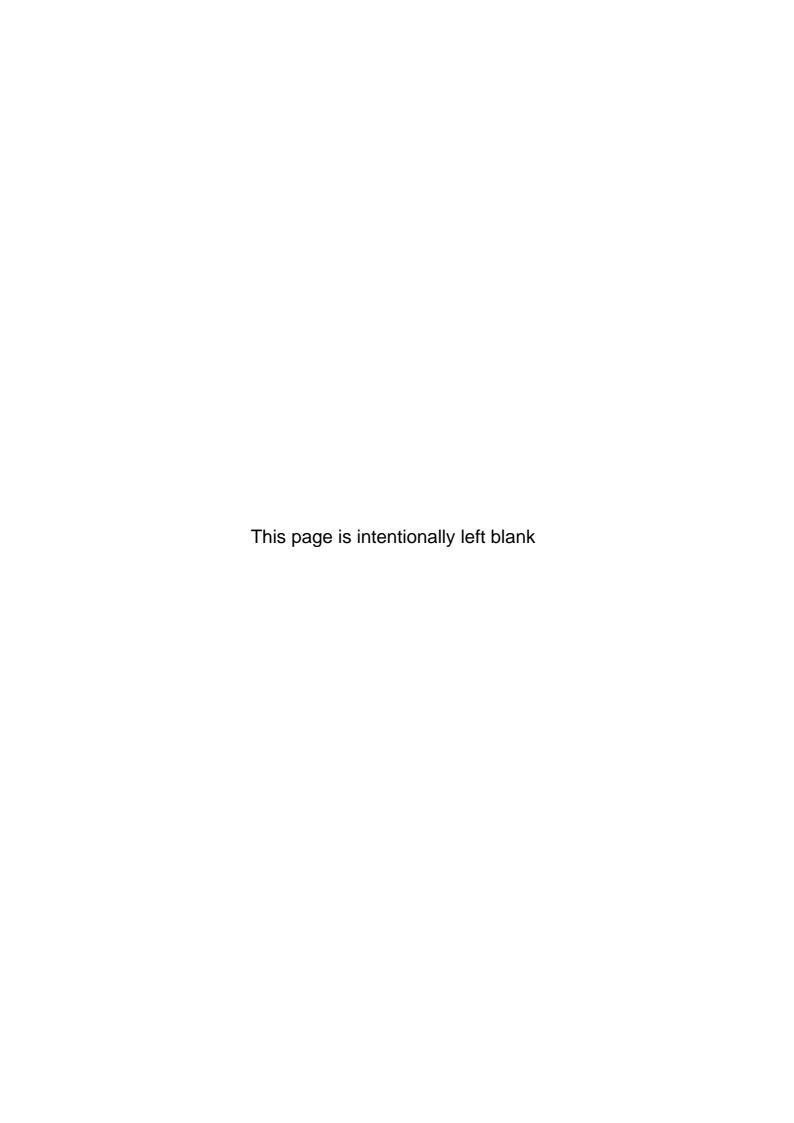


By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.



# Agenda Item 19

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.



# Agenda Item 20

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

